ELMEC IMPACT

Sustainability Report

2024

ELMEC
IMPACT

Indice

Illustrations by Fabiana Deidda
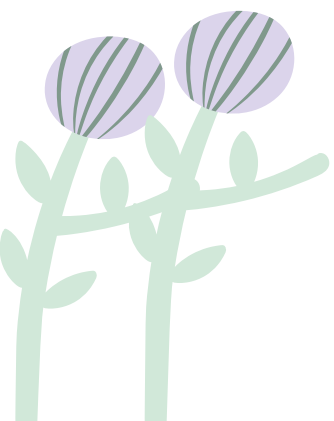
Letter from the president to stakeholders

"

Our manifesto is an expression of the principles that guide us every day. The "Good morning!" that echoes through our corridors is more than just a greeting; it is a symbol of a positive and welcoming work environment, where personal responsibility and trust are at the heart of everything we do. These reflections accompany us in the completion of every project, reminding us of the importance of integrity and trust in what we do.

Continuous training is our investment in the future, a commitment that allows us to explore the potential of each individual and promote excellence. Our company size, while large enough to tackle complex challenges, allows us to remain flexible and attentive to detail, maintaining a professional and reliable approach.

This balance between growth and attention to the individual is also reflected in our commitment to a stimulating and enjoyable working environment. We firmly believe in the well-being of our employees and are committed to supporting it through various initiatives, ranging from personal well-being to sports, psychological support services, and work-life balance initiatives.
Sustainability is a value that we integrate into our daily activities, seeking to reduce our environmental impact and promote responsible practices. Our goal is to contribute positively to the community and the environment around us, in line with the principles of our manifesto.

Rinaldo Ballerio – President of Elmec informatica spa
Alessandro Ballerio – Chief Executive Officer

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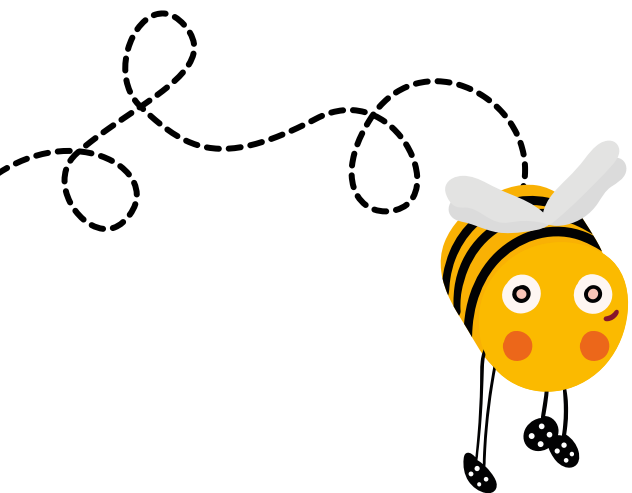
The future of companies lies in innovation

We are a 100% Italian company and have been working in IT for over 50 years. We do this thanks to 737 people, including 590 specialized technicians who work every day at our Technology Campus in Brunello (VA).
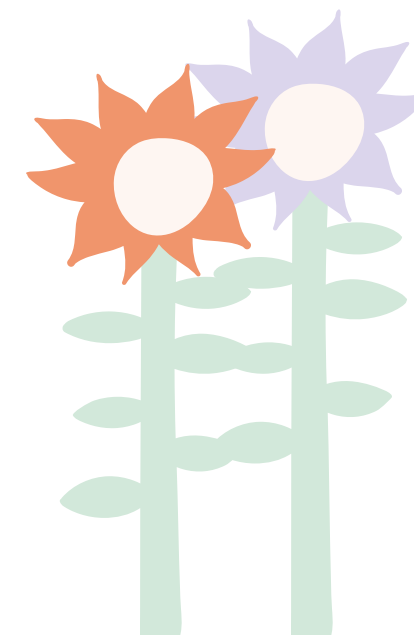
DATA IN BRIEF

Elmec in numbers

180.29 MILION
Total turnover

+8,31%
compared to 2023

66,36%
Recurring services
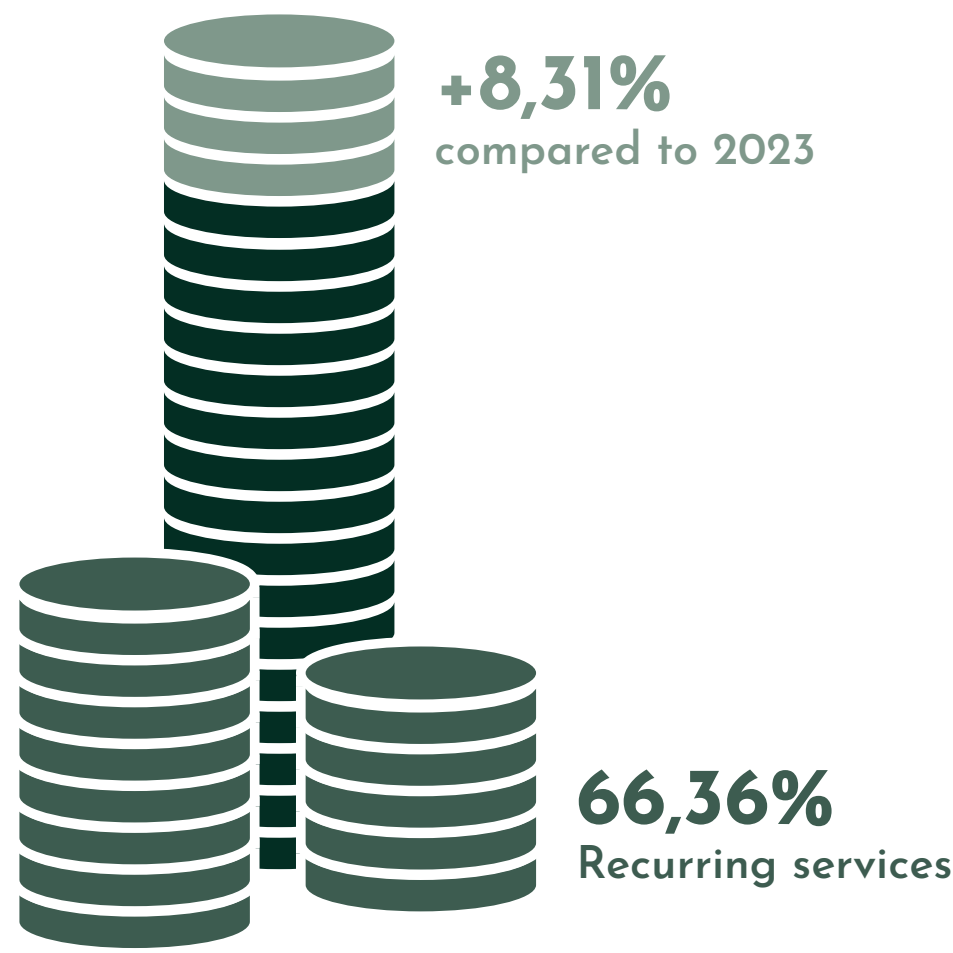
737
Employees

80%
Specialized technicians

1. IDENTITY AND PROFILE

1.1 The history of Elmec

'70 ANNI

In 1971, Clemente Ballerio and Cesare Corti founded Elmec in Varese, a mechanical processing company, which was our first venture into the market.

'80 ANNI

In the 1980s, Elmec began selling its first PCs thanks to a partnership with IBM. In 1983, a group of five young developers from Elmec founded Elmec Informatica S.r.l. and created PcCall, the first device capable of transferring files between computers and providing remote technical assistance.

'90 ANNI

The 1990s left an indelible mark on Elmec's history, characterized by a strong push towards the IT sector. In 1992, the first commercial office was opened in Gazzada.

'00 ANNI

We opened a technical office in Brunello and enhanced our outsourcing services with a new Data Center and 24/7 management of IT systems and applications. We also acquired several companies, including a stake in NGI SpA, which was subsequently renamed EOLO SPA.

'10 ANNI

We built the new Green Data Center BR4, one of the most important infrastructures in Italy, certified Tier IV for Design and Facility by the Uptime Institute. We also opened a new office in Brunello: Elmec 3D, which deals with additive manufacturing. In the meantime, we obtained Ecovadis and ISO14001 certifications, formalizing our environmental management system.

'20 ANNI

In the 2020s, Elmec inaugurated its new BR6 headquarters – BuyTec's home for reconditioned products, powered the Data Center with 100% renewable energy, inaugurated the new delivery HUB, and offset the emissions from its services for the first time.

1.2 Elmec's structure and size

From punch cards that were physically brought to warehouses to a data center capable of offering physical and cloud storage solutions for several petabytes of information. We have been accompanying companies in their digital evolution for over 50 years.

Elmec employs 737 people (as of December 31, 2024), 80% of whom are specialized technicians. The company's total turnover is €177.78 million (as of December 31, 2024), 67.30% of which comes from recurring services. The company's ecosystem includes numerous innova-

tive businesses that interact synergistically for the technological development of companies. Not only information technology, but also cyber security, renewable energy, circular economy, connectivity, ERP, and the Internet of Things.

CYBERGON

elmec solar

BuyOTec

nts INFORMATICA

everynet

Our company's certifications

EUROCERTIFICATIONS ISO 9001

EUROCERTIFICATIONS ISO 14001

garanzia italia

EUROCERTIFICATIONS ISO/IEC 27001

ISO/IEC 27017

ISO/IEC 27018

MQSCERT ISO 20000-1:2018

MQSCERT ISO 22301:2019

HP SUSTAINABLE IMPACT AMPLIFY CHANGEMAKER

SILVER | Top 15% ecovadis Sustainability Rating MAY 2025

1.2.1 The Elmec Informatica campus

Elmec has several offices in Italy. In Lombardy, logistics and shipping are located at the B1 site in Brunello, at Via Campo di Maggio, 41. Also in Brunello, Elmec Informatica's headquarters are located at the B2 site at Via Pret, 1, the Competence Center at the B4 site at Via Campo di Maggio, 45, and the Innovation Center at the B5 site at Via Campo di Maggio, 39. The new B6 site, where the business unit dedicated to the reconditioning of technological devices is located, is in Buguggiate, in Via del Luguzzone, 2. In Veneto, the commercial and technical headquarters are located in Padua, in Via Nona Strada, 23.

SUISSE

B3

B6

B1

B4

B5

GA

EVERYWHERE

B2

MEETING BAR
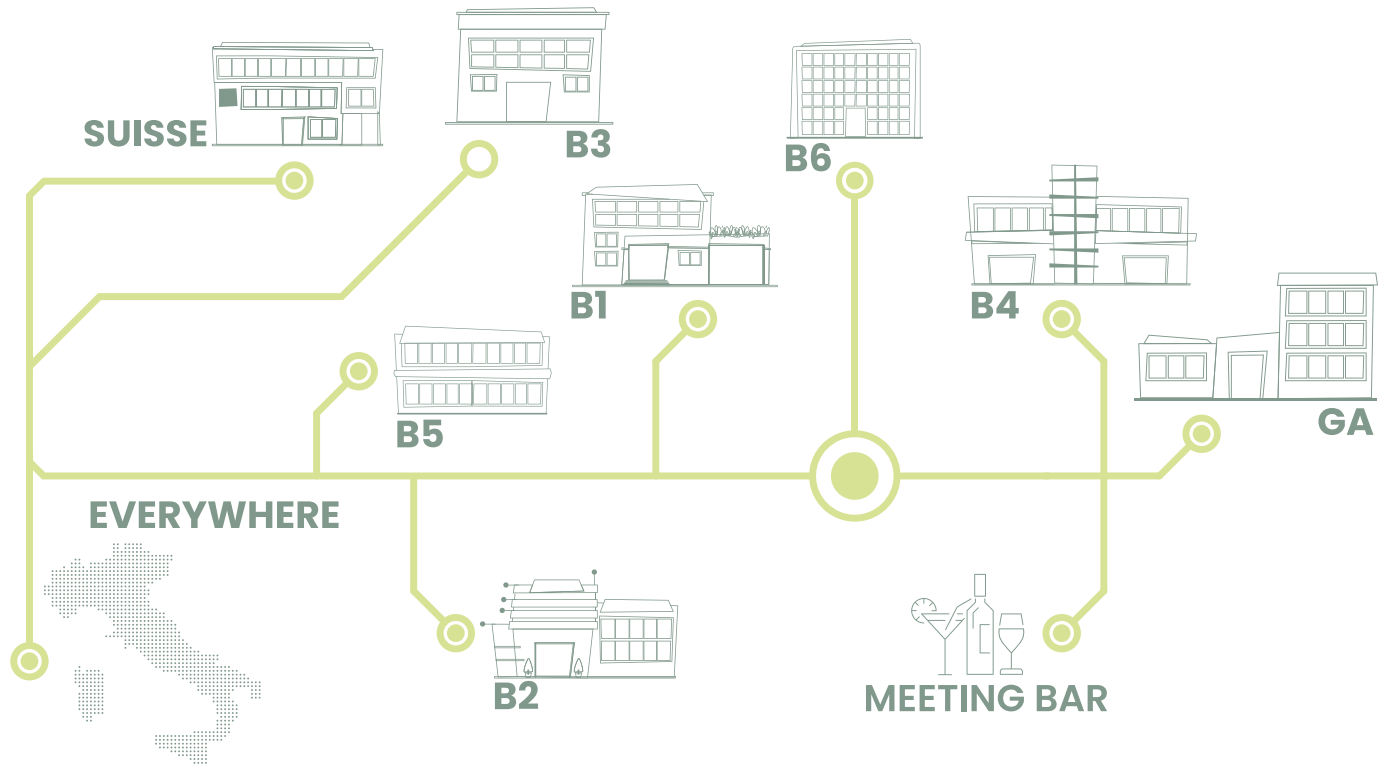
B1 – Workplace Hub
Tech Hub (DaaS)
Warehouse and
Logistics, Gym

B2 – Headquarter
Elmec4You
Company restaurant

B3 – Refurbished technology shop
Edificio in fase di ristrutturazione

B4 –Your data home
Data center (TIER IV)
Infrastructure Services
Competence Centers
Managed Services

B5 – Innovation Center
R&D
CybergON
Workplace
Elmec Solar
Everynet

B6 – The home of refurbished products
Buytec

GA – Gazzada Data Center

1.3 Vision, mission, and code of ethics

VISION

We imagine a future in which IT technology is simple, accessible, and sustainable, capable of promoting business progress responsibly. We want to be the innovators who transform digital challenges into opportunities for growth, providing our expertise and the best technological solutions, always with an eye toward protecting the environment and the well-being of the community.

MISSION

Our mission is to be a reliable partner for customers, suppliers, and employees, guaranteeing certified quality standards and clear procedures at every stage of the digital journey. Our IT services stand out for the high level of expertise of our employees and our concrete commitment to innovative, secure, and sustainable solutions.

CODICE ETICO

Elmec has drawn up a Code of Ethics to define its ethical commitments in its business activities and prevent unlawful conduct. The Code establishes ethical principles and responsibilities for directors, employees, collaborators, and agents regarding business conduct, personnel policies, accounting transparency, health, safety, and the environment, confidentiality, ethical standards toward third parties, and implementation of the Code.

The code of ethics can be consulted at the following link or via QR code. *www.elmec.com/documents/codice-etico.pdf*
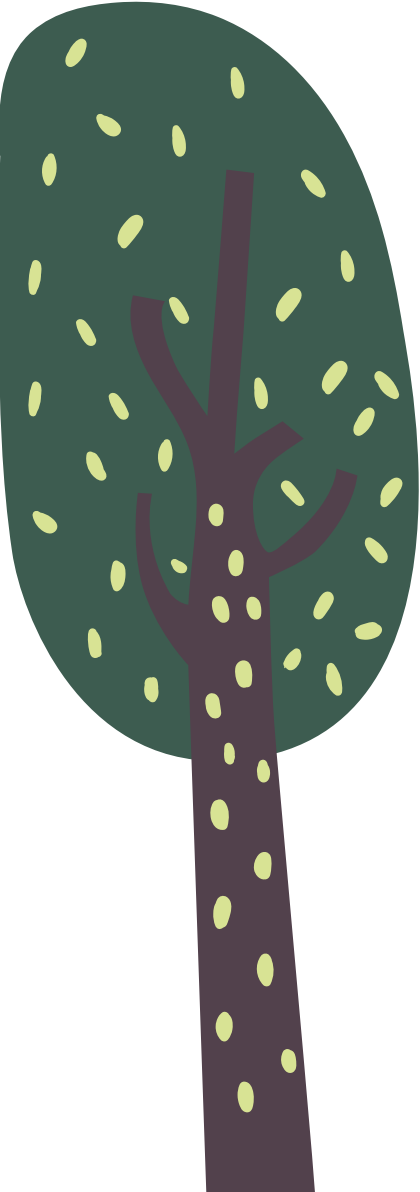
1.4 Business model

Elmec Informatica SpA is an Italian company that provides IT solutions and services to various companies and organizations. Elmec Informatica's business model is mainly based on the following pillars.

IT SECURITY

Over 50 specialized technicians protect companies from cyber-attacks every day, around the clock. Our service is fully integrated with Elmec's services: in the event of an incident, a single team will take care of securing and restoring the systems

SOFTWARE LICENSING

We have a team of specialists dedicated to managing the software license lifecycle. Our "software advisory" approach allows us to quickly identify the solution best suited to our customers' ecosystem in order to optimize costs and actual needs.

USER PRODUCTIVITY

Through our technicians, software tools, and services, we help our customers' users be more productive. We provide 24/7 support, advanced technologies, and security wherever they work: at your premises, working remotely, or on the road. In addition, with MyElmec software, we allow you to control the devices, security, and governance of the service provided.

INFRASTRUCTURE AND DATA

Elmec Informatica manages infrastructure and data with a Cloud Best approach, ensuring infrastructure management wherever it is: at the customer's premises, in our Data Center, or in the Cloud. We use automated processes and an integrated supply chain, supported by more than 300 specialized technicians who work tirelessly to keep your infrastructure up to date and secure.
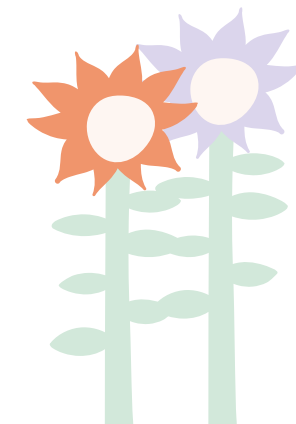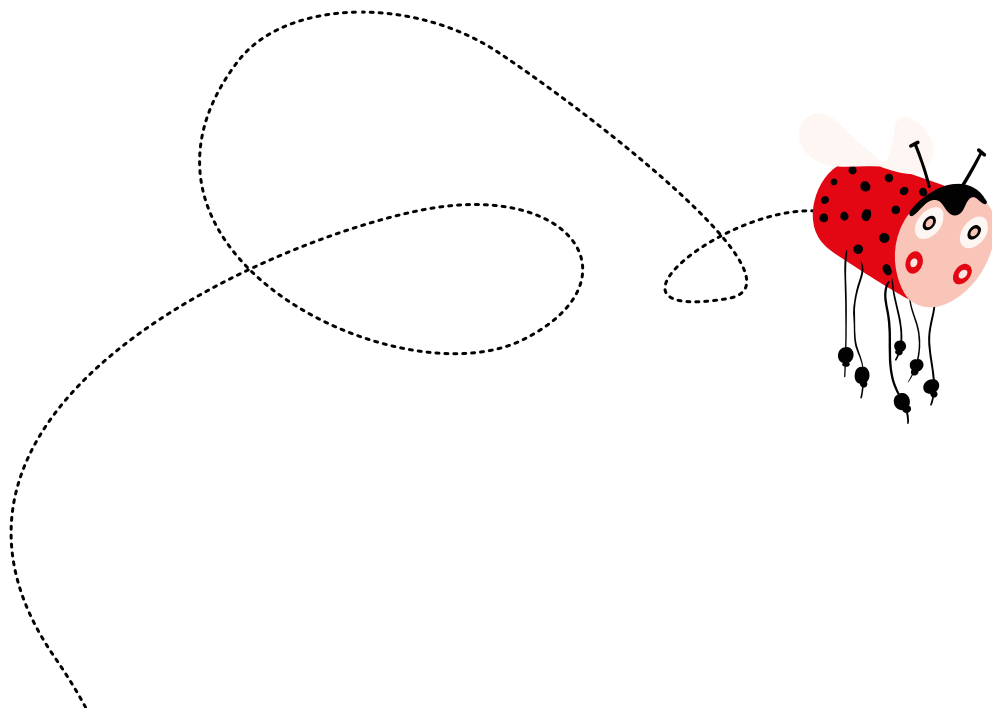
1.4 Business model

Elmec Informatica, based in Brunello (Varese, Italy), is an Italian IT services and solutions company that has been supporting companies on their path to digitalization for over 50 years. Today, the company has three main core businesses:

IT SECURITY

A business unit dedicated to cyber security services with pervasive expertise in both Hybrid Cloud and Digital Workplace offerings.

IT INFRASTRUCTURE

A holistic approach to designing and managing your digital ecosystem with the best expertise in cloud, systems, platforms, security, and networks.

USER PRODUCTIVITY

Predictive systems for workstation governance with a dedicated R&D technical team to ensure security, stability, performance, and satisfaction for all users.

CLOUD

Multi Cloud Management
Hybrid Cloud
Infrastructure as a code
Resource Metering
Orchestration
FinOps

INFRASTRUCTURE

Data center
Data Integrity (Backup)
Disaster Recovery
System & Storage Management
Hyperconvergence
Edge Computing & Operational Technology
Networking

INNOVATION (AUTOMATION)

Container architecture
Software integration
Microservices application
Continuous integration
& continuous deployment
Infrastructure & Service monitoring
Configuration management
Application Modernization

WORKPLACE

Device as a Service Solution
Modern Windows Management
Modern MacOS Management
Mobile Device Management
Digital Transformation Process
End user Management & Support

SECURITY OPERATION CENTER

Incident response
Threat hunting
Penetration testing
Continuous Vulnerability Assessment
Security Information and Event Management (SIEM)
Active Directory Audit
Open-source Intelligence (OSINT)
Awareness & E-learning

PLATFORM

Virtual Desktop Infrastructure
Data Base Technology
SAP Technology
M365
Identity Management
Malware analysis & Security Patching

1.5 Directly generated, distributed, and retained economic value

The economic value generated and distributed (or "added value") represents the wealth produced by Elmec Informatica during the financial year.

It is used to measure, in summary, in accordance with GRI 201, Elmec's ability to create value for its stakeholders.
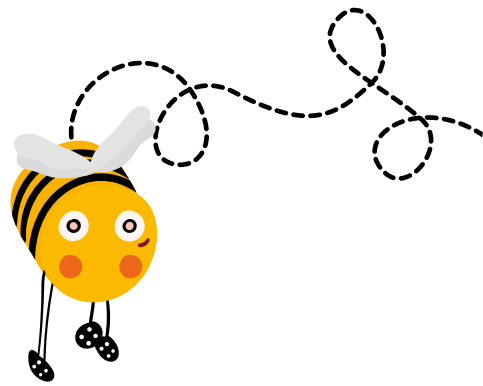
|	2024	2023	2022
ECONOMIC VALUE GENERATED	180.286	166.461	156.939
Distribution of Economic Value Generated:	€'000	€'000	€'000
OPERATING COSTS	79.888	81.870	85.320
PERSONNEL – Value distributed to employees	40.853	36.835	33.429
FINANCERS – Value distributed to capital providers	316	672	214
INVESTORS (*) – Value distributed to shareholders	3.500	–	10.000
INVESTMENTS IN THE COMMUNITY (**) – Value distributed to the community	275	607	428
GOVERNMENTS AND PUBLIC ADMINISTRATION – Value distributed to the PA	8.958	7.049	5.734
TOTAL VALUE DISTRIBUTED	133.790	127.033	135.125
ECONOMIC VALUE RETAINED	46.496	39.428	21.814

2. GOVERNANCE AND SUSTAINABILITY STRATEGY

2.1 Governance structure

The corporate governance structure adopted by Elmec Informatica is based on the traditional organizational model:

• Shareholders' Meeting (responsible for deciding on matters provided for by law and the Articles of Association);
• Board of Directors (responsible for managing the Company);
• Board of Statutory Auditors (responsible for supervision).
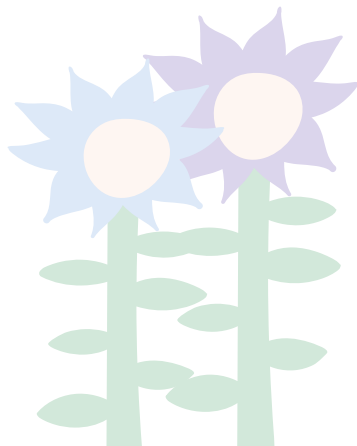
2.1.1 Board of Directors

The Board of Directors (''BoD'') is vested with the broadest powers for ordinary and extraordinary administration, with the authority to perform all acts deemed appropriate for the achievement of the corporate purpose, with the exception of those reserved by law to the Shareholders' Meeting. The Board is responsible for the ordinary and extraordinary administration of the Group, including the definition of organizational, control, and strategic guidelines. The Board of Directors is composed of three directors, two of whom are shareholders. The executive members of the Board of Directors are Alessandro Ballerio, Rinaldo Ballerio, and Andrea Bottelli. The Board of Directors is in office from May 29, 2023, until the approval of the financial statements for December 31, 2024.[AM1]

The Chief Executive Officer, Rinaldo Ballerio, has been specially appointed as employer in accordance with Law 81–08. All Directors meet the eligibility and integrity requirements set forth by law and other applicable provisions, and the Board of Statutory Auditors monitors compliance in this regard. The skills of the individual directors and those of the Board of Directors as a whole have been deemed adequate, demonstrating appropriate knowledge and experience in accounting, finance, and risk management, including non-financial risks and those related to sustainability. The remuneration and any benefits of the directors are determined by the Shareholders' Meeting; to date, no variable bonuses are recognized.

Within the organization, there are centers of responsibility for specific areas, such as the Data Protection Officer, the CSR Manager, the RSPP (Prevention and Protection Service Manager), the Chief Information Security Officer, the IT Security Committee, etc. Each manager assesses the impacts and risks of their specific area of interest and keeps the directors up to date through reports or periodic meetings. Information about labor disputes, rather than communications with trade unions, is brought to the attention of the directors through regular meetings with the Human Resources Department.

The reporting of critical issues raised by the company's stakeholders is managed through the individual company departments, which periodically report this information to the directors.

BOARD OF DIRECTORS	ROLE	AGW
Rinaldo Ballerio	Chairman and Chief Executive Officer	Over 50
Alessandro Ballerio	Chief Executive Officer	Over 50
Andrea Bottelli	Director	Over 50

2.1.2 Board of Statutory Auditors

The Board of Statutory Auditors consists of three standing auditors and two alternate auditors, appointed by the shareholders. The auditors remain in office for three financial years, may be re-elected, and their term of office expires at the end of the Shareholders' Meeting called to approve the financial statements for the third financial year of their term of office. The Board of Statutory Auditors monitors compliance with the law, the Articles of Association, the principles of proper administration, and the independence of the Independent Auditors.

BOARD OF STATUTORY AUDITORS	RUOLO
Dr. Mentasti Fabio	Chairman of the Board of Statutory Auditors
Dr. Jemoli Luigi	Effective auditor
Dr. Marsegaglia Silvana	Effective auditor

2.2 Identification and monitoring of risks

Elmec Informatica carries out periodic analyses of the most significant risks affecting the organization and its activities. In some areas, specific risk analyses are carried out:

- Cybersecurity and privacy
- Worker health and safety
- Administrative liability pursuant to Italian Legislative Decree 231/2001

In the field of occupational safety, our company has always promoted responsible behavior, implementing the necessary preventive measures to protect the health, safety, and security of all personnel.

Risk analysis in the field of occupational health and safety is not limited to the mere prevention and protection of workers, but also extends to all those present at our premises, whether they are visitors, customers, or suppliers.

In particular, suppliers are subject to strict qualification protocols in accordance with Article 26 of Italian Legislative Decree 81/08 and subsequent amendments.
The risk information sheet can be consulted at the following link or via QR code.

www.elmec.com/documents/scheda-informativa-rischi.pdf
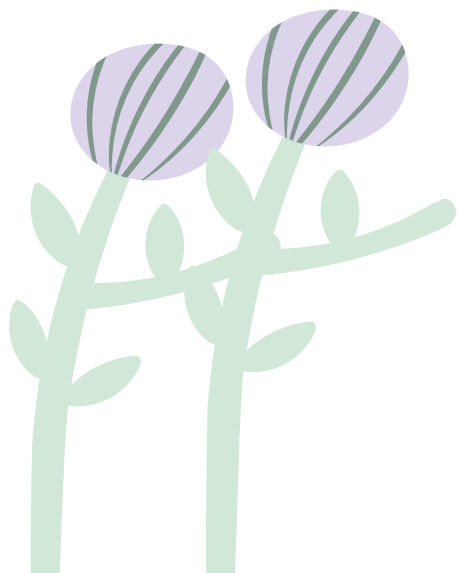
2.2.1 ESG Risk Assessment

To ensure effective monitoring and responsible risk management, Elmec Informatica has adopted an Enterprise Risk Management (ERM) approach integrated with the complexity of its business and ESG (Environmental, Social & Governance) strategies. This system allows ESG risks to be identified, assessed, and mitigated proactively, contributing to the company's long-term sustainability. The company has developed a structured framework for ESG risk management that involves the entire organization through well-defined roles and responsibilities. In this model, the Board of Directors establishes guidelines for identifying, assessing, and monitoring key risks, periodically reviewing their effectiveness, while the Sustainability Committee is responsible for designing and implementing the ESG system, supporting the company in identifying strategies and mitigation actions to reduce environmental, social, and governance impacts. Fi-

nally, management handles operational risks on a daily basis, taking the necessary corrective actions in line with the framework adopted. The overall objective of the model is to create a common language and a shared culture in ESG risk management, developing a system capable of identifying, analyzing, assessing, and managing exposure to the main risks, highlighting critical issues in order to activate monitoring and mitigation tools, and producing periodic reports for Top Management.

The risk assessment model includes specific analyses and considerations relating to ESG risks, i.e., environmental, social, and governance risks that may have an impact on an organization's activities. The ESG risk assessment model is based on the standard published by the World Business Council for Sustainable Development (WBCSD) and the Committee of Sponsoring Organizations (COSO) "Enterprise Risk Management: Applying enterprise risk

management to ESG-related risks" and includes risk categories consistent with the company's business model, as well as the topics covered by the Corporate Sustainability Reporting Directive (CSRD) approved by the EU on November 28, 2022.

The assessment of each identified risk event is divided into three main phases: the first consists of measuring the "Gross Risk," i.e., the theoretical risk related to the activities and business model, without taking into account the mitigation and prevention measures already implemented; the second phase involves identifying the measures adopted by Elmec Informatica S.p.A. to counter or prevent each risk, allowing the relative "Net Risk" to be defined; finally, detailed risk reports are prepared for each potentially critical event. Based on these analyses, 94 specific risks have been identified, divided into eight areas: Social Opportunities, Climate Change, Corporate Behavior, Corporate Gover-

nance, Environmental Opportunities, Human Capitals and Rights, Natural Resources, and Pollution and Waste. The areas most affected are Human Capitals and Rights, which account for 29% of risks, followed by Corporate Governance with 28%, while 24% of the risks identified relate to environmental issues.
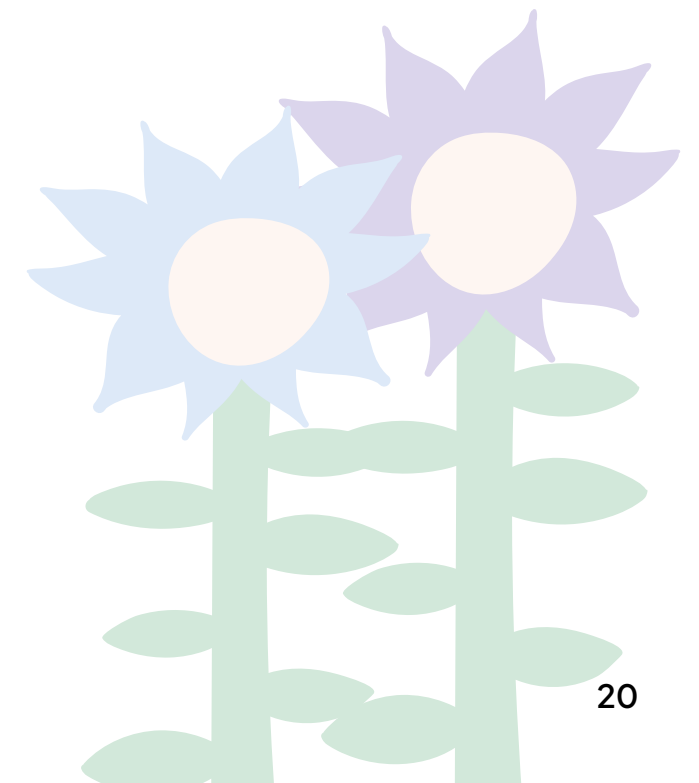
2.3 Model 231 and supervisory body

In accordance with Italian Legislative Decree 231/01, which introduces into Italian law the concept of "administrative liability" for entities for crimes committed in Italy or abroad by directors, employees, or other persons acting in the interest or for the benefit of those entities, Elmec Informatica has adopted an Organization, Management, and Control Model.

