



2021 Consolidated Non-Financial Declaration

in accordance with Italian
Legislative Decree 254/2016



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Dear Stakeholders,

2021 was an extraordinary year which will be remembered as one of unimaginable events, immediately following the pandemic that plagued humanity and still continues to claim victims worldwide.

We witnessed the storming of the US parliament, the halting of world trade - due to an *ordinary* accident in the Suez Canal - the withdrawal of the West from Afghanistan that set the Afghan people and democracy back a hundred years, the great global vaccination campaign, the launch of the *green pass* era.

The year 2021 will leave its mark on history, as will the present time, which is opening up with glimpses of world war in the heart of Europe no less.

Within the smaller scope of our being a company and an economic player, Exprivia has continued its mission of innovating its customers' business models through digital transformation, interpreting the greatest changes underway. These transformations are now as inevitable as they are urgent: ecological and energy transitions, Europe's various national versions of the NRRP which have become central to the social and economic policies of each country.

We can certainly say that the market in which we operate is experiencing a privileged situation: we were able to continue operating during the pandemic, thus ensuring the continuity of our customers' processes. Indeed, it was precisely technology that enabled new approaches to service with remote working, while today we find ourselves at the centre of the largest industrial plan that our country has seen since the Second World War, as pervasive as the transformations that digital technology has brought about in every field today, first and foremost in the Public Administration.

As a group with sound foundations and cohesive management, we are steering the future. It has never been easy to make predictions, and is more difficult than ever today: the war in Ukraine has surprised us and left us incredulous. We quickly stopped reading about pandemics and the NRRP to make room for daily war bulletins. But we do not want to give up the responsibility of developing the future, our future: never before has it been so 'sustainable'.

Exprivia's notion of 'sustainability' is inspired by the 2030 Agenda and considers the objectives set for sustainable development to be indispensable. These objectives concern and involve all countries and components of society, in the awareness that the programme does not solve every problem but represents a good foundation from which to build a different world and give everyone the chance to live in an environmentally, socially and economically sustainable one.

Protecting the environment and promoting human capital are objectives that risk remaining mere ideas if they are not overseen by an efficient governance system. We believe that a 'sustainable business' model cannot be achieved without an internal organisation that integrates the values of sustainability in the actions of the self-governing body.

We believe that providing information on the actions undertaken is fundamental to fostering a spirit of sharing and trust. For this reason, we must share our desire to continue creating a low-carbon economy, putting people and their health and safety at the centre of our way of working, and acting ethically both in our choices and in our dealings with all stakeholders, while at the same time making our activities in the area increasingly participatory in a logic of collaboration with all stakeholders.

We must invest in the areas where we live to develop training, research, culture and sport; in fact, we maintain constant partnerships with the academic world and the organisations that revolve around it, with professional associations and the trade union with which we engage in regular dialogue to monitor the activities implemented with respect to our colleagues.

Our commitment, attention and sense of responsibility towards our stakeholders are confirmed by the continuous focus on and updating of the indications in the Code of Ethics, the rules of conduct as suggested by the Corporate Governance Code of Borsa Italiana and by the whistleblowing platform.

This past year has certainly been an important one in terms of consolidating our activities and building value, and it is for this reason that we will continue to work towards building a better ecosystem, in the knowledge that technology and the digital sphere can be an important driver for inclusion and for a more sustainable vision of society as a whole.

Domenico Favuzzi, Chairman and Chief Executive Officer Exprivia SpA



Exprivia S.p.A.

subject to the management and co-ordination of Abaco Innovazione S.p.A.

Registered Office in Via Adriano Olivetti 11, Molfetta, Italy

Company Share Capital Euro 26,979,658.16 fully paid-up

Tax code and Bari Register of Companies Number 00721090298 Economic and Administrative Index Number BA-481202

Company with shares listed on the Euronext market of Borsa Italiana S.p.A.

Exprivia exercises Management and Coordination activities, pursuant to articles 2497 et seq. of the Italian Civil Code, exclusively over the companies belonging to the group wholly controlled by it.

For this purpose, the Board of Directors of Exprivia approved a **Regulation on the exercising of Management and Coordination activities** on 4 December 2017, which governs the mechanisms used by the Holding Company to determine the procedures for managing the necessary infra-group information flows and to carry out its management and coordination activities over the companies subject to it.

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Methodological notes

GRI indicators 102-1; 102-5; 102-45; 102-46; 102-50

This document is the '2021 Consolidated Non-Financial Declaration' of the **Exprivia Group** (hereinafter also “**the Group**”), a group of companies whose holding company is **Exprivia SpA** (hereinafter also “**Exprivia**”), a company listed on the Euronext market of Borsa Italiana, the Italian stock exchange, [XPR.MI]; it constitutes the fifth **Consolidated Non-Financial Declaration** drawn up in compliance with Italian Legislative Decree no. 254 of 30 December 2016 (hereinafter also “**Italian Legislative Decree no. 254/16**”), in “Implementation of Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups”, which requires the submission of a non-financial declaration by public-interest entities (pursuant to article 16, paragraph 1 of Italian Legislative Decree no. 39 of 27 January 2010) and specifically in the capacity of a “company issuing securities admitted to trading on Italian and European Union regulated markets”.

The 'Consolidated Non-Financial Declaration for 2021' (hereinafter, briefly, the 'Non-Financial Declaration' or 'NFD'), reports the activities of the Exprivia Group, excluding Italtel, which officially left the group in May 2021. This document supplements and completes the Annual Financial Report and additional documentation pertaining to the Group's 2021 Consolidated Financial Statements (1.1.2021 - 31.12.2021) and has therefore been drawn up in compliance with the provisions of Italian Legislative Decree no. 254/16. The Group drafted this document in accordance with what was set out, on average, in the sustainability reports of the benchmark in the sector.

The following criterion governs the reporting scope in the 'Environment, Health and Safety' chapter: the company offices¹, both in Italy and overseas, are considered **significant**, and therefore included within the reporting scope of this Declaration, **if they have a number of workstations equal to or greater than 30**. It was decided to use the number of workstations rather than the number of employees, since consumption is directly linked to the staff working at the office rather than those recruited at an office but working on customer premises.

The conversion factors used to convert the different energy quantities into GJ are taken from the Defra (UK Department for Environment, Food and Rural Affairs) database, indicating the conversion factors to GJ for various energy carriers updated in 2021.

The emission factors used to calculate the CO2 emissions shown in the NFD are as follows:

- **direct emissions** (scope 1): DEFRA 2021.
- **indirect emissions** (scope 2): for electricity purchased from the electricity grid, emission factors calculated using two approaches were used:
 - **Location-based approach**: emission factors from Terna International Comparisons 2020;
 - **Market-based approach**: emission factors from the European Residual Mixes 'AIB' (updated at 31.05.2021) and for the remaining countries the above-mentioned location-based factors (Terna International Comparisons 2020).

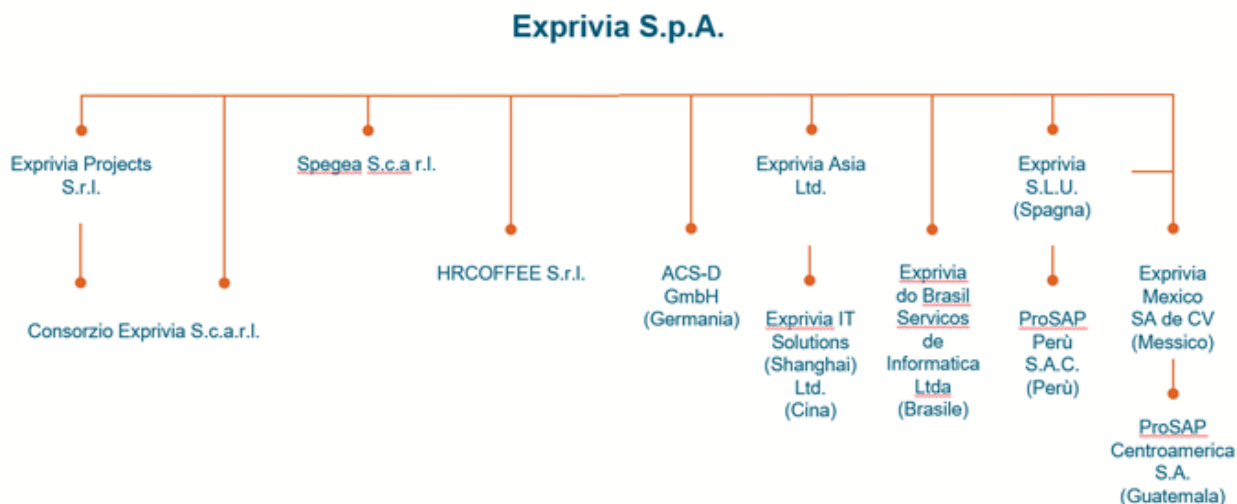
¹ The scope of analysis excludes the Palermo office, which closed (on 28-02-2021) and Spegea due to the low significance of the related environmental aspects, the small number of workstations (about five) and the insignificant environmental indicators (the workspaces used are shared and there are no specific consumption meters).



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Reporting scope

The analysis and reporting scope for the purposes of Italian Legislative Decree no. 254/16 includes for this year, except where otherwise specified, all the companies belonging to the Exprivia Group as illustrated below in the ownership chart²:



Reporting spheres

The NFD reports on aspects relating to the fight against active and passive corruption, the environment, HR management, social aspects and respect for human rights assessed as significant and material according to a specific and consolidated process, which takes into account the Group's specific activities, illustrated below in this document (see the 'Materiality analysis in relation to the business' section).

With regard to each topical reporting sphere, evidence is provided of the material nature of the aspect with respect to the Group's activities, the risks associated with it, the commitments and the results obtained and monitored by means of indicators capable of representing the operating results.

The data and information in this NFD refer to events which occurred in 2021, deriving from the company's business activities, significant on the basis of the materiality analysis and in compliance with Italian Legislative Decree no. 254/16. They are gathered and consolidated by the various reference units, using extractions from the company information systems, with the coordination of a senior manager reporting directly to the company management.

In this regard, it is hereby specified that the Group has adopted the indicators envisaged by the GRI Sustainability Reporting Standards (hereinafter, the "GRI Standards" or "GRI") issued by the Global Reporting Initiative in 2016, using the 'GRI-referenced' approach. Reference to the GRI indicators may be found in the 'GRI link table'.

This document has been subject to a compliance opinion by the independent auditors, BDO Italia S.p.A. which issued the 'Report by the Independent Auditors'.

ExpriVia's Board of Directors approved the NFD on 15 March 2022. The NFD is published in the 'Corporate Social Responsibility' section of the holding company's website (www.expriVia.it).



1. An international group enabling digital transformation processes

The Exprivia Group is an international business group specialised in Information and Communication Technology. It uses digital technologies to steer its customers' business change drivers.

The Group stands out for its reliability in managing complex projects through the connection and integration of vertical and horizontal skills and the ability to create solutions that are easy to use and update, as they are based on continuous research and innovation.

Exprivia SpA has been listed on the Italian Stock Exchange since 2000, in the Euronext Milan (XPR) market.

The founding concepts of our vision

Future

The future is the point towards which we orient ourselves in defining scenarios, processes and goals for ourselves and our customers.

Connection

This is what makes us innovators. It is the capacity to identify unexpected solutions by linking our skills. It is the ability to imagine the future by directly combining what we know in the present: technology with customer needs, the world of research with that of business, the city with its residents.

Perfect

Perfect is the level we strive to achieve in the planning of innovative and efficient IT solutions in each specific sector.

Reliability

For us, this is a constant practice that leads us to seek out perfection in everything we do, to guarantee that we will always meet our commitments and to consider effectiveness and efficiency to be indispensable requirements of all the products and services we offer.



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Simple

Being simple is the fundamental requirement of all of our systems, designed to improve people's lives through the availability and usability of information.

Simplicity

For us, this means concealing the complexity of technology behind a sleek user experience, making innovation and digital transformation accessible to businesses and the public through a process of extreme streamlining which strives for simple solutions.

1.1 The markets

GRI indicators 102-2; 102-6

Today, we are one of the main players in the digital transformation of businesses, and we owe this to the wide range of expertise and experience we have developed through many years of work in our various markets.



Banking, Finance & Insurance

Digital progress and financial technique: the binomial of the future

The financial market is experiencing a radical transformation of its business model. The need to always offer new services that can be used at any time using any device requires the development of increasingly innovative and efficient IT solutions and services.

Thanks to the know-how accrued over more than 25 years of partnerships with the top credit and insurance institutions in Italy and abroad, we have the specialisation and experience to fully meet customer needs through tailor-made and omni-channel digital solutions: from creditworthiness assessments to monitoring, from capital markets to factoring management, from data value to customer experience.



Telco & Media

Skills and technologies for network virtualisation

In the Telco & Media market, the strategies on which the key players in the market compete are linked not only to technological innovation but, at the same time, the need to simplify and automate, as well as the need to expand their offer with high value-added services. On all of these three strategies, the Exprivia Group now has the best assets in terms of the offer, know-how, and geographical presence to be able to skilfully support its customers in these areas.

A distinctive aspect in the Italian context of Telco is Exprivia's Innovation Lab, aimed at verifying and optimising the provision of services on 5G networks, speeding up the adoption of orchestration and automation methodologies, processes and solutions. In addition, the initiative enables the delivery of innovative cloud-ready solutions to specific vertical markets (e.g., IoT, e-Health, Smart City, Industry, etc.).

Thus, we are the best partner for service providers for Telco media providers and manufacturing companies to better support their business in programmes for technological innovation and automation and enriching the B2B offer.





Energy & Utilities

Energy-optimising technology

The energy and utilities sector is rapidly evolving to adjust to infrastructure technological upgrading processes, the development of new services and the entry into force of new directives on safety, energy efficiency and environmental and consumer protection, which are having a considerable impact on both supply and demand.

In this regard, we offer our customers specific solutions for the development and management of transversal and characteristic processes that aim to ensure greater operational efficiency, high performance and elevated customer service quality to energy, water, environmental and public utility sector businesses. Systems based on technologies like the cloud, XaaS, CRM, big data analytics and business intelligence, IoT, digital channels, social networking, e-mobility and enterprise application governance which place users at the very heart of processes, providing them with increasing autonomy and awareness.



Aerospace & Defence

Military defence, civil safety and digital technology

Recent geopolitical events demand an immediate response from the civil and military aeronautical, naval and terrestrial sectors in the adoption of safety systems where the technological element plays an increasingly crucial role in guaranteeing the safety of people, places, machinery and information systems.