This Model establishes organizational controls and protocols of conduct that are implemented through internal procedures, training, and audit/assurance activities. The Model is subject to continuous updates to respond to regulatory changes and to adapt it to the company's organization.

A Supervisory Body, composed of external professionals and an internal member, has been appointed to oversee the correct application of the Model.
To this end, information flows are established between the Supervisory Body and the top management.

The organization, management, and control model can be consulted at the following link or via the QR code below:

https://www.elmec.com/documents/modello-organizzativo-elmec-informatica.pdf
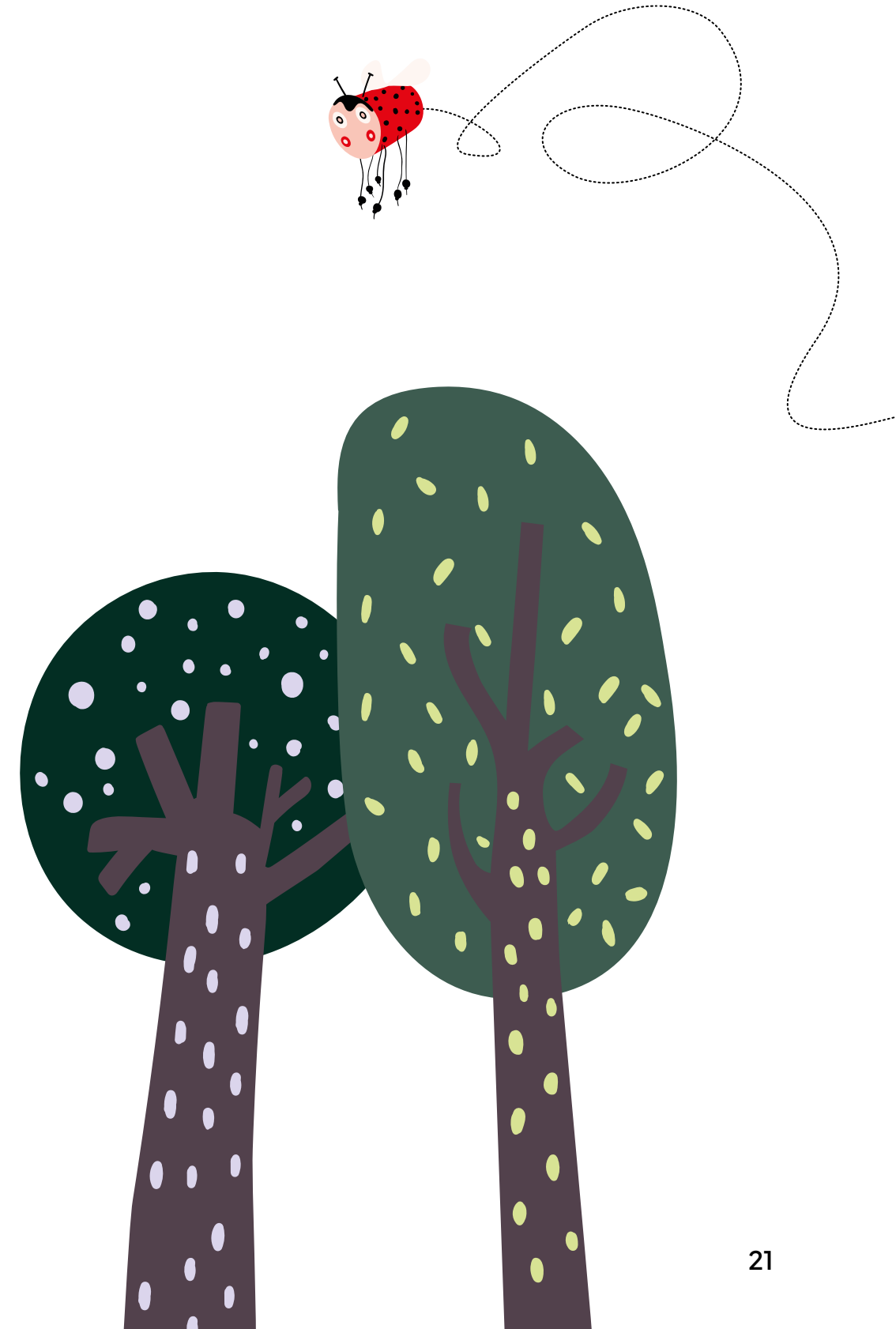
2.4 Ethics and anti-corruption

Elmec considers the fight against corruption to be one of its fundamental principles. It is committed to promoting ethics in its business processes and adopting policies aimed at preventing and combating corruption.

To achieve these objectives, Elmec has adopted a series of measures. Firstly, it has formalized a Code of Ethics that defines the values and principles that must be respected by all its employees and business partners.

The Code of Ethics has been distributed to staff and all Recipients and is regularly updated to take account of regulatory changes and best practices.

In particular, the document has recently been revised to improve the representation of the principles of conduct relating to key sustainability issues, and the following topics have been specifically added:

- Assessment of ethical aspects in procurement activities
- Whistleblower rights
- Internal control and risk management
- Sustainability reporting
- Combating climate change
- Sustainability strategy
- Responsibility towards the community
- Privacy and personal data protection
- Stakeholder communications
- Sustainability governance

Secondly, Elmec has an internal control system in place to ensure that business processes comply with anti-corruption laws and regulations. The internal control system is characterized by the Organization, Management, and Control Model pursuant to Legislative Decree 231/01 implemented by the Company to prevent and mitigate various risks of crime, including the following:

- Corruption in judicial proceedings
- Corruption of persons in charge of public services
- Incitement to corruption
- Corruption between private individuals

This system provides for the implementation of control procedures involving suppliers and business partners, aimed at assessing corruption risks and implementing mitigation measures to reduce such risks. Elmec promotes a culture of integrity among its employees through awareness-raising activities and the organization of training sessions on ethics, transparency, and the fight against corruption. Finally, Elmec is committed to supporting initiatives that promote ethics and the fight against corruption, both nationally and internationally. Here are some examples:

- Adherence to the UN 2030 Agenda for Sustainable Development, a global action plan that commits governments, international organizations, the private sector, and civil society to work together to achieve sustainable development goals by 2030.
- Implementation of corporate codes of ethics and whistleblowing procedures to report any cases of corruption or unethical behavior.
- Adoption of environmental and social sustainability policies that promote corporate responsibility and environmental protection.
- Participation in training and awareness programs for employees to promote an ethical and transparent corporate culture.

In 2022, the Board of Directors of Elmec Informatica prepared and adopted an anti-corruption policy aimed at providing guidance to directors, managers, employees, consultants, intermediaries, and all other collaborators of the Company, in order to ensure compliance with applicable regulations and combat corruption in accordance with our values and principles of conduct.

As part of its system for reporting illegal acts and violations, Elmec Informatica has set up a communication channel for reporting any situations or circumstances that may involve issues related to corruption. In light of the new Legislative Decree 24/2023, the company has updated its whistleblowing model to bring it into line with the new regulatory requirements and has introduced a Whistleblowing Policy aimed at further strengthening the system for protecting and managing reports. Elmec Informatica reports specific indicators to monitor the material issue of "anti-corruption," which have not identified any cases or events of corruption involving Elmec personnel.

Elmec's Code of Ethics sets out specific behaviors to mitigate the risk of conflicts of interest.

The directors monitor any situations of conflict of interest during Board meetings. In addition, transactions with related parties are reported in Elmec Informatica's financial statements.

The company also analyzes any complaints from stakeholders through the whistleblowing channel and plans improvement actions with the involvement of those stakeholders.

2.5 Governance and ESG strategy

2.5.1 Sustainability governance

Elmec Informatica is committed to progressively strengthening its ESG governance to ensure respect for the environment, health protection, and the safeguarding of human rights and local communities. The company recognizes the importance of sustainability as a fundamental element for its own development and that of the communities in which it operates. To ensure sustainable governance, Elmec Informatica has adopted a series of corporate governance tools aimed at implementing sustainability principles. These tools include the ESG policies adopted by Elmec Informatica's Board of Directors in 2022, which provide guidelines for directors, managers, employees, consultants, intermediaries, and all other collaborators of the Company, in order to ensure behavior in line with the Code of Ethics and best practices on sustainability. In addition to

the policies, Elmec has developed an analysis of material ESG issues and a 2023–2025 strategic sustainability plan, formally approved by the Board of Directors, which is the main tool of the Company's highest governing body for planning and monitoring actions and projects aimed at achieving its ESG objectives (see the "Sustainability Plan" section for further information).

Internally, the company promotes a culture of sustainability through the adoption of eco-sustainable policies and practices, the reduction of waste, and the implementation of efficient and environmentally friendly production processes.

The preparation of the Plan involved the direct participation of the executive directors, who defined the strategic guidelines, projects, and timeline in collaboration with the departments and operating areas directly involved in their achievement.

The Board of Directors periodically obtains information on the outcome of the dialogue with stakeholders and uses it to support the approval processes for Group strategies, sustainability policies, and the formalization of Elmec's purpose statements: vision, mission, and values.

Compliance with laws and regulations

COMPLIANCE WITH LAWS AND REGULATIONS	2024	2023	2022
Incidents of non-compliance with laws and/or regulations punished with fines	0	0	0
Incidents of non-compliance with laws and/or regulations punished with non-monetary sanctions	0	0	0

In the last three years (2024, 2023, and 2022), no monetary or non-monetary penalties were imposed as a result of violations of the laws and regulations applicable to the Company.
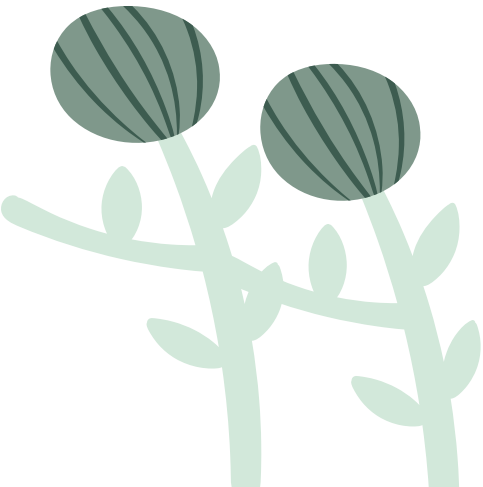
2.5.2. ESG data collection tool

To structure our sustainability governance more effectively and simplify ESG data collection, we have developed an advanced monitoring tool in-house, created by our Information Systems department. Thanks to its ability to provide real-time data, this tool ensures immediate visibility of key ESG KPIs, such as human resources, safety, consumption, waste, training, and many other key indicators.

Accessible via the Business Unit Intelligence portal, it allows users to easily download Excel files complete with information, making the sustainability reporting process more agile and transparent.

In addition to facilitating data collection, the tool is a strategic element for structuring and strengthening sustainability governance, supporting decision-making through timely and reliable information. The availability of constantly updated KPIs not only allows progress to be monitored throughout the year, but also promotes proactive and responsible resource management, contributing significantly to the achievement of corporate sustainability objectives.
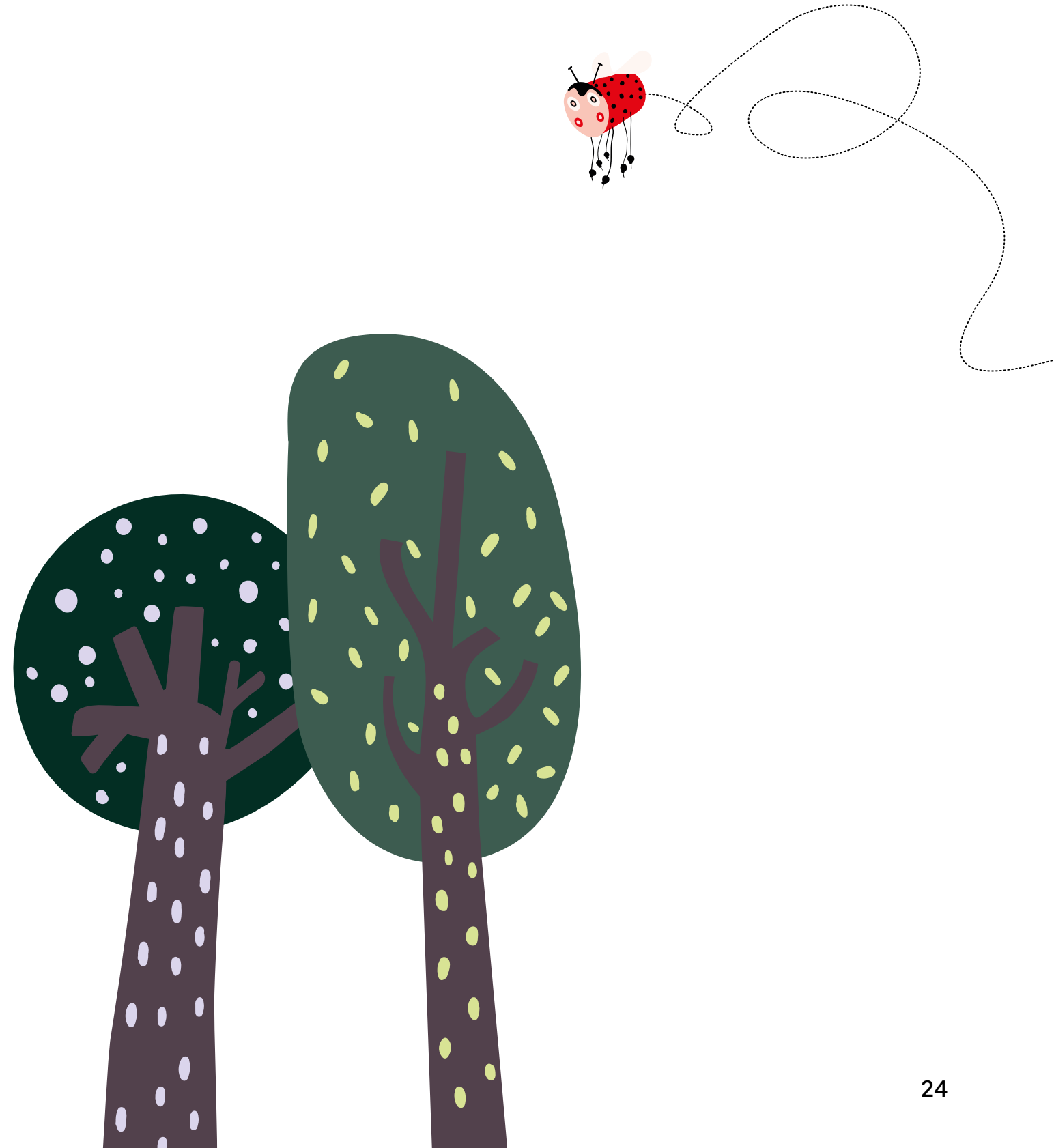
2.5.3 Materiality analysis

As part of a continuous improvement process that involved alignment with the GRI 3 standard, in 2022 Elmec updated its assessment of its material topics, i.e., aspects that represent the economic, environmental, and social impacts that are relevant to the company and its stakeholders.
This update was necessary to respond to the following requirements:

• The GRI Universal Standard 3: Material Topics 2021, which requires companies to report in their sustainability reports on all ESG topics considered relevant because they can significantly influence or be influenced by the conduct of their activities, based on a specific materiality analysis
• The need to develop a materiality matrix. According to this perspective, materiality analysis can no longer be self-referential and therefore consider only the organization's point of view, but must also include that of stakeholders
The process of updating the material topics was managed by the ESG Office and was divided into the following phases:
• Analysis of Elmec's business model and activities
• Benchmarking analysis of material issues in the sector in which Elmec operates
• Preliminary assessment of ESG impacts by company management
• Involvement of internal and external stakeholders (see paragraph 2.8.2)
• Assessment of the relevance of the issues identified
• Approval of the analysis by the Board of Directors

The assessment process involved stakeholders, who were asked to rate ESG issues with an impact on the economy, the environment, and the stakeholders themselves. Top management was involved in assessing the possible impacts on

the company. The company's directors were involved in the process and approved the analysis. In 2024, this assessment was maintained as valid as no changes were identified in terms of activities, organization, and regulations with significant consequences on the ESG impacts identified by Elmec Informatica.
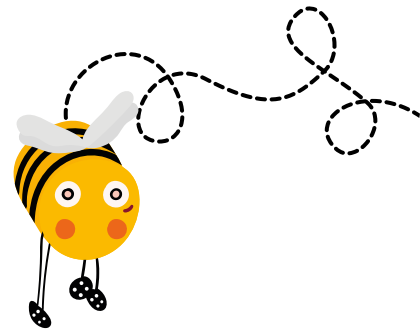
2.5.4 Material topics

Cybersecurity e privacy

Data security and privacy protection are priorities for Elmec, which processes large amounts of customer and employee information, including personal, sensitive, and confidential data, at its data centers and in the provision of other services. Ensuring the proper use of data and information and preventing cyberattacks aimed at stealing company and customer personal data, as well as data breaches.

Sustainable governance

Integrating ESG aspects into the corporate governance system and corporate strategy, in the management of relations with shareholders and all stakeholders, promoting sustainable results and the creation of long-term economic, social, and environmental value. The guidelines for ESG governance include respecting the interests of stakeholders, taking their needs into account, and responding to them.

Talent development

In a market with scarce IT resources, it is important to attract and retain talent through effective policies and partnerships with universities. Offering professional development paths to ensure stimulating prospects and specialist skills for employees, for a competent environment while delivering reliable services and developing cutting-edge technologies.

Diversity and equal opportunities

Respecting and valuing diversity of all kinds (generational, cultural, gender, etc.) is a critical success factor and one of the levers for innovation and competitiveness. It prevents any form of discrimination, ensuring an inclusive, meritocratic, and fair working environment.

Worker health and safety

Management of risks related to the health and safety of personnel in the performance of their duties, whether carried out in the office, in logistics, in IT laboratories, in data centers, or even at customer sites, as well as for activities carried out in smart working mode.

### Working conditions and corporate welfare

Reconciling professional and personal life through a comfortable and stimulating work environment and work-life balance solutions that contribute to improving employee productivity and work experience.
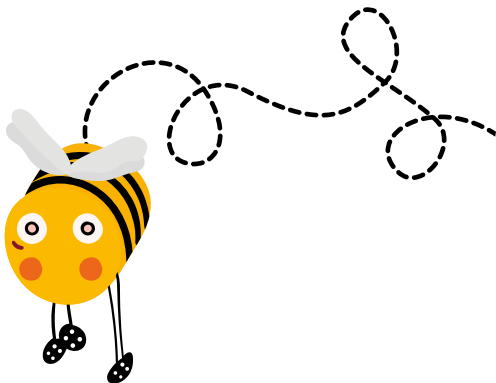
2.5.4 Material topics

Technological development and modernization

IT improves quality of life and social well-being and can respond to the needs of citizens, institutions, and businesses.
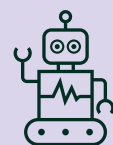
Ethics and the fight against corruption

Constantly fight corruption with ethics and training. Corruption is an obstacle to economic growth and fair competition, and poses risks to reputation.

Responsible supply chain management

Ethical supply chain management, with improved competitiveness through policies and objectives. Compliance with the highest ethical, social, and environmental standards.

Circular economy

The circular economy aims for sustainable growth, moving beyond the linear "production-consumption-disposal" economy with a regenerative approach that reduces waste and the use of virgin raw materials and energy.

Emissions and climate change

Climate impacts, risks, and opportunities related to CO2. Low-carbon solutions, digitalization, energy efficiency, renewable sources, and sustainable mobility to reduce emissions. Measures to address climate change.

Green products and services

Green computing includes low-impact data centers and energy-efficient electronic services that comply with green design, eco-friendly production, and environmentally friendly use and disposal. We are also committed to minimizing the impact of our facilities and our people.
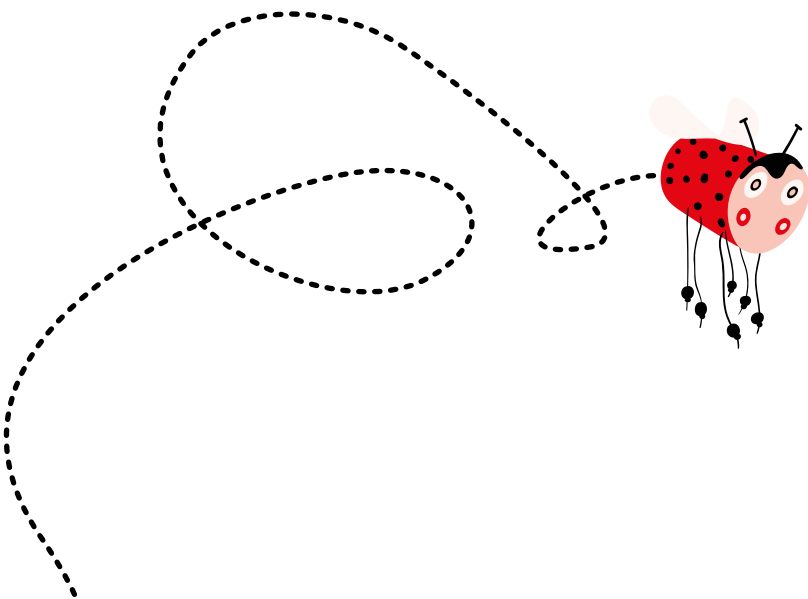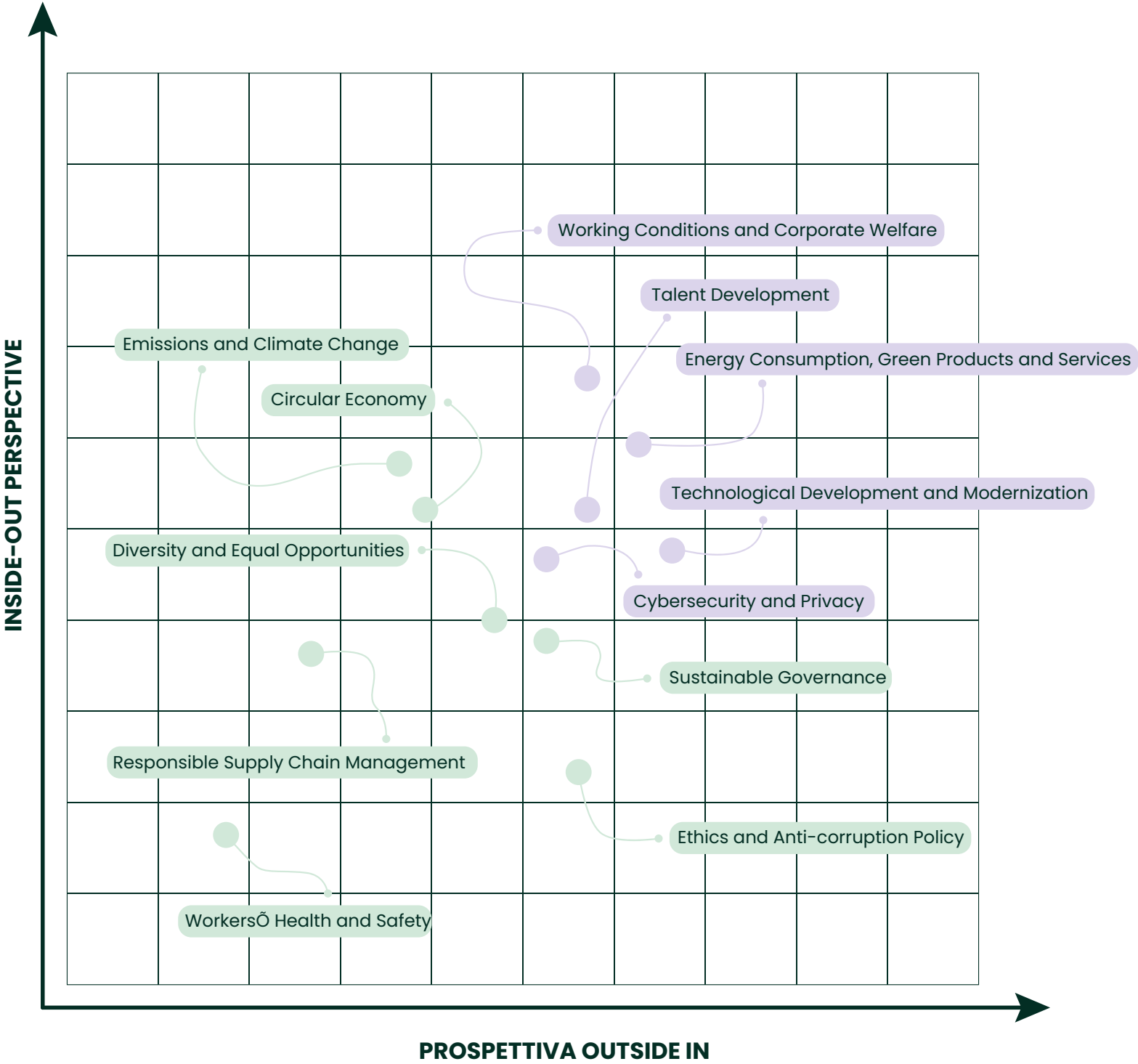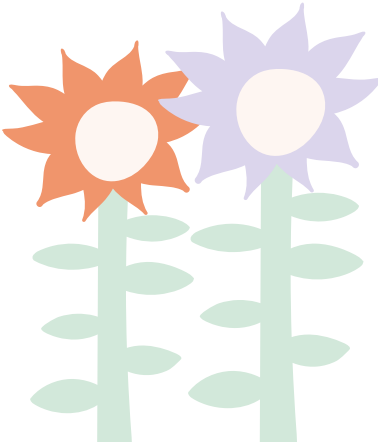
2.5.5 Materiality matrix

The 12 material topics identified and assessed based on the methodology described above are shown below in relation to the two dimensions of the analysis:

• Significance for Elmec (x-axis).
• Significance for the environment and external stakeholders (ordinate axis).

The inside-out analysis was carried out based on the identification and assessment of impacts according to the GRI 3 assessment methodology and an internal rating scale.

INSIDE-OUT PERSPECTIVE

PROSPETTIVA OUTSIDE IN

Working Conditions and Corporate Welfare

Talent Development

Energy Consumption, Green Products and Services

Emissions and Climate Change

Circular Economy

Technological Development and Modernization

Diversity and Equal Opportunities

Cybersecurity and Privacy

Sustainable Governance

Responsible Supply Chain Management

Ethics and Anti-corruption Policy

WorkersÕ Health and Safety

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

As part of Elmec's ongoing commitment to improving sustainability, a Sustainability Plan was drawn up in 2022 with a view to strengthening ESG governance and ensuring maximum transparency towards stakeholders. In order to define this Plan, various elements were considered and integrated, including material issues that take into account stakeholder expectations, the company's strategic objectives, and the 17 Sustainable Development Goals (SDGs) for 2030 promoted by the United Nations, inspired by the "Ten Principles" of the United Nations Global Compact (UNGC).

The Sustainability Plan is monitored annually by the CSR Manager during the preparation of the CSR Report. The process consists of three phases: drafting, management, and control.
The drafting of the 2023–2030 Sustainability Plan ra-

tionalises the sustainability strategy, objectives, implementation methods and timelines.

Elmec's plan was prepared based on the material issues identified by the company, also thanks to stakeholder engagement activities. For each material issue, the objectives to be achieved were identified and one or more actions aimed at pursuing these objectives were subsequently defined.
The preparation of the Plan involved the direct participation of the executive directors, who defined the strategic guidelines, projects, and timeline in collaboration with the departments and operating areas directly involved in their achievement.
The sustainability plan was approved by the Board of Directors on February 28, 2023.

During the implementation and management phase,

responsibility for achieving the individual objectives of the Plan is assigned to the departments and operating areas that have the resources, tools, and skills necessary to achieve them.
On the next page, before presenting the Sustainability Plan in its entirety, the progress made by the company in relation to the sustainable objectives that had been set for 2024 is indicated.
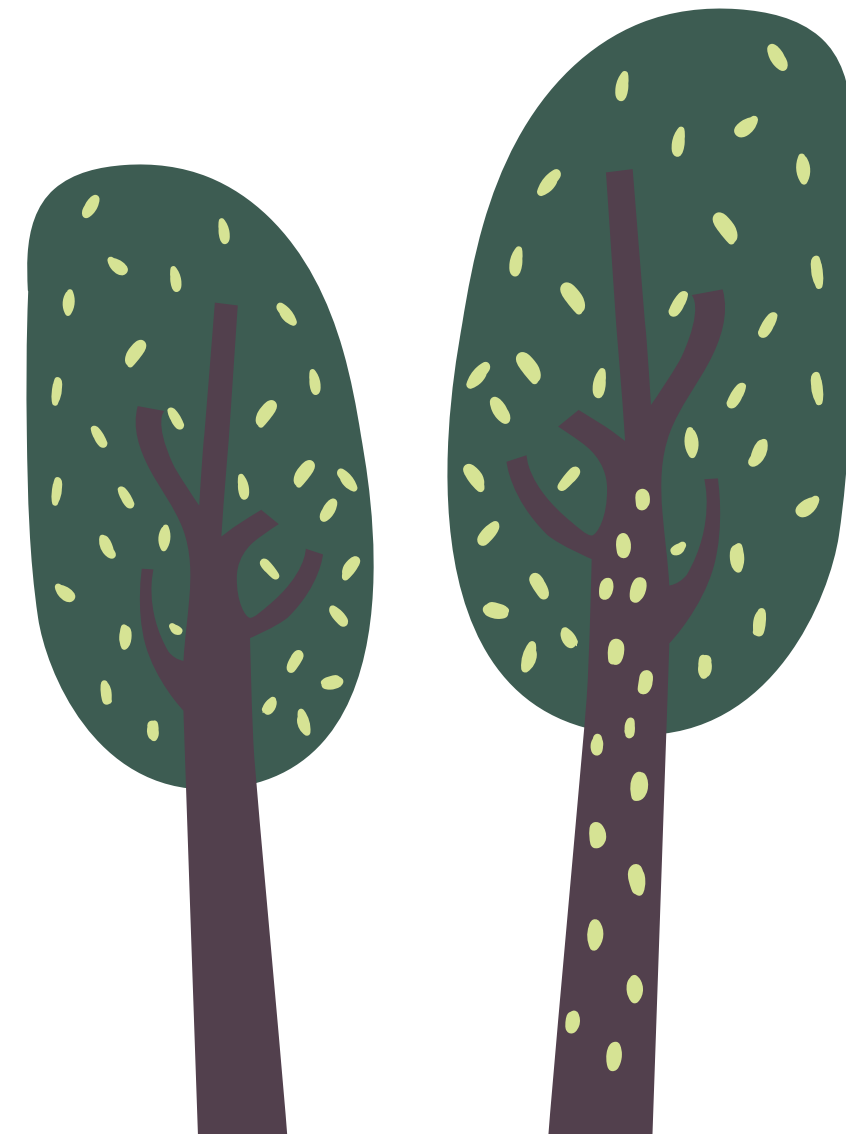
2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Progress towards the targets set for 2024

Elmec has not only carried out most of the actions set out in the Plan for 2024 in various areas, including energy consumption, green products and services, emissions and climate change, working conditions, corporate welfare, worker health and safety, talent development, technological innovation, responsible supply chain management, diversity and equal opportunities, and corporate ethics, but has also embarked on a path to achieve its medium- and long-term goals.

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Circular economy	Enter into agreements with waste disposal companies to coordinate waste generation and ensure a new life for certain EWCs (establish contacts with specialized suppliers for the disposal of plastic for the creation of gadgets, currently 85% recycling rate)	2024	Not achieved – activity to be rescheduled in 2025
Energy consumption, green products and services	Increase the capacity of existing photovoltaic systems in order to pursue energy savings, as well as obtaining benefits in terms of environmental impact through the reduction of polluting emissions and CO_2	2024	Elmec installed a new 400kWp photovoltaic system, which doubled the amount of energy produced internally.
Emissions and climate change	Develop a system for calculating and reporting direct and indirect CO_2 emissions and a specific calculation for DAAS and Data Center services	2024	Elmec Informatica developed an internal calculation system to calculate CO_2 emissions, ensuring accurate reporting of direct and indirect emissions attributable to DaaS services and the Data Center.
Emissions and climate change	Introduce reward and awareness programs for sustainable driving that will gradually lead to a reduction in the fuel consumption of the company fleet	2024	Elmec provided employees with company cars with a sustainable driving course called Road to 21. Thanks to the course, it was possible to reduce the fuel consumption of the company fleet compared to 2023.
Working conditions and welfare	Elmec everywhere project through the hiring of personnel with the possibility of full remote working, with the idea of creating a system for welcoming personnel throughout Italy with an induction process equal to that of a person hired in person at the headquarters	2024	The Elmec Everywhere program has been introduced, offering full remote career opportunities. The onboarding process includes assigning a "buddy" to new hires to facilitate their integration into the workplace and providing them with the Everywhere Kit, which includes a PC, a backpack, and some Emporio products. In addition, the project involves Everywhere colleagues visiting the campus once a month. During this period, they are provided with free board and lodging and are given priority access to campus initiatives.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Talent development	Develop an approach focused on attracting and recruiting personnel using techniques and strategies tailored to different types of candidates, such as recent graduates, high school graduates, experienced workers, and managers, through different proposals and hiring methods based on the profiles of the candidates in question. E.g., Elmec everywhere project	2024	The goal was achieved through the implementation of targeted activities, including events with schools for the recruitment of recent graduates, open days dedicated to recent graduates and new graduates, Capture the Flag events for recruitment for the Everywhere project, initiatives at the universities of Padua and Perugia, and a post-diploma course in cybersecurity.
Diversity and equal opportunities	Identification of a set of indicators for monitoring the gender wage gap for all roles and categories of personnel	2024	The target was achieved in 2023. In 2024, we refined the data collection system with the introduction of an automatic data collection tool.
Diversity and equal opportunities	Improving the set of KPIs for measuring the Company's performance with regard to young people (e.g., number of internships converted into employment contracts, youth turnover rate, percentage of young people participating in internal committees and cross-functional working groups, number of employees under 30, number of promotions under 30)	2024	Not achieved - set of KPIs being implemented in 2025
Diversity and equal opportunities	Integration of company policies with a Diversity & Inclusion policy that addresses gender, generational, and disability issues, and leadership based on trust and respect	2024	Elmec introduced its Diversity and Equal Opportunities Policy in September 2024.
Cybersecurity and privacy	Strengthening of the incident management process by refining the system for detecting and classifying incidents with potential impact on privacy aspects	2024	Not achieved - ongoing activity to be completed in 2025
Sustainable governance	Establishment of a Sustainability Committee that meets periodically to discuss Elmec's sustainability issues, monitor the achievement of the objectives and targets of the Sustainability Plan, and evaluate new ESG initiatives	2024	Elmec established a small Sustainability Committee, composed of key ESG process representatives, supported by a larger committee open to all employees, both of which meet periodically to monitor the progress of the Sustainability Plan, discuss objectives and targets, and evaluate new initiatives.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Sustainable governance	Development of an ESG risk management framework aimed at analyzing ESG risks in accordance with the new CSRD directive	2024	Elmec Informatica carried out an ESG Risk Assessment, which identified 94 specific risks, divided into eight areas: Social Opportunities, Climate Change, Corporate Behavior, Corporate Governance, Environmental Opportunities, Human Capitals and Rights, Natural Resources, and Pollution and Waste.
Sustainable governance	Preparation of a gap analysis between the ESG indicators currently in use at the company and the new EFRAG standards	2024	Elmec achieved this goal through a double materiality analysis, which allowed it to compare the ESG indicators in use with the new EFRAG standards and identify areas where company metrics needed to be adjusted.
Sustainable governance	Introduction of resolutions concerning ESG projects into the agenda of Board of Directors' meetings: approval of policies and procedures, approval of the Sustainability Report, participation of directors in certain meetings of the Sustainability Committee	2024	Elmec has permanently included specific resolutions on ESG projects on the agenda of its Board of Directors' meetings and has appointed the Chief Executive Officer as a member of the Executive Committee, thus ensuring the direct participation of directors in the meetings of the Sustainability Committee.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Circular economy	Improve the system for detecting the quantities of waste produced by type and destination	2023	Elmec Informatica developed an automated data collection system in-house, involving the company's IT department to facilitate the monitoring of corporate waste management.
Energy consumption, green products and services	Renew the ISO14001 Environmental Management System certification	2023	Elmec renewed its ISO 14001 certification.
Emissions and climate change	Provide a €500 bike-to-work bonus to those who cycle to work for at least 50 days in a year	2023	Bonus payment in May 2023 to six employees who achieved the target set by the proj
Emissions and climate change	Introduce reward and awareness programs for sustainable driving that will gradually lead to a reduction in fuel consumption by the company fleet	2023	The action has not yet been carried out as it is under discussion in the plan update
Working conditions and corporate welfare	Propose awareness and prevention campaigns against smoking: discourage tobacco use through the Lombardy Region project, with group sessions and internal training on the issue	2023	Initiative carried out in November 2023 in collaboration with LILT Italia. Thirty-three employee participated in the plenary awareness session. Nine of these then undertook a personalized program with LILT to quit smoking.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Working conditions and corporate welfare	Implement a project to raise awareness of proper nutrition and create a connection between physical activity and calorie consumption in the company restaurant, through a partnership with the supplier "Maghetti" to offer healthy options in the food and beverage vending machines located in the company	2023	The company has implemented several initiatives, including the inclusion of healthy products in vending machines in collaboration with Maghetti and the introduction of a nutritionist in the company as part of a nutrition project in collaboration with Compass. Specifically, information cards have been introduced to indicate the calorie content of each dish in the company restaurant. In addition, new items have been added to the menu to meet different dietary requirements, such as sustainable meals and recommended options for daily calorie intake, taking into account the different needs of men, women, and athletes
Working conditions and corporate welfare	Provide a maternity bonus (€2,500) for mothers on maternity leave	2023	Elmec Informatica paid nine maternity bonuses to its female employees in 2023
Working conditions and corporate welfare	Provide a book bonus (€300.00) for employees with school-age children	2023	Elmec Informatica paid 126 book bonuses to its employees in 2023
Worker health and safety	Carry out preventive activities by offering free check-ups at affiliated centers	2023	Elmec offered a free blood check-up for all employees at the Beccaria center in Varese. Sixty-s colleagues took advantage of this offer by visiting the center.
Worker health and safety	Reduce non-compliance identified by internal audits on worker health and safety by involving the personnel subject to the checks	2023	After the checks, follow-ups were conducted on security employees, who received specific training, all with a view to reducing the non-conformities identified by internal audits.
Worker health and safety	Promote the agreement with EAP Italia, a partner company, for the provision of a dedicated telephone line (medical helpline) for reception, support, information, and counseling	2023	Elmec encouraged the use of the agreement with EAP Italia through targeted communications people managers and the entire workforce
Talent development	Reorganize and map the current skills of staff in order to create training plans, reskilling programs, and review the current performance management system and short-term incentive system	2023	Elmec has moved from a performance-based assessment model to a potential-based assessment model defined by objective parameters. This assessment determines the allocatio of flexible benefit bonuses for employees. The assessment is carried out by department managers

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVE	YEAR SET FOR ACHIEVING THE OBJECTIVE	HOW THE OBJECTIVE WAS ACHIEVED
Diversity and equal opportunities	Integrating company policies with a Diversity & Inclusion policy that addresses gender, generational, and disability issues, and leadership based on trust and respect	2023	Activity planned for 2024
Diversity and equal opportunities	Promoting the development of new tools to facilitate the working life of staff with disabilities (e.g., Braille in meeting rooms, restrooms, facilitating tools in vending machines, facilitating routes within the company)	2023	Elmec Informatica, together with Elmec3D, has printed Braille signs to be applied in all meeting rooms
Technological development and modernization	Promote scientific research by funding scientific research initiatives in the Digital/Cloud field (e.g., observatories, universities, etc.)	2023	Elmec has collaborated with its technology vendors to promote scientific research and has participated as a sponsor in events focused on digitalization, such as the Canalys Forum 2023 and HPE Discover 2023
Cybersecurity and privacy	Consolidate partnerships with ITS, universities, and schools in order to offer training and awareness activities on cybersecurity to attract talented individuals who are trained and interested in the company's projects/initiatives in the future	2023	CybergON, Elmec's cybersecurity business unit, organized a "Capture the Flag" training competition designed to engage students and give them hands-on experience solving real-world cases
Responsible supply chain management	Renew Ecovadis certification	2023	Elmec renewed its certification in the first half of 2023
Responsible supply chain management	Prepare and send questionnaires to strategic suppliers with questions aimed at identifying ESG risks and their level of management of sustainability issues	2023	Elmec sent an ESG questionnaire to the company's technology service providers.
Ethics and anti-corruption	Strengthen anti-corruption aspects in staff training courses on Legislative Decree 231	2023	Elmec organized an internal training course

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	SCADENZE				LINK SDGS		
				2023	2024	2025	2030			
CIRCULAR ECONOMY	Improve people's awareness and behavior regarding waste recycling and reduce unsorted waste	1	Conduct internal training on separate waste collection methods and more responsible behavior aimed at reducing the amount of unsorted waste			🎯		11	12	15
		2	Enter into agreements with waste disposal companies to coordinate waste generation and ensure a new life for certain EWCs (establish contacts with specialized suppliers for the disposal of plastic for the creation of gadgets, currently 85% recycling rate)		🎯			11	12	15
	Improve tools for detecting and measuring waste produced by office activities	3	Improve the system for recording the quantities of waste produced by type and destination	🎯				11	12	15
	Reduce the use of plastic in office activities and packaging	4	Involve suppliers of packaging and single-use plastic products in projects to reduce the volume of plastic materials and/or replace them with renewable materials				🎯	11	12	15
	Maximize the recovery and reuse of hardware	5	Gradually increase the share of hardware recovered through new initiatives with stakeholders such as customers, schools, associations, and partners, considering that the share of hardware depends on the number of devices arriving at Elmec for refurbishment, as well as the minimum requirements for devices to be reconditioned				🎯	11	12	15

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS		
				2023	2024	2025	2030			
ENERGY CONSU- MPTION GREEN PRODUCTS AND SER- VICES	Proteggere l'ambiente e ridurre il consumo di energia e risorse naturali	6	Rinnovare la certificazione del Sistema di gestione ambientale ISO14001	🎯				11	12	15
	Protect the environment and reduce the consumption of energy and natural resources	6	Renew the ISO14001 Environmental Management System certification				🎯	11	12	15
	Contribute to the development of green initiatives	7	Support tree planting initiatives to combat soil erosion, enrich biodiversity, protect soil fertility, create sustainable ecosystems, and absorb CO2, with consequent positive effects on the atmosphere							
	Improve the energy perfor- mance of the data center through internal generation from renewable sources	8	Increase the capacity of existing photovoltaic systems in order to pursue energy savings, as well as obtaining benefits in terms of environmental impact through the reduction of pollutant and CO2 emissions		🎯					7

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS	
				2023	2024	2025	2030		
EMIS-SIONS AND CLIMATE CHANGE	Improve the CO2 emissions detection and reporting system	9	Develop a system for calculating and reporting direct and indirect CO2 emissions and a specific calculation for DAAS and Data Center services		🎯			7 ENERGIA PULITA E ACCESSIBILE	13 LOTTA CONTRO IL CAMBIAMENTO CLIMATICO
		10	A €500 bike-to-work bonus for employees who cycle to work for at least 50 days a year	🎯				7 ENERGIA PULITA E ACCESSIBILE	13 LOTTA CONTRO IL CAMBIAMENTO CLIMATICO
	Reduce CO2 emissions and combat climate change	11	Gradual increase in the use of green company cars (e.g., hybrid/electric vehicles)				🎯	7 ENERGIA PULITA E ACCESSIBILE	13 LOTTA CONTRO IL CAMBIAMENTO CLIMATICO
		12	Introduction of reward and awareness programs for sustainable driving, which will gradually lead to a reduction in the fuel consumption of the company fleet		🎯			7 ENERGIA PULITA E ACCESSIBILE	13 LOTTA CONTRO IL CAMBIAMENTO CLIMATICO

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS
				2023	2024	2025	2030	
WORKING CONDI-TIONS AND WELFARE	Improve staff awareness and attention to healthy lifestyle habits	13	Smoking prevention: discouraging tobacco use through the Lombardy Region project, with group sessions and internal training on the subject	🎯				3 SALUTE E BENESSERE
		14	Project to raise awareness of proper nutrition and create a connection between physical activity and calorie consumption in the company restaurant. Partnership with supplier "Maghetti" to offer healthy options in the company's food and beverage vending machines	🎯				3 SALUTE E BENESSERE
	Assess, manage, and improve health and safety at work through a structured approach and corporate welfare initiatives	15	Maternity bonus of €2,500.00 for mothers on maternity leave	🎯				3 SALUTE E BENESSERE
		16	Book bonus, €300.00 bonus for those with school-age children	🎯				4 ISTRUZIONE DI QUALITÀ
		17	Elmec everywhere project through the hiring of staff with the possibility of full remote working, with the idea of creating a system for welcoming staff throughout Italy with an induction process equal to that of a person hired to work on site		🎯			8 LAVORO DIGNITOSO E CRESCITA ECONOMICA

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS		
				2023	2024	2025	2030			
WORKER HEALTH AND SA-FETY	Prevention and staff health	18	Prevention through free preventive check-ups at affiliated centers	🎯				3 SALUTE E BENESSERE		
		19	Reduction of non-compliance identified by internal audits on worker health and safety through the involvement of personnel subject to checks	🎯				3 SALUTE E BENESSERE		
		20	Agreement with EAP Italia, a partner company, to provide a dedicated helpline for reception, support, information, and counseling	🎯				3 SALUTE E BENESSERE		

2.6 Piano di sostenibilità e Sustainable Development Goals - SDGs

Social

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS
				2023	2024	2025	2030	
TALENT DEVELOP-MENT	Increase the skills and professional certifications of its people to ensure responsiveness to constant and sudden changes in the reference market	21	Reorganization and mapping of current staff skills in order to create training plans, reskilling programs, and review of the current performance management and short-term incentive system	🎯				4 ISTRUZIONE DI QUALITA
	Attracting the best talent on the market	22	Integration into the global evaluation system for top management with ESG objectives on environmental and social issues (integration of Elmec 2024-2026 economic objectives)			🎯		4 ISTRUZIONE DI QUALITA
	Staff development and retention	23	Development of an approach focused on attracting and recruiting personnel using techniques and strategies tailored to different types of candidates, such as recent graduates, high school graduates, experienced workers, and managers, through different proposals and engagement methods based on the profiles of the candidates in question. E.g. Elmec everywhere project		🎯			4 ISTRUZIONE DI QUALITA
		24	Identification of skills and characteristics for each resource through objective and transparent processes for the preparation of ad hoc professional growth paths (e.g., definition of a customized job path for each employee)	🎯				4 ISTRUZIONE DI QUALITA

2.6 Piano di sostenibilità e Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS
				2023	2024	2025	2030	
DIVERSITY AND EQUAL OPPORTU-NITIES	Improving the gender wage gap	25	Identification of a set of indicators for monitoring the gender wage gap for all roles and categories of personnel		🎯			5 PARITÀ DI GENERE, 10 RIDURRE LE DISUGUAGLIANZE
	Strengthening the culture of diversity and inclusion in the company by valuing what makes people different: age, gender, ethnic background, religion, disability, sexual orientation, education, or national origin	26	Improving the set of KPIs for measuring the company's performance with regard to young people (e.g., number of internships converted into employment contracts, youth turnover rate, percentage of young people participating in internal committees and cross-functional working groups, number of employees under 30, number of promotions under 30)		🎯			4 ISTRUZIONE DI QUALITÀ, 5 PARITÀ DI GENERE, 10 RIDURRE LE DISUGUAGLIANZE
		27	Integration of company policies with a Diversity & Inclusion policy that addresses gender, generational, and disability issues Leadership based on trust and respect		🎯			4 ISTRUZIONE DI QUALITÀ, 5 PARITÀ DI GENERE, 10 RIDURRE LE DISUGUAGLIANZE
		28	Development of new tools to facilitate the working life of staff with disabilities (e.g., Braille in meeting rooms, restrooms, assistive devices in vending machines, routes within the company)	🎯				10 RIDURRE LE DISUGUAGLIANZE

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2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS
				2023	2024	2025	2030	
TECHNOLOGICAL DEVELOPMENT AND MODERNISATION	Promote scientific research	29	Promotion of scientific research through the funding of scientific research initiatives in the Digital/Cloud field (e.g., observatories, universities, etc.)	🎯				8 LAVORO DIGNITOSO E CRESCITA ECONOMICA 9 IMPRESE, INNOVAZIONE E INFRASTRUTTURE

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS
				2023	2024	2025	2030	
CYBERSECURITY AND PRIVACY	Improve the privacy risk detection system, starting with help desk activities	30	Strengthening the incident management process by refining the system for detecting and classifying incidents with potential impact on privacy aspects		🎯			16 PACE, GIUSTIZIA E ISTITUZIONI SOLIDE
	Develop digital training services	31	Consolidating partnerships with ITS, universities, and schools to offer training and awareness-raising activities on cybersecurity in order to attract talented individuals who are trained and interested in the company's projects/initiatives in the future	🎯				4 ISTRUZIONE DI QUALITÀ 16 PACE, GIUSTIZIA E ISTITUZIONI SOLIDE

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS		
				2023	2024	2025	2030			
SUSTAINABLE GOVERNANCE	Strengthen management decision-making on sustainability issues	32	Activation of a Sustainability Committee that meets periodically to discuss Elmec's sustainability issues, monitor the achievement of the objectives and targets of the Sustainability Plan, and evaluate new ESG initiatives		🎯			9 IMPRESE, INNOVAZIONE E INFRASTRUTTURE		
	Adopt ESG Risk Management tools	33	Development of an ESG risk management framework aimed at analyzing ESG risks in accordance with the new CSRD directive		🎯			9 IMPRESE, INNOVAZIONE E INFRASTRUTTURE		
	Integrate and improve the current set of ESG indicators with a view to adopting the new ESRS European Sustainability Reporting Standards	34	Preparation of a gap analysis between the ESG indicators currently in use at the company and the new EFRAG standards		🎯			9 IMPRESE, INNOVAZIONE E INFRASTRUTTURE		
	Strengthen the role of the Board of Directors in ESG projects	35	Introduction of resolutions concerning ESG projects into the agenda of Board of Directors' meetings: approval of policies and procedures, approval of the Sustainability Report, participation of directors in certain meetings of the Sustainability Committee		🎯			9 IMPRESE, INNOVAZIONE E INFRASTRUTTURE		

2.6 Piano di sostenibilità e Sustainable Development Goals - SDGs

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS		
				2023	2024	2025	2030			
RESPONSIBLE SUPPLY CHAIN MANAGEMENT	Constant monitoring of suppliers' sustainability performance	36	Renewal of Ecovadis certification	🎯				17 PARTNERSHIP PER GLI OBIETTIVI		
	Identification of ESG risks of strategic suppliers	37	Prepare and send questionnaires to strategic suppliers with questions aimed at identifying ESG risks and their level of management of sustainability issues	🎯				17 PARTNERSHIP PER GLI OBIETTIVI		

MATERIAL THEME	OBJECTIVES	#	ACTIONS TO ACHIEVE THE OBJECTIVES	DEADLINES				LINK SDGS		
				2023	2024	2025	2030			
ETHICS AND ANTI-CORRUPTION	Staff training on Legislative Decree 231 and anti-corruption	38	Strengthen anti-corruption aspects in staff training courses on Legislative Decree 231	🎯				16 PACE, GIUSTIZIA E ISTITUZIONI SOLIDE		

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

In September 2015, the leaders of the 193 UN member countries unanimously signed the 2030 Agenda, a policy document that sets out 17 sustainable development goals (SDGs) to be achieved by 2030. These goals are made up of 169 targets and represent a real call to action to promote sustainability. The SDGs are not only aimed at institutions, but also involve other actors, such as businesses. Elmec believes that the Sustainable Development Goals (SDGs) represent an opportunity and a direction for the future development of the company. In addition, Elmec has identified the links between the priorities defined within the materiality matrix and their impact on some of the SDGs.

CYBERSECURITY AND PRIVACY

DIVERSITY AND EQUAL OPPORTUNITIES

TALENT DEVELOPMENT

WORKERS' HEALTH AND SAFETY

WORKING CONDITIONS AND CORPORATE WELFARE

SUSTAINABLE GOVERNANCE

ENERGY CONSUMPTION, GREEN PRODUCTS AND SERVICES

EMISSIONS AND CLIMATE CHANGE

ETHICS AND ANTI-CORRUPTION POLICY

RESPONSIBLE SUPPLY CHAIN MANAGEMENT

TECHNOLOGICAL DEVELOPMENT AND MODERNIZATION

CIRCULAR ECONOMY

2.7 Social and environmental policies and guidelines

As part of its voluntary program to strengthen ESG governance, which began in 2022, Elmec Informatica has drawn up its own policies on social and environmental issues, in line with the contents of the Code of Ethics. The policies were approved by the Board of Directors on March 17, 2023, and distributed internally to employees. These policies are freely available on the Company's website.

The policies adopted by Elmec are:

- Sustainability Policy
- Stakeholder Engagement Policy
- Human Rights Policy
- Anti-Corruption Policy
- Lobbying Policy
- Environmental Policy
- Diversity and Equal Opportunities Policy
- Whistleblowing Policy

The policies, together with the Code of Ethics, form part of the group's organization, management, and control model, in line with the principles and objectives of the Organization, Management, and Control Model pursuant to Italian Legislative Decree 231/2001. Elmec is committed, starting from its Sustainability Policy, to continuing to operate in compliance with human rights, ensuring that it does not practice any form of discrimination or use forced or child labor. The Group guarantees safe workplaces and maintains positive relationships with stakeholders and local communities. The Stakeholder Engagement Policy establishes the Company's commitment to maintaining fair and transparent relationships with its stakeholders, based on mutual trust. The Human Rights Policy reaffirms our commitment to respecting global human rights, a fundamental and non-negotiable value in our corporate culture and strategy. Our approach to protecting human rights is inspired by international standards such as:

- The United Nations Declaration of Human Rights.
- The United Nations Convention on the Rights of the Child.
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and other relevant conventions.
- The European Convention on Human Rights.

With its Anti-Corruption Policy, Elmec reaffirms its commitment to not tolerate and to combat corrupt practices in any way. The Lobbying Policy sets out the principles of conduct to be adopted in terms of compliance with the law, fairness, transparency, and disclosure. Finally, the Environmental Policy was drawn up in conjunction with the achievement of the ISO 14001 environmental management system and sets out Elmec's commitments to the environment and to mitigating its impact. Upon implementation, the policies are distributed to company personnel by email and made available on the company intranet. All company departments are responsible for their implementation and compliance by employees. Starting in 2023, the policies have been included in the onboarding package to inform new hires.
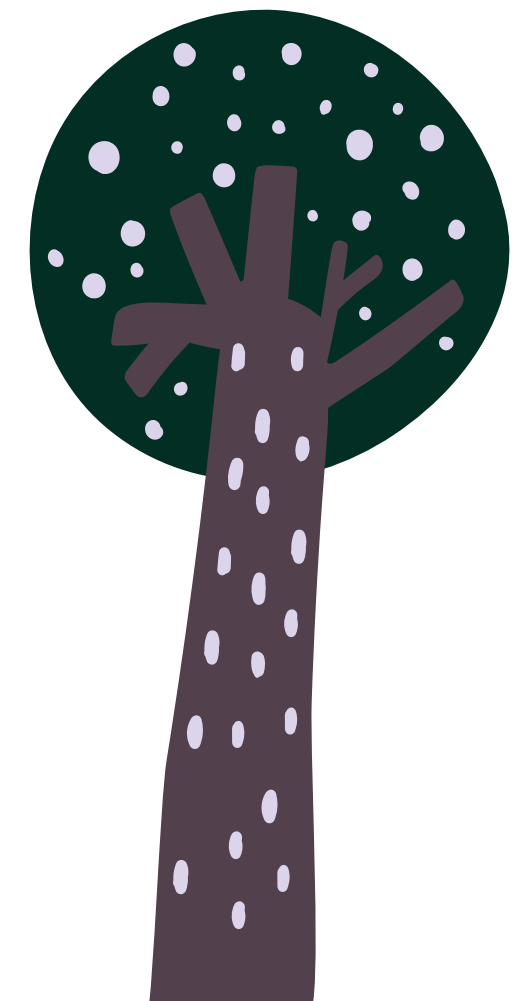
2.8 Our stakeholders

Elmec informatica uses the term "stakeholders" to refer to all those who have interests or expectations of various kinds (social, economic, professional, human) in relation to the Company. Clarity, transparency, and fairness are the principles that guide our relationships with all those inside and outside the company. The identification of stakeholders is an essential starting point for defining sustainability reporting processes and materiality analysis. The "stakeholder map" has been confirmed for the 2024 reporting year. The categories of stakeholders identified are as follows:
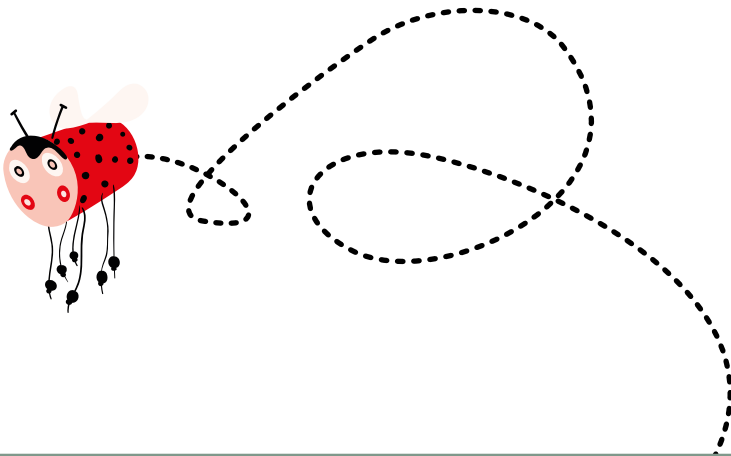
STAKEHOLDER CATEGORY
CUSTOMERS: Elmec is committed to providing domestic and international customers with customized, high-quality IT solutions, ensuring their satisfaction and loyalty.
EMPLOYEES: Elmec is committed to providing its employees with a safe, healthy, and stimulating work environment, offering them opportunities for professional development and growth.
SUPPLIERS: Suppliers of products, technical services, and consultants with whom Elmec collaborates to offer quality services to customers and to better manage its organization
FINANCIAL INSTITUTIONS: Lending institutions and banks that contribute to the growth and development of the company
INSTITUTIONS: Public Administration, Region, Province, and Municipalities
ASSOCIATIONS, COMMUNITIES, AND THE LOCAL AREA: Trade associations, sports clubs, cultural associations, charities, educational institutions (schools and universities), and voluntary organizations
MEDIA AND PUBLIC OPINION: Social networks, TV, local and national newspapers, and publications
INNOVATION COMMUNITY: Technology partners and other operators in the sector
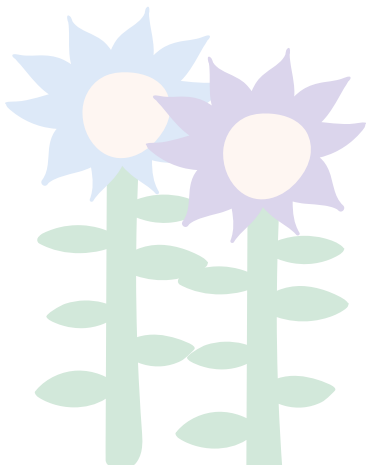
2.8.1 Stakeholder Engagement Initiatives

When developing a social responsibility strategy, it is essential to define the company's reference context in order to take into account all parties, both internal and external to the organization, whose activities influence the company's operations and vice versa. Elmec Informatica, which has always been committed to strengthening the social value of its business activities, is committed to carefully managing its relationships with stakeholders.

Convinced that carefully monitoring the expectations of each of Elmec Informatica's stakeholders can be a valuable tool for increasing trust in the company, identifying new opportunities, and managing risks, Elmec carried out a Stakeholder Engagement activity in 2022. This activity, which consists of the systematic involvement of the company's key stakeholders on relevant issues, was conducted using the "AccountAbility 1000 (AA1000)" standard, which is the most widely recognized globally.

The strategic objectives of Stakeholder Engagement can be summarized as follows:
- Developing and strengthening relevant relationships
- Building relationships based on mutual trust
- Identifying stakeholder expectations on material issues
- Improving corporate decision-making processes
- Improving risk management
- Strengthening competitiveness and reputation
- Monitoring new social needs, market demands, and emerging trends
- Influencing stakeholders to improve their decision-making processes that impact Elmec.
- The main stages of this process can be summarized as follows:
- Stakeholder mapping
- Definition of strategic engagement objectives

- Identification of issues relevant to stakeholders
- Identification of the most effective methods of engagement
- Carrying out stakeholder engagement activities
- Review and feedback

The stakeholder engagement activities involved the parties listed in the table below.
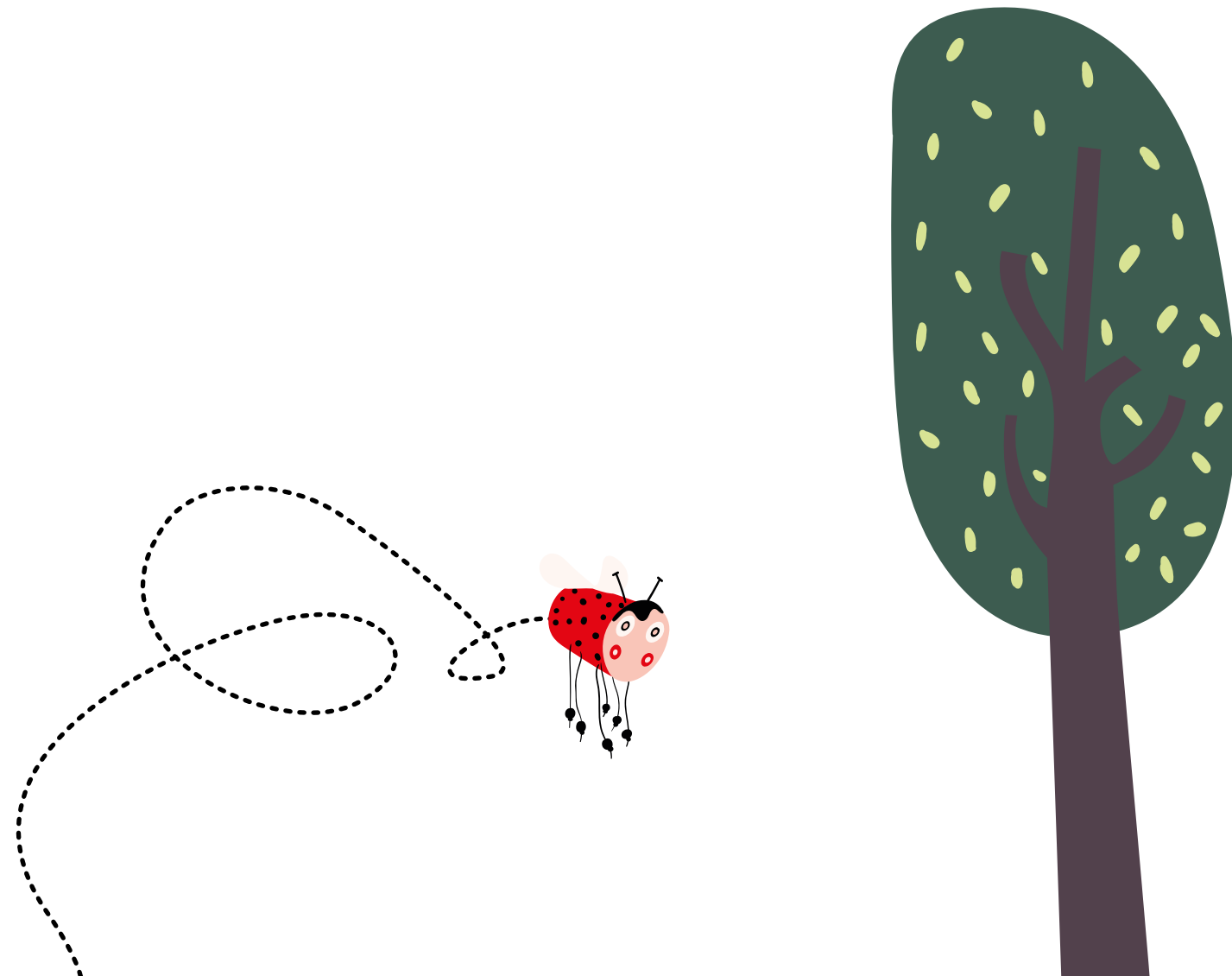
2.8.1 Stakeholder Engagement Initiatives

CATEGORIA STAKEHOLDER	ENGAGEMENT ACTIVITIES	MAIN TOPICS OF COMPARISON
CUSTOMERS	• Round table at Elmec headquarters • Study tours	• Products and services offered and circular economy • Opportunities to undertake shared sustainable projects and initiatives
EMPLOYEES	• Administration of an anonymous questionnaire • Training and engagement on ESG issues • Monthly internal newsletter	• The questionnaire explored all ESG issues and requested an assessment of those considered most significant
SUPLLIERS	• Remote round table • Study tours	• Elmec's commitment to reducing food waste and the circular economy in food and catering • Welfare and talent development
FINANCIAL INSTITUTIONS	• Round table at Elmec headquarters • Study tours • Periodic communication of results	• Personal data protection, personnel-related issues, and energy efficiency • Sustainability governance
INSTITUTIONS	• Round table at Elmec headquarters • Relations with municipal administrations • Study tours	• Elmec's commitment to supporting the digitization of public bodies • Energy consumption, welfare, and talent development
ASSOCIATIONS, COMMUNITIES, AND LOCAL AREA	• Round table at Elmec headquarters • Study tours • Collaborations	• Elmec's commitment to promoting information technology in schools • Energy consumption, green products and services, diversity, and equal opportunities
MEDIA AND PUBLIC OPINION	• One-to-one meetings	• Personnel-related issues, emissions, and climate change

The active involvement of all stakeholders enabled Elmec to identify the relevant issues. The main results are reported below:

- The round table discussion, which was attended by some of the company's most important customers, highlighted the importance of environmental issues, particularly those relating to the circular economy, energy consumption, the provision of green products and services, atmospheric emissions, and their impact on climate change. The participants agreed on the importance of integrating green products/services into Elmec's offering, providing specific guidance in this regard.