Even more urgent is IT support for taking strategic decisions in critical situations for the implementation of preventive measures based on scenario monitoring and controls. We offer the sector a genuine advantage by enabling analysis of complex heterogeneous information (images, videos, data, texts, symbols, voices, sounds, etc.) generated by a multitude of wearable, fixed and mobile sensors on flights, in navigation, in orbit, in vehicles and in drones. In particular, we develop systems for command and control, surveillance, cartographic representation, processing of geographical maps and rapid prototyping of land-based, naval and aerial consoles which, partly thanks to augmented reality techniques, the wealth of geo-referenced information and social collaboration, offer maximum interaction with scenarios that are increasingly faithful to reality.



Manufacturing & Distribution

Towards the new industrial revolution

The future of industrial processes is following a digital path. The common thread lies in the various enabling technologies that are changing how we design, create and distribute products by automatically organising and managing an enormous quantity of information in real time.

The fourth industrial revolution is in full swing and very soon we will see completely controlled, interconnected and automated production through technological evolution.



Industry 4.0 defines this change through a panorama that is still evolving, but already has precise lines of development coinciding with the knowledge and skills we possess: the use of data and connectivity, analytics and machine learning, human/machine interaction and interaction between reality and the digital realm. We have seized this extraordinary opportunity by focusing on bringing new-found energy to the entire industrial process with our digital solutions and completely automating the management of huge quantities of information in a simple, streamlined and efficient manner.



Healthcare

Innovative solutions for individual health and efficient administration

Building a healthcare system that combines savings and efficiency, takes care of people even before treating them, eliminates waste and reduces waiting times. With these main objectives, we represent the ideal partner for a healthcare system striving for a future of excellence.

The technological solutions we apply to the healthcare system make it possible to connect all of the disparate pieces of the entire Italian Regional Healthcare System, from administrative and management centres to public and private hospitals within the entire supply chain, right down to individual professionals and online services for users, ensuring maximum optimisation of every single resource.

A team of 350 specialists, 30 years of presence in the IT sector and solutions and services in 500 healthcare facilities for 20 million patients confirm the effectiveness of our responses to the needs of the healthcare industry, which are fundamental for the economy and development of every region.



Public Sector

PA digitalisation: the first step towards a reinvigorated country

Some time ago the Public Administration launched a modernisation process based on principles such as innovation, simplicity and reliability to support businesses, residents, public employees and the state itself. The streamlining of bureaucracy through the digitalised management of the Public Administration, together with organisational renewal measures, means we can now reconcile optimising expenditure with quality of service.

From this perspective, we have been able to draw on much of our experience in optimising processes for large private enterprises, which we have reconceptualised according to the needs of central and local governments and broken down into a range of areas, including:

- products and services for management;
- eGovernment and eProcurement solutions;
- storage and sharing of electronic documents;
- planning and control through business intelligence and business analytics platforms;
- performance measurement in PA processes;
- solutions to support administrative processes (SOA paradigm);
- single point of access for the exchange of information between entities, residents and businesses;
- system integration to ensure 24/7 operational continuity and automatic repairs.



1.2 Skills

EXPERTISE	DESCRIPTION
Big Data & Analytics	<p>Offer of all the very latest tools for supporting both decision-making processes and ordinary activities based on the possession of information. The Big Data & Analytics area is dedicated to developing projects, services and solutions aimed at the strategic use of big data for increasing business.</p>
Cloud	<p>The advent of cloud computing has completely revolutionised how we acquire, implement and execute IT services.</p> <p>Our cloud services refer to four fundamental models: Public Cloud, Private Cloud, Hybrid Cloud and Community Cloud.</p>
IoT & Contextual Communication	<p>The IoT is capable of having a positive effect on the very idea of business, work, study, health and life.</p> <p>The main skills development areas are: Industry 4.0, Digital Healthcare, Smart Cities, Smart Grid.</p>
Cybersecurity	<p>Services designed based on the security controls of the National Institute of Standards and Technology (NIST), which, using information provided by the Exprivia Cybersecurity Observatory, can be divided into the following:</p> <ul style="list-style-type: none"> • Identify – From consultancy activities to Vulnerability and Penetration Tests (VAPT), from malvertisement campaign simulations to analysing and searching for data that may have been stolen and posted on the deep and dark webs. • Protect – Implementation and management of controls that focus on protection from any incidents, segmentation, micro-segmentation, management and governance of identities and accesses, management of privileged identities, static security (SAST) and dynamic application security (DASD), safety, obfuscation and masking of data at rest and in transit. • Detect - Continuous monitoring using SIEM and sophisticated AI tools. • Response - Exprivia has a team than can be called upon to respond to an incident (Global Response Team). • Restore - The GRT can be used not only to respond to an attack but to restore the service.

Mobile

We offer companies and entities the possibility of reaping the maximum benefit from latest-generation mobile technologies by including them within a broader multi-channel strategy which encompasses Mobile Device Management for business devices, Mobile Payment in the various commerce and service sectors, Mobile Health and Mobile Application Development in the areas of health, finance and security.

SAP

With a strategic partnership that has lasted for more than 20 years, we are now one of the main reference players in the SAP world in Italy and abroad. Our main areas of intervention are: Administration, Finance and Control, Operation & Logistics, Business Analytics and Human Capital Management.

Business Process Outsourcing

Supporting company evolution by taking responsibility for the procedures of end user acquisition, management and retention. The offering ranges from back office outsourcing services relating to typically internal functions such as human resources, accounting and information technology, to front office outsourcing services like customer care and customer service.

Network & Digital Transformation

In the world of Telco Operators and Media Companies, we have developed, over time, skills related to the convergence between IP networks and optical networks and on mobile operators' infrastructure components.

As regards Enterprise networks, we currently have broad competencies in designing and implementing converged wired and wireless solutions, in Private Network solutions, SD-WAN, and technological refresh of corporate networks.

The Software Factory of Exprivia develops carrier-grade systems and solutions with characteristics of robustness, scalability and resilience. We use Agile design and development methodologies based on SCRUM and DevOps logic, using both open source technologies and off-the-shelf products for the design and implementation of customised solutions for the customer.



1.3 The Group around the world

GRI indicators 102-3; 102-4

The Group is present abroad through its subsidiaries in Europe, Asia and North and South America. Specifically, it is present in Spain, Germany, Mexico, Guatemala, Brazil and China. For more information on all the Group's offices, see the 'Location' section on the Exprivia website.



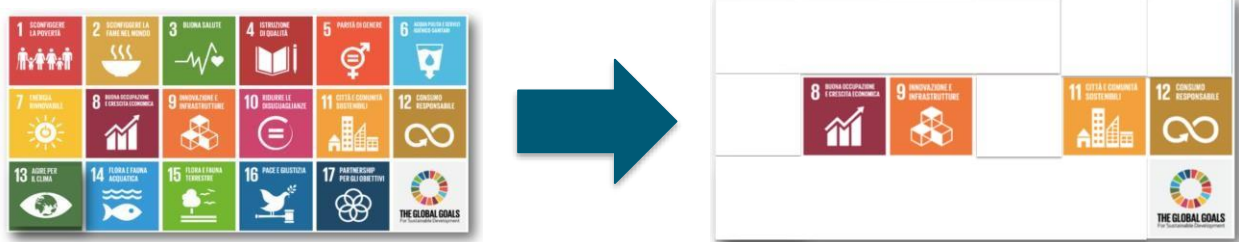


2. Materiality analysis in relation to the business

The Exprivia Group culture is oriented towards technological innovation and a flexible structure able to guide the market and anticipate changes. The company's activities have always been inspired by the ethical principles of legality, honesty and transparency, ensuring full respect for people's rights, fair competition, protection of the environment and workplace health and safety.

The group is committed to promoting and applying these values in the provision of customer services and in the dissemination of its corporate culture. The group carries out a wide range of activities and initiatives that are directly or indirectly related to sustainability issues. They range from the improvement and innovation of its products and services, through intense research activities, to internal company initiatives with numerous participations in Consortia, Associations and National and International Organisations.

In relation to the seventeen sustainable development goals adopted by the United Nations, a coherence analysis was carried out aimed at identifying goals that can actually be pursued by the group, in relation to its identity and the role it plays in the social and economic scenario.



In drawing up the Consolidated Non-Financial Declaration, we started from the consolidation of the virtuous processes set up during the previous year. The documentary sources linked to the group's core business have been updated and supplemented. The analysis was conducted in accordance with GRI Standards instructions.

Given the vastness of the Exprivia Group, cross-functional work teams were created.

The first activity consists in a benchmark evaluation and presentation of the analysis to top management. The Exprivia Group's 2021 materiality analysis included the phases reported below.

- Evaluation of topics resulting from the above goals chosen;
- Evaluation of the main trends in the reference sectors;
- Evaluation of stakeholders' specific interests through the company's press consultants;
- Sector benchmark assessment: the sustainability reports published by the Group's main competitors were analysed;

2.1 Material topics

GRI indicator 102-47

Every year, the Exprivia Group defines and reports on relevant sustainability issues, with reference to the five areas of Italian Legislative Decree no. 254/2016, for the company and for stakeholders. The issues are defined on the basis of an identification and prioritisation process that includes the phases indicated in the previous paragraph.

Considering the offer provided by Exprivia (solutions composed of proprietary and third-party products, engineering and consulting services) and considering the sector to which it belongs, the Group has decided not to include the Coronavirus risk among its priority risks. For more details on this topic, see the thematic sections, as shown in the contents of this document.

254/16 Scope art.3 paragraph 1	Material topics	Risks	Policies and risk management
Respect for human rights	Diversity, inclusion and equal opportunities Personal data protection	Events that may jeopardise respect for human rights	<p>The Exprivia Group expresses its commitment to protecting human rights through the Code of Ethics, the Organisation Model pursuant to Italian Legislative Decree 231/2001, careful negotiations with social stakeholders and gradual enhancement of sustainability, showing its ability to create value over time and promoting the economic and social development of the areas and communities in which it operates.</p> <p>The Group is committed to actively supporting the Universal Declaration of Human Rights. Internal Audit provides support in preventing and mitigating risk factors.</p>

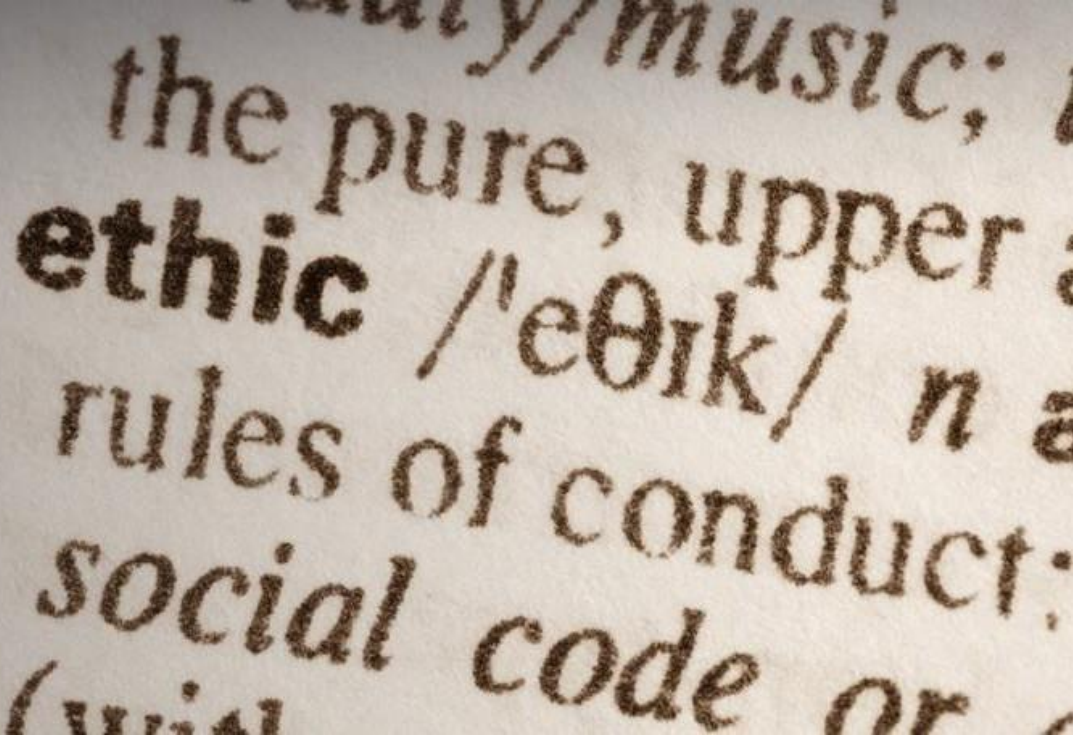
Work and personnel management	Workplace health and safety		The development of human capital, quality employment and engagement are the pillars of the personnel management policies. Individuals are a true strategic asset for the achievement of the company plans and objectives. Human capital lies at the heart of company interests, furthering the potential of each individual resource and providing incentives for individual skills and capabilities.
	Attraction of talent and valorisation of human capital	Risk connected with outgoing turnover	
	Decent working conditions		The Group adopts a stable employment policy for the workers, preferring permanent employment contracts and limiting the choice of temporary contracts solely to residual accessory term activities.
	Training		
Social aspects			Relations with the local areas
		Reputational risk	One of the pillars of the Exprivia Group's Strategic Plan is certainly the relations it holds with communities based on principles of transparency, ethics, inclusiveness and respect for human rights. These principles are included in the Code of Ethics.
		Operational risk in carrying out activities with the local areas	The Group defines and carries out specific action plans on an annual basis. The aim is to increase brand reputation both locally and at national and international level. These plans include activities which range from participating in or sponsoring local initiatives, such as events, conferences or seminars, to taking part in projects for the development of the local area promoted by the local authorities and solidarity support initiatives in favour of bodies and associations active within the territory.
		Risks related to corruption	
		Risks related to dependence on customers	Relations with customers
		Risks related to contractual commitments	Market competitiveness is conducted in strict compliance with competition regulations and with a view to social responsibility and environmental protection, to ensure correct and functional use of resources. In this regard, thanks to the whistleblowing tool, customers in business relations with the Group may report any unlawful conduct. Such conduct may concern possible infringements of, or requests or inducements to infringe, laws or regulations, the provisions of the Code or internal procedures, with reference to the activities and services that concern the Group.
		Risks related to internationalisation	
		Risks related to competition	
	Credit Risk		Welfare
			The welfare initiatives implemented tend to introduce new services every year with respect to the range available to the workforce. Exprivia People Care is the company welfare plan



			<p>which enhances the total reward system by responding to an ever broader range of worker expectations and needs, not only financial.</p> <p>Smart Working takes on the form of a new approach to company organisation, where the individual needs of the worker balance, in a complementary manner, those of the company. The Group has created a series of activities aimed at implementing this means of working.</p>
<p>Environment, health and safety: use of energy resources, impact of emissions on the environment</p>	<p>Energy management</p> <p>Protection of the environment and responsible use of resources</p> <p>Use of socially responsible suppliers committed to environmental protection</p>	<p>Environmental risks</p> <p>Risks associated with health and safety in the workplaces</p> <p>Risks relating to information security</p> <p>Risks associated with the management of SW projects and IT services</p> <p>Risks relating to the business context and to legislative/regulatory compliance</p> <p>Business risks at corporate level</p>	<p>In order to mitigate risks, the Group undertakes to:</p> <ul style="list-style-type: none"> • Operate in compliance with all laws, regulations and standards applicable in the environmental sphere; • Constantly safeguard the environment from the performance of its production processes and from the use of the company's infrastructures and structures that are necessary for the above processes; • Inform, train and update the company staff so as to promote environmental responsibility and awareness; • Monitor and assess the environmental impacts generated in the conducting of business activities, preventing environmental pollution and the potential environmental effects of new processes and/or variations; • Continuously improve the Environmental Management System to improve the company's environmental performance; • Seek and develop technologies and innovative solutions, such as easy access to health services, environmental protection and improvement, and ongoing training at work; • Provide products and solutions that offer the best safeguards for the environment and the health and safety of their installers and users, until their disposal at the end of their useful life; • Reduce emissions of greenhouse gases (GHGs), including through the promotion of alternative ways of working that minimise commuting between home and the office (smart working) and business trips; • Reduce waste by encouraging recycling and safe and responsible disposal; • Give priority to suppliers and partners partly based on their compliance with the principles expressed in this policy.



<p>Fight against corruption</p>	<p>Business management ethics</p> <p>Prevention of corruption</p> <p>Fair competition</p>	<p>Risk of corruption that affects relations with the PA</p> <p>Risk of corruption related to the processing of sensitive data and the confidential information of third parties</p> <p>Risks of discrimination</p> <p>Risk of lack of ethics in business management</p> <p>Risk of unfair competition</p>	<p>In order to mitigate risks, the Group is equipped with:</p> <ul style="list-style-type: none"> • A Code of Ethics which prohibits practices of corruption, illegitimate favours, collusive conduct and solicitations of benefits (whether direct and/or through third parties). • The Internal Audit unit, which has assurance tasks with the purpose of assisting the organisation in the pursuit of its objectives. • The implementation, in accordance with Italian Legislative Decree no. 231/2001, of the internal Organisation Model, oversight of which is the responsibility of the Supervisory Body. • The adoption of a Quality System which constitutes a structured compliance programme containing, inter alia, tools and policies useful for combating and preventing active and passive corruption. • The implementation of the guidelines to be used by the procurement unit for assessing the reputational reliability of the third parties with which Exprivia has business dealings, with the purpose of carrying out an integrity check and protecting Exprivia from possible negative repercussions due to monetary fines or disqualification (pursuant to Italian Legislative Decree no. 231/01) and from the reputational risks linked to any unlawful practices in business dealings. • The whistleblowing platform capable of ensuring the maximum levels of confidentiality for reports to the Supervisory Body on unlawful conduct significant for the purposes of the 231 Decree, based on precise and consistent factual elements and on the violations of the body's Organisation, Management and Control Model, which the intended audience has become aware of as a result of the functions performed. <ul style="list-style-type: none"> • Prevention of active and passive corruption • Internal policies for the resolution of conflicts of interest • Privacy Regulation (GDPR)
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3. Organisation and management model

3.1 Corporate governance

GRI indicator 102-18

Exprivia

The corporate governance system of the Exprivia SpA holding company is developed according to the legislation in force and applicable to the sector, and respects the legal regime of a listed issuer as well as the indications of the Corporate Governance Code promoted by Borsa Italiana with which the company complies. In its organisation, Exprivia also takes into account the best practices which can be obtained from discussion at international level. Exprivia exercises Management and Coordination activities, pursuant to articles 2497 et seq. of the Italian Civil Code, over the group companies controlled by it, whether directly and indirectly. For this purpose, the Board of Directors of Exprivia approved a Regulation on the exercising of Management and Coordination activities on 4 December 2017, which governs the mechanisms used by the Holding Company to determine the procedures for managing the necessary infra-group information flows and to carry out its management and coordination activities over the companies subject to it. In any case, all the companies controlled by Exprivia, including those subject to its management and coordination, are legally independent and apply the principles of correct corporate and business management through a traditional administration and control system that assigns management tasks to the Board of Directors, monitoring legality to the Board of Statutory Auditors and statutory auditing to the independent auditing firm.

Therefore, the **main governance bodies** of Exprivia are: the Shareholders' Meeting, the Board of Directors, the Board of Statutory Auditors and the Independent Auditing Firm. The Shareholders' Meeting is the corporate body that expresses the shareholders' will through its resolutions. Exprivia's Board of Directors operates not only collectively but also through its directors with delegated powers. With the resolution of 23 June 2021, the Board established an internal board committee with investigative, propositional and advisory functions: the Integrated Internal Committee which, as established by the recommendations of the Corporate Governance Code, incorporates all the above-mentioned functions relating to (i) Appointments, (ii) Remuneration, (iii) Control and Risks and (iv) Related Party Transactions. Furthermore, the Board of Directors appoints a Supervisory Body (SB) which monitors the correct implementation of the Organisation, Management and Control Model pursuant to article 6 of Italian Legislative Decree no. 231/01 adopted by Exprivia SpA and reports to the Board of Directors and the Integrated Internal Committee in terms of Control and Risks. Finally, the Board of Directors appoints (most recently by resolution of 20 July 2021) the Internal Audit Manager, who functionally reports to the Board through the Chief Executive Officer and is responsible for establishing and maintaining the internal control and risk management system. The Internal Auditor is not responsible for any operational area, has direct access to all the information useful for carrying out his activities and ensures the information due to the Integrated Internal Committee with control and risk functions and the Board of Statutory Auditors.

For further details on the composition of Exprivia's administration and control bodies, please refer to the document on Corporate Governance and Ownership Structure, which can be found in the Corporate > Corporate Governance >



In 2021, as in the two previous years, the management of Exprivia's **organisational and governance model** was headed by the chief executive officer and comprised the heads of the various company divisions, both production (DF) and business line (MIU) and STAFF.

The manager responsible for coordinating activities in accordance with Italian Legislative Decree no. 254/16 as well as drafting this document reports directly to the chief executive officer and expresses indications, sharing project aspects and monitoring the results achieved. In order to more fully integrate sustainability into the business, the assigned manager cooperates with the various Divisions in managing of the processes typical of the relevant areas, also thanks to the activation of the network which has contributed to the drafting of the related policy.

Furthermore, in order to monitor the independent compliance goals for correct corporate and business management, the companies Exprivia Projects S.r.l. and Spegea scarl have also adopted their own Organisation and Management Models pursuant to article 6 of Italian Legislative Decree no. 231/2001, and have entrusted the relevant Supervisory Bodies appointed by the respective Boards of Directors with the task of checking and controlling their implementation.

3.2 The internal control system and risk management

GRI indicator 102-15

On 11 November 2021, the Board of Directors of Exprivia SpA approved the guidelines of the Internal Control and Risk Management System (ICRMS), which it disseminated internally and to the subsidiaries. The ICRMS consists of the set of rules, procedures and organisational structures aimed at allowing Exprivia to be run in a healthy, correct and coherent manner with the company's objectives, through an adequate process of identification, measurement, management and monitoring of the main risks, the structuring of adequate information flows to ensure the circulation of information and the coordination of the various actors of the ICRMS. Exprivia takes inspiration from the existing national and international best practices. In particular, its ICRMS considers the recommendations of the Corporate Governance Code and is defined in line with the 'Internal Controls - Integrated Framework' model issued by the Committee of Sponsoring Organisations of the Treadway Commission in 1992 and updated in 2013 (the COSO Report).

Within the adopted System, the Internal Auditor is responsible for the third-level control activity and has the task of providing independent assurance on the ICRMS as well as ensuring that it is functioning and adequate with respect to the size and operations of the Company, verifying that Management has identified the main risks, they have been assessed in a homogeneous manner and that the appropriate mitigation actions have been defined and implemented. S/He also verifies that the risks are managed consistently with the Board of Directors' resolutions, external standards and internal rules. To this end, the Internal Auditor prepares a three-year audit plan and submits the annual audit plan to the Board of Directors for approval. The audit plan lists the activities through which the Internal Auditor verifies, either on an ongoing basis or in relation to specific needs and in compliance with international standards, the operation and suitability of the ICRMS.

3.3 Prevention of active and passive corruption

GRI indicators 102-16; 102-17; 102-30; 205-1; 205-2; 206-1

3.3.1 Significance for the Exprivia Group's activities

Corruption represents a serious risk for the activities and the reputation of the Group, therefore it has been identified as a material topic of great importance. For this purpose, the Group has countered the occurrence of phenomena deriving from the violation of the body of laws overseeing correctness, honesty and loyalty in every relationship both internal and external adopting a commitment of "zero tolerance" vis-à-vis corruption under any form, confirmed in both the respective Codes of Ethics and the respective Organisation, Management and Control Models adopted in accordance with Italian Legislative Decree no. 231/01 by each Group company. This commitment is applied in Exprivia by means of an appropriate Disciplinary System vis-à-vis the employees, as well as vis-à-vis third parties with the provision of specific "ethical" contractual clauses (Indicator GRI 205-1). In 2021, as in 2020, the Supervisory Bodies of the respective companies did not receive any reports or detect any episodes of corruption, except for the report to the SB of Exprivia SpA of a complaint the Company received from a software vendor concerning the improper use of software that was not duly licensed. However, this was limited to one user - a new company employee - and for a short duration. The claim was quickly resolved



without financial or reputational damage to the company, through a promptly defined settlement.

In 2021, staff information activities continued with regard to Italian Legislative Decree no. 231/2001, the Code of Ethics and the Organisation, Management and Control Model.

In 2021, Exprivia's Supervisory Body carried out auditing activities to verify compliance with the protocols indicated in the 231 Organisation, Management and Control Model.

These audit were also carried out by Spegea and Exprivia Projects, within the context of the verification of their Organisational Models.

For some years, Exprivia has had an internal system for reporting irregularities. The system is made available to employees and to whoever works for or on behalf of each Group company. This system has been assured since 2019, including in terms of protecting the identity of whistleblowers, in line with the requirements of the European General Data Protection Regulation (GDPR), and in compliance with Italian Law 179/2017 ('Provisions to protect those who report offences or irregularities of which they become aware as part of a public or private employment relationship'), by a dedicated computer platform that can be accessed from the company's website. Therefore, the web portal is today the primary reporting channel adopted by Exprivia for reporting any infringements of the Code of Ethics or, more generally, offences within professional activities (whistleblowing) of which the whistleblower becomes aware.

3.3.2 Auditing activities and management results

Internal auditing

The Exprivia Group companies, each within its remit, carry out systematic internal auditing for the purposes of business ethics, corruption prevention, the management of financial resources and the procurement system, environmental management, information security, personal data protection (privacy) and Human Resources management, in addition to those aimed more specifically at business and production: checks of the management of Projects, Services and Sales through the audits conducted by the competent SBs and the Integrated Management Systems tasked with ensuring the Quality Systems and Internal Audit.

External auditing

Exprivia, in its capacity as technological company which has partnerships with leading multinationals in the IT sector (SAP, Microsoft, Oracle, etc.) is normally subject to periodic audits carried out by the third parties with which it has business dealings. Exprivia is also subjected to periodical auditing carried out by public or private certification bodies. These audits also concern the compliance of the internal processes, the observance of the intellectual property rights in the use of third party software, the protection of the security of the information and the handling of the medical and EC marked devices.

3.4 Customer relations

A varied offer allows the Group to offer its solutions to every size private and public entity; together, they search for new business models imposed by the era of Digital Transformation:

- the radical change in the business scenarios with the fourth industrial revolution which very soon will see completely controlled, interconnected and automated production through technological evolution;
- the new solutions for the virtualisation of the network systems;
- the innovative technologies which are changing the world of the utility companies in production, distribution, transport and sales of the primary sources (water, energy, etc.);
- the need for increasingly complex processing of quantities of data for the analysis of the phenomena of the environment and the earth;
- the transformations in the world of credit and finance in a sector which is very rapidly evolving;
- the health system which is changing, influenced by the growing attention to personal well-being and care, the progressive ageing of the population and the growing diffusion of chronic illnesses, which to these factors added the need to increasingly rationalise the progressive increase in health spending;
- the streamlining of bureaucracy, organisational renewal, which permits the optimisation of the expenditure for the quality of



The Exprivia Whistleblowing Platform, where customers in business relations with the Group may submit reports.

Piattaforma EXPRIVIA per la segnalazione di condotte illecite e di irregolarità nell'ambito dell'attività lavorativa

Sei un whistleblower?

Invia una segnalazione

Hai già effettuato una segnalazione? Inserisci la tua ricevuta.

XXXX XXXX XXXX XXXX

This reporting channel can also be accessed from the Group's website. No reports of this kind were received during 2021. At the same time, in its work, the Group pays attention to the satisfaction of customers and/or colleagues, taking prompt and effective action.

3.5 Supplier network

GRI indicators 102-9; 414-1

One of the Group's assets is the closely-knit network of suppliers for the execution of its activities. In the majority of cases, this involves parties with which, over time, it has constructed clear relationships, capable of creating value over the long-term.

With the exception of a few cases relating to the management of physical spaces (security, cleaning, etc.) or vertical functions (accounts auditors, administrative consultants, telephony, etc.), the Group operates with suppliers who work in the same sector as the company, i.e. Information and Communication Technology (ICT), handled according to high quality standards. The Group guarantees its suppliers fair remuneration for their activities and the respecting of payment times, in exchange for a commitment forever increasing quality and efficiency.

3.5.1 Guidelines for supplier assessment and selection

All Exprivia suppliers are subject to a periodic evaluation and qualification process, according to the Quality Management System, with particular reference to the Procurement Procedure. The steps of the procedure are briefly shown here.

Exprivia procures goods and services from suppliers on the Qualified Suppliers List. The suppliers are divided into three classes: Approved suppliers, Suppliers approved with due reservation, Unapproved suppliers.

The activities for the qualification of the suppliers involve an initial assessment for the purpose of introducing new suppliers in the List of Suppliers approved with due reservation and a periodic assessment, within the first quarter of the year following that of reference, which makes it possible to establish the permanence or otherwise of the supplier within one of the three classes making up the Qualified Suppliers List.

When there is the need to introduce a new supplier, the Purchasing Unit carries out an initial qualification, requesting all the documentation, for the purpose of noting the regularity thereof. The documents requested include: Chamber of Commerce registration; Copy of latest financial statements to verify solvency and financial soundness; D.U.R.C. (contribution compliance certificate); DVR (risk assessment document) and declaration of general safety conditions, pursuant to Italian Legislative Decree 81/08; Compliance self-certification; Copy of professional civil liability policy (desirable but not mandatory); Declaration of general safety conditions; ISO compliance.