- Meetings with financial institutions – namely three of the largest banks contributing to the company's growth and development – highlighted the importance of protecting personal data entrusted to Elmec's data centers, as well as issues related to personnel, who are considered an indispensable resource for the provision of the services Elmec offers its customers. The same parties also agree on the importance of the path towards strengthening sustainability governance undertaken by the company.
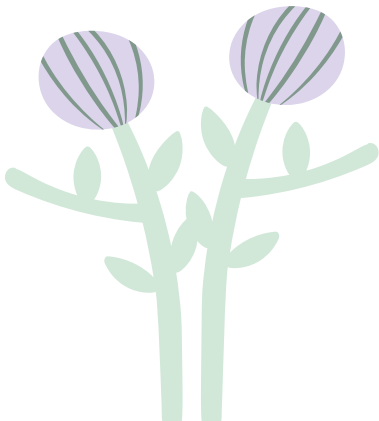
2.8.1 Stakeholder Engagement Initiatives

- From the questionnaire submitted to around 100 Elmec employees, the issues identified as particularly sensitive were those relating to responsible supply chain management, ethics and the fight against corruption, and the circular economy of the products/services offered by Elmec to its customers.
- The main issues that emerged from the round table discussion, which was attended by various types of associations, including four schools (two universities and two higher education institutions), a voluntary organization, a sports association and a trade association, were both those relating to personnel, with a focus on the importance of talent development and management—a topic very dear to all the educational institutions involved—and those related to the environment, including the importance of Elmec's management of energy consumption, as an energy-intensive company, and its ability to offer increasingly environmentally friendly products and services.
- Similar results emerged from the meeting with the institutions, which involved the mayors of the three main municipalities in the area where Elmec operates and representatives of provincial and regional bodies and the Chamber of Commerce.
- In addition to the importance of the issues mentioned above, topics related to diversity and equal opportunities, talent development, working conditions, and work-life balance were also considered relevant. Furthermore, the institutions all agree that Elmec's virtuous behavior can serve as a driving force among companies in the Varese area.
- The meeting with the consultant responsible for managing relations with the media and the press highlighted that the main topics include issues related to personnel, such as working conditions, corporate welfare, and work-life balance, as well as environmental issues, including energy consumption, the offer of green products, and the importance of managing the company's carbon footprint.

The results of the Stakeholder Engagement are periodically submitted to the Board of Directors for evaluation and integration into Elmec's sustainability strategy. During 2023, the ESG office organized an event at the Company's headquarters called "ESG Community Lab." The highlights of the 2022 sustainability report were presented at this event. The event was attended by around thirty Elmec stakeholders, including customers, suppliers, and representatives of associations, who took part in round tables and thematic workshops aimed at exchanging knowledge and opinions on:

- Governance and sustainability reporting
- Circular economy
- Renewable energy
- Welfare and wellbeing

The workshops were led by internal and external experts who coordinated the working groups. Similarly, the same initiative was repeated in 2024, with the aim of presenting the highlights of the 2023 sustainability report, thus confirming the ESG office's ongoing commitment to promoting dialogue and the exchange of best practices in the field of sustainability.

3. HUMAN RESOURCES
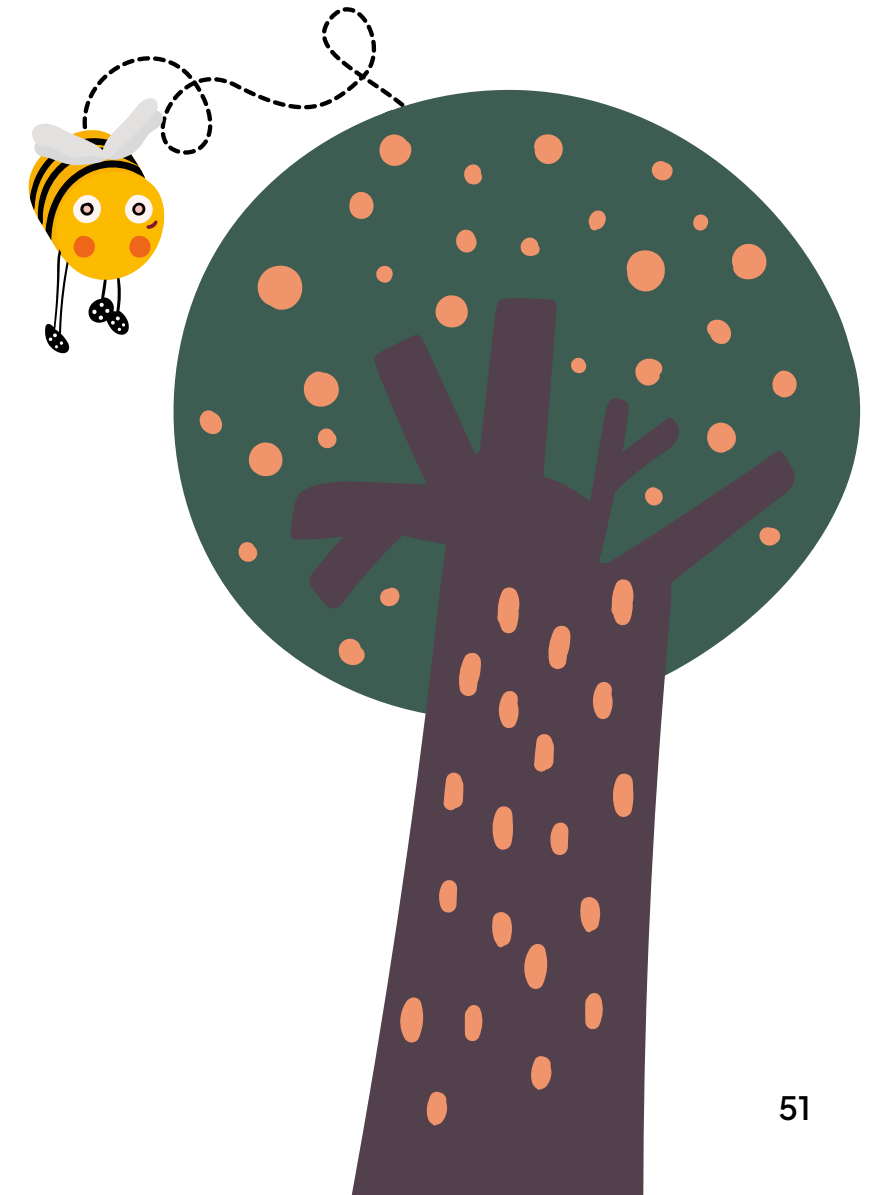
3.1 Rischi e temi rilevanti per Elmec

At Elmec informatica, personnel management is a key element in the success of our company. However, we are aware of the risks and important issues that need to be addressed.

One of the main risks we have to manage is competition in the IT sector, which could lead to the loss of our talent to other companies. For this reason, we are committed to providing a stimulating work environment with opportunities for professional growth within the organization.

Furthermore, we understand that IT work can be stressful and demanding, especially when working on deadline-driven projects. For this reason, we ensure that we offer a healthy and safe working environment, with training programs on stress and workload management and the promotion of a work-life balance.

We are also aware of the need to keep our staff's skills up to date, given the continuous evolution of technology. For this reason, we invest in training our employees and keeping their knowledge up to date.

Finally, we know that diversity and inclusion are important issues in the management of personnel in an IT services company. For this reason, we promote an inclusive corporate culture that values diversity of background, gender, and opinions in order to create a fair and productive work environment for all our employees.

Following the ESG Risk Assessment, 27 risks affecting human resources and their rights were identified. In the table below, these risks are listed by topic and classified in terms of net risk, i.e., the level of risk remaining after the implementation of mitigation measures by Elmec.

Based on the materiality analysis and the process of collecting non-financial data and information, the personnel-related issues relevant to Elmec, which are provided in this chapter, are as follows:

- Working conditions and welfare
- Talent development
- Diversity and equal opportunities
- Worker health and safety

The impacts that Elmec Informatica has assessed in its materiality analysis relating to personnel issues are as follows:

- Impacts on personnel and collaborators in terms of equal opportunities resulting from the Company's actions in the area of diversity
- Human resource management policies and programs aimed at enhancing skills, training, welfare, and clear and defined career plans facilitate the attractiveness of personnel, generating positive impacts on the development of human capital and on the fulfillment of individuals
- Adequate incentive and performance evaluation processes generate impacts on the enhancement of merit and equal opportunities, as well as on the well-being of personnel
- Impacts on worker health and safety related to the emergence of new pandemics in the absence of an adequate protection and prevention system
- Impacts on worker health resulting from workplace accidents

Before addressing material issues relating to personnel in detail, some information on the composition of the workforce and turnover is provided below.
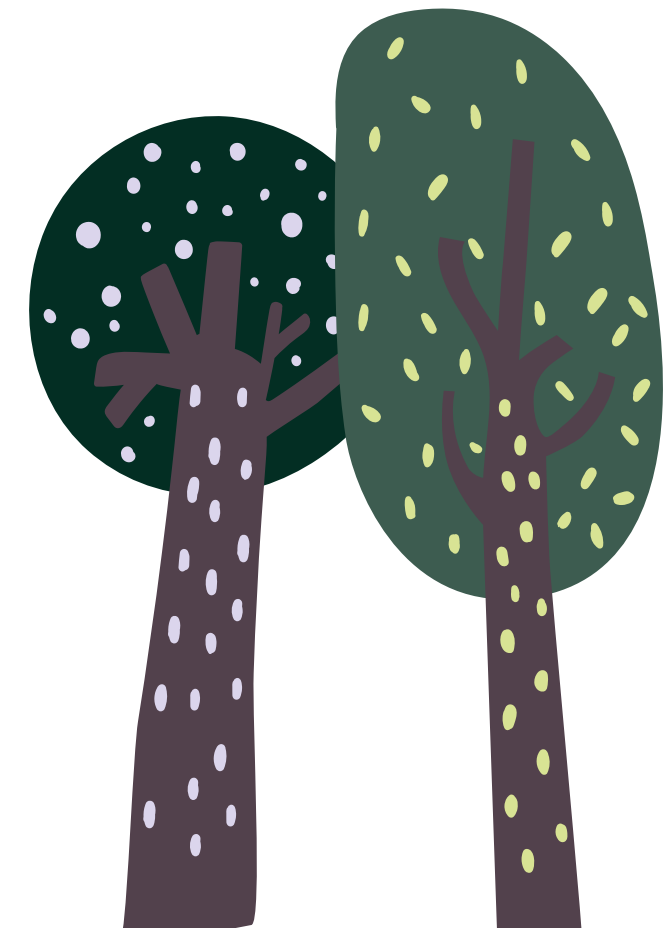
3.1 Risks and issues relevant to Elmec

Topic	Number of risks identified for Net Risk					
	High	Medium High	Medium	Medium Low	Remote	Total Risks
Collective Bargaining	0	0	0	0	1	1
Diversity	0	1	0	0	0	1
Fair Treatment and Opportunity	1	1	2	0	0	4
Health and Safety	0	0	8	4	0	12
Human Rights	0	3	0	0	0	3
Training	0	1	0	0	0	1
Workplace Harassment	0	1	0	0	0	1
Work-Life Balance	0	1	0	0	0	1
Working Conditions	0	3	0	0	0	3
Total Risks	**1**	**11**	**10**	**4**	**1**	**27**
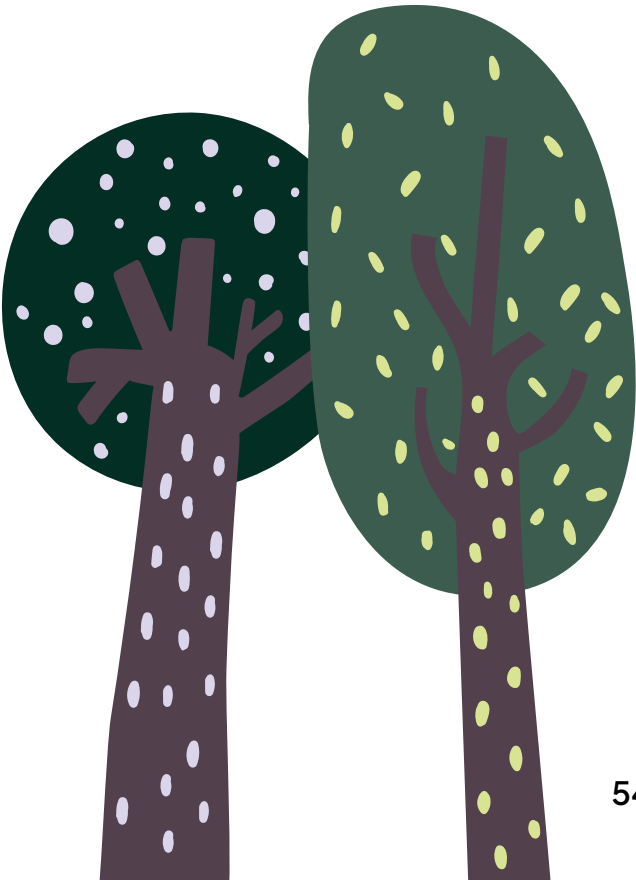
3.2 Staff composition

Elmec Informatica will have 737 employees at the end of 2024 (702 at the end of 2023). The 4.99% increase is mainly due to the growth of the company's business and the expansion of its activities, which have required the hiring of new employees to meet market demands. In terms of gender composition, at the end of 2024, 73% of the workforce will be men (73% in 2023) and 27% women (27% in 2023). As Elmec Informatica is a company operating in the IT sector with a predominantly male workforce, we recognize that the socio-economic environment of Varese, located between Milan and Switzerland, represents a si-gnificant challenge for the promotion of gender equality, as staff selection is influenced by strong competition between companies in this highly competitive region for attracting talent.

In terms of professional classification, at the end of 2024, 93% of the workforce will be made up of employees (93% in 2023), 6% of middle managers (6% in 2023), and 1% of senior managers (1% in 2023). The table below provides details on the composition of the workforce broken down by professional category and gender.

	EMPLOYEES		MANAGERS		EXECUTIVES		TOT. M	TOT. F
Last 3 years	M	F	M	F	M	F		
Employees as of December 31, 2022	430	161	36	7	7	1	**473**	**169**
Total employees by professional category as of December 31, 2022	591		43		8			**642**
Employees as of December 31, 2023	471	180	33	7	10	1	**514**	**188**
Total employees by professional category as of December 31, 2023	651		40.		11			**702**
Employees as of December 31, 2024	499	184	33	8	11	2	**543**	**194**
Total employees by professional classification as of December 31, 2024	683		41		13			**737**

Analysing the workforce by age group, in 2024, 51% of employees will be under 30 (51% in 2023), 25% will be between 31 and 40 years old (24% in 2023), for a total of 76% of people under 40 years of age (75% in 2023) of the total workforce. The table below provides details on the composition of the workforce broken down by age group and gender.

	UP TO 30		31–40 YEARS		41–50 YEARS		OVER 50 YEARS		TOTAL
	M	F	M	F	M	F	M	F	
Employees as of December 31, 2022	274	72	96	50	59	24	44	23	**642**
Employees as of December 31, 2023	281	78	111	56	70	25	52	29	**702**
Employees as of December 31, 2024	302	76	120	61	68	26	53	31	**737**

In 2024, 12 temporary workers, including 4 women and 8 men, also collaborated with Elmec Informatica (29 people in 2023).

Elmec Informatica recognizes the importance of diversity in the composition of its workforce. We are committed to ensuring that our workforce reflects the diversity of the society in which we operate, in terms of gender, ethnicity, ability, and cultural background. To achieve this goal, we introduced the Diversity and Equal Opportunity Policy in 2024, which promotes access to job opportunities in a fair and non-discriminatory manner.
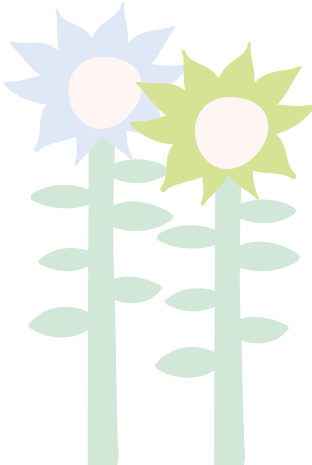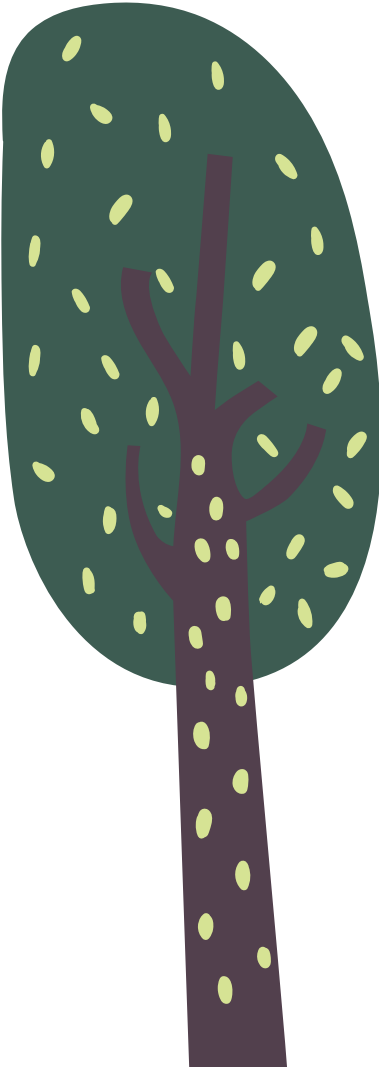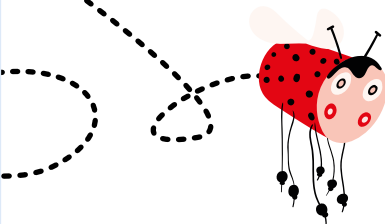
Staff turnover is an important factor to consider in any company, as it can affect business continuity and organizational efficiency. A high turnover rate can indicate problems with personnel management, the work environment, or the corporate culture. In addition, the loss of experienced employees can have a negative impact on the quality of work performed and customer relations. Conversely, a low turnover rate can indicate good human resource management, a positive work environment, and a company that is able to provide growth and development opportunities for its employees.

Monitoring staff turnover is therefore essential to understanding the organizational health of the company and taking corrective measures if necessary. In addition, a low turnover rate can also be a competitive advantage for the company, as it allows it to retain experienced and motivated employees who can contribute to the long-term success of the organization. Turnover (defined as the net effect of new hires and staff departures on the average number of employees during the year) is 5% (compared to 9% in 2023 and 7% in 2022). The initiatives implemented by Elmec Informatica to retain employees are mainly aimed at potentially critical roles.

Staff turnover can be positively motivated by the opportunity to acquire new skills, work in a more stimulating environment, or advance one's career. A moderate turnover rate can bring new ideas and perspectives, improving the company's efficiency and productivity. However, it is important to balance the attraction of new talent with the stabilization of experienced staff, ensuring continuity and knowledge within the organization.
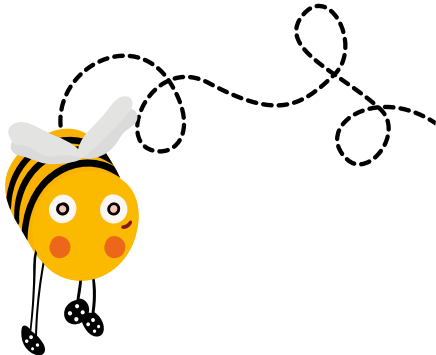
3.3.1 Staff Turnover

2022	MAN	FEMALE	TOTAL
Employees as of December 31, 2021	439	161	**600**
Hired in 2022	108	28	**136**
Left in 2022	74	20	**94**
Employees as of December 31, 2022	473	169	**642**

2023	MAN	FEMALE	TOTAL
Employees as of December 31, 2022	473	169	**642**
Hired in 2023	116	41	**157**
Departed in 2023	75	22	**97**
Employees as of December 31, 2023	514	188	**702**

2024	MAN	FEMALE	TOTAL
Employees as of December 31, 2023	514	188	**702**
Hired in 2024	104	27	**131**
Departed in 2024	75	21	**96**
Employees as of December 31, 2024	543	194	**737**
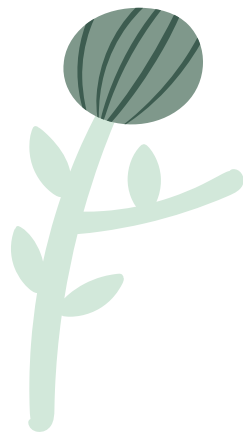
3.3.1 Staff turnover

2022	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees as of December 31, 2021	547	44	9	**600**
Hired in 2022	132	4	0	**136**
Left in 2022	88	5	1	**94**
Employees as of December 31, 2022	591	43	8	**642**

2023	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees as of December 31, 2022	591	43	8	**642**
Hired in 2023	157	0	0	**157**
Departed in 2023	92	5	0	**97**
Employees as of December 31, 2023	656	38	8	**702**

2024	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees as of December 31, 2023	651	40	11	**702**
Hired in 2024	131	0	0	**131**
Departed in 2024	92	4	0	**96**
Employees as of December 31, 2024	683	41	13	**737**
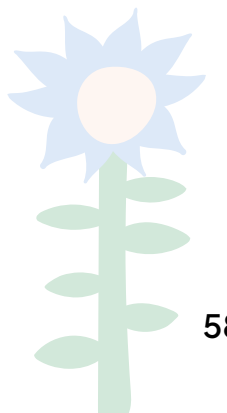
3.4 Working conditions and corporate welfare

Our commitment as a company is to become the best employer possible, providing our employees with continuous opportunities for professional growth. We recognize the importance of work-life balance and have implemented services to improve the quality of life of our employees, both at work and in their private lives. A comfortable and stimulating work environment is essential to ensuring employee productivity and job satisfaction. Offering a balance between professional and personal life is an important investment in creating a healthy, productive, and rewarding work environment for everyone. In relation to personnel management, Elmec has identified potential risks that can affect productivity and work quality, such as high turnover or absenteeism, and a lack of training and professional development. To mitigate these risks, Elmec has implemented a series of initiatives to improve employee reten-

tion, such as the creation of a career plan, a skills development program, and an incentive system. In addition, the company is committed to ensuring the training and continuous development of its staff through the organization of internal and external training courses and to ensuring that employees are aware of professional development opportunities within the company.
Elmec has adopted a human resources management system that allows it to identify and manage the main potential risks in this area.
Elmec has adopted a series of policies and procedures to ensure the effective and responsible management of its personnel. In particular, the company has developed specific policies and procedures regarding:

Health and safety at work
Elmec has adopted a series of policies and procedures to ensure the health and safety of its employees in the workplace. In particular, the company has a Health and Safety Manager (RSPP) who defines prevention and protection procedures and activities.

Staff selection and recruitment: Elmec has defined a selection process that involves the HR department and the various relevant areas of the company. The process involves analyzing the professional profile and skills required for each position, using objective assessment tools, and adopting criteria of equality and non-discrimination. In addition, the company constantly monitors the recruitment and selection processes to ensure the effectiveness of the system and the suitability of the profiles selected.

Performance evaluation:
Elmec evaluates the performance of its employees through a performance management system that involves the definition of measurable objectives and the evaluation of their achievement. Performance evaluation is an important tool for defining individual development plans and for awarding bonuses and incentives.

Performance Evaluation:
Elmec evaluates employee performance through a performance management system that includes the definition of measurable goals and the assessment of their achievement. Performance evaluation is an important tool for defining individual development plans and assigning rewards and incentives.

Well-being and welfare:
Elmec has defined policies and procedures for managing the well-being and welfare of its employees in order to promote a healthy and pleasant working environment. In particular, the company offers psychological support and counseling services, work-life balance services, and wellness programs organized in collaboration with associations and professionals in the field. The company constantly monitors the effectiveness of the policies and procedures adopted in order to continuously improve the management of its personnel and ensure respect for workers' rights.

Elmec's HR (Human Resources) department plays a key role in personnel management and the implementation of company policies.
The main activities managed by the HR department include the definition and review of HR policies and procedures, the management of employee training and professional development, the management of trade union relations, and the management of the selection and recruitment process for new resources
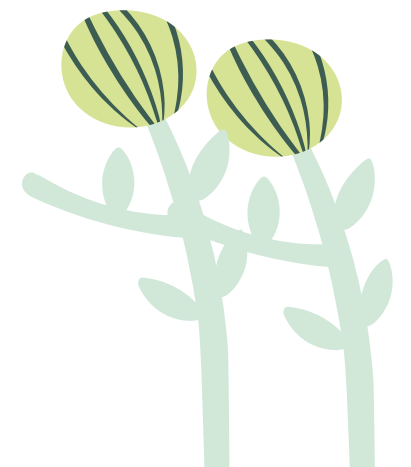
3.4.1 Corporate welfare initiatives

Elmec offers many work-life balance solutions, including a company gym equipped with personal trainers, a company restaurant offering healthy, balanced meals, an annual sports tournament, and many other initiatives such as Elmec4You and Elmec4Sport.

In addition, it has implemented many welfare initiatives in favor of environmental sustainability, such as a water dispenser, eco-friendly detergents on tap, and a reuse market available to employees. The most distinctive feature is the desire to spread a positive culture alongside the services provided: the company promotes a culture based on simplicity and trust, offering self-service facilities without any payment controls. Compared to the previous year, a number of new features have been added to the company, such as a tennis court, a soccer field, a yoga room, a games room, a party area, an on-site optometric prevention program, and free visits with a nutritionist.
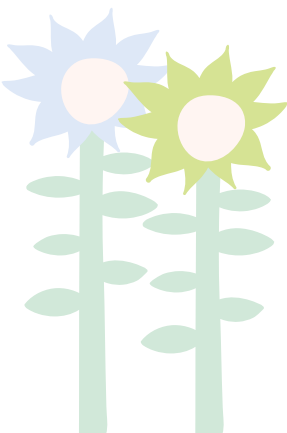
Company welfare

Book bonus
Sustainable mobility bonus
Flexible benefits

Easy shopping at work

Shopping at work
Temporary shop
Special agreements
Emporium
Eco-friendly detergents
Reuse market
Buytec Bazaar

Sports for everyone

Annual sports tournament
Basketball court
Tennis court
Five-a-side football pitch
Yoga room

Group activities

Team building
Elmec4you
Elmec4sport
Board game area
Company vegetable garden
Party area
E-games room
Book club
Chess club

Everyday services

Shoemaker
Tailor
Car wash
Parcel delivery
Library
Company restaurant
Company gym
Water dispenser
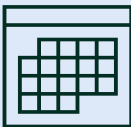
Salute e prevenzione

Blue prevention
Pink prevention
Optometric prevention
Helpline
Sports medical examination
Company nutritionist
Free blood check-up
Company doctor
Medicines at work
Agreements
Suspended medicine

3 FOOD AREAS
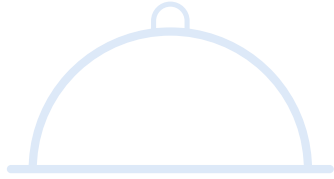
4 MENUS CREATED BY THE COMPANY NUTRITIONIST (MEN, WOMEN, SUSTAINABLE, ATHLETES)

MENÙ

90.309 MEALS SERVED

ELMEC BISTROT: the zero-waste company restaurant.

Elmec's company restaurant is a place where quality, sustainability, and well-being come together. In addition to high-quality ingredients sourced from Italy and the Mediterranean, the restaurant uses innovative Industry 4.0 equipment. Furthermore, the restaurant has a strong focus on nutrition, informing employees about the calorie content of dishes and offering seasonal and sustainable products. Reducing food waste is another priority, with the option of taking home carefully stored leftovers. This demonstrates the company's commitment to the environment and sustainability. Finally, the restaurant offers a multifunctional space for recreational and training activities or corporate events, creating a comfortable and stimulating environment for employees. The focus on creating a balance between professional and personal life is an important investment in creating a healthy, productive, and rewarding work environment for all employees.

2.983 PORTIONS SAVED

600kg OF FOOD WASTE AVOIDED

5.481 SUSTAINABLE MEAL VOUCHERS

High-quality raw materials, zero waste, and multifunctional spaces

ACTIVE USERS BY GENDER*
*TOTAL REGISTERED USERS

25% female

75% male
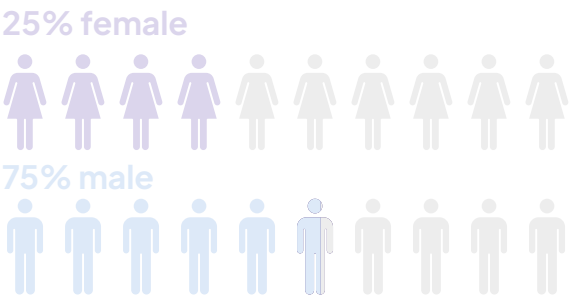
ACTIVE USERS BY AGE
0–24 YEARS: 9%
25–34 YEARS OLD: 58%
35–49 YEARS OLD: 25%
50–64 YEARS OLD: 8%

8%
9%
25%
58%
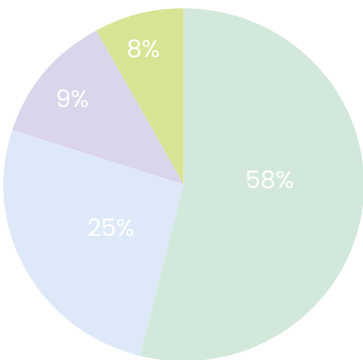
COMPANY GYM: the home of sport, free for all employees

Elmec's company gym is equipped with TecnoGym equipment, a leader in the fitness sector, and offers a wide range of machines for muscle strengthening, cardiovascular training, and toning.
In addition, the gym is open free of charge to all employees and offers flexible hours to allow everyone to maintain a healthy and balanced lifestyle. Twice a month, a personal trainer is on hand to provide support and useful training advice. Elmec's company gym allows employees to enjoy a comfortable and technologically advanced environment where they can exercise regularly, improving their health and well-being.

480 UTENTI TOTALI ISCRITTI
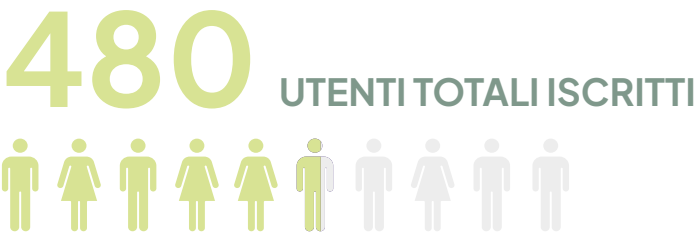
PEOPLE FOLLOWED BY PERSONAL TRAINER

70

A space to dedicate to your physical well-being

3.4.1 Corporate welfare initiatives
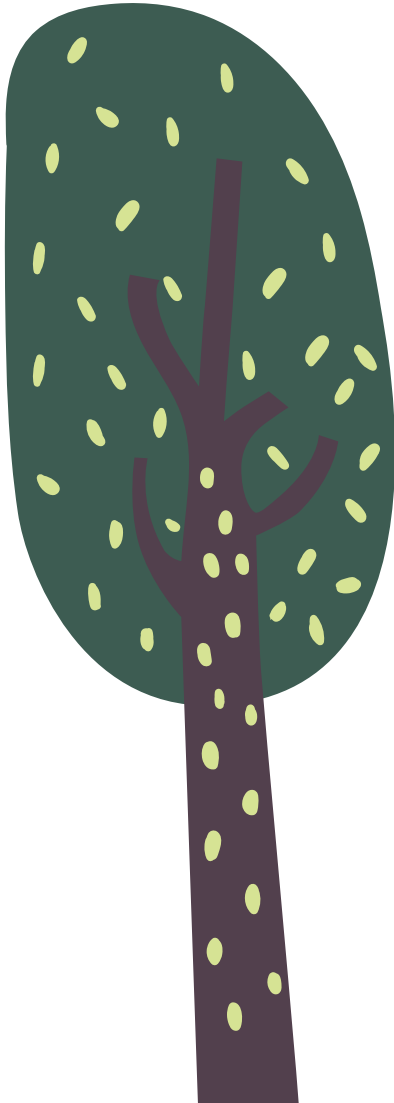
YOGA ROOM: classes for all levels with an instructor.