In the event of 'special' supplies, such as those regarding services and supplies related to good and sound facility





management, the above documentation is supplemented with further documents to check compliance with specific laws and/or special technical requirements.

It is not compulsory for suppliers to send us the above documentation, since only specific regulatory requirements are of a mandatory nature. With regard to Exprivia's procurement procedure, submission of all the documentation is necessary for qualification purposes, otherwise the Supplier could be excluded, unless submission is considered to be a preferential element.

A number is associated with each supplier which determines its ranking. Qualified suppliers are entered in a supplier register which is updated annually. All of the documentation produced and received during the qualification process is digitally stored in specific folders on the big 1 server. Suppliers that no longer meet the qualification requirements are suspended from the Register, blocked in the information system and included on a list of inactive suppliers, making it no longer possible to issue orders to them.

Monitoring: the Procurement function observes the performance of the qualified suppliers and assesses over time whether they can still be included among the active suppliers. It can decide to cancel the previous qualification, making it impossible to issue orders and consequently eliminating the supplier from the Supplier Register. Furthermore, in order to keep suppliers aligned with the needs of Procurement as much as possible, it conducts an annual update of the assessment sheet of every single supplier.

3.5.2 Supply indicators in accordance with sustainability

GRI indicators 204-1; 308-1

This document highlights some indicators with regard to the sustainability of the supplies carried out by **Exprivia** in 2021. Exprivia's most significant suppliers, identified as those with purchase orders of Euro 100,000 or more, are broken down by category of purchases in 2021 as follows:

- 47% consulting (45% in 2020),
- 11% hardware (38% in 2020),
- 31% software (10% in 2020),
- 11% other purchases (7% in 2019).

Below is a table indicating the social and environmental criteria with which suppliers are assessed:

Base figure	2021	2020	2019
Use of local suppliers by significant venue ³	90%	89%	91%
New suppliers that have submitted a DVR	62.5%	42%	76%
Code of Ethics	70%	84%	76%
New suppliers provided with environmental certifications	20.83%	29%	25%

3.5.3 Tax Governance

GRI indicators 207-1; 207-2

Although convinced that the tax system must be updated on the basis of the major changes in the economic system, which have become even more incisive in the lives of individuals as well as companies precisely because of the current pandemic, Exprivia, which has always been aware of the social role it plays not only in terms of employment with about 2,000 employees, is very attentive to tax issues, both in terms of the effects on the national economic system and internal financial dynamics. Most

³ The suppliers taken into account have registered offices in the area where they operate.



of Exprivia's activities are carried out in Italy, but thanks to its presence in Spain, Brazil, Mexico and China, the company prepares and updates its tax policy on an annual basis, in accordance with international transfer pricing rules that regulate tax flows between different countries. Exprivia's approach to taxation is founded on transparency and total compliance with local and international regulations. The Administration Department handles compliance and tax optimisation including through continuous discussion with external professionals that support the company, by following all the new regulations that must be complied with within the time frames envisaged and which must be used in the event of new rules in support of companies.

The Board of Directors is promptly informed of particular risks arising from issues of a fiscal nature and oversees the correct approach introduced by the companies' managers.

Fiscal control governance is, therefore, requested by the Board of Directors from the Administration Department which, through the use of adequately trained and competent personnel and with the support of external consultants, monitors the propriety of transactions and applies the correct regulations. All requests made to Exprivia by the tax authorities are managed within the correct information flow, with Exprivia's approach marked by total transparency and constructive dialogue.

3.6 Taxonomy Reg. 852/2020

Starting in January 2022, companies subject to the obligation to publish a Non-Financial Declaration (NFD) must disclose to the public the proportion of their revenues, capital expenditure (CapEx) and ordinary operating expenditure (OpEx) that qualify as environmentally sustainable.

The activity aimed at regulatory compliance followed the indications of the European taxonomy, involving several areas of the structure in the internal comparison.

Exprivia carried out a precise analysis in mapping economic activities, distinguishing them as follows: eligible activities are all those economic activities that contribute to climate change mitigation or adaptation, whereas aligned activities contribute to the achievement of one of two objectives. They either comply with the technical screening criteria, or do not significantly harm any of the other objectives and comply with the minimum safeguards. The economic activities include those relating to:

Information technology: Collaboration vs. Mitigation and Adaptation; Application Life Cycle vs Mitigation and Adaptation; Data Driven vs Mitigation and Adaptation; Artificial Intelligence vs Mitigation and Adaptation; Digital Channels vs Mitigation and Adaptation

Digital infrastructure: Cloudification vs Mitigation and Adaptation; Data Center vs Mitigation and Adaptation

Automation: Process robotics vs Mitigation and Adaptation; Workflow vs Mitigation and Adaptation

Business processes: Energy vs Mitigation and Adaptation; Logistics and Transport vs Mitigation and Adaptation; Infrastructures vs Mitigation and Adaptation; Industry 4.0 vs Mitigation and Adaptation; Territory vs Mitigation and Adaptation; Healthcare vs Mitigation and Adaptation.

Exprivia carried out an analysis of all the economic activities reported, both by mapping them in their entirety and by assessing their consistency with the NACE codes reported in Delegated Regulation (EU) 2021/2139.

	Revenues	CAPEX	OPEX
Eligible Activities	176,476,000	0	157,138,000
Percentage on the indicator total	9.9%	0	8.2%



4. Human rights

GRI indicator 102-8

In the **Exprivia Group**, the Human Resources Management and Organisation processes are conducted in compliance with the company's Code of Ethics and the enhancement of human capital, ensuring protection of the principle of equal opportunities.

The Group guarantees the best working conditions in accordance with the Workers' Health and Safety Legislation and, as regards the Human Rights Policies, refers to the Organisational Model 231 (Italian Legislative Decree no. 231/01). In this regard, the Group also undertakes to protect the moral integrity of its employees by protecting them from acts of psychological violence and by combating any form of discrimination or harm to individuals and ideas.

The Group considers its people a paramount asset for achieving business and offer-development objectives and therefore ensures the training and active involvement of people, facilitating teamwork and working conditions that protect people's psychological integrity and promote creativity and personal initiative.

Placing people at the centre of the development plans means first and foremost protecting people's rights and making sure that they can work in an environment that fosters the professional development. To achieve this, it is essential for Exprivia to adopt the principles of equality, meritocracy and equal opportunities and to promote individual diversity as an added value, by actively supporting the Universal Declaration of Human Rights.

In 2021, with the aim of assessing the levels of organisational well-being of our human capital, we sent a Climate Survey to the entire Exprivia population, obtaining feedback on the most important dimensions of people's well-being, namely: job involvement, team working and satisfaction with agile working methods. The survey found an average positive result (feedback: very, extremely and fairly) of about 89% for these dimensions. Moreover, a great deal of investments was made in smart working in 2021, reaching almost the entire company population. Details of this way of working will be provided in this report.



4.1 Exprivia staff: the significant numbers

The Exprivia Group has an employment trend with regard to staff which is growing continually and can count on highly professional management with managerial ability recognised throughout the market.

A number of aspects inherent to the workforce of the Group as of 31 December 2021 are presented below.

The quantitative information provided refers to the employees in terms of single individuals and they are not expressed as full time equivalents (FTE).

Furthermore, the information provided is considered to be sufficient for ensuring understanding of the human resources management carried out by the Group. Certain information associated with the reference GRI standards, if deemed sensitive for business activities, has been omitted.

4.1.1 Total workforce

Scope: Exprivia S.p.A., Exprivia Projects, Spegea, HRCOFFEE, Exprivia Asia, Exprivia SLU, Exprivia Do Brasil, Exprivia Mèxico, ACS Germania.

Total workforce	2021	2020	2019
Total employees	2,397	3,980	4,036
Of which BPO workers	451	628	616

The Exprivia Group carries out important Business Process Outsourcing (BPO) activities at its offices in Molfetta (BA) and on behalf of large enterprises in the Italian industrial sector. Due to the specific dynamics of the sector, the employment agreements applied, the type of skills used, it was considered necessary to differentiate the analysis with respect to the predominant sector, Information Technology (IT).

Therefore, due to the presence of the business component, BPO, the company population is distributed throughout Italy with a more significant presence in the south, where the registered and administrative offices of the Group are also located (in Molfetta); these offices employ the majority of the workers in the Staff units.

4.1.2 Geographical breakdown

Geographic areas	no. employees 2021	% in the territory 2021	no. employees 2020	% in the territory 2020	no. employees 2019	% in the territory 2019
Italy	2,299	95.91%	3,429	86.16%	3,464	85.83%
Abroad	98	4.09%	551	13.84 %	572	14.17%
Overall total	2,397	100%	3,980	100%	4,036	100%

4.1.3 Breakdown in relation to qualification

GRI indicators 405-1; 202-2

The breakdown by staff qualification as at 31 December 2021 is around 98.08% professionals and 1.92% managers. Women represent around 36.15% of total employees.

In 2021 the analysis of the age of the company population disclosed a clear predominance of the 30-50 years' age bracket. The trend relating to the latest recruitment, however, is changing in favour of the under 30 bracket.

Age bracket	Management	Middle management	White-collar workers	Other ⁴
< 30	-	-	359	-
30 - 50	19	107	1,356	-
> 50	27	129	396	4
Overall total	46	236	2,111	4

Category	2021		2020		2019	
	Men	Women	Men	Women	Men	Women
White-collar workers	1,297	814	2,210	1,177	2,247	1,188
Middle management	189	47	418	94	419	89
Management	42	4	72	9	80	10
Other	3	1	4	4	2	1
Overall total	1,531	866	2,704	1,284	2,748	1,288

Over 95.00% of managers and middle managers are residents in Italy and are recruited at the Group's operating centres.

4.2 Workplace health and safety

In order to ensure an increasingly greater protection on the health and safety in the workplace sphere, Exprivia used dedicated staff, engaged in risk assessment, in the planning and implementation of the training activities, in the active involvement of all the staff and in the performance of the operational monitoring activities. Safety management is a concrete commitment to a shared culture, which concerns not only Exprivia staff, but also suppliers, consultants and contractors, with the aim of involving the entire company community.

Workplace safety is managed by the Company Prevention and Protection Service, which prepares all the documentation required by the regulations in force; the highlights of the activity carried out by the CPPS for the year 2021 are reported below:

- Drafting of updated versions of Risk Assessment Documents for all Exprivia offices;
- Drafting of the Risk Assessment Document for customer activities, with the implementation of specific Check Lists for the identification of specific risk factors;
- Training activities for correctly compiling the Check List tool for customer workplaces;

⁴ This category includes contract workers and/or interns/trainees.



- Drafting of the Improvement Action Planning (IAP) document resulting from the risk assessment documents, with relative priority intervention indexes;
- Implementation of Emergency Plans for company offices;
- Planning activities for cardio-protection equipment in workplaces;
- Training and refresher training activities for employees with fire-fighting responsibilities;
- Preparation of the Company Skills and Responsibilities Plan.

Regarding point 403-1, the Company is implementing a management system for workplace health and safety.

With regard to Hazard Identification (403-2), all the risks potentially present in the company's working environment and at Exprivia's customers' worksites were assessed in the risk assessment and accident investigation. The risks to which workers are most exposed are certainly those related to the use of video terminals and to customer activities, for which operational procedures have been put in place to minimise the risk level. The methods for the above evaluations comply with those laid down in the current legislation on workplace health and safety (Italian Legislative Decree 81/08 as amended).

Within the framework of health monitoring activities, in compliance with the health protocols identified with the cooperation of the Company Physician, health checks are carried out in ad hoc areas within the company premises in order to constantly monitor, in accordance with the provisions of the legislation, the health conditions of employees (403-3).

In order to ensure the direct involvement of workers in the decision-making processes concerning occupational health and safety management, regular meetings are held in the presence of all the Workers' Safety Representatives, Employer's Delegates, Heads of the Prevention and Protection Service and Company Physician, also via conference calls (403-4).

Training activities on workplace prevention and protection measures have been planned and regularly carried out, with the sharing of risk assessment methods and their outcomes. In addition, training activities were carried out for specific roles in the company's safety organisation chart (first aid officers, fire-fighting officers, etc.).

4.2.1 COVID-19 emergency

In light of the serious pandemic emergency linked to the spread of the COVID-19 virus, in compliance with the provisions of the various decrees issued on the basis of the fluctuating trend and spread of the pandemic, Exprivia has updated the Anti-Infection Protocols for limiting the spread of the virus in the workplace.

Company procedures have also been drawn up, in line with the provisions of current legislation, to regulate access to workplaces exclusively to those with Green Certification or Green Pass, with relative training and information for workers.

4.2.2 Accident indices

GRI indicator 403-2

The data collected in these analyses confirm that the number of accidents that occurred in 2021 is to be considered low and with an incidence of severity and frequency close to 0. The type of accident, recognised by INAIL, that occurred in the year was exclusively while commuting, with one non-serious road accident to an employee returning home at the end of the working day.

This indicates that the risk associated with the mere work activities in which the employees are daily employed is extremely low and is due to occasional and rare unforeseeable accidents that can occur during the day (bruises, slipping), which are unrelated to the intellectual work they carry out.

The figure relating to the frequency index and the severity index is shown below.

Frequency index = no. of accidents x 1,000,000 / no. of hours worked

The frequency index of 2021 was **0.27** (including commuting accidents).

The frequency index in 2021 was **0** (EXCLUDING commuting accidents)

Severity index = total number of accident days x 1,000 / number of hours worked.





The severity index in 2021 was **0.0019** (including commuting accidents).

The severity index in 2021 was **0** (EXCLUDING commuting accidents)

Accident means any accident with regard to which all procedures have been completed and for which formal notification has been received from INAIL for the granting of compensation.

Accidents at work (excluding commuting accidents)	2021	2020	2019
Accidents suffered by Group employees	0	0	8
Of which women	0	0	6
Days lost due to accidents	0	192	199
Of which women	0	123	176
Cases of occupational disease	0	0	0
Group accident frequency index	0	0	1.31
Female accident frequency index	0	0	0.98
Group accident severity index	0	0.04	0.03
Female accident severity index	0	0.02	0.03
Average Days Lost	0	0	25

Based on this analysis, we can see and confirm that the environment where Group employees work is extremely protected and safe, partly thanks to the particular attention which the Group pays to internal safety aspects. The analysis includes both the Italian and foreign workforces.

Work-related fatal accidents

In 2021, the number of work-related fatal accidents in the various national and foreign offices of the Exprivia Group was zero.

This figure shows that the risk related to working activities and the environmental risks associated with the workplaces are irrelevant. The indicator result also shows that the work environment is safe and controlled, thanks also to the special attention paid to safety and to the maintenance of company offices.

Violations and sanctions associated with occupational health and safety

In 2021, no events and incidents occurred at national or international offices which led to violations and sanctions associated with occupational health and safety. The figure shows the attention paid by the company to prevention as regards workers' health and safety and its ongoing commitment to ensure compliance with current legislative and regulatory provisions at all times.



5. Work

GRI indicator 102-8

Human resources constitute a strategic asset for the Group, are essential to the company's existence and represent a critical factor for competing successfully on the market. Honesty, loyalty, ability, professionalism, flexibility and expertise are some of the decisive factors for achieving the Group's objectives.

Through the course of the employment relationship, the **Exprivia Group** undertakes to create and maintain the necessary conditions in order for the culture, ability, knowledge and skills of everyone to develop and be recognised, by adopting a policy based on recognising merits and equal opportunities, making provision for specific continuous training programmes, professional updating and the acquisition of greater expertise. For this reason, the Group considers training a strategic element for the development of its staff, undertaking not only to constantly develop its training offer but also to adopt equally innovative methods for providing its courses. This certainty when it comes to professional development paves the way for joint company/employee evolution projects by improving the engagement levels of the staff. ICT companies depend greatly on the quality and level of engagement of the human resources working for them and on their flexibility to adapt to the opportunities arising from the transformation processes under way.

The second-level supplementary agreement applied to **Exprivia** and, therefore, to its more than 1,800 employees, represents the start of a process towards greater sharing of the company's goals with all employees.

Our goal is to establish the conditions for dynamic and flexible, but also happier, work, where everyone has opportunities and is stimulated in both personal and professional growth.

5.1 Significance for the Exprivia Group's activities

The evolution of the organisation and its alignment with market requirements are based on the topics of effective enhancement of human capital, a focus on quality and engagement.

Individuals are a true strategic asset for the achievement of the company objectives and development plans. Human capital has



always been at the heart of the company's interests, through the development of potential, improving individual expertise and abilities and promoting discussion between managers and staff, in line with the business objectives.

These objectives represent the cornerstones of the professional skills development project, in accordance with merit-based criteria.

5.2 Employment contracts applied

The Group adopts a stable employment policy for the workers, preferring permanent employment contracts and limiting the choice of temporary contracts solely to residual accessory term activities. Around 98% of the company population has a permanent employment contract; apprenticeship contracts are included among the permanent contracts.

Contract type	2021	2020	2019
Permanent contracts	2,368	3,867	3,874
Temporary contracts	29	113	162
Total	2,397	3,980	4,036

Type of employment relationship, broken down by gender and geographical area of origin/recruitment.

Type of relationship by area	Women	Men	Overall total
Italy	11	18	29
Abroad	-	-	-
Temporary contracts	11	18	29
Italy	831	1,439	2,270
Abroad	24	74	98
Permanent contracts	856	1,513	2,368
Overall total	866	1,531	2,397

Details of Full-Time and Part-Time employment relationships, divided by gender, are shown below.

Type of working hours	Men	Women	Overall total
Full Time	1,419	498	1,917
Part Time	112	368	480
Overall total	1,531	866	2,397

In relation to GRI indicator 402-1, the Group has taken steps to comply with the CCNLs (Italian National Collective Bargaining Agreement - hereinafter 'NCBA') in force and applied (Mechanical Engineering and Telecommunications) and the legislation which governs contractual terms which affect the organisation of the work and said workers. Therefore, communications have always been handled in observance of the time scales envisaged by the aforementioned legislative sources.



5.3 Turnover

GRI indicator 401-1

The rate of recruitment and termination is shown below, calculated on the total of employees, by gender and by age bracket, at the end of the reporting period.

RATE OF RECRUITMENT	2021	2021	2020	2020	2019	2019	2018	2018
	ITALY	ABROAD	ITALY	ABROAD	ITALY	ABROAD	ITALY	ABROAD
Men	14.3%	32.4%	4.70%	3.14%	10.22%	37.42%	9.7%	41.6%
Women	14.1%	36.8%	2.01%	0.95%	11.95%	34.78%	11.5%	47.1%
<30 years of age	51.9%	54.5%	2.79%	1.18%	51.68%	56.60%	50%	78.4%
Between 30 and 50	1.5%	27.1%	3.59%	2.69%	8.35%	35.25%	8.3%	35.4%
>50 years of age	34.1%	66.7%	0.33%	0.23%	2.10%	15.15%	2.1%	23.3%

RATE OF LEAVERS	2021	2021	2020	2020	2019	2019	2018	2018
	ITALY	ABROAD	ITALY	ABROAD	ITALY	ABROAD	ITALY	ABROAD
Men	17.37%	25.00%	5.48%	3.49%	11.10%	29.10%	11.9%	34.7%
Women	25.89%	42.11%	1.93%	1.08%	7.76%	26.09%	9.2%	32.7%
<30 years of age	32.48%	72.73%	3.09%	0.95%	27.83%	35.85%	27.1%	46.1%
Between 30 and 50	3.35%	183.33%	2.84%	3.27%	10.01%	27.50%	9.6%	34.2%
>50 years of age	73.89%	1.91%	1.48%	0.35%	3.42%	22.73%	9.6%	15.0%

5.4 Motivation and internal engagement

The success and growth of the **Exprivia Group** are directly linked to the excellence of our people; the men and women at Exprivia express their brand awareness to customers, colleagues and agents, to guarantee the image of the Company. To achieve this result, Exprivia invests in training and enhancement, establishing the conditions for a cooperative and motivating working environment. In a competitive scenario, characterised by continuous evolution, people are pushed to strive for continuous improvement thanks to a Performance Appraisal system and renewed investment in market place training platforms, which stimulate knowledge sharing. The values of professionalism, flexibility, innovation, attention to quality and a focus on objectives constitute the crux of the Group's HR management procedures. The challenges of the reference market on which Company operates demand a special focus on professional retraining, ongoing training and innovation, applied to both technological skills and the managerial culture. In particular, an important training course was completed in 2021, specifically for all company middle management. In fact, the Company believes that the role of middle management is the real driving force behind the professional development of our people, enabling and involving them in managing challenges in a resilient and innovative way. The People Remote Management training plan involved 98 resources and lasted 60 hours over the period from November 2020 to May 2021. The training activities were carried out in virtual classrooms (online distance learning) and through the dissemination of training titbits (similar to short webinars). The average satisfaction of the participants, measured on a scale of 1 to 5, was between 4 and 5 for all aspects assessed. There was particular satisfaction with the effectiveness of communication, a category that encompasses presentation clarity, the use of different communication channels, logic and topic comprehensiveness. The process began with





assessment sessions that identified areas of strength and improvement with the aim of mainly working on the improvement items. The strengths were planning and strategic vision, decision-making and influence, leadership and team management, innovation and change management, making the area of planning, innovation and team building a real strength of our organisation. We also launched a new social organisation project in 2021 with the adoption of Exprivia People, the agile and engaging platform created to connect us directly from our mobile phones. The solution was designed to give everyone a voice, to strengthen our cohesion and to bond not only with our colleagues, but also with the values of our company. It is a communication and sharing project based on the paradigms of a corporate social network. With Exprivia People, we can share our thoughts through posts, exchange opinions, enhance ideas and communicate in personalised groups. Exprivia People allows to create a team of people with high aspirations, who evolve and feel like sharing as a team. In particular, Exprivia People is responsible for the welcome aboard programmes, corporate press review, internal communication and live talks on innovative topics. In 2021, the Company carried out a new analysis on the Information System connected to human capital management processes, selecting new software focusing on a new, increasingly integrated system so as to be able to more effectively support value creation in the medium and long term. The Company continued to invest in its career development model in 2021 through rolling application methods, transparent communication, planning professional and salary development steps, certainty and transparency with regard to career paths, generating the development of the best talents.

5.4.1 Initiatives reserved for the company population

2021 was a particularly challenging year, as it bore the consequences of the 2020 pandemic, which is unfortunately still ongoing. Exprivia wanted to offer its company population a bit of joy with three internal events during the Christmas holidays with a symbolic purpose, expressing its thanks to all employees who have managed the daily activities in this state of emergency from the coronavirus and its variants with a great sense of responsibility and professionalism.

The events were held at:

EXE - Rome on 14 December 2021

Old Fashion - Milan on 20 December 2021

La perla del Doge - Molfetta (BA) on 23 December 2021



exprivia

Company Welfare

GRI indicator 401-2

In terms of welfare, a number of initiatives have been implemented and we tend to introduce new services each year with respect to the range available to the workforce.

In most cases, they concern advantages granted to all employees on top of those established by law and/or the NCBA. A Group management system on this issue has not yet been activated; for this reason, the activities carried out by the two main Group companies are described below.

Since 2016, a welfare initiative has been in place aimed at the entire workforce. Exprivia People Care is the company welfare plan which enhances the total reward system by responding to an ever broader range of worker expectations and needs, not only financial. This project was created due to the company's sensitivity towards initiatives and tools that can achieve work-life balance, as well as maintain the purchasing power of the workers.

The Exprivia People Care plan

Since 2017, the Mechanical Engineering NCBA has made it mandatory to introduce a **supplementary company health policy** for all employees entitled to it. Exprivia has chosen a policy that can be extended to the entire family unit (spouse and children **even if not dependent**). It includes both the reimbursement of hospital costs and those for advanced diagnostics, specialist visits and diagnostic check-ups, including dental care. In accordance with the provisions of the NCBA, it is provided without distinction to employees with either full-time or part-time permanent contracts. For staff hired on temporary contracts, this right accrues after 6 months.

During 2020, Exprivia introduced a Dental Plan agreement for its employees with the insurance fund, Chubb, which allows them to be able to take advantage of various dental services for themselves and/or their families, by paying a monthly fee of Euro 9.58 or Euro 16.50 depending on the package chosen.

Ticket Restaurant for all employees for each day worked on-site. The luncheon vouchers are in electronic format and the value for all is Euro 7.00 net per working day carried out in the office or at the customer's premises. Important affiliations have been implemented, during these years of operation, with large food sales chains, such as Coop and Lidl. No more useless waste of paper on paper vouchers and much easier to use. The measure is aimed at all permanent and temporary full-time employees; for part-time workers, a minimum of 6 hours/day must be worked.

In 2021, the right to meal vouchers was also extended to employees working remotely with a daily nominal value of Euro 5.00.

Smartphones and SIMs for permanent white-collar workers (full-time and part-time), apprentices and management. The smartphones and SIMs provided permit unlimited phone calls and browsing. This is an important step towards improving our communication, both internal and with our customers.

With the increased use of remote work in 2021, the number of gigabytes allocated to each employee has been extended (from 5 to 40 per month), thus enabling greater browsing via their mobile device or hotspot.

Flexible Benefit, the company wished to supplement the amount of the benefit envisaged by Mechanical Engineering NCBA, with an additional benefit, for an overall total made available to the individual employees with the right of Euro 250 per annum. The additional part is reserved for permanent employees and is re-proportioned for part-time employees. The handling and spendability of the available benefit takes place via a platform made available by Easy Welfare, a leading company in Italy in the management of company welfare. Employees have a wide range of services available to them, which is expanded annually.

Having achieved the payout condition for the Performance Bonus in July, employees were given the opportunity (established by union agreement) to convert the amount of the bonus into welfare through the Edenred platform.

In 2019, Exprivia signed an agreement with **Corporate Benefits Italia** (a leading company in Europe in the company affiliations sector), aimed at **enhancing the offer of affiliations dedicated to our employees**. The agreement provides for the creation of a portal through which our employees can benefit from an exclusive offer of company affiliations (over 180 partners, comprising prestigious brands and leading businesses) which entitle users to useful discounts from major distribution chains.

During 2021, the range of market places was expanded, granting our employees more chances to save money when making purchases.

5.5.1 Right to and protection of maternity

All Group employees are entitled to use parental leave in accordance with the provisions of the law.

The Group has always striven to facilitate the work of its pregnant employees as much as possible; for example, at Exprivia's Molfetta headquarters, where there is an internal car park with a limited number of parking spaces, part of this has been allocated to pregnant employees, enabling them to enter the company site directly to make it easier to then enter the building.

The sense of belonging and well-being present in the company can also be seen from the fact that in every case of staff on maternity leave, all the employees returned to work after taking compulsory and/or optional maternity leave.

Maternity support - Contact Centre Perimeter

Speaking about maternity support for working women does not simply mean discussing the work/life balance, but first and foremost talking about women.

The topic of maternity support at work, especially in private companies, forms part of the more general issue of equal opportunities and its final goal is to reduce the gender gap which involves, or rather lies at the heart of, the company's organisation.

Carrying on from 2018, and with the aim of promoting and supporting working mothers, the Exprivia Group has introduced, in the internal company regulations in force for the Contact perimeter, a significant prerogative for all mothers with children under three years old. The company regulation governs the procedures for Contact Centre employees working on shifts to request exemption from certain time slots if there are proven reasons for doing so (attending study courses, medical treatments prescribed at certain times, other part-time work).

5.5.2 Absenteeism

GRI indicator 401-3

All Exprivia Group employees within the Italian scope have social security coverage with INPS for cases of absence due to illness and hospitalisation.

The table below shows the percentages of absence due to illness and hospitalisation, broken down by companies in the Italian scope.

Rate of absenteeism	
Company	Total
Exprivia S.p.A.	0.01%
Projects S.r.l.	0.03%
Average	0.01%

The rate is relatively low compared with the average in the sector and the final average takes account of certain higher rates caused by serious (non-professional) illness, which extended into 2021.

5.5 Training

GRI indicators 404-1; 404-2

Digital innovation accelerates and animates increasingly tighter competition while the development of communication infrastructures and ICT investments fuel the development of digital transformation which becomes the protagonist of a growing market. Exprivia has supported these factors of profound change; digitalisation has made it necessary to have a more complex mix of skills and abilities in which technological skills are complementary to transversal skills.

Exprivia, which has always invested in the preparation of its resources, also in 2021 had the objective of increasing, disseminating and updating technological expertise in line with the innovation trends of the digital and transversal market, through training on innovative technological areas and on management skills, necessary to achieve the transformation in progress.

This development of expertise goes hand in hand with investments for the creation of a work environment that offers everyone the same opportunities from a merit-based approach. These are the main drivers on which the Exprivia Group is relying to achieve its ambitious growth objectives.

Training delivered in 2021 totalled 33,346 hours (80 of which in foreign offices), involving 12,277 participants. The total number of hours of the courses was delivered almost entirely online.

Particular attention is paid to the aspect of training financing: in fact, all the possible sources of funding are used thereby guaranteeing the sustainability of the investments. The funding obtained in 2021 is 49% of the costs incurred, compared to 48% in 2020.

Training is planned at the start of the year and is continuously updated to make training investments effective and consistent with business objectives and company strategies. One of the most significant initiatives for guaranteeing continuity and flexibility in the use of training, also for 2021, is the adoption by 373 users, of the Udemy training platform which, applied alongside traditional education, offers a constantly updated marketplace of over 100,000 courses and online videos. This initiative was appreciated by our staff, who made considerable use of it to improve their expertise, in a way closely and swiftly connected with requirements emerging during work activities.