In 2023, we opened a yoga room on campus, an oasis dedicated to the well-being of our employees. Here, we offer a wide selection of classes, carefully curated and led by a qualified instructor. Among the practices offered are the ancient disciplines of Hatha and Mindfulness, Sun Salutation sessions, Vinyasa Flow Zen and Postural Yoga courses. Each course is designed to improve both physical and mental health, creating a regenerating space where participants can free themselves from stress and restore their inner balance. Our yoga studio is open to all employees, with flexible hours designed to accommodate various work schedules. Our goal is to create a welcoming and reassuring environment where each individual can feel inspired to explore their physical and mental potential. With this initiative, we aim to promote a healthy and sustainable lifestyle among our employees, offering them a valuable opportunity to take care of themselves and cultivate their well-being in a lasting and profound way.
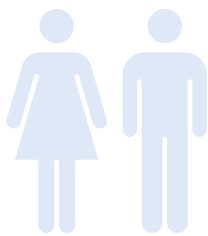
76
COURSE ENROLMENTS

6 DIFFERENT TYPES OF COURSES

5
CLASSES PER WEEK

Yoga Room: balance for body and mind

38

ACTIVE VOLUNTEERS IN
THE ORGANIZATION

ELMEC4YOU: the beating heart of internal company initiatives

Elmec4you is an important voluntary association within Elmec, dedicated to promoting employee well-being through a balance between professional and private life. Through constant and close relations with local organizations, the association manages agreements, organizes events, and coordinates stakeholders involved in improving corporate welfare. Thanks to its activities,

Elmec4you is a key reference point for life at the company outside working hours, helping to create a healthy, productive, and rewarding work environment for all employees.
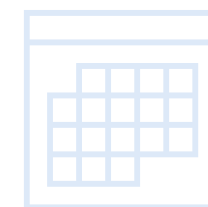
30

EVENTS ORGANIZED FOR EM-
PLOYEES IN 2024
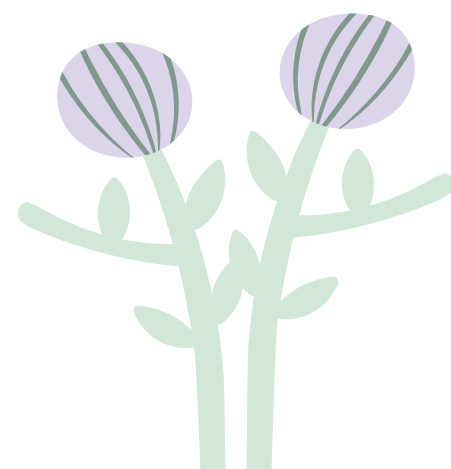
A volunteer association, a real
driving force behind initiatives

300

COLLEAGUES RE-
GISTERED WITH THE
CLUB

TOTAL KILOMETERS COVERED

123.720 KM

ELMEC4SPORT: sporting activities also depend on people's commitment

Elmec has created Elmec-4sport, a community of sports enthusiasts who get together after work to train together in various disciplines.

The community includes groups for running, swimming, soccer, basketball, and much more. The key feature of Elmec4sport is people's willingness to share their experience with others. The company provides the necessary facilities and funds, but without the enthusiasm and passion of the participants, none of this would be possible. Thanks to this project, some Elmec colleagues participated in the Chianti Eco Marathon in 2023 and the Barbaresco Eco Marathon in 2024, achieving extraordinary results.

9 SPORTS MANAGED
(RUNNING, WALKING, CYCLING, PADEL, SOC-
CER, BASKETBALL, TENNIS, BEACH VOL-
LEYBALL, CLIMBING)

An association of volunteers, a real driving force behind initiatives

3.4.1 Corporate welfare initiatives

1000 KG
OF CHOCOLATE SOLD IN 2024

1.445
OF RICE SOLD IN 2024

500 LT
OF APPLE JUICE SOLD IN 2024

EMPORIO ELMEC4YOU

In one of our offices, we have created Emporio Elmec4you, a real shop where employees can buy seasonal and local products at discounted prices. This shop sells products from companies located near Elmec and from businesses that have shared part of our fifty-year history with us. Emporio is self-service and payment is independent.

ECOLOGICAL DETERGENTS ON TAP

We have introduced self-service dispensers for ecological detergents on tap. Each employee can go to the dispensers and pay, taking the detergents in complete autonomy. The value of this project lies not only in offering a service at the workplace, but also in contributing to our goal of eliminating plastic and spreading a culture of mutual trust within the company.

1.550 LT
OF DETERGENTS DISPENSED IN 2024

163 KG
OF CO2 SAVED THANKS TO THE REUSE OF BOTTLES

WATER HOUSE

As further proof of its commitment to the environment, the company has provided a free water house for all employees, dispensing more than 40,000 liters of fresh water since its installation (February 2022).

This service reduces the consumption of plastic bottles that employees would otherwise have to buy to quench their thirst during the working day, improving the quality of life in the workplace and the surrounding environment. The water cooler is not only available during working hours, but employees can also fill up bottles to take home.

Thanks to small efforts like this, it is possible to make a difference and help create a better world.

30.950
DISPENSED IN 2024 ALONE

20.600
PLASTIC BOTTLES SAVED

3.3 T
OF CO2 SAVED
thanks to the use of the water kiosk, avoiding the production and transport of 1.5–liter plastic bottles

ANNUAL SPORTS TOURNAMENT

With a focus on fun and a touch of healthy competition, every year we organize a company tournament that includes various sports, such as soccer, basketball, beach volleyball, and padel tennis, with more than 300 colleagues participating. This event is eagerly awaited by employees and their families, who can participate in the various competitions. In this way, Elmec promotes not only sport as a means of maintaining physical and mental health, but also a sense of belonging and collaboration between colleagues and families.
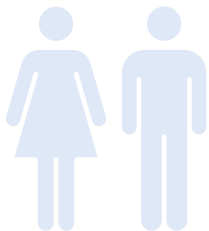
350
PARTICIPATING COLLEAGUES

4
SPORTS TO COMPETE IN

3.4.1 Corporate welfare initiatives

3 DAYS A
WEEK AVAILABLE
AT THE COMPANY

Company Doctor

Company doctor available for personal consultations and professional visits

40
VISITS IN 2024

Blue prevention

Free preventive check-ups for male-specific cancers

100
VISITS IN 2024

Blood check-ups

Check up del sangue gratuito per tutti i collaboratori presso centro convenzionato

Eye Screening Tests

Doctor at Elmec

Preventive Health
Care for Women

HEALTH

Preventive Health
Care for Men

Nutritionist
at Elmec

Complete Blood Count
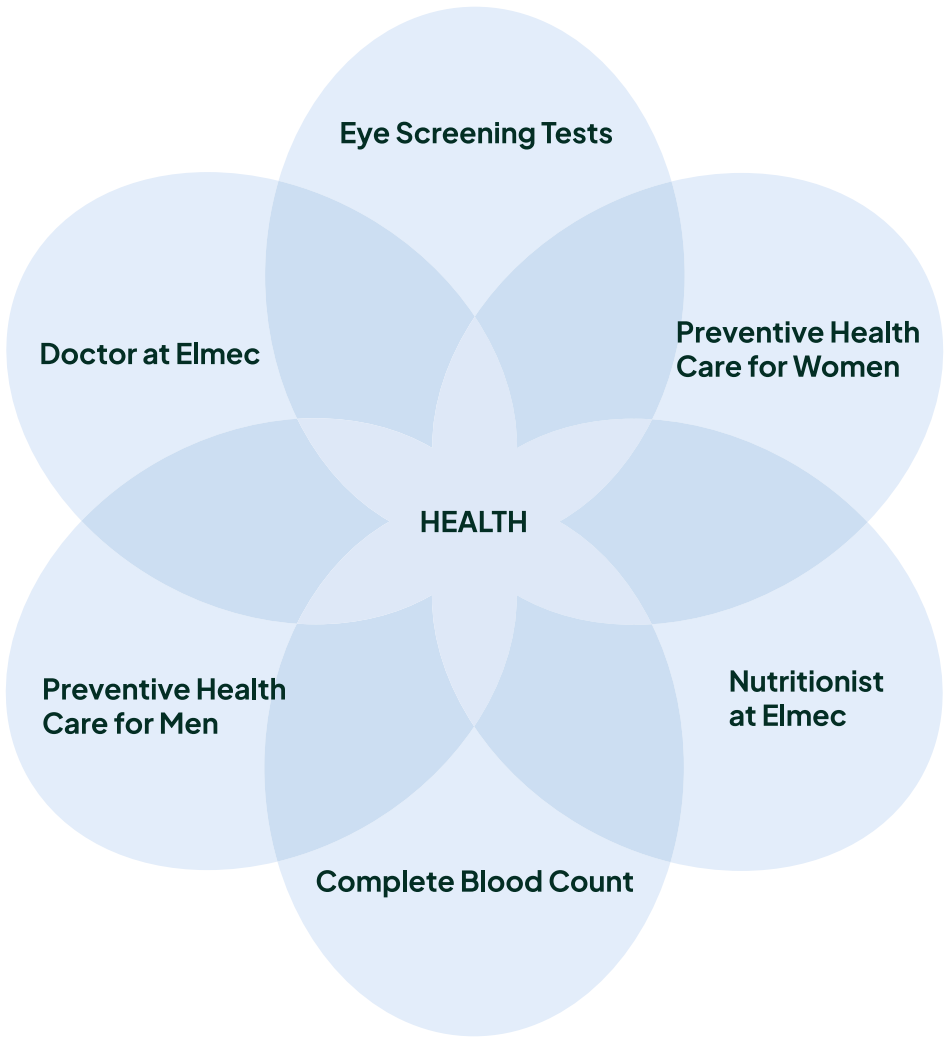
Pink prevention

Free preventive check-ups for female-specific cancers

164
VISITS IN 2024

Company nutritionist

Free personal consultations with a nutritionist at the company

248
VISITS IN 2024

3.4.1 Corporate welfare initiatives

At Elmec, employee health is a core value. We recognize the importance of creating a healthy and safe work environment for our employees, as their health and well-being are vital to the success of our company. For this reason, we have implemented numerous preventive measures to ensure that our employees are able to work in a healthy and safe environment.

We have invested in tools and resources that help our employees adopt healthy lifestyles, such as fitness, nutrition, and mental wellness programs. In addition, we have established a regular screening program to ensure that our employees are in good health and that any health issues are identified and addressed promptly.

Medication delivery to the workplace

At Elmec, you can order medication from a partner pharmacy and have it delivered to the workplace.

Discounted medication agreement

Employees are entitled to a 15% discount on any medication purchased from the same pharmacy.
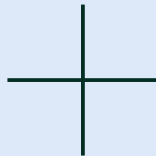
Medication suspension

Every year, we collect commonly used medications to donate to people in need.
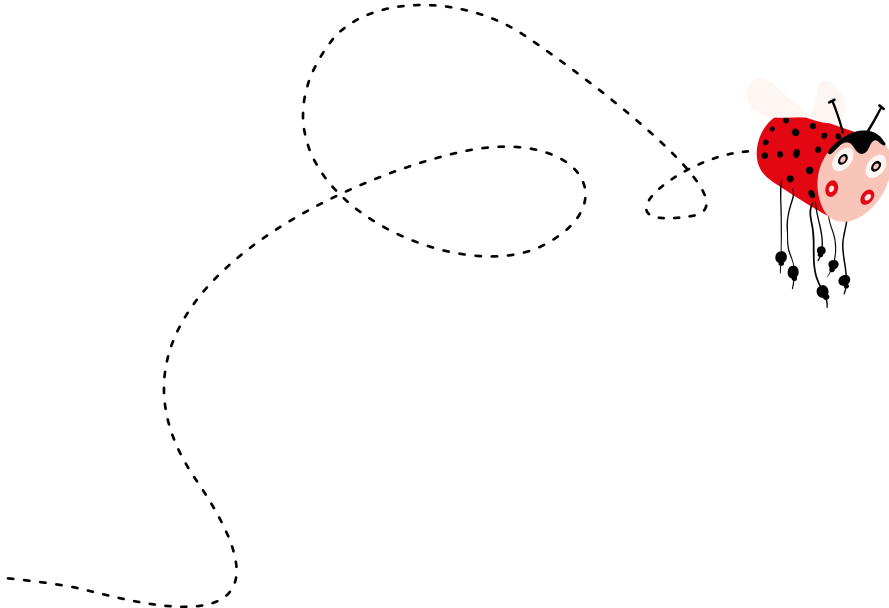
3.4.1 Corporate welfare initiatives

Elmec provides certain full-time employees with a wide range of benefits, including supplementary healthcare, life and disability insurance, and pension benefits. Below is a list of bonuses available to all employees:
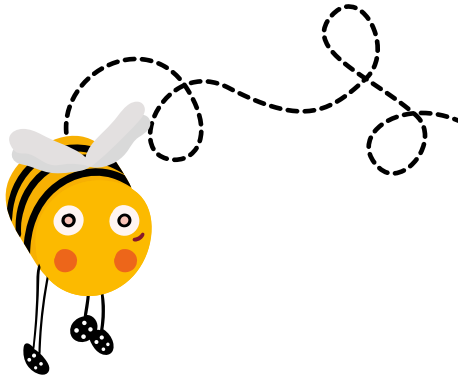
Flexible benefit

Through OneFlex, Aon's corporate welfare and flexible benefits platform, we offer our employees annual or occasional bonuses based on their contract and performance, as rewards for their work and to foster a motivating and rewarding work environment.

Book bonus

The program provides a bonus of €300.00 in flexible benefits for each school-age child of each employee. The aim of this bonus is to facilitate access to the purchase of useful materials for the education of our employees' children, such as textbooks, teaching aids, or other necessary school supplies.

Sustainable mobility bonus

To encourage the use of bicycles as a means of transportation to the workplace, we have introduced a sustainable mobility bonus program. The program provides a bonus of €500.00 in flexible benefits for employees who choose to use a bicycle as their means of transportation to work at least 50 times in a year.

Parent bonus

Elmec Informatica recognizes the importance of supporting employees who are becoming parents and has established a special bonus for new parents. All new fathers and mothers are granted a bonus of €500.00 in flexible benefits. In addition, to provide further support to new mothers at such a significant time, Elmec Informatica pays an additional bonus of €2,000.00.

3.4.1 Corporate welfare initiatives

Company nutritionist

The nutritionist at Elmec is available twice a week and offers a free initial consultation to all company employees. Their main task is to provide personalized nutritional advice to help employees find their nutritional balance and understand the value of proper nutrient combinations.

Sports medical examination

A non-competitive sports medical examination is important for the health of employees who use the free company gym. All employees can have the examination at a discounted price to assess their health and identify the most suitable physical activity for them. They can also have a competitive sports medical examination at a discounted price.

Lombardy Region WHP Program

Elmec has joined the WHP project promoted by the Lombardy Region to promote the health and well-being of its employees. The project includes a series of activities and initiatives aimed at creating a safer and more welcoming work environment through the promotion of a healthy lifestyle, prevention, and the enhancement of workers' psychological well-being.

Defibrillators in the company and in the local area

Cardiac arrest is one of the leading causes of death in industrialized countries, and the speed with which defibrillation is performed is a critical factor in determining patient survival. In order to ensure safety and health, Elmec has decided to equip each of its offices with semi-automatic defibrillators. In addition, two defibrillators have also been installed in the municipality of Brunello, thus providing an important emergency response tool in the event of a cardiac emergency.

Help line: Personal support service available free of charge all year round, every day, at all hours.

Intended for employees at all levels to help them manage situations that affect their well-being and that of their relationships, both in the workplace (stress, anxiety, depression, role, relationships with bosses and colleagues, etc.) and in their private lives (parenting, caregiving, emotional and mental distress). The support, aimed at empowering individuals and increasing their capacity for self-determination, is divided into the following services:

- · Confidential, immediate, and guaranteed 24/7/365 telephone helpline with qualified professionals to respond and normalize the emotional state and highlight areas for reflection and awareness.
- · Psychological consultation sessions with a brief, solution-oriented approach, in person and/or virtual.
- · Management Consultation: assistance to managers and HR professionals who manage resources.
- · Guidelines on legal, tax, and social welfare issues.
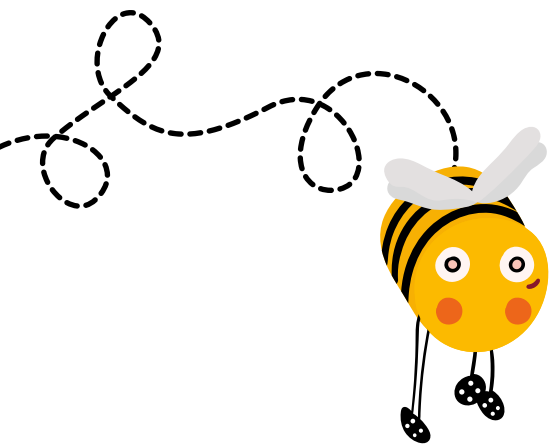
3.4.2 Performance and career paths

100% of employees are subject to an annual appraisal process. Every six months, in June and November, department managers conduct interviews with their employees: any proposals for changes in remuneration and bonuses submitted by managers are submitted to the HR department and approved by the directors.

Senior managers are subject to a six-monthly assessment by the directors with the support of the HR department.

Their remuneration, which includes fixed and variable remuneration and any benefits, is updated, if necessary, at the time of the assessment.

2022	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees who received an annual performance review	591	43	8	**642**
Total employees	591	43	8	**642**
Percentage of employees who received a periodic performance and career review	100%	100%	100%	**100%**

2023	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees who received an annual performance review	651	40	11	**702**
Total employees	651	40	11	702
Percentage of employees who received a periodic performance and career review	100%	100%	100%	**100%**

2024	EMPLOYEES	MANAGERS	EXECUTIVES	TOTAL
Employees who received an annual performance review	683	41	13	**737**
Total employees	683	41	13	**737**
Percentage of employees who received a periodic performance and career review	100%	100%	100%	**100%**

3.4.2 Performance and career paths

2022	MALE	FEMALE	TOTAL
Employees who received an annual performance review	473	169	**642**
Total employees	473	169	**642**
Percentage of employees who received a periodic performance and career review	100%	100%	**100%**

2023	MALE	FEMALE	TOTAL
Employees who received an annual performance review	514	188	**702**
Total employees	514	188	**702**
Percentage of employees who received a periodic performance and career review	100%	100%	**100%**

2024	MALE	FEMALE	TOTAL
Employees who received an annual performance review	543	194	**737**
Total employees	543	194	**737**
Percentage of employees who received a periodic performance and career review	100%	100%	**100%**
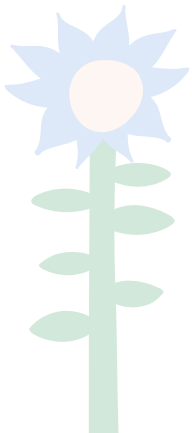
3.5 Talent development

Elmec Informatica is a company that recognizes the importance of talent development to ensure its long-term sustainability. For this reason, the company has implemented various initiatives aimed at promoting the professional growth of its employees. In particular, Elmec Informatica offers training and on-the-job training programs to enable its employees to acquire new skills and improve those already acquired. In addition, the company encourages its employees to participate in innovative projects, stimulating creativity and problem-solving skills.

Thanks to these initiatives, Elmec Informatica is able to develop internal talent, attract the best resources on the market, and ensure a high level of satisfaction and motivation among its employees, thus contributing to the sustainability of the company.
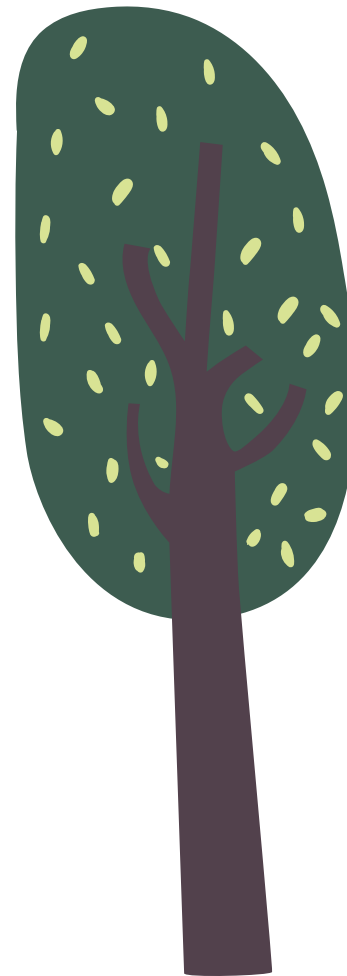
3.5.1 Training

Elmec's approach includes both internal skills development programs and the dissemination of a digital culture throughout the region. Internal training programs aim to build and increase the professional skills required by the respective models, enhance potential, evaluate and reward excellent performance, and safeguard specific technical knowledge. It is a comprehensive approach that is constantly evolving. To ensure the continuous development of its employees' skills, Elmec Informatica has implemented various types of training programs. In particular, the company offers technical training programs, such as software development and IT security courses, management training programs, such as project management and leadership courses, and cross-functional training programs, such as soft skills and customer experience courses. The objectives of Elmec Informatica's training programs are the continuous development of employee skills and the promotion of a corporate culture based on professional excellence. In 2024, Elmec offered 22,141 hours of training (19,284 hours in 2023), +15% compared to the previous year. The number of training hours per capita was 27. The training provided to staff mainly covered the following areas:
• Company training: 1,316 hours
• Regulations, company quality: 1,362 hours
• Professional: 7,705 hours
• Worker health and safety: 1,013 hours
• IT security: 2,351 hours
• Soft skills: 2,519 hours
• Sustainability: 296 hours
• ICT technologies: 5,580 hours
Almost all of the training provided to employees consists of internal training courses. Elmec Informatica's investment in training in 2024 amounted to €109,050.00. It should be noted that company training refers to training related to internal tools, procedures, and policies.
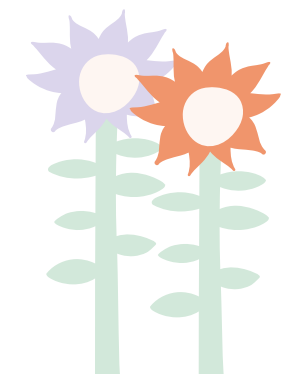
3.5.1 Training
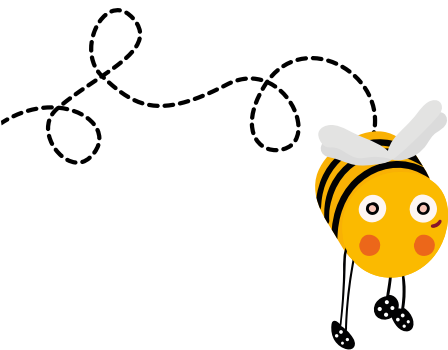
TRAINING HOURS PROVIDED IN 2022	EMPLOYEES				MANAGERS				EXECUTIVES				TOTAL	
	U		D		U		D		U		D			
TOPIC	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS
Worker health and safety	584	743	255	306	41	54	7	7	7	21	1	1	895	1.132
Soft skills	508	1.965	218	658	53	352	5	26	6	152	0	0	790	3.152
ICT technologies	1.043	3.171	365	941	32	149	17	62	0	0	0	0	1.457	4.323
Regulations and corporate quality	699	887	315	457	42	61	7	7	7	16	1	3	1.071	1.431
Corporate training	1.157	2.415	471	1.124	52	104	22	40	6	9	1	1	1.709	3.693
IT security	565	906	211	338	14	30	7	9	3	9	0	0	800	1.292
Professional/Operational trai-ning	54	319	32	161	11	80	4	30	0	0	0	0	101	590
Onboarding	310	1.159	133	978	5	37	0	0	0	0	0	0	448	2.174
Total training in hours		**11.565**		**4.963**		**867**		**181**		**207**		**5**	**7.271**	**17.787**

TRAINING HOURS PROVIDED IN 2023	EMPLOYEES				MANAGERS				EXECUTIVES				TOTAL	
	U		D		U		D		U		D			
TOPIC	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS
Worker health and safety	205	1.409	64	426	4	49	1	7	0	0	0	0	274	1.891
Soft skills	137	1.167	46	432	14	230	2	25	2	17	0	0	201	1.871
ICT technologies	116	532	50	266	3	6	0	0	1	1	0	0	170	805
Regulations and corporate quality	565	2.479	214	860	36	116	9	27	12	52	1	3	837	3.534
Corporate training	565	2.351	219	945	40	0	0	0	0	0	0	0	824	3.296
IT security	182	1.059	90	489	10	38	3	19	5	14	0	0	290	1.619
Professional/Operational trai-ning	249	2.420	131	1.313	31	579	7	68	10	775	1	2	429	5.155
Onboarding	550	630	212	258	44	148	9	27	11	50	1	3	827	1.116
Total training in hours	**2.569**	**12.048**	**1.026**	**4.990**	**182**	**1.167,01**	**31**	**173**	**41**	**910**	**3**	**8**	**3.852**	**19.284**

3.5.1 Training
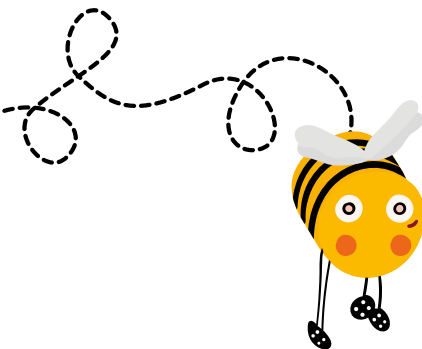
TRAINING HOURS PROVIDED IN 2024	EMPLOYEES				MANAGERS				EXECUTIVES				TOTAL	
	U		D		U		D		U		D			
TOPIC	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS	N.	HOURS
Worker health and safety	150	766	47	192	10	43	0	0	2	12	0	0	**209**	**1.013**
Soft skills	145	1.869	44	615	7	25	4	6	3	5	0	0	**203**	**2.519**
ICT technologies	209	3.694	62	1.855	12	27	2	2	2	1	0	0	**287**	**5.580**
Regulations and corporate quality	369	913	141	385	30	43	6	6	9	15	0	0	**555**	**1.362**
Corporate training	131	974	75	329	7	8	2	2	3	5	0	0	**694**	**2.351**
IT security	470	1.614	177	618	28	70	9	21	10	29	0	0	**694**	**2.351**
Professional/Operational trai- ning	292	4.493	138	2.8882	23	179	9	90	7	40	1	4	**470**	**7.688**
Onboarding	98	239	35	71	1	1	1	1	1	1	0	0	**136**	**313**
Total training in hours	**554**	**14.562**	**211**	**6.947**	**33**	**395**	**9**	**127**	**11**	**107**	**1**	**4**	**819**	**22.141**

3.5.1 Training

Training hours provided in different subject areas in 2024:

The table above shows the number of hours and the number of people involved in training on various topics. As announced in the previous year's sustainability report, Elmec has included sustainability among its corporate training topics, totaling 313 hours provided. Starting in 2022, the "Onboarding" category no longer appears in the table. This change was made to integrate Onboarding training hours into other categories, allowing for a more detailed analysis of the topics covered during the introduction of new employees to the company.
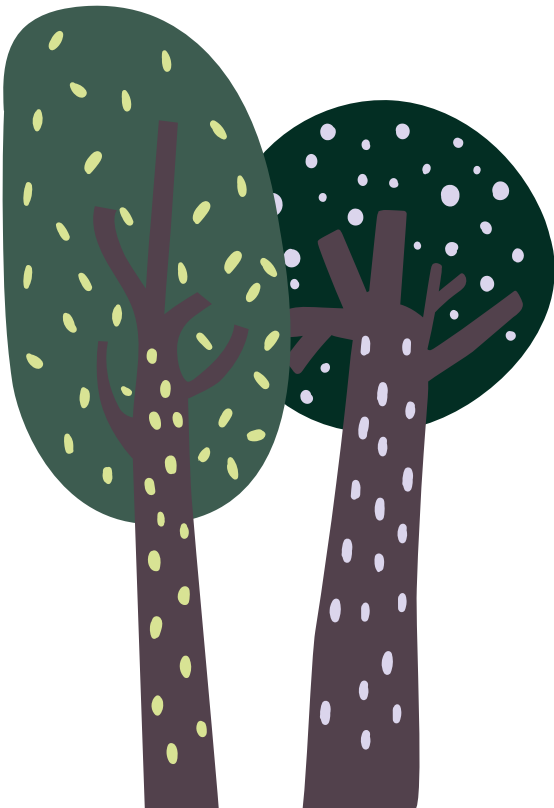
Staff skills mapping and creation of training plans and reskilling programs

Staff skills mapping and the creation of training plans and reskilling programs are essential strategies for ensuring the professional growth of employees and the competitiveness of the organization. Skills mapping allows to identify existing staff skills and gaps that can be filled through training. Creating customized training plans and reskilling programs helps develop the skills needed to perform current tasks effectively and prepare staff for future roles and challenges. In addition, these programs can improve operational efficiency and reduce costs by reducing the need to hire external staff to fill skill gaps. Finally, creating a continuous learning environment can improve employee motivation and engagement, helping to maintain a highly skilled and motivated team.
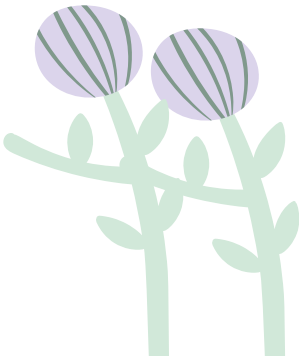
3.5.1 Training

Integration of ESG objectives into the system for top management

The integration of ESG (Environmental, Social, and Governance) objectives into the system for top management is an important corporate strategy for ensuring the long-term sustainability of the organization. The ESG system includes objectives and metrics that assess the company's performance in terms of its environmental, social, and governance impact. Integrating these objectives into the top management's performance management system, such as strategic planning, risk assessment, and remuneration, ensures that ESG objectives are aligned with the company's strategy and that top management is involved in the sustainable management of the company.

In this way, the integration of ESG criteria can help improve the company's reputation, reduce risks, and create long-term value for stakeholders, including employees, customers, investors, and society as a whole.
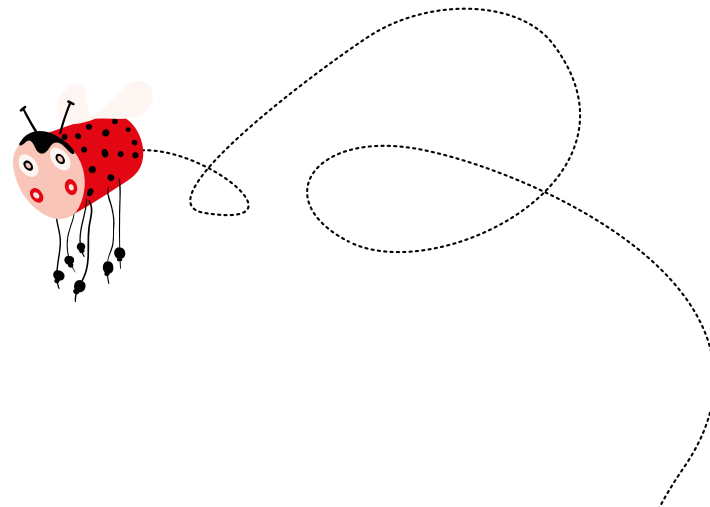
Job Path for employees

Elmec Informatica is a company that values the talent and professional growth of its employees, offering numerous career development opportunities. The company's approach to professional growth is focused on the individual, ensuring that every employee has access to the training and development opportunities best suited to their needs.

To support the career development of its employees, Elmec Informatica offers a wide range of training and professional development programs. These programs include internal and external training courses, mentoring and coaching programs, participation in industry conferences and events, and opportunities for team development. In addition, Elmec Informatica promotes a culture of continuous learning, encouraging employees to share knowledge and skills with colleagues and take on increasing responsibilities.

Finally, Elmec Informatica promotes a culture of innovation and adaptation to market changes, ensuring that employees are constantly exposed to new technologies and new ways of working. This open and experimental mindset helps employees develop a wide range of skills and knowledge that can be used to advance their careers and achieve their professional goals.
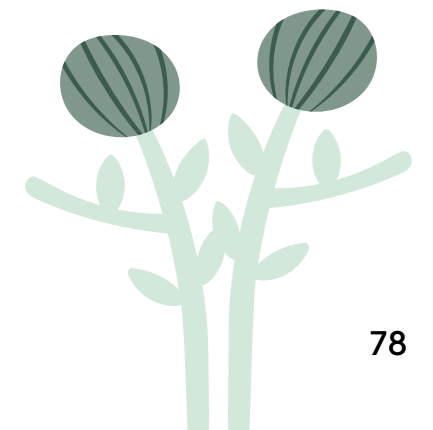
3.5.1 Training

Internal initiatives related to training

Technical certifications

Elmec staff are committed to continuous learning in the field of IT, acquiring technical certifications throughout the year to stay up to date and provide cutting-edge service
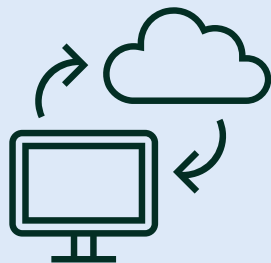
312 312 certifications obtained in 2024

Continuous training and evaluation process

Hours of training provided

A 360° approach that encompasses both technical IT skills and soft skills.
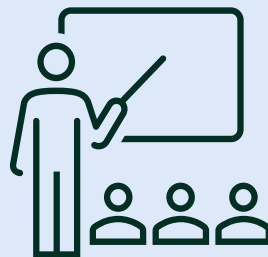
22.141 h hours of training provided

Evaluation process

Evaluation process

100% of Elmec employees receive a periodic review of their work within the company.

100% of employees receive a review of their work
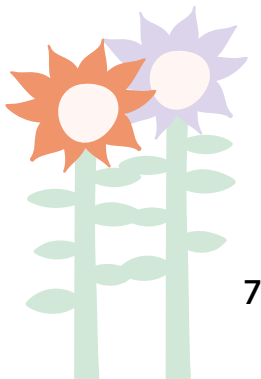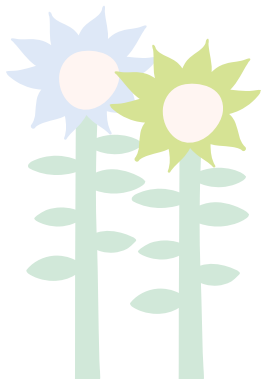
3.5.1 Training

Internal initiatives related to soft skills training

Soft skills are crucial to the growth and success of the company, as they help build positive relationships between employees, improve communication, time management, and problem solving. To support our employees in their development, we offer a range of training courses, including mindfulness for stress management, public speaking to improve communication skills, theater for creativity and leadership, and a course on confidence to increase personal security.