The following training courses are of particular interest:

Remote Management: 98 managers were involved in a training course launched at the end of 2020 and concluded at the end of May 2021. The need to develop flexibility, engagement (even more so in a context of remote working) and focusing



on objectives has made it necessary to improve our managers' effectiveness and ability to influence their employees. The course began with a digital assessment right at the beginning, consisted of virtual classrooms, virtual coaching and a final digital assessment to evaluate the training effectiveness.

Plan for success and reach your goals: this learning path is offered through the Udemy platform with the aim of providing a guideline for the creation of a new mindset, new behaviours and habits that lead us to better plan times and objectives through creative and innovative thinking aiming for more profitable productivity.

Sure for Future: this upskilling and reskilling process has allowed the company to strengthen the skills and expertise of 21 colleagues in order to facilitate their allocation to project activities, for a new professional relaunch. The planned courses included synchronous training (virtual classroom) and asynchronous training on specialised platforms; the courses ended with a final phase of laboratory activities. In order to support and monitor the learning process, we selected some Training Tutors within the Company who, in collaboration with the Training and Development unit, had the task of facilitating the learning processes of the learners and collaborating with external teachers in the assessment of learning outcomes.

AWS skills development plan: training and certification programme that allowed Exprivia to raise the level of its partnership with AWS. The plan involved 24 resources.

ADOBE training programme for 36 participants (of which 12 in 2021); the last 5 days will continue in 2022.

Cloud University Systems & Networking: a training project aimed at upgrading staff skills and abilities in order to develop professionals such as System&Network Engineers, high-profile specialists in the field of systems; the course started in 2021 and will continue in 2022.

Cloud University Developer: a training project aimed at updating staff skills and abilities in order to develop professionals such as JEE Cloud Developers with particular regard to the management of software systems on the clouds of the main providers (AWS, Azure, Google). The project was designed in 2021 but will be provided in 2022.

Master's degree, important at national level, in which Exprivia managers took part:

Executive Master in Management of Health and Social Care Companies, at Bocconi, starting in 2020 and ending in 2021

Executive Master in Information Architecture and User Experience Design, at UILM

Executive Master Program in Digital Transformation, at the Milan Polytechnic Institute

Second-Level Master in DATA SCIENCE of the Department of Informatics of the University of Bari Aldo Moro and the Department of Electrical and Information Engineering of the Bari Polytechnic Institute

Master MBA, provided by Spegea Corporate Business School.

In substance, the training programmes developed:

TECHNICAL AND SPECIALISED SKILLS: activities aimed at increasing technical knowledge and skills to support innovation and technological development programmes, through specialised training activities also aimed at obtaining certification. These specialised interventions were fully disseminated, in the belief that working on skills means increasing the value of people and, therefore, the organisation's competitive advantage. A total of 15,408.00 training hours (of which 3,158 for the contact centre) and 8,546 participants (of which 6,769 for the contact centre) were overall provided.

MANAGEMENT SKILLS: aimed at improving organisational conduct for the development of professional skills, project management and the development of conduct that contributes to determining a precise leadership style for handling working teams, in order to improve management effectiveness. A total of 8,367 hours were provided for 1,448 participants.

LANGUAGE SKILLS: training activities were carried out to increase the staff's language skills, with particular attention paid to flexible training (e-learning, Skype lessons and phone lessons). A total of 188 hours were provided for 98 participants.

COMPLIANCE: training activities mainly concerned the fundamental management processes of the Group's integrated Quality Management System (QMS). In order to achieve an increasing dissemination of skills related to some core processes of Exprivia's Integrated QMS (in addition to the 231 Model), we designed an e-learning training course on HCM that started in 2021 and will continue throughout 2022.

The project is divided into 5 training courses:

- o Management of projects and financial risks related to management



- Management of IT services and business continuity
- Information security and privacy management in the execution of projects and provision of services
- Code of Ethics and Organisational Model pursuant to regulation 231/01
- Cybersecurity and privacy

Thanks to the new training project, it will be possible to ensure:

controlled project management in order to achieve the objectives in terms of quality, time and costs;

the planning, development, implementation, execution, monitoring, updating and continuous improvement of services provided to customers;

the protection of ExpriVIA's and its customers' information assets from all threats, internal or external, intentional or accidental;

knowledge and awareness of the Corporate Code of Ethics and 231 Model.

Overall, in the field of compliance, 1,387 hours of training were provided to a total of 661 participants.

COMPULSORY TRAINING: training activities concerned primarily:

- Protection of health and safety at work (pursuant to Italian Legislative Decree 81/08)
- GDPR (General Data Protection Regulation) - Privacy Regulation (EU 2016/679).

In the area of Compulsory Training, a total of 5,534 training hours (of which 2,945 for the contact centre) and 1,524 participants (of which 721 for the contact centre) were provided.

Main information about all the training provided and an indication of the average hours of training by gender and by category:⁵

2021	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	11,911	21,435	382	4,372	28,592	33,346
Personnel (Italy + abroad)	865	1,528	46	236	2,111	2,393
Average training hours	14	14	8	19	14	14

2020	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	23,883	33,741	475	6,852	50,299	57,625
Personnel (Italy + abroad)	1,280	2,700	81	512	3,387	3,980
Average training hours	19	12	6	13	15	14

2019	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	

⁵ The calculation of staff excludes the category Other presented in the Human Rights chapter.



	Women	Men	Management	Middle management	White-collar workers	Total
Hours	27,342	54,457	852	11,457	69,490	81,799
Personnel (Italy + abroad)	1,288	2,747	90	508	3,437	4,035
Average training hours	21	20	9	23	20	20

The numbers shown below consider **mandatory training** only:

2021	Gender		Category			
	Women	Men	Management	Middle management	White-collar workers	Total
Hours	3,102	2,432	2	282	5,250	5,334
Personnel (Italy + abroad)	865	1,528	46	236	2,111	2,393
Average training hours	4	2	0	1	2	2

2020	Gender		Category			
	Women	Men	Management	Middle management	White-collar workers	Total
Hours	1,170	3,729	11	439	4,449	4,900
Personnel (Italy + abroad)	1,280	2,700	81	512	3,387	3,980
Average training hours	1	1	0	1	1	1

2019	Gender		Category			
	Women	Men	Management	Middle management	White-collar workers	Total
Hours	3,501	10,682	221	2,122	11,839	14,182
Personnel (Italy + abroad)	1,288	2,747	90	508	3,437	4,035
Average training hours	3	4	2	4	3	4

5.6 Professional certifications

Certifications make it possible for each business unit to have a wealth of objective and measurable professional skills, ensuring their customers certification of the technical abilities of the individuals involved in the projects. Furthermore, for the purposes of participation in tender calls, it is indispensable to be able to employ and rapidly handle all company and individual certifications. In 2021, **414 certifications and specialisations were obtained/renewed**, increasing the number of certificates obtained in the year by **50%** compared to 2020, with a **percentage of certified resources amounting to around 34% of the workforce (Exprivia S.p.A), compared to 26% in 2020.**

5.7 Connection with the education and training system

We now have an increasing number of well-established partnerships with universities and polytechnics, including: the University of Pavia, the Milan Polytechnic, the Milan State University, the Bocconi University of Milan, the La Sapienza University of Rome, the Luiss Guido Carli University, the University of Bari, the Bari Polytechnic, the LUM University of Bari, the University of Salento, the Ecampus University, the Federico II University of Naples, the University of Calabria, the University of Siena, the University of Trento and the University of Palermo.

In 2021, some 50 trainees were managed in partnership with Italian universities and polytechnics, using both face-to-face and remote solutions.

The Talent Acquisition programmes also continue, as does interest and involvement with the Higher Technical Colleges System; in particular, the second two-year cycle for 'Developer 4.0' was completed in 2021, and the 2021-2023 two-year period has begun with courses in Molfetta, Foggia and Lecce, as well as in Bari in collaboration with the Partners of the Apulian IT District.

The year 2021 also sees us playing an active role in classroom teaching and tutoring, both remotely and in person.

During the final quarter of the year, we were delighted to recruit the further 46 Higher Technical College young graduates at Exprivia.

Another important tool activated by Talent Acquisition remains the Academy; once again in 2021, certain projects were launched, concerning the ERP SAP, the Factory Application Integration and the Healthcare company factories.

5.8 Performance evaluation

GRI indicator 404-3

Performance Evaluation is a process that assigns personal quantitative goals which, together with an assessment of most relevant organisational behaviour, helps to improve individual, and thus company, performance.

The Performance Evaluation process is conceived as an opportunity for all (managers and employees) to have in-depth and constructive exchanges of views aimed at defining the activities and commitments against which they must measure themselves during the year.

The Performance Evaluation is expressed through:

- Performance Appraisal
 - assessment of individual quantitative objectives;
 - assessment of qualitative objectives connected with organisational behaviour.

- Management By Objectives (MBO)
 - assessment of individual quantitative objectives;
 - assessment of budget objectives.

The Performance Appraisal was implemented on the Talentia Human Capital Management platform in 2020 and applies only

The process includes an allocation phase between March and April and an evaluation phase between April and May of the following year; the relative table highlights the number of appraisals evaluated between April and May 2021, from 2020.

With regard to the MBO system, the evaluation of individual quantitative objectives is measured by means of a form and is linked to the salary review with respect to the career path. The assessment of the budget objectives is connected with the company's bonus system and based on assessment of the structure's economic and financial indicators. For the Italy scope, both numbers have been shown, while only the second type is provided for the abroad scope.

The Performance Evaluation data concern solely the Exprivia Group's core scope. Therefore, the percentages calculated are evaluated with respect to the Italy workforce, excluding the following Group companies: HR Coffee, Exprivia Projects, Spegea Scarl.

A summary of these companies' processes is given below:

Starting in 2021, Hrcoffee has developed a periodic performance assessment model on a scale of 10 common values (Communication, problem solving, time management, attention to detail, adaptability, team work, flexibility, digital mindset, leadership and creativity) and 10 knowledge values developed for the factory and internal process part. The expected values are indicated by the Hrcoffee board, while the actual values are determined by the manager and the self-assessment. The Fill Gap process allows the identification of any training gaps.

Spegea evaluates performance annually in terms of suitability to the role, both with reference to technical skills and soft skills. The process starts from a mapping of roles and the identification of specific performance indicators which aim to stabilise each employee's adherence to their role. An evaluation form is created from these and shared with each employee at the beginning of the year in an individual meeting. On a six-monthly basis, performance is evaluated by assigning a score on a scale of 1 to 5 for each identified indicator. The appraisal is returned to the employee through a feedback interview, during which areas for improvement are identified that will be the subject of particular evaluation during the next interview.

For Exprivia projects, the monitoring of consultants' performance is carried out on a six-monthly basis and focuses on specific service KPIs. The following KPIs are used by the two main services provided:

- For front-office services (telephone and webchat): RETEMPTION SWA: number of Swa (active switches = electricity or gas commodity contracts) acquired divided by the number of interactions (calls or chats) handled; PRODUCTIVITY: number of interactions (calls or chats) handled per hour on average; PERCEIVED QUALITY: subjective evaluation provided by the end customer after a single interaction.
- For back-office services: PRODUCTIVITY: number of files handled per hour on average; PERCEIVED QUALITY: subjective evaluation provided by the end customer after handling a single file.

Tables – Performance Management

Employees covered by annual review - Performance appraisal – ITALY	2021	2020	2019
% of total workforce Italy	63%	58%	35%
of which Management	38%	7%	21%
of which Middle management	64%	39%	45%
of which White-collar workers	63%	63%	33%
of which Men	61%	58%	38%
of which Women	68%	57%	26%

The Performance Appraisal table shows that 2021 is in continuity with 2020, while the important deviation with 2019 is due to the adoption of the HCM platform that allowed a wider dissemination of the appraisal programme.

Employees covered by Performance Assessment MBO	ITALY 2021	ITALY 2020	ITALY 2019	ABROAD 2021	ABROA D 2020	ABROA D 2019	ITALY + ABROA D 2021	ITALY + ABROA D 2020	ITALY + ABROA D 2019
% of total workforce	11%	4%	5%	54%	41%	38%	13%	10%	11%
of which Management	49%	16%	28%	56%	50%	60%	50%	21%	33%
of which Middle management	30%	8%	15%	100%	54%	58%	31%	12%	20%
of which White-collar workers	7%	3%	2%	52%	39%	35%	10%	10%	8%
of which Men	13%	5%	6%	51%	39%	40%	15%	11%	12%
of which Women	7%	2%	4%	63%	47%	33%	10%	8%	8%

With regard to the MBO Italy system, it should be noted that the net increase recorded is due to the different scope analysed: in 2020 the process was implemented only for Exprivia Spa, but the percentages were calculated on the total Exprivia spa + Italtel resources. Even comparing the figure with only the percentage of the Exprivia population involved in 2020, there is still an improvement (7% in 2020; 11% in 2021); this may be due to the consolidation of the salary review process during the career path interview, which envisaged a greater involvement of resources.

There has been a slight improvement in the abroad scope.

In the tables, the numbers represented for the differences in gender are consistent with those indicated in the rest of the report.

5.9 Smart working

Smart working at **Exprivia** takes the form of a new approach to company organisation, where the individual needs of the worker balance, in a complementary manner, those of the company. This new way of executing the employment relationship is characterised by a lack of working hours or spatial restrictions and by work organisation that reconciles the personal and professional requirements of the employees. In order to implement this innovative vision of the organisation of work, a culture characterised by the following is fundamental: sharing of values and principles of trust and transparency; widespread communication, cooperation, accountability and decision-making autonomy, as well as a growing focus on results.

In June 2018, Exprivia launched a smart working programme, which was signed up to by around 350 employees (as at February 2020).

With the arrival of the COVID-19 pandemic, between February and April Exprivia enabled around 90% of the workforce to work remotely, and the measure was also implemented in Exprivia Projects (a company which had never previously used smart working).

On-site work (company or customer sites) was only permitted for those whose activities were incompatible with smart working.

The company constantly renewed its smart working arrangements in line with the various Prime Ministerial Decrees issued and provided the workforce with clear communications and reports on safety in compliance with the indications from INAIL (the Italian National Institute for Insurance against Accidents at Work).

In January 2021, the company activated a New Smart Working Regulation whose implementation was postponed until the end of the emergency status, which is currently scheduled through 31 March 2022.

The aim of the new Regulation is to regulate smart working in a structural and widespread manner in the post-emergency period, based on the evidence gathered in both the experimental (pre-pandemic) and emergency phases. The company believes that this way of working may be the way of the future, and that it will also meet the expectations and needs of its employees.

On the basis of the new Regulation, employees were asked to respect the Plan by signing an individual agreement. Around 90% of the entire company population has signed agreements. The main elements of the Regulation are outlined below:

Smart Working is open to all Exprivia SpA employees whose tasks and/or activities are compatible with agile working.