These courses aim to improve the soft skills of our employees, create a positive and productive work environment for everyone, and are promoted and incentivized by the Elmec4you association.

Mindfulness course

Course dedicated to people managers

Public speaking course

– 100 colleagues enrolled in the first edition

Theatre company

– 30 actors
– 2 shows per year
– 200 spectators per show on average

Confidence course

+50 colleagues involved
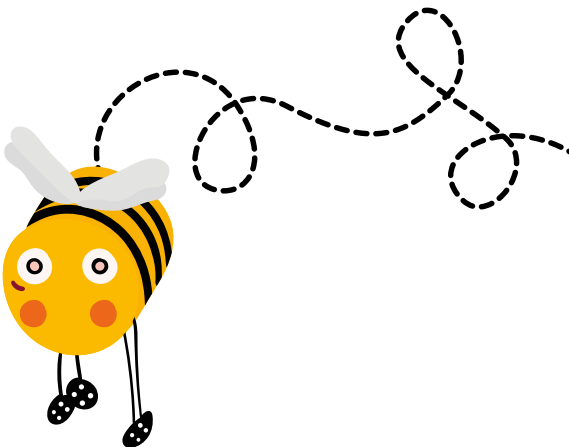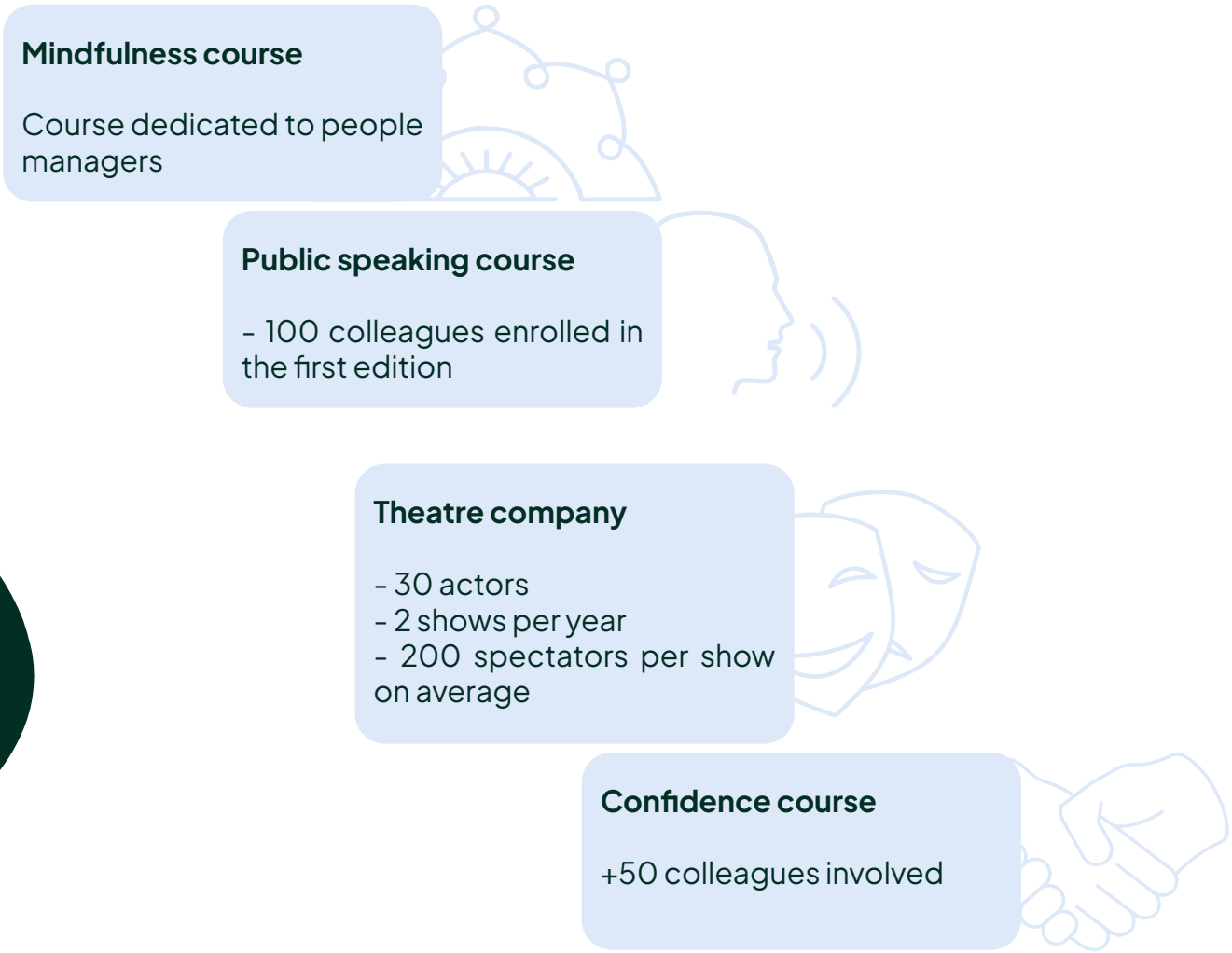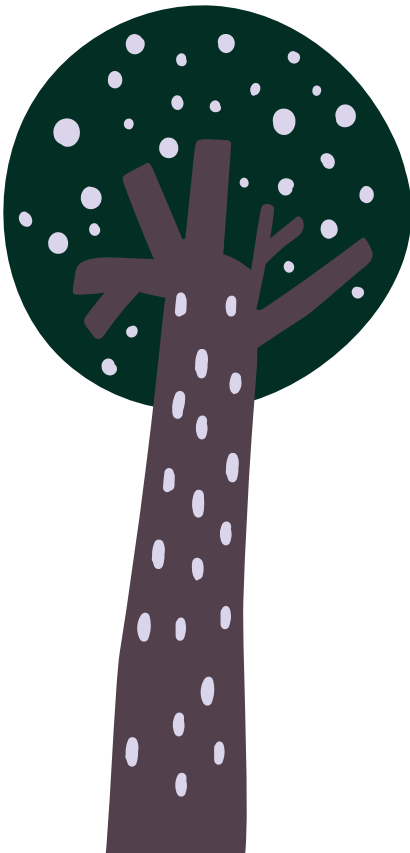
3.5.1 Training

Internal initiatives related to training:

Professional onboarding programs:

Our onboarding programs provide young talents with the training and skills needed for a stimulating career focused on continuous learning.
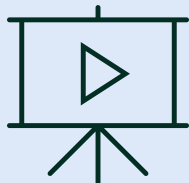
Recruitment process:

Our recruitment process is highly rigorous and merit-based, relying on a thorough and careful assessment of candidates' skills, experience, and potential.

Start program:

Our Start program offers comprehensive and personalized training for all new hires, ensuring they are equipped to work effectively and productively from day one.
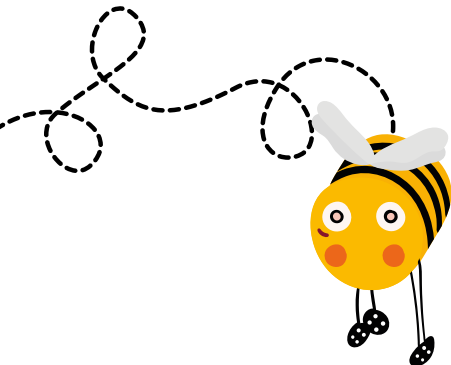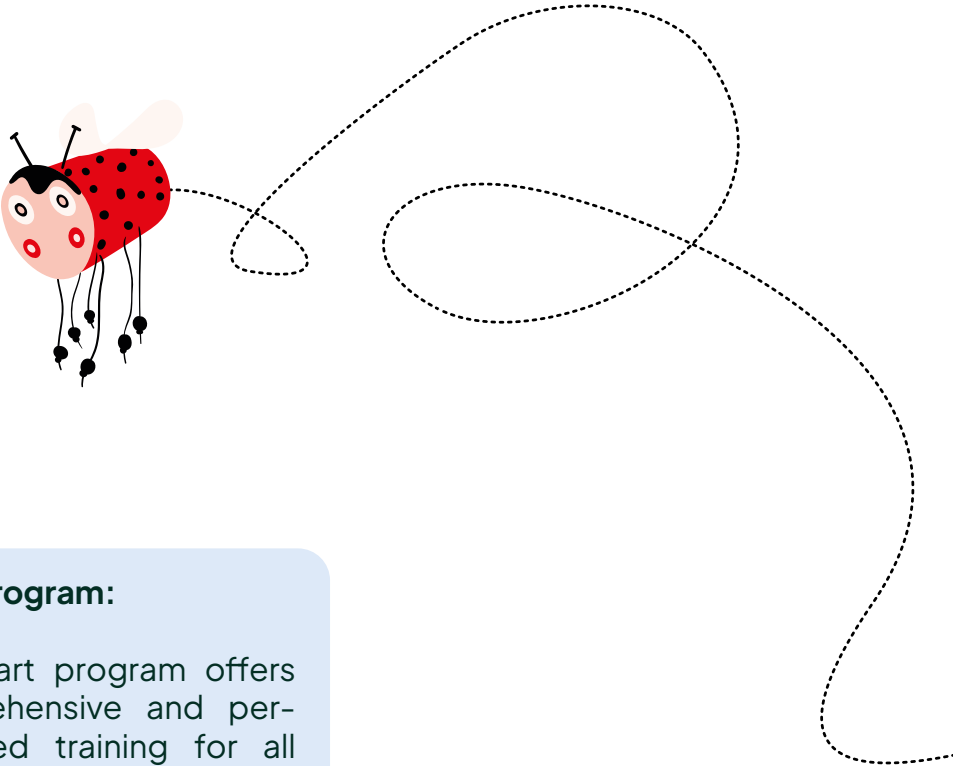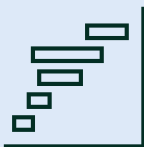
3.5.1 Training

Technical Certifications

Elmec's results are driven by the highly qualified people who make up our organization: 736 employees, over 80% of whom are specialized and highly certified technical professionals, available to meet our clients' needs 24/7. In 2024 alone, a total of 312 technical certifications were obtained.

312
Total Certifications Issued in 2024

SAP SAS ORACLE	SAP SAS ORACLE	ITIL PRINCE 2 DEVOPS AGILE	IBM AWS CISCO VMWARE VEEAM NETAPP CHECKPOINT MICROSOFT HPE SOPHOS KUBERNETES ANSIBLE

HP LENOVO APPLE DELL LOGITECH
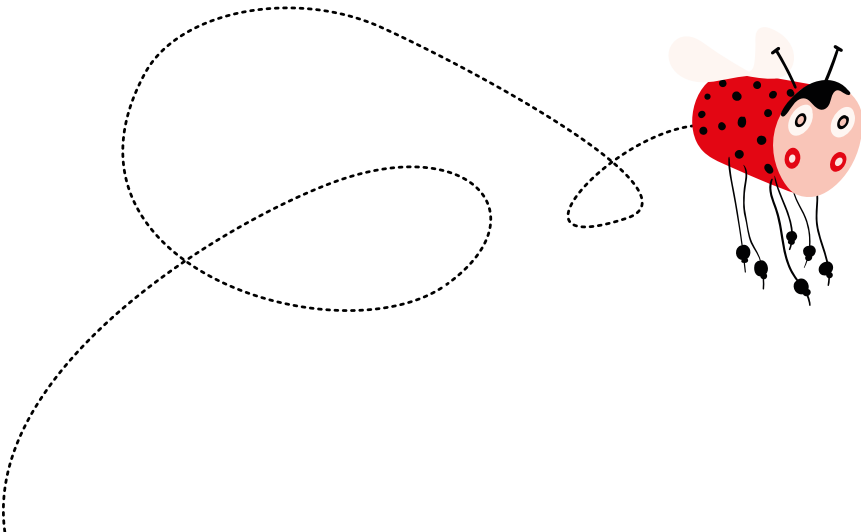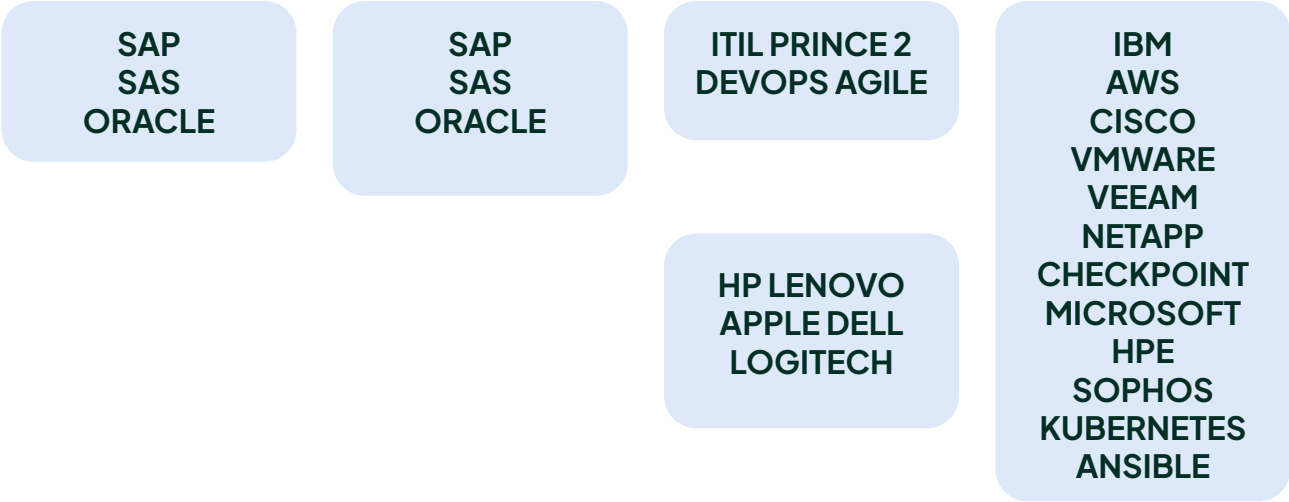
3.6 Diversity and Equal Opportunities

At Elmec, diversity management means recognizing and respecting individual differences within a shared corporate culture. We are committed to eliminating all forms of discrimination—particularly those based on gender, age, nationality, ethnic origin, ideology, and religious beliefs—by operating in compliance with laws, contractual obligations, customs, and cultural practices associated with the diverse backgrounds that define us.

We view diversity as a key value to be preserved and promoted in order to foster the growth of our company. In 2024, Elmec Informatica adopted its Diversity and Equal Opportunities Policy, with the goal of promoting and enhancing diversity and of creating a work environment where everyone feels respected and valued, while enjoying equal opportunities for growth and development.

Specifically, the Policy sets out guidelines for directors, managers, employees, agents, consultants, intermediaries, and other third-party representatives of Elmec, ensuring that the company operates in compliance with applicable laws, regulations, and principles on diversity and equal opportunities.

As of the end of 2024, Elmec Informatica's workforce consisted of 73% men (unchanged from 2023) and 26% women (also unchanged from 2023).

94% of employees had full-time contracts (93% in 2023), while part-time employees represented 6% of the workforce (7% in 2023), 66% of whom were women.

Elmec Informatica complements its Diversity and Equal Opportunities Policy with training and awareness programs aimed at employees, to ensure a workplace free from discrimination and to promote a corporate culture based on equality and mutual respect.

The tables below provide a detailed breakdown of the workforce by contract type (full-time vs. part-time, permanent vs. fixed-term), disaggregated by gender.

	2022			2023			2024		
	U	D	TOTAL	U	D	TOTAL	U	D	TOTAL
Full-time employees	451	136	**587**	496	160	**656**	528	165	**693**
Part-time employees	22	33	**55**	18	28	**46**	15	29	**44**
Total employees	**473**	**169**	**642**	**514**	**188**	**702**	**543**	**194**	**737**

	2022			2023			2024		
	U	D	TOTAL	U	D	TOTAL	U	D	TOTAL
Permanent employees	451	136	**568**	412	149	**561**	457	167	**624**
Fixed-term employees	22	33	**74**	102	49	**151**	86	27	**113**
Total employees	**473**	**169**	**642**	**514**	**188**	**702**	**543**	**194**	**737**

Development of New Tools to Facilitate the Work Life of Employees with Disabilities

Elmec Informatica recognizes the value of including people with disabilities and their contribution to the workforce. We are committed to removing barriers that prevent people with disabilities from reaching their full work potential by providing the necessary tools and resources to ensure full and equitable access and participation.

To this end, we have developed new tools to facilitate the work life of employees with disabilities, including the creation of Braille signage for the identification of workspaces and equipment.

Additionally, we work daily to make our offices physically and mobility barrier-free to guarantee access for all our employees.

We believe these efforts are essential to ensure the full and equitable inclusion and participation of people with disabilities in working life. We are determined to continue investing in these initiatives and to collaborate with relevant organizations and communities to create an increasingly inclusive and sustainable work environment for all our employees.

3.6 Diversity and Equal Opportunities

Free Sanitary Products

"Periods are not a luxury." We strongly believe in this slogan: free sanitary products are available in all restrooms.

Maternity Bonus

We protect the maternity of all our female colleagues.
A €2,500 bonus is granted upon maternity leave to help with expenses during this important time.

DIVERSITY AND EQUAL OPPORTUNITIES

Intercultural Exchange

We organize internal discussion sessions to raise awareness on inclusivity-related topics.

Barrier-Free Offices

Accessible workplaces to promote socialization, work, and movement without physical, sensory, or cognitive barriers.

Cultural Insights

We organized a Passion Time session with Carlotta Vagnoli to discuss stereotypes, toxic language, and gender-based violence.

International Aperitif

We organized an event where we tasted traditional dishes from the various cultures represented among Elmec's staff.

3.6.1 Gender wage Gap

Salaries for each contract category are defined in compliance with applicable laws and national collective agreements.

The compensation policy aims to fairly and concretely recognize the commitment and contribution of our people to the Company's success. Salary levels depend on the roles and responsibilities held, reflecting the required experience and skills, demonstrated excellence, and overall contribution to the business, without any discrimination.

For employees in managerial roles, ad personam bonuses (variable pay elements) are awarded based on the achievement of quantitative and qualitative objectives.

Elmec Informatica is committed to ensuring equal treatment between men and women, both in terms of pay and career opportunities. Our goal is to eliminate any gender disparities within the organization.

To achieve this, we have implemented measures to identify any pay differences between men and women, with the aim to correct them and ensure pay equity.

To date, we have identified some salary differences between male and female employees, and we are committed to addressing these gaps in the future.

Our performance evaluation system uses objective and transparent criteria to guarantee equal treatment for all employees, regardless of gender or ethnicity. Additionally, we have adopted policies to ensure pay equity among employees with similar roles and responsibilities.

GENDER GAP IN AVERAGE ANNUAL SALARY WOMEN VS. MEN 2022		
Employees	Middle Management	Executives
3,47%	10,6%	22,9%

GENDER GAP IN AVERAGE ANNUAL SALARY WOMEN VS. MEN 2023		
Employees	Middle Management	Executives
3,30%	9,95%	16,86%

GENDER GAP IN AVERAGE ANNUAL SALARY WOMEN VS. MEN 2024		
Employees	Middle Management	Executives
4,40%	8,18%	13,18%
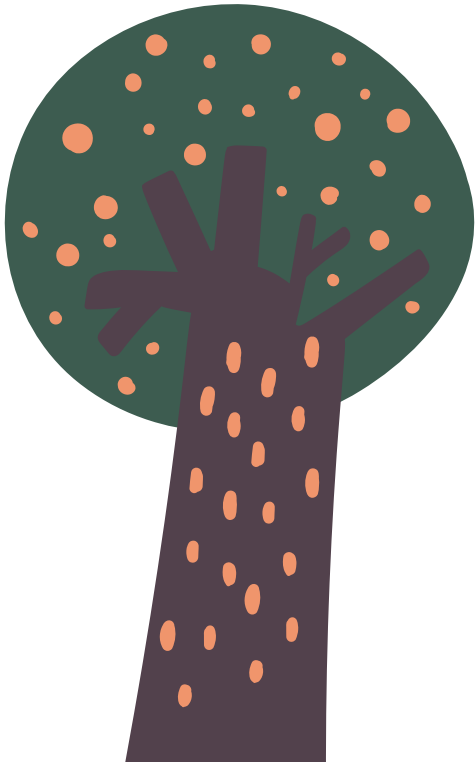
The table above shows the average gross annual income difference between women and men by job level. It should be noted that the figures for 2022 and 2023 differ partially from those reported in the previous report due to improvements made to the calculation system, making it more accurate and consistent.

The data on the gender pay gap reveal varying trends by job category. Among employees, there is a slight increase in the pay gap, from 3.30% in 2023 to 4.40% in 2024. Conversely, for the middle management category, the gap decreased from 9.95% to 8.18%, confirming a positive trend ongoing since 2022. The most significant improvement concerns senior management, where the gap dropped substantially from 16.86% to 13.18%.

These results have been made possible by the adoption of the Diversity and Equal Opportunities Policy and the Company's concrete commitment to promoting a fairer and more inclusive work environment, contributing to the gradual reduction of the gender pay gap.

Overall, the gender wage gap in 2024 stands at 7.48%, continuing to decrease since 2022.

3.6.2 Culture on Diversity & Inclusion

Elmec Informatica promotes an inclusive and diverse culture that values differences among people and sees them as a source of enrichment. We are committed to ensuring that all our employees feel welcomed and respected within the organization. To achieve this goal, we have implemented policies and initiatives that promote diversity, inclusion, and non-discrimination, for example through staff training and the organization of events celebrating cultural differences. During the year, there were no reported cases of discrimination within the company (0 cases also in 2022, 2023, and 2024).

On November 25, 2024, on the International Day for the Elimination of Violence against Women, we organized a sensitization event on Diversity and Inclusion. During the event, Carlotta Vagnoli, a writer and activist known for her commitment against stereotypes and gender violence, explained the dynamics that lead to discriminatory behavior through the presentation of her book "Maledetta sfortuna". Quick interventions were also made by representatives of local organizations such as the Felicita Morandi Foundation and the Cooperative for the Fight Against Marginalization, who provided further insights on the topic. The event, open to a mixed audience of adolescents and adults, highlighted the importance of adopting inclusive practices and language as essential tools to combat gender violence.

3.7 Health and Safety of Workers

We believe that the health and safety of workers are fundamental for the well-being and productivity of our employees. At Elmec, we commit to adopting preventive measures and reducing workplace accidents. We have implemented adequate precautions to manage risks, developed training projects, and ensured compliance with new regulations. Our activities focus on providing training courses on workplace hazards. We have an internal Health and Safety Manager who supports activities through constant analysis of incidents and near misses, with the support of periodic external consultants. We promote awareness and training of personnel, also consulting the Workers' Safety Representatives (RLS) and appointed supervisors.

We regularly offer workplace safety training courses and encourage our employees to follow balanced work programs and effectively manage stress. In 2024, a total of 1,013 hours of health and safety training were delivered, corresponding to 5% of total training hours. During the same period, no accidents involving our employees or external personnel occurred. Elmec Informatica actively involves its employees in managing workplace health and safety by organizing informative and training meetings in which employee feedback on addressed issues is encouraged.
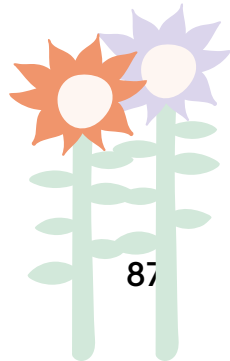
3.7 Employee Health and Safety

Elmec Informatica adopts a proactive approach to safeguarding the health and safety of its employees, participating in the Workplace Health Promotion (WHP) program promoted by the Lombardy Region. Through regular workplace inspections and risk assessments, we identify hazards related to employees' activities and promote healthy lifestyles through dedicated initiatives. We also provide ergonomic equipment, including for those working remotely.

We offer occupational health services, including periodic medical examinations, health evaluations, and management of work-related illnesses and injuries, ensuring the utmost confidentiality of personal data in compliance with current regulations.

The Health and Safety Prevention Officer (RSPP) coordinates these activities alongside a dedicated emergency management team that continuously monitors workplaces to minimize risks and hazards.

We foster transparent and ongoing communication about health and safety initiatives, encouraging collaboration between employees and management. Training on health and safety is regularly assessed and updated, with free courses offered during working hours.

2024	WORKPLACE INJURIES											
Type of workplace injuries by:	Number of injuries (permanent employees)			Number of injuries (fixed-term employees)			Number of injuries (non-employees)			Total number of workplace injuries		
Fatal accidents	U	D	**TOTAL**	U	D	**TOTAL**	U	D	**TOTAL**	U	D	**TOTAL**
Accidents with serious consequences (prognosis > 120 days)	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Accidents with prognosis between 40 and 120 days	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Accidents with prognosis less than 40 days	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Total occupational injuries recorded during the period	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**

There were no recorded workplace injuries in 2024.
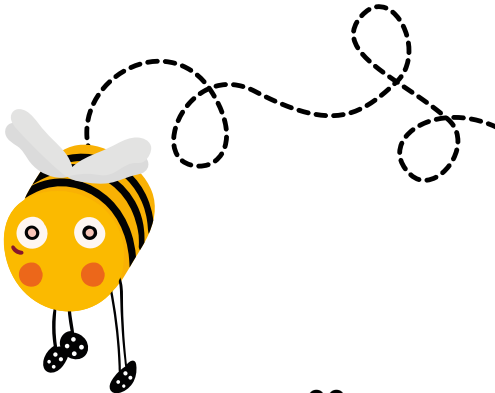
3.7 Health and Safety of Workers

2023	WORKPLACE INJURIES											
Type of workplace injuries by:	Number of injuries (permanent employees)			Number of injuries (fixed-term employees)			Number of injuries (non-employees)			Total number of workplace injuries		
Fatal accidents	U	D	TOTALE	U	D	TOTALE	U	D	TOTALE	U	D	TOTALE
Accidents with serious consequences (prognosis > 120 days)	0	0	0	0	0	0	0	0	0	0	0	0
Accidents with prognosis between 40 and 120 days	1	0	1	0	0	0	0	0	0	1	0	1
Accidents with prognosis less than 40 days	0	0	0	0	0	0	0	0	0	0	0	0
Total occupational injuries recorded during the period	1	0	1	0	0	0	0	0	0	1	0	1

The workplace injury that occurred during the year resulted in 87 days of absence and involved the fall of an employee who was wearing safety and anti-slip shoes.
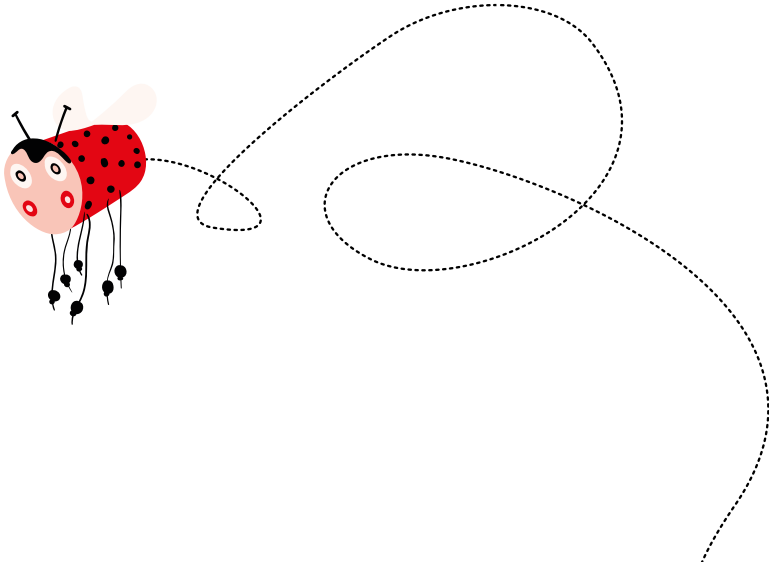
3.7 Health and Safety of Workers

2022	WORKPLACE INJURIES											
Type of workplace injuries by:	Number of injuries (permanent employees)			Number of injuries (fixed-term employees)			Number of injuries (non-employees)			Total number of workplace injuries		
Fatal accidents	U	D	**TOTALE**	U	D	**TOTALE**	U	D	**TOTALE**	U	D	**TOTALE**
Accidents with serious consequences (prognosis > 120 days)	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Accidents with prognosis between 40 and 120 days	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Accidents with prognosis less than 40 days	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**
Total occupational injuries recorded during the period	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**

There were no workplace injuries in 2022.
Please note that the number of injuries was adjusted (from 3 to 0) following a data review, which revealed that the reported cases were commuting accidents that occurred on the way to the workplace.
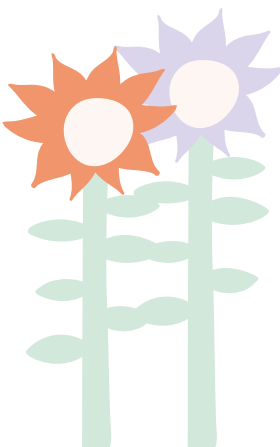
3.7 SHealth and Safety of Workers

No cases of occupational diseases were recorded in 2022, 2023, and 2024.

2024	Number of Occupational Diseases (Permanent Employees)			Number of Occupational Diseases (Temporary Employees)			Total Number of Occupational Diseases		
Type of occupational diseases by:	U	D	TOT	U	D	TOT	U	D	TOT
Cases of occupational diseases recorded	0	0	0	0	0	0	0	0	0
Fatal cases of occupational diseases	0	0	0	0	0	0	0	0	0
Total cases of occupational diseases	0	0	0	0	0	0	0	0	0

2023	Number of Occupational Diseases (Permanent Employees)			Number of Occupational Diseases(Temporary Employees)			Total Number of Occupational Diseases		
Type of occupational diseases by:	U	D	TOT	U	D	TOT	U	D	TOT
Cases of occupational diseases recorded	0	0	0	0	0	0	0	0	0
Fatal cases of occupational diseases	0	0	0	0	0	0	0	0	0
Total cases of occupational diseases	0	0	0	0	0	0	0	0	0

2022	Number of Occupational Diseases (Permanent Employees)			Number of Occupational Diseases(Temporary Employees)			Total Number of Occupational Diseases		
Type of occupational diseases by:	U	D	TOT	U	D	TOT	U	D	TOT
Cases of occupational diseases recorded	0	0	0	0	0	0	0	0	0
Fatal cases of occupational diseases	0	0	0	0	0	0	0	0	0
Total cases of occupational diseases	0	0	0	0	0	0	0	0	0

3.7 Health and Safety of Workers

Days of absence recorded:

2024*	PERMANENT EMPLOYEES			FIXED-TERM EMPLOYEES			TOTAL NUMBER OF DAYS OF ABSENCE		
Days of absence	U	D	TOTALE	U	D	TOTALE	U	D	TOTALE
Days of absence due to occupational injuries	21	0	21	0	0	0	21	0	21
Days of absence due to occupational diseases	0	0	0	0	0	0	0	0	0
Total days of absence	21	0	21	0	0	0	21	0	21

* The 21 days of absence due to occupational injuries in 2024 refer to an individual who sustained the injury prior to becoming a direct employee, during their time as a temporary agency worker.

2023	PERMANENT EMPLOYEES			FIXED-TERM EMPLOYEES			TOTAL NUMBER OF DAYS OF ABSENCE		
Days of absence	U	D	TOTALE	U	D	TOTALE	U	D	TOTALE
Days of absence due to occupational injuries	87	0	87	0	0	0	87	0	87
Days of absence due to occupational diseases	0	0	0	0	0	0	0	0	0
Total days of absence	87	0	87	0	0	0	87	0	87

2022*	PERSONE CON CONTRATTO A TEMPO INDETERMINATO			PERSONE CON CONTRATTO A TEMPO DETERMINATO			NUMERO TOTALE GIORNI DI ASSENZA		
Days of absence	U	D	TOTALE	U	D	TOTALE	U	D	TOTALE
Days of absence due to occupational injuries	0	0	0	0	0	0	0	0	0
Days of absence due to occupational diseases	0	0	0	0	0	0	0	0	0
Total days of absence	0	0	0	0	0	0	0	0	0

* There were zero days of absence in 2022. It should also be noted that the number was revised (from 120 to 0) following a data review, which revealed that the absences were related to three commuting accidents.

3.8 Industrial Relations and Employment Protection

All employees of Elmec Informatica are covered by national collective labour agreements applicable according to current legislation. 99% of employees are subject to the Metalworkers' National Collective Labour Agreement (CCNL Metalmeccanici).

Elmec Informatica respects employees' right to unionize and to collectively negotiate their working conditions.

The company is committed to maintaining an open and constructive dialogue with trade union representatives and fully respects workers' rights.

It also guarantees stable and secure employment for its workforce, with attention to work-life balance needs.

In conclusion, Elmec Informatica is committed to promoting diversity, inclusion, and non-discrimination within the organisation, ensuring equal opportunities and a safe, healthy working environment for all employees. The company will continue to work on improving its policies and initiatives to create an increasingly fair and sustainable workplace.
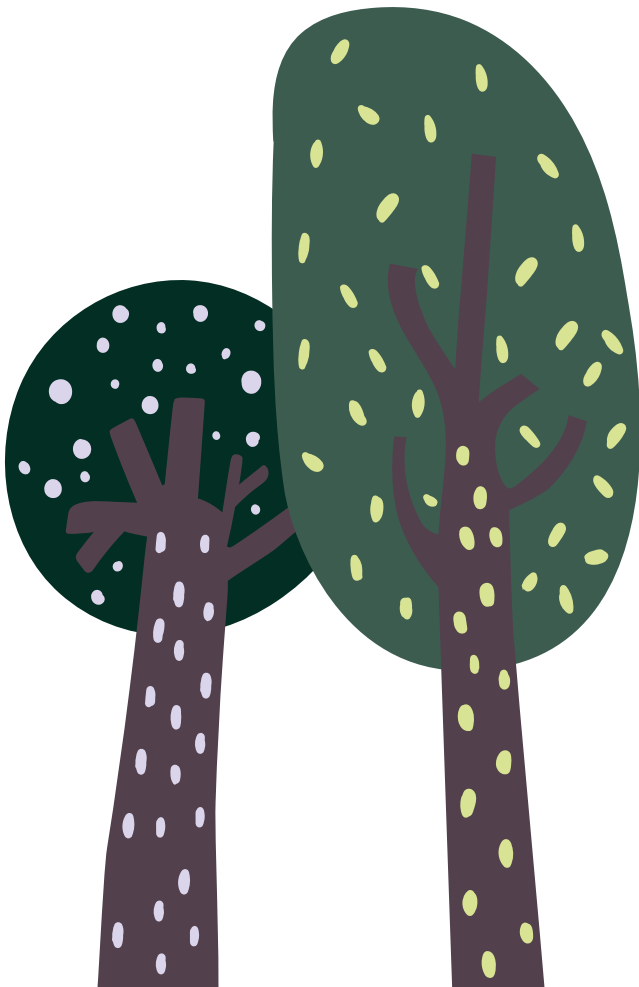
TRADE UNION RELATIONS 2024	U	D	TOTALE
Metalworking Industry National Collective Labour Agreement	532	192	**724**
Managers' National Collective Labour Agreement – Industry	10	1	**11**
Managers' National Collective Labour Agreement – Commerce	1	1	**2**
Total employees covered by national collective labour agreements	543	194	**737**
Total employees	543	194	**737**
% of employees covered by national collective labour agreements	100%	100%	**100%**

TRADE UNION RELATIONS 2023	U	D	TOTALE
Metalworking Industry National Collective Labour Agreement	504	187	**691**
Managers' National Collective Labour Agreement – Industry	9	0	**9**
Managers' National Collective Labour Agreement – Commerce	1	1	**2**
Total employees covered by national collective labour agreements	514	188	**702**
Total employees	514	188	**702**
% of employees covered by national collective labour agreements	100%	100%	**100%**

TRADE UNION RELATIONS 2022	U	D	TOTALE
Metalworking Industry National Collective Labour Agreement	466	168	**634**
Managers' National Collective Labour Agreement – Industry	6	0	**6**
Managers' National Collective Labour Agreement – Commerce	1	1	**2**
Total employees covered by national collective labour agreements	473	169	**642**
Total employees	473	169	**642**
% of employees covered by national collective labour agreements	100%	100%	**100%**

3.9 Our Non-Material Topics

3.9.1 Life at the Company

Elmec Informatica has implemented numerous initiatives aimed at creating a positive and enjoyable work environment for its employees. This includes promoting team-building activities, creating comfortable workspaces, encouraging a healthy work-life balance, and organizing social and well-being events for employees.

The company believes that a positive work environment can enhance employee motivation and confidence, improve their ability to face daily challenges, and foster greater collaboration, creativity, and innovation. Elmec is committed to providing a workplace that supports employee development, happiness, and the overall success of the company.

Team building

At Elmec Informatica, leadership strongly believes that team cohesion is essential to the company's success. For this reason, the company regularly organizes various team-building activities for its employees. These activities can take many forms, such as sports events, team games, brainstorming sessions, internal hackathons, and more. The primary goal of these initiatives is to encourage collaboration among colleagues by promoting idea sharing, effective communication, and problem-solving.

Team-building activities not only strengthen relationships among coworkers but also boost motivation, productivity, and creativity within the company. Moreover, they offer employees a chance to connect outside the work environment, helping to create a more pleasant and engaging workplace.

Company Library

Elmec also offers a company library where employees can borrow books or bring in their own previously read books to share with colleagues.

Company Clubs

Several company clubs have been established at Elmec Informatica to promote social interaction, inclusion, and the appreciation of individual passions. The active clubs include:

- ET Lab – Theater Club
- Crochet Club
- Book Club
- Chess Club
- Garden Club
- Creative Club
- Secret Level – Game Room Club
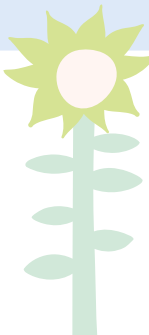
3.9.2 Volunteering

In 2024, Elmec restarted its volunteering initiative called the "50X50 Challenge," an ambitious and meaningful project for the local ecosystem.

The challenge was simple yet demanding: Elmec's staff were invited to run, walk, or cycle 50 kilometers within 50 days. Once the goal was reached, Elmec pledged to donate €50 to the Italian Union of the Blind and Visually Impaired (UICI), an organization that has been supporting blind, visually impaired, and additionally disabled people for over 100 years, promoting equality of rights, accessibility and social inclusion, autonomy, and mobility.

In total, 24,133 kilometers were covered, and €15,000 were donated to the association.

This initiative adds to the many monetary donations that Elmec Informatica provides to various organizations within the Province of Varese and beyond.

3.9.3 Respect for Human Rights, a Growing Issue

Elmec aims to adopt a holistic and proactive approach to safeguard the fundamental rights of all individuals.

In particular, our policy establishes respect for human rights as a primary principle, ensuring that everyone involved in our activities, from employees to suppliers, is treated fairly and with respect. Additionally, we value diversity and uphold the principle of non-discrimination to create an inclusive and welcoming work environment for all.

Regarding working conditions, we commit to providing a healthy and safe workplace for all our employees, opposing forced labor and human trafficking. We respect working hours and offer fair compensation and benefits to our employees. Moreover, we ensure that child labor is never used at any stage of our activities, always guaranteeing safety and health at work for all employees.

We also take the workplace environment very seriously by adopting measures aimed at ensuring a sustainable and environmentally conscious workplace.

Our policy further includes freedom of association and collective bargaining, recognizing employees' rights to organize and negotiate their working conditions. We also respect the privacy of our employees and are committed to engaging local communities and stakeholders in our activities.

Ultimately, Elmec Informatica's human rights policy represents a significant step forward in protecting the fundamental rights of all individuals involved in our activities. We are proud to have adopted these principles and to actively work to ensure their effective implementation.

4. ENVIRONMENTAL ASPECTS
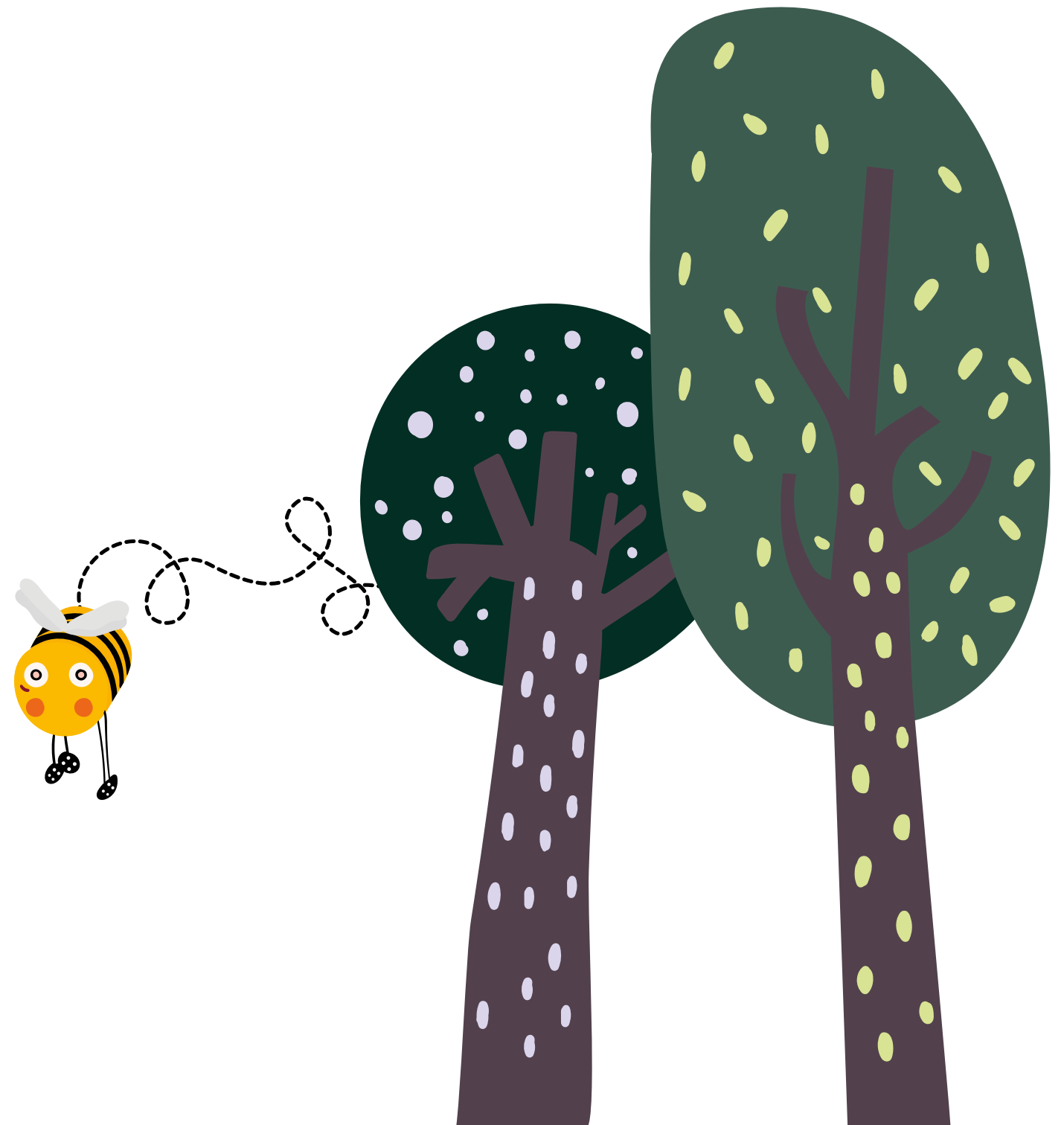
4.1 Environmental Risks and Key Topics for Elmec

The first Elmec company was founded back in 1971 — a very different organization from what it is today, but already committed to envisioning sustainable development beyond mere economic growth. We strive to engage people in initiatives aimed both at mitigating the effects of climate change, reducing waste, and also adapting to and compensating for environmental impacts.

As a company operating in the technology sector, Elmec Informatica faces several challenges and risks related to environmental issues. In particular, the key topics to consider are:

Energy Consumption and Green Services:
It is important for Elmec Informatica to invest in sustainable technologies, such as the use of recyclable materials, improving the energy efficiency of products, and utilizing renewable energy sources. This can increase demand from customers who are increasingly attentive to environmental sustainability. Additionally, Elmec Informatica reduces its own energy consumption, for example through the use of low-consumption technologies or the adoption of systems to monitor and control energy usage.

Circular Economy:
Elmec Informatica implements circular economy models based on rethinking the product life cycle and their refurbishment and reintegration into the market. The circular economy also includes waste management. The company properly manages its waste, for example through separate waste collection and recycling. Special attention is given to the management of waste coming from decommissioned technological equipment.

Emissions and Climate Change:
The company monitors its greenhouse gas emissions and works to reduce them. Additionally, it considers the effects of climate change on its activities, for example by reducing the use of plastics and supporting initiatives that promote environmental sustainability.
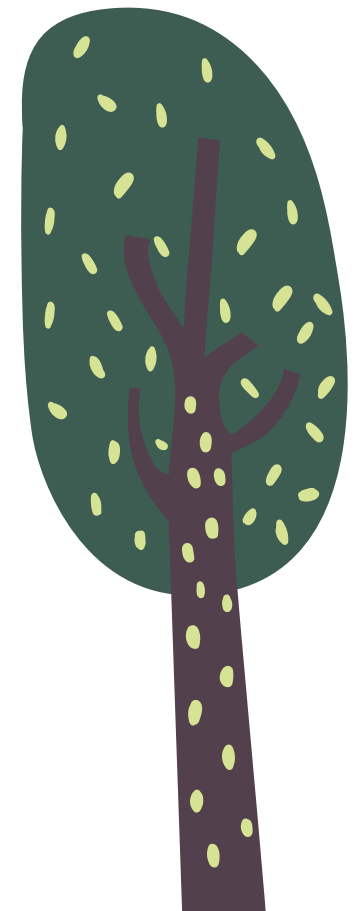
4.1 Environmental Risks and Relevant Topics for Elmec

In addition to these three topics, the ESG Risk Assessment analysis identified 23 risks related to environmental aspects. The following table lists these risks by category and classifies them according to their net risk, that is, the residual risk level after the implementation of mitigation measures carried out by Elmec.

	Number of risks identified by Net Risk					
Tematica	**High**	**Medium High**	**Medium**	**Medium Low**	**Remote**	**Total Risks**
Biodiversity and land use	0	0	1	0	0	1
Climate change adaptation and mitigation	0	4	1	0	0	5
Deforestation	0	0	1	0	0	1
Green Building	0	1	0	0	0	1
Renewable Energy	0	1	0	0	0	1
Waste	0	3	1	0	0	4
Pollution	0	1	1	0	0	2
Service Carbon Footprint	0	2	0	1	0	3
Circular Economy	0	2	1	0	0	3
Water Resources	1	0	0	0	1	2
Total Risks	1	14	6	1	1	23

4.1.1 Environmental Protection

Elmec is committed to sustainability by striving to best interpret essential values such as Reduction, Recycling, and Reuse. Thanks to this spirit, Elmec not only aims to raise public awareness on sustainability issues but also to promote a long-term cultural change, with the goal of making sustainability a value shared by the community as a whole.

In this way, the company becomes a spokesperson for a vision of sustainability that goes beyond mere technical and engineering aspects to embrace a broader and more complex concept that takes into account the social and cultural dimensions related to sustainability itself.

In other words, Elmec wants to demonstrate that sustainability is not just a matter of technology and infrastructure, but above all a matter of culture and shared values, which are essential to guarantee a sustainable future for generations to come.

Elmec's initiatives to promote a culture of sustainability include:

Also in 2024, for the fourth consecutive year, Elmec obtained the ISO 14001 certification, an internationally recognized standard for environmental management systems. This certification attests to Elmec's adoption of a structured and systematic approach to monitoring, managing, and improving the company's environmental performance.

Eco box

Waste Management

Sustainability Week

Plastic aware project

Buytec

beekeeping hives

emission calculation and offsetting

Home automation

Green data center

Photovoltaic systems

Recharging stations

Bike to work

Carpooling
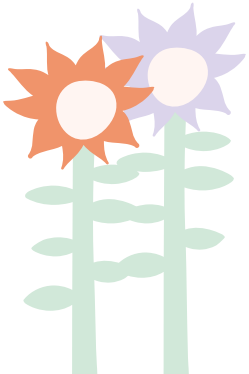
4.1.2 Environmental Policies

Elmec Informatica, like many other companies, has recognized the importance of adopting sustainable environmental policies to reduce the environmental impact of its activities. To achieve this goal, the company has implemented several measures, including reducing energy consumption through the use of low-consumption technologies and the implementation of monitoring and control systems.

Additionally, Elmec Informatica has launched a waste management program that includes recycling and the proper disposal of materials used in its operations, as well as promoting practices to reduce waste and packaging.

The company has also introduced sustainable mobility policies for its employees, encouraging the use of eco-friendly transportation means, such as bicycles and electric vehicles.

In this regard, Elmec has established a sustainability policy, which can be accessed at the following link:

https://hub.elmec.com/hubfs/Elmec_Informatica_Policy_Sostenibilita.pdf
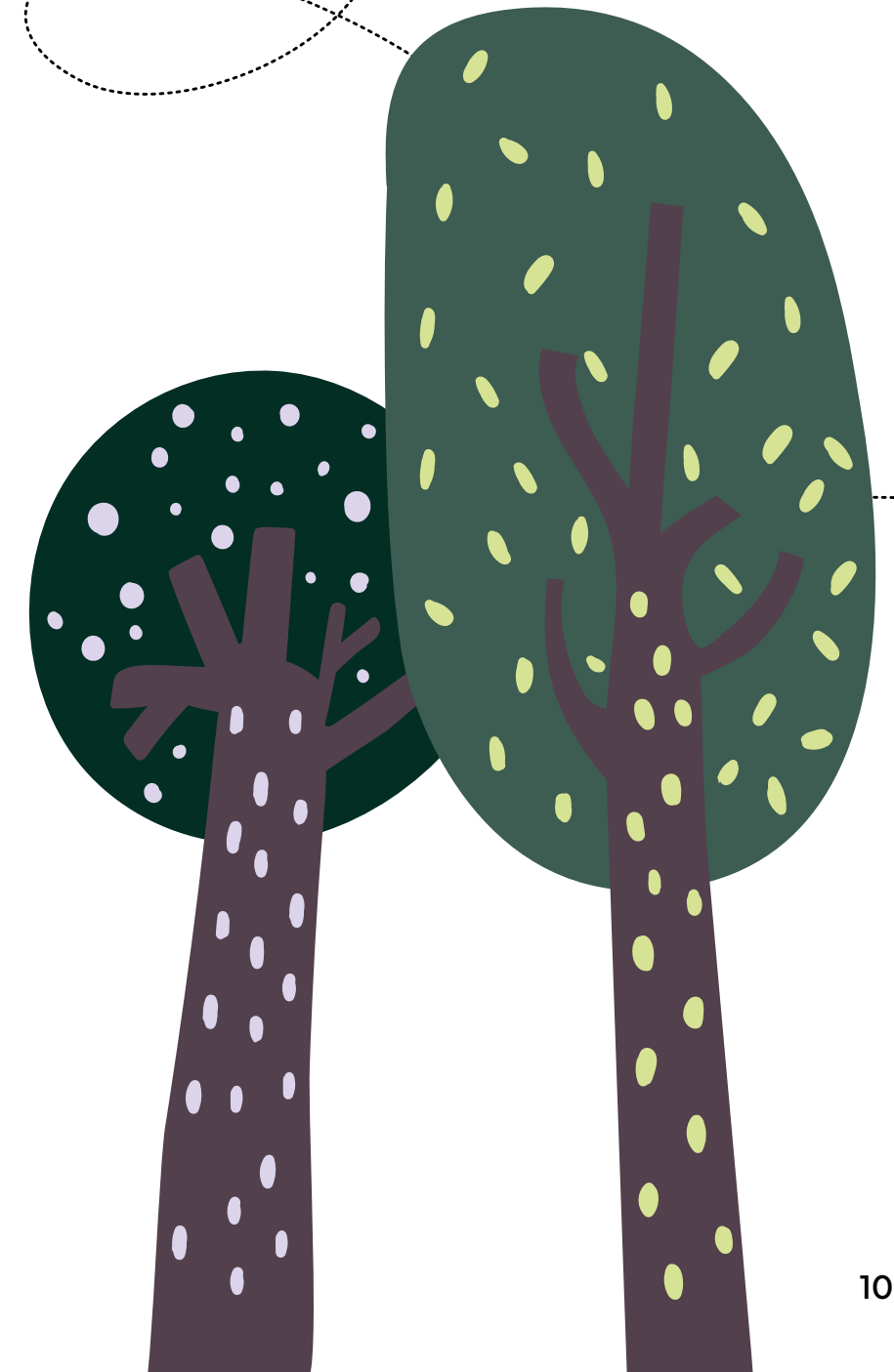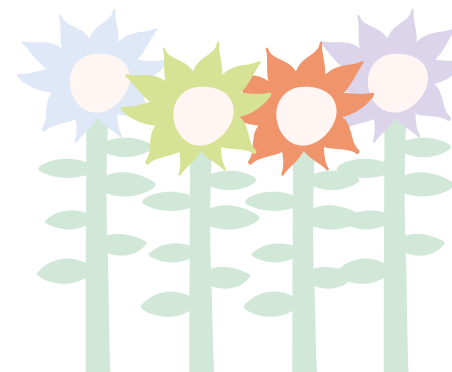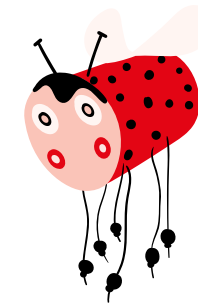
4.2 Energy Consumption, Products, and Green Services

Green data center powered by 100% renewable energy

In 2024, we made a significant step towards a sustainable future: we purchased enough renewable energy to cover 100% of the annual electricity consumption of our Green Data Center. This milestone represents a major advance in our journey to reduce CO_2 emissions at the corporate level and to minimize our negative impact on the environment.
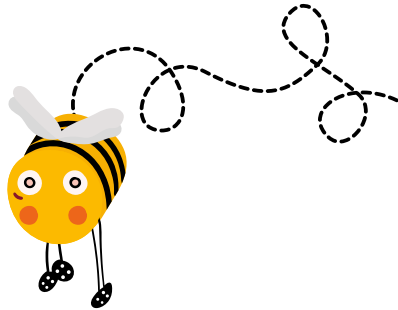
Why it is a Green Data Center

Here are the features that distinguish our TIER IV certified facility:

Industrial area remediation	Cooling system	Photovoltaic panels	Energy efficiency index
Remediation of an industrial area (13,000 sqm)	Smart cooling system	Pannelli fotovoltaici forniti da Elmec Solar	Design PUE of 1.18 (evaluated at 50% of total load). Global average 1.56
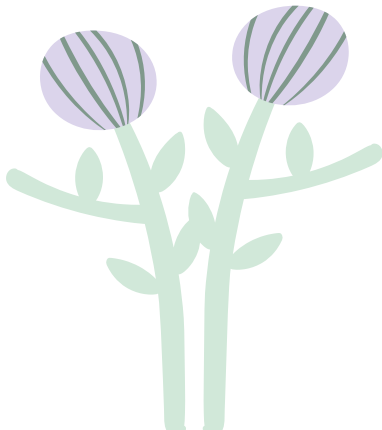
4.2 Energy Consumption, Products, and Green Services

Energy Consumption	Unità di misura	2024	2023	2022*
Energy consumed from fossil sources				
Electric energy	MWh	1.884	2.105	1.857
Natural gas	MWh	374	231	
Diesel	MWh	1.402	1.596	
Gasoline	MWh	710	547	
Methane	MWh	0,67	0,25	
Total energy from fossil sources	MWh	4.371	4.479	
Renewable energy				
Photovoltaic	MWh	541	297	182
Data Center (renewable energy purchased with certificate of origin)	MWh	3.572	3.862	3.699
Total renewable energy	MWh	4.113	4.159	3.881
Total energy consumed	**MWh**	**8.484**	**8.638**	**5.738**

In 2024, the total energy consumption of Elmec Informatica amounted to 8,484 MWh, showing a slight decrease of -1.8% compared to 8,638 MWh in 2023. Breaking it down, consumption from fossil fuel sources dropped from 4,479 MWh in 2023 to 4,371 MWh in 2024, marking a -2.4% reduction. Regarding renewable energy, total consumption remained essentially stable, moving from 4,159 MWh in 2023 to 4,113 MWh in 2024 (-1.1%). Notably, there was a significant increase in production from internal photovoltaic systems (+82.1%), reaching 541 MWh, confirming the progressive strengthening of our self-production capacity.

*Liquid fuels have been converted and reported in MWh as required by the ESRS. Data for the year 2022 is not available.

By "Green Certified devices" we mean technological devices that have obtained Energy Star or EPEAT certification. These certifications confirm that the devices meet strict environmental and energy efficiency standards, thus helping reduce environmental impact and promoting sustainable practices in the technology industry. The increase in green devices managed by the company, both in 2024 and 2023 compared to 2022, was driven by a more conscious choice of our technology partners. We prioritized devices certified by Energy Star or EPEAT, ensuring excellent energy performance and reduced environmental impact.

GREEN PRODUCTS AND SERVICES	2024	2023	2022
Number of "Green Certified" hardware units sold/rented to customers	48.536	51.173	66.012
Total hardware units sold/rented to customers	48.536	51.173	81.179
Percentage of "Green Certified" hardware over total hardware sold/rented to customers	100%	100%	81%

Charging Stations for Electric Vehicles

Through the installation of charging stations for electric vehicles, Elmec has made a concrete commitment to combating climate change.

The use of renewable energy sources is, for us, an effective means to support this goal, complementing the many other internal initiatives already in place to reduce the company's energy consumption and carbon footprint.

There are currently 3 charging stations available on our premises, and they are offered free of charge to our visitors.
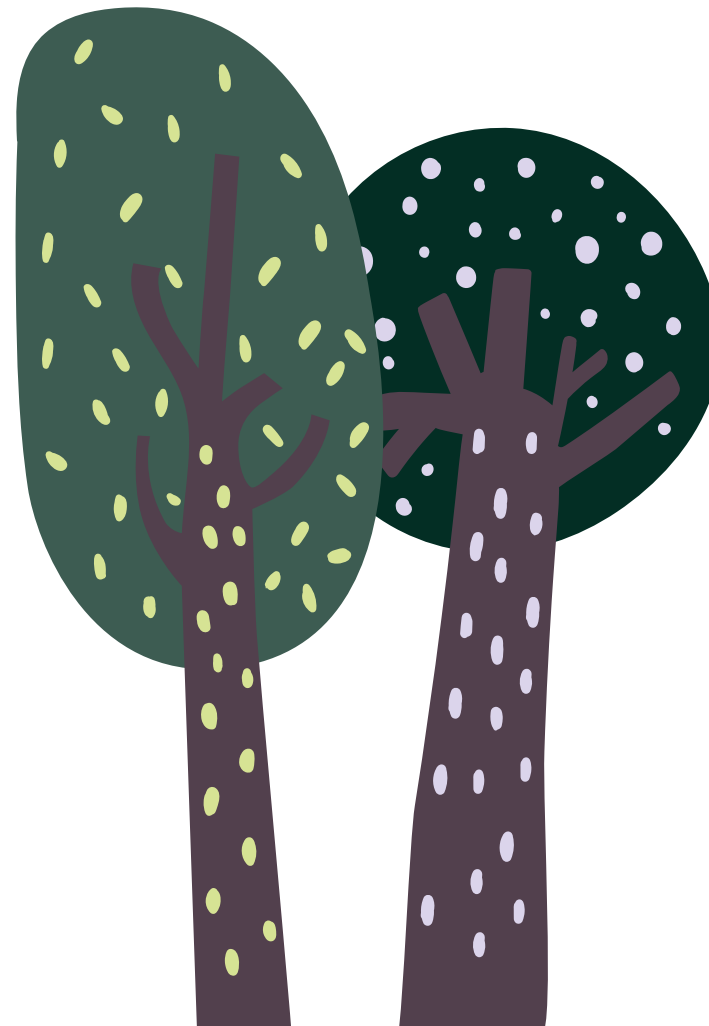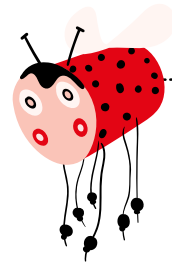
Elmec Informatica's circular economy strategy focuses on waste reduction through the responsible disposal of IT and electronic devices, the selection of low-energy consumption products and services, and the optimized management of devices via MyElmec.

We also collaborate with partners who share our sustainable approach.

We have implemented several measures for the disposal of non-functional devices through certified partners, use packaging made from recyclable materials compliant with current regulations, and promote the reuse of devices at the end of their operational lease in collaboration with Buytec.

Additionally, up to 10% of devices at the end of the Device-as-a-Service (DaaS) contract are donated to a charitable organization that repurposes them for new users, aligning with the principles of a circular economy.

Waste management is also an integral part of this process: each site, within the framework of the Environmental Management System based on the ISO 14001 standard, has adopted specific procedures to regulate this activity, ensuring not only compliance with relevant legislation but also the continuous improvement of performance aimed at reducing the amount of waste generated and maximizing recycling.

4.2.2 Water Resources

Elmec's water resources come primarily from the municipal water supply and are used for sanitary purposes in the office facilities. In addition, Elmec draws water from an artesian well to cool its Data Center.

Below, we report the following consumption data:
• Sanitary water discharge for the years 2022, 2023, and 2024.
• Water withdrawal for the cooling of the Data Center. The increasing trend in discharged water is attributable to the ongoing expansion of the campus due to the hiring of new personnel.

Water Discharged	2024	2023	2022
Unit of measurement: m³	8.462	8.000	7.000

Water Usage for Data Center Systems	2024	2023	2022
Municipal water withdrawal [m³]	286	971	1.970
Well water withdrawal [m³]	3.601	3.204	1.989
Total water withdrawal [m³]	3.887	4.175	3.959
Total IEC* usage [m³]	1.734	2.022	2.030

*IEC refers to Indirect Evaporative Cooling, meaning the cooling system used for the Data Center rooms.
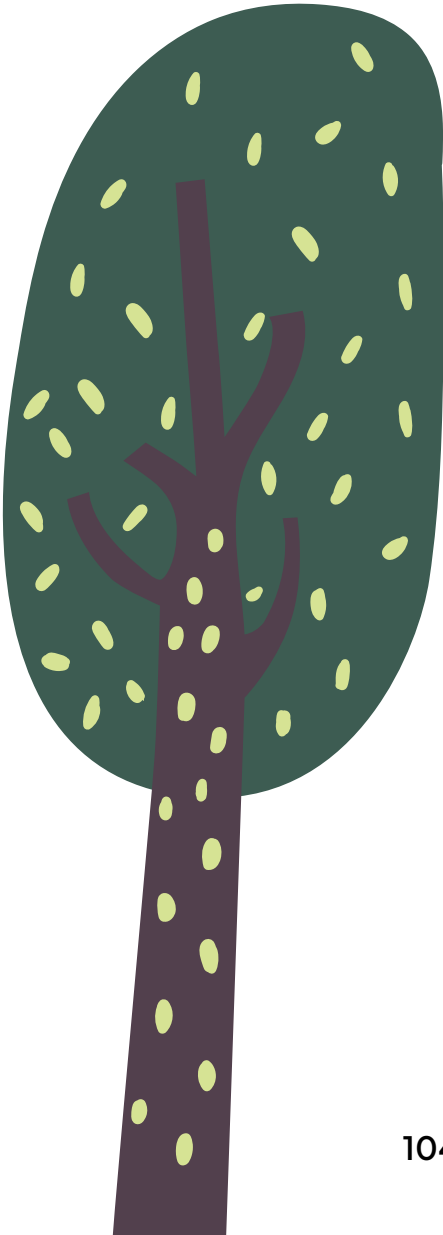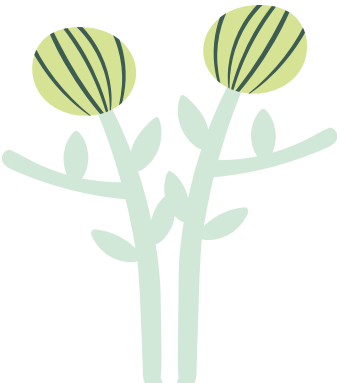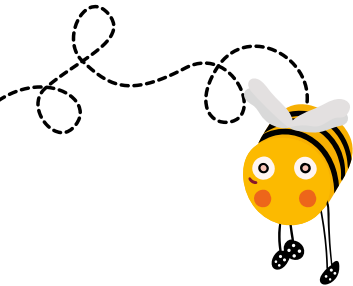
4.2.3 Environmentally Material Topics

Circular Economy

Through Buytec, we give a second life to the devices we supply to companies during the operational leasing of workstations. This choice, in a complex historical and macroeconomic context marked by a shortage of raw materials, extends the lifespan of products, allowing them to be used well beyond a single cycle. Additionally, we properly manage waste generated at our sites, raising employee awareness about correct waste sorting and the principle of reduction.

Emissions and Climate Change

Elmec monitors its greenhouse gas emissions both at the corporate level and regarding its commercial offerings. Moreover, we work to reduce and potentially offset these emissions. We take seriously the impacts of climate change on our business, for example, by reducing plastic usage and supporting initiatives that promote environmental sustainability and the recycling of items and waste.