Smart Working can be carried out as follows:

- a) First and second-line staff within the company organisation chart can work remotely up to 2 days a week.
- b) New employees hired on or after 1 March 2021 can work remotely only after the first month of employment; from the second to the sixth month of employment, up to 3 days a week of remote work can be carried out.
- c) Other staff can work remotely up to 4 days a week.

Reduction of CO2 emissions

It has been estimated that in **Exprivia**, as a result of the Smart Working days used during the year 2021 (about 348,000 days), about 20,880,000 km and about 452,000 hours (equal to about 56,500 working days) have been saved, with a decrease in CO2 emissions of about 8,885,000 kg.



5.10 Industrial Relations

The Group has always maintained open and transparent relations with trade unions and workers' representatives. It believes that it is possible to provide solutions that are better balanced with the needs of all stakeholders only through continuous and constructive dialogue. The activities under way with trade unions and workers' representatives in the Group's two main companies are shown below.

Exprivia is involved in ongoing negotiations with workers' organisations at national and local level. For this purpose, the Group has established a specific unit within the Human Resources Division. Smart working negotiations were carried out in 2021, which led to a trade union agreement in July to regulate a number of institutes linked to agile working. In particular, meal vouchers were also granted for agile working days, the right to disconnect was redefined in more detail, and trade union and inclusion rights were regulated.

During 2021, the committee set up in 2020 and composed of the Head of the Prevention and Protection Service, the Company Physician, the Head of Industrial Relations and the Workers' Safety Representative remained active in order to monitor health protection and prevention initiatives related to COVID risk. Regular meetings were held in which data were presented and anti-COVID risk safety initiatives were shared. The Committee meetings and periodic meetings were held for both Exprivia SpA and Exprivia Projects.

In 2021, Exprivia SpA made use of social safety nets because of COVID until June, and ordinary CIGO (state fund for redundancy subsidies) benefits from September to December; such use required fulfilling the relevant trade union procedures which call for the issuing of information to the trade unions, joint analyses and agreements. It should be noted that the ordinary procedures always ended with the signing of agreements with the trade unions involved.

The agreements laid down the Company's advance payment of the wage subsidies under the INPS (Italian national social security body) to the workers concerned.

With regard to Exprivia SpA alone, there was also the monitoring/execution of the supplementary agreement signed in 2018. Therefore, certain meetings were held to discuss the introduction of the Performance Bonus during which the Trade Unions were provided with the results achieved in 2020, set as targets for the payment of the performance bonus. It should be noted that based on the provisions of the 2018 agreement, the targets have been met that allowed the Performance Bonus to be disbursed. During these meetings, the trade union representatives were provided with the targets for 2021 which, if achieved, would enable the payment of the bonus for 2021. In particular, a different criterion for achieving the targets was defined with the trade union organisations.

Other aspects were also shared, such as collective closures and funded training courses.

During 2021, under the auspices of Exprivia Projects, in addition to the aforementioned points connected with the COVID-19 emergency, various meetings were held with the trade union representatives and territorial secretariats with the aim of resolving a number of organisational/operational problems affecting staff. In the majority of cases, solutions were found which helped improve the organisation of the work at the sites and restored well-being to the workers.

A social clause procedure was managed in September due to the award of a tender for a telephone back office, which led to the hiring of 63 employees working for the outgoing supplier. The procedure was concluded with the signing of an agreement.

5.11 Management Systems and Certifications

We believe that sustainability is an indispensable value for the Exprivia Group, which is reflected in respecting people, the environment and society as a whole.

Certifications	Object
ISO 9001, ISO 13485 and CE marking (MDD), ISO 14001	The Quality Management Systems are certified in accordance with the ISO 9001 standard to define, maintain and improve the company processes by gradually identifying new objectives consistent with those of the highest levels defined in the Quality Policy. For the design and development of the Exprivia medical systems, ISO 13485 and the medical devices directive have been adopted. ISO 14001 certifications enable identification and minimisation of the environmental impacts of production activities.
ISO/IEC 20000-1, ISO/IEC 27001, ISO 22301	They make it possible to adopt the best practices in the sector and ensure ever greater satisfaction of the needs of stakeholders.
ISO 18295	The standard provides a framework applicable to any Contact Centre – both inbound and outbound – which wishes to satisfy the requirements and expectations of all the stakeholders involved (principal, users, operators of the Contact Centre), while continuously improving performances by using the results of the KPI defined. The certification – which is of a service rather than a management system – was obtained in 2018 and constitutes a distinctive plus (compared with ISO 9001 certification) for customers who wish to commission Contact Centre services.

The company seeks to extend the processes and best practices used in Italy at international level, by appropriately adjusting them to the relevant national context, so that others may gain from the improvement actions identified over years of experience.

The management systems are periodically subject to audit, both internal and external, aimed at periodically checking the state of application of the system and its compliance with the reference norms and with applicable legislation.



6. Environment

GRI indicator 102-29

The Exprivia Group, in the firm belief that the quality of the environment affects the quality of life and economic development, has decided to comply voluntarily with the UNI EN ISO 14001 standard, by defining and implementing an Environmental Management System compliant with the requirements of said standard, which guarantees a systemic approach to the continuous improvement of environmental performance and indirectly to the reduction of applicable risks.

In 2007 Exprivia obtained certification of the EMS for its Molfetta premises in accordance with the ISO 14001 standard, maintaining validity to-date.

In 2019 Exprivia provided ENEA with an Energy Audit of the Molfetta and Rome (Bufalotta) sites pursuant to Italian Legislative Decree 102/2014 "Energy Efficiency", encompassing Energy Efficiency Programmes over the four-year period of audit validity.

In compliance with the provisions as per Italian Legislative Decree no. 81 dated 2008 and any other legislative provision in connection, Exprivia undertakes to protect the workplace safety and health of the individuals, adopting all the measures necessary and opportune for ensuring the absolute compliance of the workplaces with the highest standards regarding safety and hygiene.

6.1 Significance for the Exprivia Group's activities

Exprivia is an ICT service provider company, whose production processes involve human intensive features on which the human production factor prevails rather than the machinery. Their sensitivity with respect to health and safety in the workplace aspects and environmental matters, and in particular the problems posed by climate changes at global level, is however high.



6.2 Management activities and results

With regard to the SGA, the main improvement action of the environmental performances carried out by the Exprivia Group over the last few years were:

- Limiting the consumption and waste and optimum running of the systems in relation to the season.
- Technological innovation by means of the virtualisation of IT equipment in the areas for CED use.
- Monitoring consumption and implementation of performance indicators.
- Adoption of policies to raise consumer awareness.
- Rational use of space with site change activities or use of co-working spaces, aimed at optimising the areas used and the air-conditioned volumes.
- Attention to water, paper and toner consumption.
- Use of flow reducers for wash basin taps in the restrooms.
- Preferential use of trains instead of planes for business trips within the country (lower emissions).
- Increased use of videoconferencing and virtual meeting tools to reduce travel by company staff.

6.3 Environment, surveys and trend in consumption

GRI indicator 302-1

The data provided relate to the Exprivia Group and to the full year 2021. It should be noted that until 2020, the indicator values also included the data of the company Italtel, whereas from 2021 they were no longer taken into account.

The values of the indicators for 2021, as well as the percentage changes in the 2021 data compared to those of the previous two years⁶, are consequently affected by the lack of data on Italtel.

The continuation throughout 2021 of the generalised smart working adopted in March 2020 in order to manage the COVID-19 emergency confirmed the savings in consumption associated with carrying out work activities on company premises. Moreover, the value of the FTE has been reconfigured to take account of the reduced presence – in both the Italian and foreign offices – of company personnel present in the office on average, using the following data for the reconfiguration criteria:

- Average daily attendance data provided by the contact persons of the Italian sites covered;
- Estimates of the average daily presences for the other Italian offices, obtained through extrapolation from the offices referred to in the previous point;

The following table shows the breakdown of energy consumption expressed in GJ⁶ (gigajoules) per type of energy carrier used, for the years 2021-2019.

Energy consumption by type in GJ	2021	2020	2019
NON-RENEWABLE ENERGY CONSUMPTION⁷			
Methane	396.09	8,807	8,662
Fuels/Diesel	6.54	468	3,903
LPG	226.33	1,878	3,390
Electricity	7,544	88,344	108,454
Total non-renewable energy consumption	8,173	99,497	124,409

Electricity was the primary energy carrier for 2021, with a share of 92%, corresponding to 7,544 GJ, followed by fuels - Methane (396.09 GJ), LPG (226.33 GJ) and lastly Motor Fuels/Diesel (6.54 GJ).

It should be noted that on the basis of the GSE (Energy Services Manager) recognition, pursuant to the Decree of the Ministry of Economic Development of 31 July 2009 on the composition of the initial national energy mix of electricity fed into the grid for 2020, it is estimated that the share of energy from renewable sources is 45.04% for the consumption of Exprivia's Italian offices.

⁶ The data for the years 2019 and 2020 are those published in the 2020 NFD, in order to ensure consistency and comparability of this NFD with those of previous years:

⁷ The following aspects are highlighted:

For Exprivia's Rome office in Via del Tintoretto, it was not possible to obtain the electricity and methane consumption from the condominium administration for the air conditioning system, therefore the electricity and methane consumption in 2020 were considered.



6.3.1 Greenhouse gas emissions

The following tables show the t CO₂eq referring to direct and indirect emissions by type of vector used (GRI indicators 305-1 and 305-2).

The following sources were used for the emission factors: Terna International comparisons 2020, European Residual Mixes 'AIB' updated 31.05.2021, DEFRA 2021 - fuel properties sheet, DEFRA 2021- fuels sheet.

Scope 1 (Direct GHG emissions - GRI indicator 305-1)

The indicator measures the direct emissions of the organisation (e.g. fuels, chemical processes, process emissions, oxidations, fuel for heating), including those related to energy carriers used other than electricity.

The values for 2021 direct emissions are shown in the following table, together with deviations compared with the values from previous years.

DIRECT EMISSIONS (SCOPE 1)	2021	2020	2019
TOTAL CO ₂ eq EMITTED			
(tonnes)	37.4	3,498.0	3,207.1
% change	-98.9%	9%	106.06%
Cumulative % change	-98.8%	125%	106.06%
CO ₂ eq METHANE (tonnes)	22.4	506.8	484.7
CO ₂ eq LPG (tonnes)	14.5	30.7	222.6
CO ₂ eq FUEL (tonnes)	0.5	124.1	257.7
CO ₂ eq from F-GAS	0.0	2,836.4	2,242.1

Exprivia's Spanish office does not consume methane, LPG and fuels.

The percentage changes are due to a reduction of companies in the scope of the measurements (see § 6.3). The percentage change on the total between 2021 and 2020 - considering only Exprivia's emissions - is equal to -86.4%, and is due to the elimination of emissions from F-GAS in 2021.

Scope 2 (Indirect GHG emissions - GRI indicator 305-2)

The indicator measures the indirect emissions from energy consumption (e.g. heat, electricity, steam purchased from third parties).

The following table shows the value of indirect emissions measured for 2021 and the changes compared with the values from the previous years.

INDIRECT EMISSIONS (SCOPE 2)	2021 MARKET BASED	2021 LOCATION BASED	2020	2019
CO ₂ eq ELECTRICITY (tonnes)	961	1,083	4,569	5,704
% change ⁸	/	-76.3%	-19.9%	-10.6%
Cumulative % change	/	-81.0%	-28.4%	-10.6%

⁸ For consistency with the emission calculation methods used in previous reporting periods, the percentage change and cumulative percentage change from the Scope 2 Location Based emission value are shown.

Scope 3 (Other indirect GHG emissions - GRI indicator 305-3)

The indicator measures the other indirect emissions which do not fall within scope 2 (e.g. emissions from the supply chain, business trips, home-work journey of employees).

Only business trips were taken into account.

The following table shows the values measured for 2021, broken down by means of transport used, and a comparison with previous years.

INDIRECT EMISSIONS (SCOPE 3)	2021	2020	2019
TOTAL CO ₂ eq EMITTED			
(tonnes)	69.9	467	1,983
% change	-85.1%	-76%	-20%
Cumulative % change	-96.5%	-81%	-20%
Flights	41.7	222.5	969
Rails	0.1	72.1	303
Hotels	28.1	50.8	243
Cars	0.0	122.0	467

ExpriVia pursues the reduction of journeys encouraging care of its employees the use of remote means of communication and work. This is despite the fact that specific business needs require staff to make business trips both in Italy and abroad; in 2021 there were no business trips abroad.

The greatest portion of CO₂ emitted in relation to business trips is due to flights and represents 60% of the total.

The intensity of the GHG emissions in relation to company staff (**GRI indicator 305-4**) comes to 0.441 t CO₂/FTE in 2021, compared with the 0.590 t CO₂/FTE in 2020, a variation of -25.3%.



6.4 Sewage and Waste

The only sewage produced is that from the waste water sewers from the bathrooms.

The estimated quantity of litres of waste water sent to the sewers (GRI indicator 306-1) came to 1,847.48 cubic metres in 2021. This figure is based on an average consumption of drinking water - per employee - for the toilets of a production site.

In 2020, the quantity of litres of waste water released into the sewers totalled 14,589.65 cubic metres. There was thus a change of -87.3% compared with the 2020 figure and -95.8% compared with 2019.

These types of waste were handed to authorised disposal suppliers.

In 2021, there were also disposals related to the disuse of the Castelletto site in Settimo Milanese and the Via del Tintoretto site in Rome, which resulted in packaging waste, bulky items, office furniture and paper.

Waste is disposed of by specialised companies and the amounts shown in the sheets are then noted on the Environmental Declaration Forms.

Waste produced by foreign offices was not taken into account, since it is not very significant compared to the total produced.

RIFIUTI (ton)	2019	2020	2021
CER 150106 Imballaggi mat. misti	60,8	49,7	6,5
CER 150101 Imballaggi carta e cartone	3,9	6,3	2,9
CER 160216 apparecchiature dismesse	0,0	0,0	1,7
CER 170405 Ferro e acciaio	3,6	16,1	4,9
CER 160214 RAEE non pericolosi	5,6	50,1	3,4
CER 200101 Carta e cartone	2,6	2,2	8,3
CER 200306 Rifiuti pulizia della fognatura		0,0	0,0
CER 200307 Ingombranti	2,5	0,0	10,9
CER 160213* RAEE contenenti componenti peric.	0,6	0,0	3,5
CER 080318 Toner e cartucce esausti		0,2	0,1
CER 190814 Fanghi prodotti da impianto di depur.	2,0	1,6	0,0
CER 200136 Apparecchiature elettriche ed elettroniche fuori uso		0,1	
CER 180103* Rifiuti sanitari a rischio infettivo		0,0	
CER 170202 Vetro			0,2
CER 200121* Neon			0,1
CER 200139 Plastica			0,3
Totale RIFIUTI (ton)	81,6	126,4	42,8
di cui pericolosi	0,6	0,0	3,6
di cui non pericolosi	81,0	126,4	39,3
Variazione%	n.a.	54,92%	-66,12%
Var.% cumulata	n.a.	54,92%	-47,51%
di cui a smaltimento	69,5	123,9	0,0
di cui a recupero	12,1	2,5	42,8



7. Fight against corruption

The Group undertakes to prevent any discrimination related to age, gender, health conditions, race, political opinions and religious beliefs in the company's processes (such as personnel selection, supplier selection, personnel management). Ensuring the utmost loyalty in every relationship, whether internal or outside the company, keeping our word, and delivering on promises and agreements, even in the absence of written proof, are key values for the Group. The Exprivia Group bases the performance of its activities on principles of transparency and clarity of information. The group believes in fair competition as an essential tool for protecting consumers. To this end, it undertakes to operate with the utmost fairness and ensure full respect of its competitors, and not to engage in any conduct that could lead to taking advantage of any dominant positions.

7.1 Loyalty, trust and conflicts of interest

In 2019, in order to ensure better protection of the identities of the persons involved, in line with the requirements of the General Data Protection Regulation (GDPR), the Group launched a suitable IT platform released for the management of reports, which can be accessed from Exprivia SpA website, able to guarantee the maximum levels of confidentiality and privacy for reporting irregularities at work (whistleblowing). Reports sent through this system are received, analysed, verified and processed by the Internal Auditor, the Supervisory Body, the Head of the Legal Department and the Head of Exprivia's Human Resources Department. The reporter may choose to send to all or only some of these functions.

In 2021, as in 2020, there were no reports of violation of the Code of Ethics at Exprivia, nor were any offences reported. No conflict of interest was found in 2021, just like in 2020.

7.2 Fair competition and respect for legality

In 2021, as in the two previous years, no Group company received any complaints concerning non-compliance with laws and regulations on social or economic matters, nor were any sanctions imposed against them due to infringements of regulations on product safety, industrial and intellectual property, misleading advertising, regarding information on products in communications and, in general, in marketing activities, nor for anti-competition conduct. The only exception is the complaint Exprivia received from a software vendor regarding the improper use of software that was not duly licensed. However, this was limited to one user - a new company employee - and for a short duration. The claim was quickly resolved without financial or reputational damage to the company, through a promptly defined settlement.

In 2021, as in the previous two years, there were no complaints from customers or other stakeholders on privacy issues, there was however a request for the exercise of rights by a data subject against Exprivia, which was correctly handled according to the provisions and timeframes established by the regulations. In particular, the person concerned was a candidate in the recruitment process who exercised his right to withdraw. The request was granted, having verified that there were no cases of inapplicability under Article 17, paragraph 3 of the GDPR.





In 2021, an information security incident classifiable as a data breach was recorded for a customer (Data Controller) of Exprivia, which acts as Data Processor. As the incident caused the loss of healthcare data, the Data Controller's DPO, with the support of Exprivia's technicians and DPO, carried out the data breach notification to the Data Protection Supervisory Authority, as established in Article 33 of the GDPR, within the timeframe and terms set out in the current legislation. The notification to data subjects was not carried out, as required by Article 34 of the GDPR, as the risks to the rights and freedoms of the data subjects were assessed as not high. There were instead no information security incidents that could be classified as data breaches in 2020.

In 2021, as in the two previous years, no Group company received any complaints for non-compliance with laws and regulations on the protection of personal data, nor were any sanctions imposed against them for infringements of such rules. In 2021, as in the three previous years, no non-compliance with environmental laws or regulations was recorded. No sanction was issued for the violation of regulations, misleading advertising or anti-competitive behaviour in 2021, as in 2020.

7.3 Training on business ethics

GRI indicator 205-2

In order to achieve ever-greater dissemination and promote knowledge and awareness of the Code of Ethics and the 231 Model adopted by Exprivia, an e-learning training course on HCM Talentia was designed, which started in 2021 and will continue throughout 2022.

In 2021, as in the two previous years, training activities were carried out in Exprivia in the field of Business Ethics, involving about 42% of the company population belonging to Exprivia SpA and Exprivia Projects on the subject of;

- Protection of health and safety at work (pursuant to Italian Legislative Decree 81/08)
- Privacy per the introduction of the GDPR (General Data Protection Regulation)
- Code of Ethics and 231 Organisational Model.

7.4 Internal controls

GRI indicator 205-3

Events which have given rise to disciplinary measures for corruption vis-à-vis the workers.

In 2021, as in 2020, there were no events which gave rise to disciplinary measures, nor were there any reports of episodes of corruption (not even potential) caused by the conduct of workers, except for what was indicated above in section 7.2.



7.5 Relations with the Public Administration

GRI indicator 201-4

Exprivia maintains close relationships with the Public Administration. This is demonstrated by the significant allocations the company receives to support internal research and development activities, in the form of grants and subsidised loans.

In 2021, Exprivia SpA received (i) grants totalling Euro 2,276,908 (compared with Euro 3 million received in 2020) and (ii) low-interest loan of Euro 110,182 (compared with the Euro 709,000 received in 2020).

Exprivia Group: 91 Entries in the Supplier Registers of Public Bodies in 2021.

In 2021, 39% of Exprivia's turnover regarded contracts performed directly or in the interest of Public Bodies; the figure is consistent with the 40% recorded in 2020.

In 2021, Spegea scarl, as in the previous two years, is included in certain Suppliers Registers of Public Bodies (regional accreditation, Fondimpresa accreditation, Mepa, Empulia) and has relations with the Public Administration. In 2021, 55% of billing concerned training provided with public funds (including the European Social Fund), compared with 42% of billing in 2020. Moreover, in 2021, the training provided directly to the PA totalled 0.22%, compared with 1% in 2020.





8. Relationships with local areas

GRI indicators 102-12; 102-29

The main challenges that a multinational group like Exprivia has to face certainly include creating relationships in the countries and territories where it has important offices in terms of size and history, interacting with a heterogeneous and constantly evolving ecosystem, aware of its role as a protagonist in the communities of which it is part.

Relations with communities are based on principles of transparency, inclusiveness and respect for human rights, included in Exprivia's Code of Ethics. Constantly analysing the needs and priorities of the societies in which the Group operates allows Exprivia to address new challenges and define an increasingly competitive business model, through new strategies and process innovation. The Group builds an extensive network of relationships with local bodies and organisations, both nationally and internationally, as well as locally, using instruments such as sponsorships, membership fees and charitable donations.

Attention towards the communities and local areas takes the form of dialogue and partnerships with all stakeholders and with national and local organisations. As an Italian joint-stock company involved in the design and development of innovative software technologies and the provision of IT services for the banking, medical, industrial, telecommunications and public administration markets, Exprivia is led by a top management involved in representation activities in entities and organisations of public interest.

8.1 Management activities and results

The network of participation

Attention towards the communities and local areas takes the form of dialogue and partnerships with all stakeholders and with national and local organisations. Many Group senior managers are involved in representation activities in bodies and organisations of public interest.

The Exprivia Group is part of the Italian industrial confederation system, and specifically it is involved in the governance and guidelines bodies of Confindustria Nazionale, Assinform and Confindustria Bari-BAT and the Governing Council of the National 'Cavalieri del Lavoro' Group and the Mezzogiorno Group, with the aim (besides the statutory one of belonging to a union of businesses) of furthering projects and initiatives which have positive impacts, also in terms of sustainability throughout the area of influence.

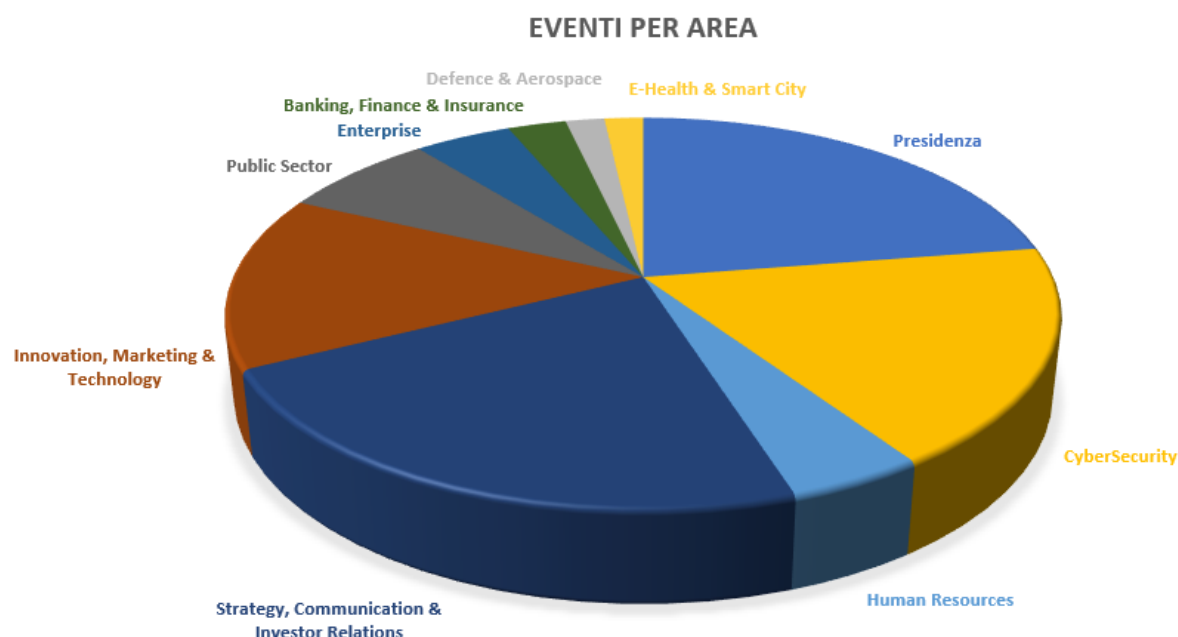
The Group is part of networks of companies and universities, stable consortia and temporary groupings of various interests for the territory, generally aimed at carrying out research and development activities, facilitating young entrepreneurs and business innovation. Among the most qualifying collaborations: Consorzio Milano Ricerche, MIP Milan Polytechnic Institute - Gradual School of Business, Software Engineering Research & Practices Srl and numerous consortia initiatives.

Project or convention-related activities, structured by area of interest and by business sector.

The Exprivia Group is constantly committed to supporting corporate and business initiatives of national and international standing. During 2021, the Group supported several digital initiatives, broken down by area of interest and business sector, in line with the previous year due to the pandemic. This involved organising webinars using platforms such as Cisco Webex. In the period September-December 2021, there was a shift to hybrid events (half digital and half in-person) due to a decrease in infections as a result of vaccine distribution. Unfortunately, the situation came to a halt towards the end of December due to the emergence of the Omicron variant of COVID, which led to an acceleration in the number of infections, albeit with much less serious manifestations than in the first wave in 2020.

Events by proposing division	2021	2020
Staff	71	49
Markets	40	38
Total	111	87

The table shows that the Staff area promoted numerous events; similar to 2020, the year 2021 was also characterised by the persistence of the pandemic, and the staff and in particular the Communication Area strongly supported the various business areas with the organisation of webinars carried out 'in house'.



Events by proponent	2021	2020	2019
Staff	71	49	107
Markets	40	38	68
Total	111	87	175

The chart shows a preference in 2021 for corporate brand initiatives aimed at conveying the brand to reinforce its visibility and prestige. The number of business initiatives for communicating the latest innovative solutions, skills and services to the market with the aim of increasing business in the reference sector and promoting ongoing partnerships was slightly lower.

The Exprivia Group reconfirmed its support for cultural initiatives during the year, reiterating the importance of culture as a fundamental asset for humanity, even for a technology company. Only through direct involvement is it possible to achieve better social, environmental and economic conditions, and Exprivia's identity lies precisely in the protection and enhancement of culture. The study of art, history and philosophy, their relationship linking the past with the present, is an authentic element of social innovation, in a context in which, increasingly often, the language of culture permeates the company management processes, providing substance to the vision of the future.

Culture and knowledge further innovation and vice versa, therefore it is the Exprivia Group's conviction that each company has the duty to imagine and plan the future and, when possible, anticipate it. Also through the development of cultural initiatives.

The Group supports various cultural events of local and national importance. Due to the pandemic, some initiatives have been converted to a digital or hybrid format. Exprivia remains the sponsor of initiatives aimed at developing the culture of agents and employees as well as the citizens in the areas in which it operates.

The following list shows the most significant cultural initiatives that the Group supported during 2021:

- Il Libro Possibile Festival^{9*}, 07-10 July 2021, Polignano a Mare (BA);
- Conversazioni dal Mare, the open-air cultural topical event - 08-10 July 2021, Molfetta (BA);
- White Night of Poetry 2021 - 4-5 September 2021 - Molfetta and Giovinazzo (BA);
- Trani Dialogues, 16-19 September 2021 (20th edition) - Bari and surroundings;
- History Lessons, 10 October - 29 December 2021, Bari;
- Donation to the Libera Association against mafia.

During 2021, Exprivia also expressed its commitment to a sensitive and topical issue, namely the Gender Gap phenomenon. Exprivia joined an initiative spearheaded by TIM Brasil to broaden women's participation in the labour market, which has materialised with six months of real results.

The project started with 10 companies joining, currently with 47, which together have released more than 700 vacancies and made 200 free courses available on the Positive Women app. In addition, more than 140 women professionals from these companies now participate in mentoring to accelerate their career development.

The year ended with eight women hired by the application - three at TIM Brasil and five at Youtility. It is estimated that in the new year, course offerings and employability actions will be expanded to have a more inclusive labour market for women.

⁹ To celebrate the cultural event, on 9 July 2021 Exprivia hosted Italian geologist, science populariser, essayist, author and TV presenter Mario Tozzi for the presentation of his book 'Uno scomodo equilibrio' at its headquarters in Molfetta.

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GRI link table
 GRI indicator 102-55

General Standard Disclosure	Disclosure	Description of the indicator	Pages	
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	GRI 102-4	Location of operations	15	
	GRI 102-5	Ownership and legal form	5	
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Anti-corruption				

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	GRI 401-3	Parental leave	39
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Occupational Health and Safety	GRI 403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	31
Training and Education	GRI 404-1	Average hours of training per year per employee	39
	GRI 404-2	Programs for upgrading employee skills and transition assistance programs	39

	GRI 404-3	Percentage of employees receiving regular performance and career development reviews	43
Diversity and Equal Opportunity	GRI 405-1	Diversity of governance bodies and employees	30
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Marketing and Labeling	GRI 417-1	Requirements for product and service information and labeling	50



Report by the Independent Auditors

GRI indicator 102-56



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