Energy Consumption, Green Products and Services

Within Elmec's facilities, we strive to reduce energy consumption by using home automation, renewable energy sources, and small but important measures to lessen the environmental impact of our sites. Regarding service delivery, Elmec is committed to researching the best solutions from both a quality and environmental standpoint.
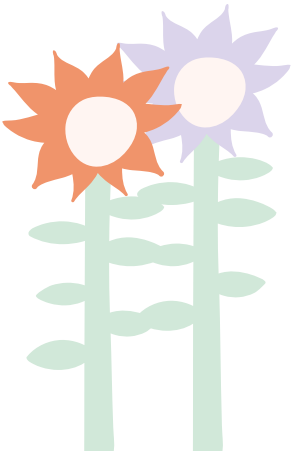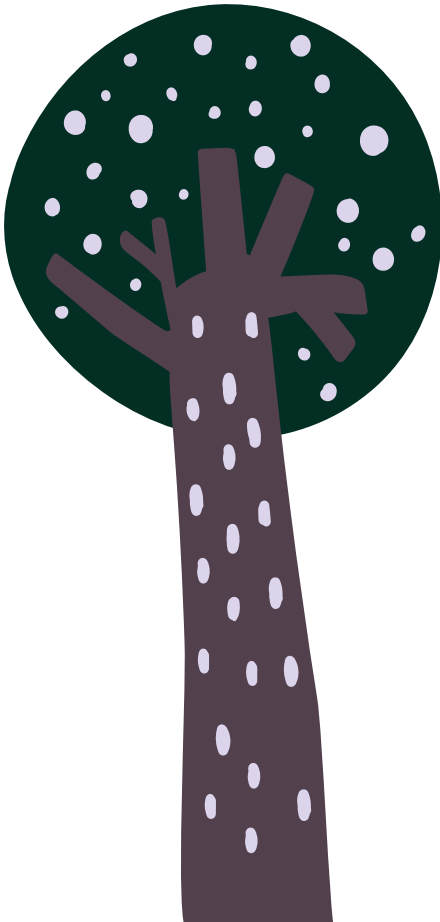
4.3 Emissions and Climate Change

4.3.1 Energy Sources

Although the building infrastructure was designed based on energy supply from fossil fuel sources, the company's direction is to optimize plant management, minimize energy waste, and, where possible, shift the energy supply toward renewable sources.

The Data Center is a clear example of this commitment: since 2021, Elmec has chosen to power this facility 100% with energy from renewable sources.

Additionally, Elmec's sites are equipped with photovoltaic and geothermal systems as well as next-generation LED lighting, which enables energy savings of 50% compared to traditional lamps.

In 2024, the company-owned photovoltaic systems produced 541 MWh, contributing to a reduction of 139,000 kg of CO_2 emissions.

A fundamental role in reducing energy consumption is also played by the use of home automation: numerous sensors are installed in the buildings to optimize energy use according to external climatic conditions. Lighting and heating automatically adjust to actual needs.
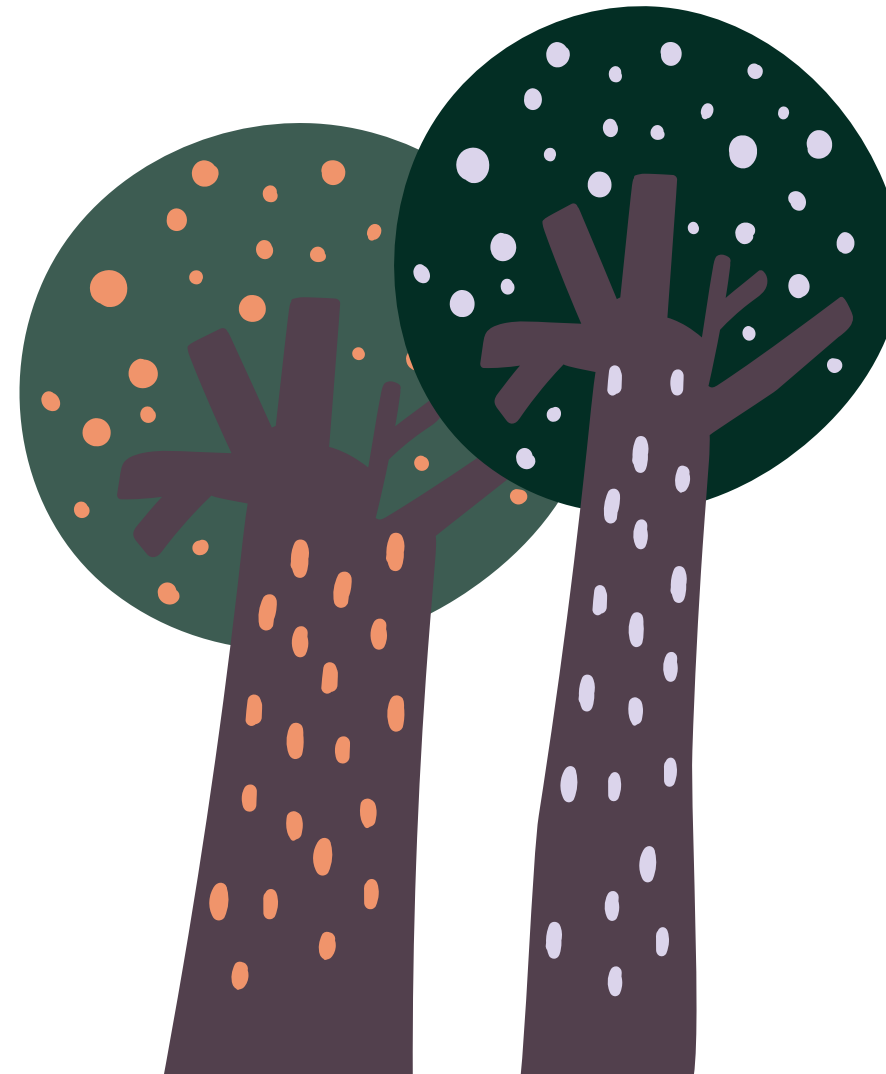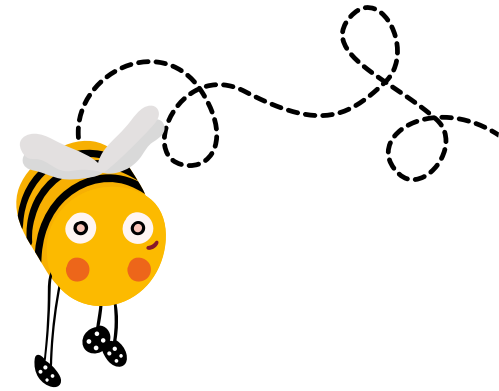
4.3.2 Greenhouse Gas Emissions

Elmec Informatica is aware of the fundamental role that companies can and must play in the fight against climate change. Reducing greenhouse gas (GHG) emissions is now a global priority, and the contribution of businesses is essential to achieve the goals set by international institutions.

For this reason, Elmec is committed annually to measuring, reporting, and reducing its carbon footprint. To effectively understand and manage its environmental impact, Elmec has established a structured process for measuring and reporting its greenhouse gas emissions. This process is based on internationally recognized principles and involves several steps, starting from defining the reporting boundaries to selecting the most appropriate calculation methodologies for each emission source.

As provided by the GHG Protocol, Elmec has divided its emissions into three categories to precisely identify the origin of emissions and organize the reporting work:

-      Scope 1 includes all direct emissions generated from sources owned or directly controlled by the company, such as fuel used for the company fleet or gas for heating buildings.

-      Scope 2 refers to indirect emissions resulting from the production of electricity purchased and consumed by the company.

-      Scope 3 includes all other indirect emissions related to business activities along the entire value chain, both upstream (such as production and transportation of purchased goods) and downstream (such as use and disposal of sold products).

To determine which categories to analyze in greater depth, Elmec conducted a materiality assessment. This step helped identify the most significant emission sources and exclude marginal ones, thus ensuring effective reporting focused on areas with the greatest environmental impact.

To quantify emissions produced by its activities, Elmec has adopted a variety of calculation methods, selected according to the type of activity and available data. For Scope 1 and 2 emissions, calculations are based on energy consumption data recorded by the company, to which specific emission factors from the GHG Protocol and IPCC guidelines—two of the main international references in the field—are applied.

For Scope 2 emissions, two different approaches have been used, both recognized by international standards:

Scope 2 emissions location-based

Calculates emissions based on the average energy mix of the country where the energy is consumed. In practice, it considers how much CO_2 is typically produced in Italy for each kWh of electricity fed into the grid.

Scope 2 emissions Market-based

Takes into account the specific characteristics of the energy purchased by the company, considering for example Guarantees of Origin that certify the use of energy from renewable sources. This approach allows for a more accurate measurement of the environmental impact related to energy supply choices.

4.3.2 Greenhouse Gas Emissions

For Scope 3 emissions, the calculation requires more complex methods due to the variety and complexity of the emission sources involved. For this purpose, Elmec has adopted the following methodologies:

- Spend-based method: used to estimate emissions related to purchased goods and services by calculating the environmental impact based on the amount spent and the relevant industry sector.

- Distance-based method: applied to emissions generated by transportation and employees' commuting, considering the distances traveled and the modes of transport used.

- Sector average data method: employed for activities such as waste management and fuel consumption that are not directly measurable, using average data available from literature or international databases.

To ensure maximum accuracy and reliability in emissions estimation, Elmec uses international life cycle assessment (LCA) databases that provide updated emission factors for materials, production processes, and activities across various industrial sectors. These sources offer a solid and consistent data foundation to build accurate and internationally comparable reporting.

Category Scope 3	Materiality Analysis	Calculation Methodology
Purchased goods and services	**Significant**	**Spend based**
Capital goods	Significant	Average spend based
Fuel- and energy-related activities	**Significant**	Average data
Upstream transportation and distribution	**Significant**	Distance based
Waste generated in operations	**Significant**	Average data
Business travel	**Significant**	Distance based
Employee commuting	**Significant**	Distance based
Leased assets upstream	**Not significant**	–
Downstream transportation and distribution	**Significant**	Distance based
Processing of sold products	**Not significant**	–
Use of sold products	**Significant**	Direct use-phase emission
End-of-life treatment of sold products	**Significant**	Waste-type specific
Leased assets downstream	**Significant**	Asset specific
Franchises	**Not significant**	–
Investments	**Not significant**	–

4.3.2 Greenhouse Gas Emissions

Emission Factors	2024 Emissioni [t CO_2]	2023 Emissioni[t CO_2]	2022 Emissioni[t CO_2]
Scope 1	590	604,4	654,7
Scope 2* – Market Based	943	1.010,4	891,4
Scope 3	16.494	36.853,8	1.959,1
Purchased goods and services	9.116	4.889,2	223,8
Capital goods	3.814	26.485,4	
Fuel- and energy-related activities	250	457,5	632,6
Upstream transportation and distribution	1.215	14,5	
Waste generated in operations	0,4	17,4	2,7
Business travel	89	127,9	111,7
Employee commuting	1.313	1.191,1	992,5
Downstream transportation and distribution	22	1,5	
Use of sold products	809	854,1	
End-of-life treatment of sold products	0,5	0,2	
Downstream leased assets	450	2.815,1	
Total	**18.623**	**38.468,6**	**3.505,1**

* The Scope 2 emissions calculated with the Location-Based method amount to 1,060 t CO_2, while the total emissions amount to 18,740 t CO_2.

It is highlighted that the Scope 3 emission values for 2024 are significantly different compared to those recorded in 2023. This variance is mainly due to the fact that in 2024, the calculation methodology was greatly refined and made more detailed, including a larger number of emission categories and using estimation methods that are more specific and consistent with the nature of each activity. In contrast, in 2023, the spend-based method was predominantly applied, which, while useful in the absence of precise data, tends to overestimate emissions due to its approximate nature.

The 2024 methodological update therefore allowed for a more accurate and realistic representation of emissions along the value chain.

During 2024, Elmec generated a total of 18,027 tons of CO_2 (compared to 38,469 tons in 2023). In particular, in 2024, 24.5 tons of CO_2 were emitted per employee and 0.1 kg of CO_2 per million euros of revenue.

As shown in the summary table below, Scope 1 emissions amount to 590 tons of CO_2, slightly reduced compared to 2023. Scope 2 emissions amount to 943 tons calculated with the market-based method (compared to 1,010.4 in 2023) and 1,060 tons with the location-based calculation. The greatest impact comes from Scope 3 emissions, which total 17,090 tons of CO_2 (compared to 36,853.8 tons in 2023), representing 92% of Elmec's total emissions.

The relevant Scope 3 emission categories were:
- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- Downstream transportation and distribution
- Use of sold products
- End-of-life treatment of sold products
- Downstream leased assets
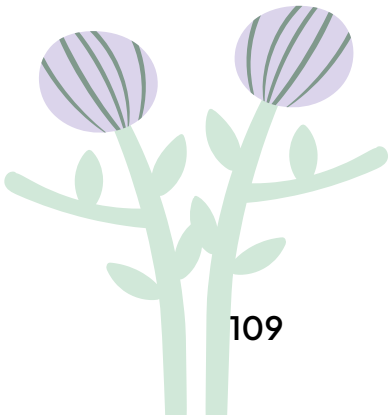
4.3.2 Greenhouse Gas Emissions

Calculation of emissions for Managed Infrastructure Services and Device as a Service

In 2024, Elmec Informatica refined the greenhouse gas emissions reporting for two of its main services: Managed Infrastructure Services (MIS) and Device as a Service (DaaS). These calculations were carried out in accordance with the principles of the GHG Protocol, analyzing Scope 1, Scope 2, and Scope 3 emissions. Elmec's objective was to understand the specific impact generated by its services and to communicate the related data to stakeholders, particularly to customers who requested it.

Regarding Managed Infrastructure Services, data were accounted for considering the following phases:
- Maintenance and auxiliary services: emissions generated by the emergency diesel engine, fire system materials, and cooling system were included;
- Service delivery: this includes emissions from the Data Center's energy consumption, upstream emissions related to fuel, energy, and water, as well as generic emissions necessary for operation based on the Corporate Carbon Footprint.

The calculations were performed following the Greenhouse Gas Protocol guidelines and allowed the derivation of a unit emission value for the service, which can be used to provide individual customers with information on the CO_2 emissions resulting from their investment in the service (spend-based method).

Regarding the Device as a Service (DaaS) offering, data were accounted for following a Cradle-to-Customer approach, integrated with data related to End-of-Life management. The following phases were considered:
- Device procurement: emissions related to device manufacturing and inbound logistics;
- Service delivery: includes emissions from electricity used for device configuration, outbound and inbound logistics to and from the customer, and the allocation of the Corporate Carbon Footprint to the DaaS service;
- End-of-Life: emissions related to the device's end-of-life treatment. Emissions related to device manufacturing were calculated based on Product Carbon Footprints available on the manufacturers' websites. A total of 809 devices were mapped for the analysis, broken down as follows:
- 111 Apple devices;
- 76 DELL devices;
- 302 HP devices;
- 228 Lenovo devices;
- 21 LG devices;
- 24 Microsoft devices;
- 41 Samsung devices;
- 6 devices from other brands.

For devices lacking available Product Carbon Footprints, the emission values related to their production were estimated by averaging the retrieved values.

The portion of the Corporate Carbon Footprint allocated to the service was calculated based on the following data:
- Total employees;
- Employees involved in delivering the DaaS service;
- Corporate Carbon Footprint;
- Devices provided through DaaS.

Corporate emissions were first allocated according to the number of employees actively engaged in the DaaS service. Subsequently, emissions allocated per single device were calculated. This resulted in a value of 155.67 kg CO_2e assigned to each device.

Emissioni Managed Infrastructure services		
Emission Source	**Emissions [kg CO_2]**	**Share %**
Raw materials	1.280	0,02%
Energy	74.460	1,11%
Heating	5.430	0,08%
General emissions	6.630.625,91	98,79%
Total MIS service emissions	**6.711.795,91**	**100%**
Emission factor per revenue	**0.13**	
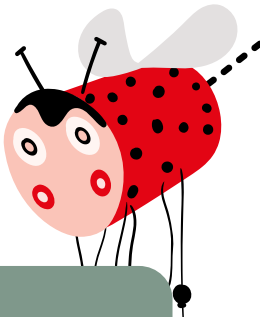
4.3.2 Greenhouse Gas Emissions

Calculation of emissions for Managed Infrastructure Services and Device as a Service

Device as a Service Emissions (e.g., MacBook Pro 14-inch with M4)

Emission Factors	Emissions [kg CO_2]	Share %
Device and Preprocessing	146,52	39,11%
Energy	0,80	0,21%
Transportation	71,54	19,10%
End-of-Life Management	0,10	0,03%
Allocated General Emissions	155,67	41,55%
Total Unit Emissions for DaaS Service	**374,63**	**100%**

Results related to the individual device with DaaS service

Device as a Service Emissions (Es. iPhone 16)

Emission Factors	Emissioni [kg CO_2]	Share %
Device and Preprocessing	44,80	16,42%
Energy	0,80	0,29%
Transportation	71,54	26,21%
End-of-Life Management	0,10	0,04%
Allocated General Emissions	155,67	57,04%
Total Unit Emissions for DaaS Service	**272,91**	**100%**

Results related to the individual device with DaaS service

Total emissions of Managed Infrastructure services and Device as a Service

Service	Emissions [t CO_2]
Managed Infrastructure Service	11.099,24
Device as a Service	6.711,80
Total	**17.811,03**

The total emissions of the Device as a Service (DaaS) were calculated by multiplying the unit totals of each device by the quantity leased by Elmec Informatica in 2024. This calculation allowed for an accurate estimate of the overall emissions of the DaaS provided by the company during the year.

Compensation of emissions for Managed Infrastructure services and Device as a Service

Elmec has chosen to offset the environmental impact generated by its Managed Infrastructure services and Device as a Service through financial support of a climate-friendly project supervised by the United Nations. Specifically, a wind energy project in Jodha, India, was funded. This project not only compensates for the emissions generated but also contributes to the sustainable development of the region by improving its social, economic, environmental, and technological well-being.

The tracking page for the climate projects that Elmec Informatica has selected to offset the emissions from its services is available at this link:

https://offset.climateneutralnow.org/vchistory/details?orderId=35526

4.3.2 Greenhouse Gas Emissions

Home Automation

Our buildings are equipped with numerous sensors that optimize energy consumption based on external climate conditions. Lighting and heating systems automatically adjust according to real-time needs. Additionally, we collect rainwater through specific sensors.

Bike to work

We have established a dedicated Bike to Work area within the company premises, providing a secure place to park and repair bicycles. As an incentive, we offer a €500 flexible benefit bonus to all employees who commute to the office by bike at least 50 times within a year. In 2024, 6 bonuses were awarded.

Free Meal Voucher for Sustainable Mobility

In 2023, Elmec introduced a significant incentive to encourage sustainable commuting: free meals at the company cafeteria. Eligible sustainable means of transport include carpooling, public transport, electric vehicles, bicycles, scooters, and walking. In 2024, a total of 5,481 meal vouchers were distributed.

Greta, l'ecologista completa

During 2024, we acquired a machine named Greta to help properly dispose of coffee capsules. Thanks to Greta, we can separate the rigid part from the organic part of the capsules: we recycle the plastic/aluminum components and reuse the coffee grounds as natural compost in our company garden.

Carpooling

Our goal is to reduce our CO_2 emissions to nearly zero. We believe our employees' contribution is crucial in achieving this. We strongly promote carpooling by connecting colleagues living in nearby areas and providing them with reserved parking spaces at our offices. In 2024, 6,020 carpool trips were recorded.

Photovoltaic Systems

Our offices are equipped with photovoltaic, geothermal systems, and next-generation LED lighting, enabling us to save 50% energy compared to traditional lamps. This year, all photovoltaic systems across our sites produced 541 MWh (compared to 297 MWh in 2023). The increase is due to the installation of a new 400 kWp system at our B6 site, more favorable climatic conditions than the previous year, and routine maintenance work that improved the efficiency of previously installed panels.
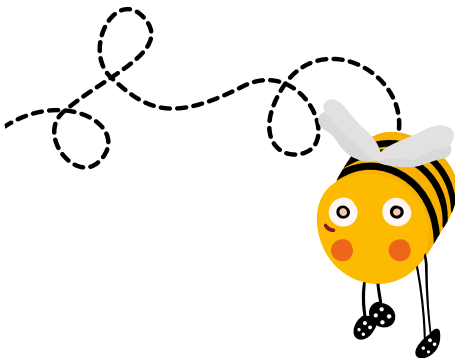
4.3.3 Waste Management

For responsible waste management, Elmec has implemented several measures, including the establishment of dedicated areas for separate waste collection and the subsequent disposal through municipal channels or via authorized transporters and disposal companies. These actions involve multiple stakeholders, such as employees, clients, and suppliers. The selection of commercial partners is also influenced by the quality of packaging used to protect and contain products.

Proper management of waste from electrical and electronic equipment is of great importance both for environmental protection and for the recovery of valuable materials. The correct disposal of special waste, hazardous materials, and printer toners carries responsibility towards the environment and regulatory authorities and is entrusted to specialized external companies.

For many years, Elmec has offered its clients a waste collection and disposal service, relieving them of the obligations imposed by the Environmental Code regulations. Elmec manages the waste generated by its own operations, while part of the waste is the responsibility of clients who purchase or lease technological devices supplied by the company.

With the aim of reducing environmental impact, Elmec is committed to minimizing the amount of packaging waste to the essential minimum, working to provide solutions with the least possible amount of packaging.

The significant increase in waste recorded in 2024, amounting to 63,224 kg, represents a 134% rise compared to 2023. This variation is attributable to an extraordinary intervention involving the dismantling and reconstruction of a company building, which generated an exceptional volume of demolition and construction waste, substantially contributing to the overall increase in wa-

Waste by type	Waste generated in 2024 by category			Waste generated in 2023 by category			Waste generated in 2022 by category		
Unit of measurement: kg	Hazardous waste	Non-hazardous waste	**Total waste**	Hazardous waste	Non-hazardous waste	**Total waste**	Hazardous waste	Non-hazardous waste	**Total waste**
Solid waste	1.348	61.234	**62.582**	1.385	25.575	**26.960**	1.370	25.361	**26.731**
Liquid waste	–	642	**642**	97	–	**97**	–	–	**–**
Total waste	**1.348**	**61.876**	**63.224**	**1482**	**25.575**	**27.057**	**1.370**	**25.361**	**26.731**
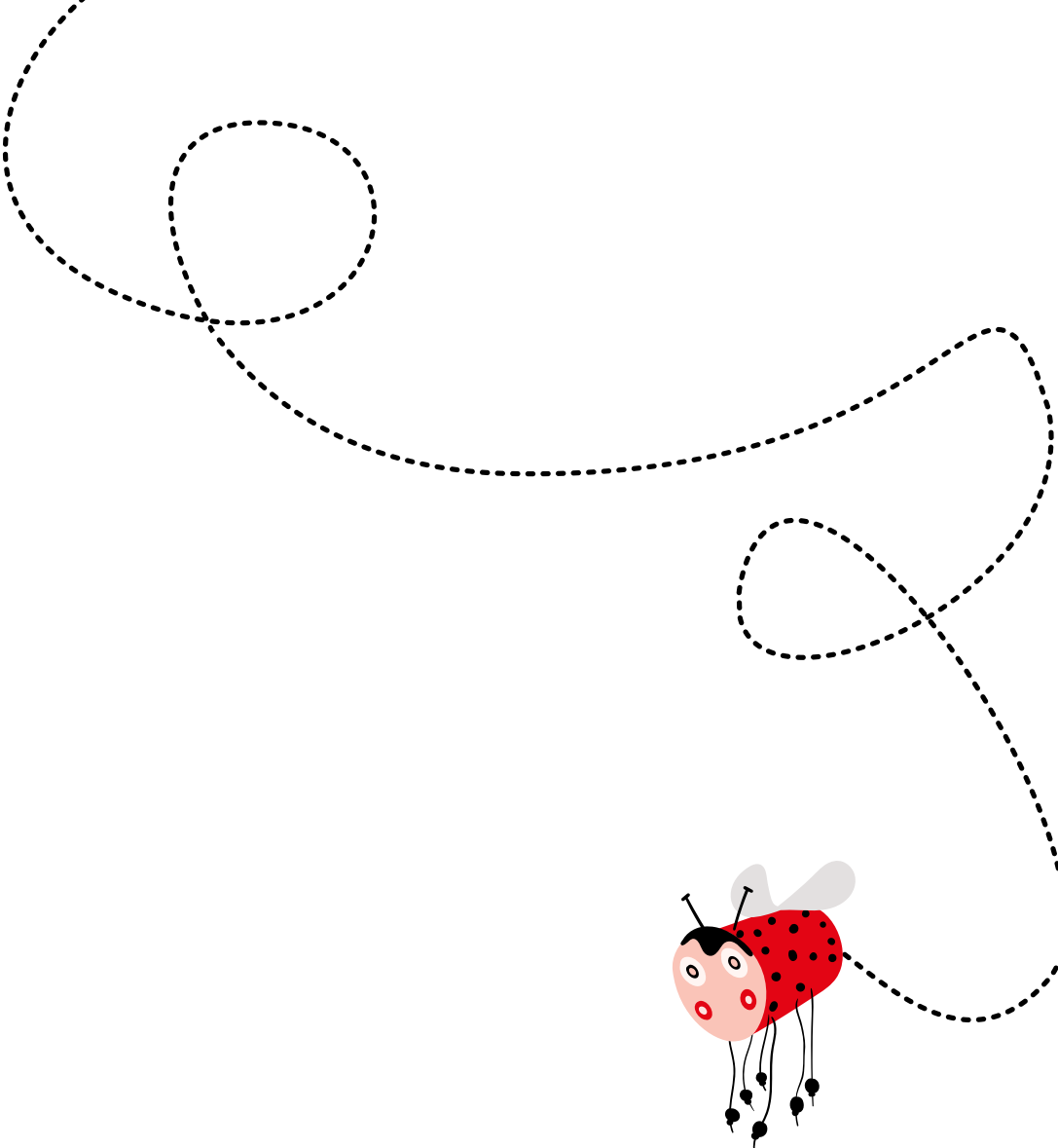
4.3.3 Waste Management

Waste Recycled–Reused by Type of Recycling or Reuse – 2024	Hazardous water			Non Hazardous waste		
Unit of measurement: kg	Onsite	Offsite	Totale	Onsite	Offsite	Totale
Physico-chemical Treatment	–	–	–	–	–	–
Recycling	–	1.264	1.264	–	58.586	58.586
Other Recovery Operations	–	–	–	–	–	–
Total Waste Recycled–Reused	**–**	**1.264**	**1.264**	**–**	**58.586**	**58.586**

Waste Recycled–Reused by Type of Recycling or Reuse – 2023	Hazardous water			Non Hazardous waste		
Unit of measurement: kg	Onsite	Offsite	Totale	Onsite	Offsite	Totale
Physico-chemical Treatment	–	197	197	–	60	60
Recycling	–	807	807	–	19.725	19.725
Other Recovery Operations	–	478	478	–		
Total Waste Recycled–Reused	**–**	**1.482**	**1.482**	**–**	**19.785**	**19.785**

Waste Recycled–Reused by Type of Recycling or Reuse – 2022	Hazardous water			Non Hazardous waste		
Unit of measurement: kg	Onsite	Offsite	Totale	Onsite	Offsite	Totale
Physico-chemical Treatment	–	–	–	–	332	332
Recycling	–	1.345	1.345	–	22.510	22.510
Other Recovery Operations	–	–	–	–	–	–
Total Waste Recycled–Reused	**–**	**1.345**	**1.345**	**–**	**22.842**	**22.842**
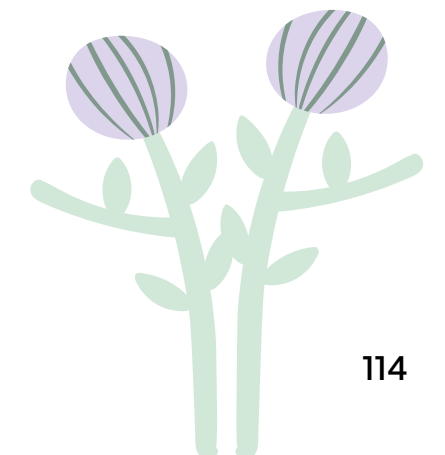
4.3.3 Waste Management

Non-Recycled Waste – Year 2024	Waste Diverted from Disposal	
Unit of measurement: %	**Hazardous waste**	**Non Hazardous waste**
Solid waste	0,13%	4,08%
Liquid waste	–	0,99%
Total	**0,13%**	**5,07%**

Non-Recycled Waste – Year 2023	Rifiuti sottratti allo smaltimento	
Unit of measurement: %	**Hazardous waste**	**Non Hazardous waste**
Solid waste	–	23%
Liquid waste	–	–
Total	**–**	**23%**

Non-Recycled Waste – Year 2023	Rifiuti sottratti allo smaltimento	
Unit of measurement: %	**Hazardous waste**	**Non Hazardous waste**
Solid waste	2%	10%
Liquid waste	–	–
Total	**2%**	**10%**
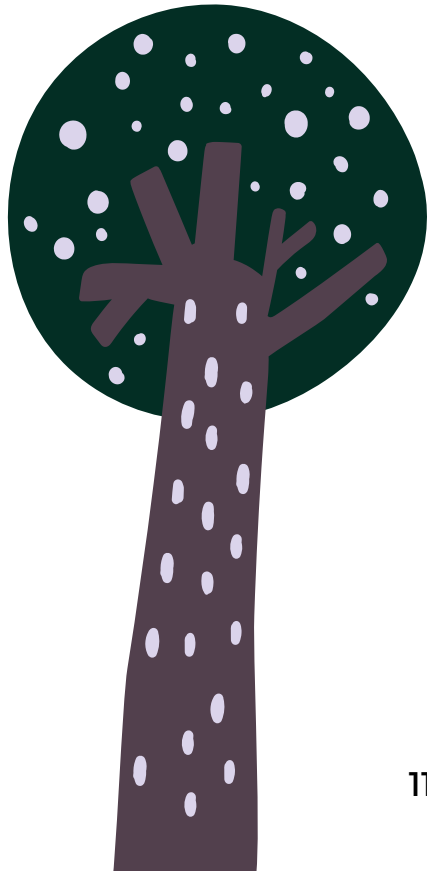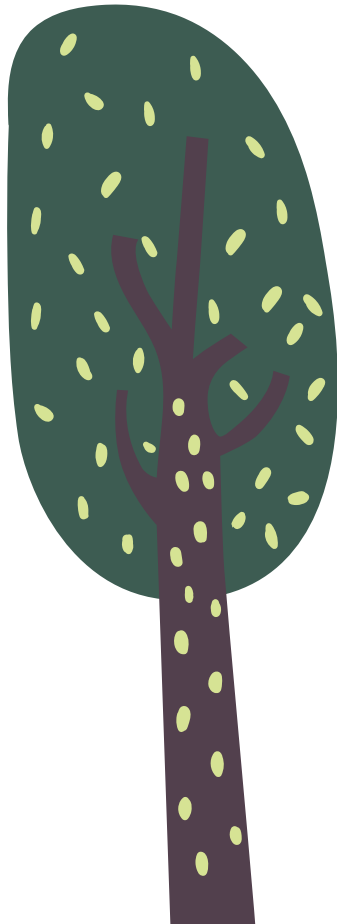
4.3.3 Waste Management

Non-Recycled Waste by Type of Disposal

Unit of measurement: kg	Hazardous Waste 2024			Non-Hazardous Waste 2024			Hazardous Waste 2023			Non-Hazardous Waste 2023			Hazardous Waste 2022			Non-Hazardous Waste 2022		
	Onsite	Offsite	**Totale**	Onsite	Offsite	**Totale**	Onsite	Offsite	**Totale**	Onsite	Offsite	**Totale**	Onsite	Offsite	**Totale**	Onsite	Offsite	**Totale**
Incineration (with energy recovery)	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**	–	25	**25**	–	179	**179**
Incineration (without energy recovery)	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**
Landfilling / Underground disposal	–	82,19	**82,19**	–			–	–	**–**	–	5.790	**5.790**	–	–	**–**	–	2.340	**2.340**
Other disposal operations*	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**	–	–	**–**
Non-recycled waste by type of disposal	–	82,19	**82,19**	–			–	–	**–**	–	5.790	**5.790**	–	25	**25**	–	2.519	**2.519**

Other disposal operations" include, by way of example, discharge, open burning, and deep well injection.

Elmec generates hazardous waste, which includes electronic devices, neon tubes, nickel-cadmium batteries, and packaging containing hazardous substances. Hazardous waste produced by Elmec that requires specialized treatment is disposed of through an authorized external waste management provider, capable of handling the specific type of waste and ensuring the highest levels of environmental and health safety.

Elmec manages various types of waste through targeted disposal and recycling processes, in full compliance with environmental regulations. Waste management activities include the safe handling of organic, plastic, paper, oil, and grease waste, with a focus on efficiency and environmental sustainability. The company has also implemented several policies aimed at reducing material use and improving environmental sustainability. For example, the original packaging used for technological devices is reused for future shipments, avoiding the need for new materials and reducing the amount of waste generated.

Among Elmec's initiatives to reduce the volume of non-hazardous waste is a paper compactor, introduced in 2020, which reduces the volume of paper and cardboard waste.

4.3.4 Buytec

BuyTec is a company founded in 2013, specializing in the refurbishment of professional-grade IT devices. Thanks to its extensive expertise, devices such as laptops, desktops, tablets, smartphones, and monitors undergo a rigorous process of diagnostics, repair, and testing before being sold on the B2C market through BuyTec's e-commerce platform (www.buytec.it) or major European marketplaces.

BuyTec is a strategic partner of Elmec Informatica S.p.A. and plays an integral role in a circular economy project designed to help companies upgrade their workstations while avoiding the disposal of decommissioned devices. Thanks to this virtuous process and increasingly efficient refurbishment methods, nearly 90% of devices returned from Elmec's services are now given a second life through BuyTec.

Since 2013, over 50,000 devices have been processed, allowing the refurbished tech company to make a significant contribution to reducing electronic waste and optimizing resource use.

BuyTec's commitment goes beyond the technical process: plastic-free packaging, support for the right to repair, and awareness initiatives targeted at schools, local authorities, and the broader community reinforce its vision of promoting more conscious purchasing habits and a culture that values refurbished IT equipment.
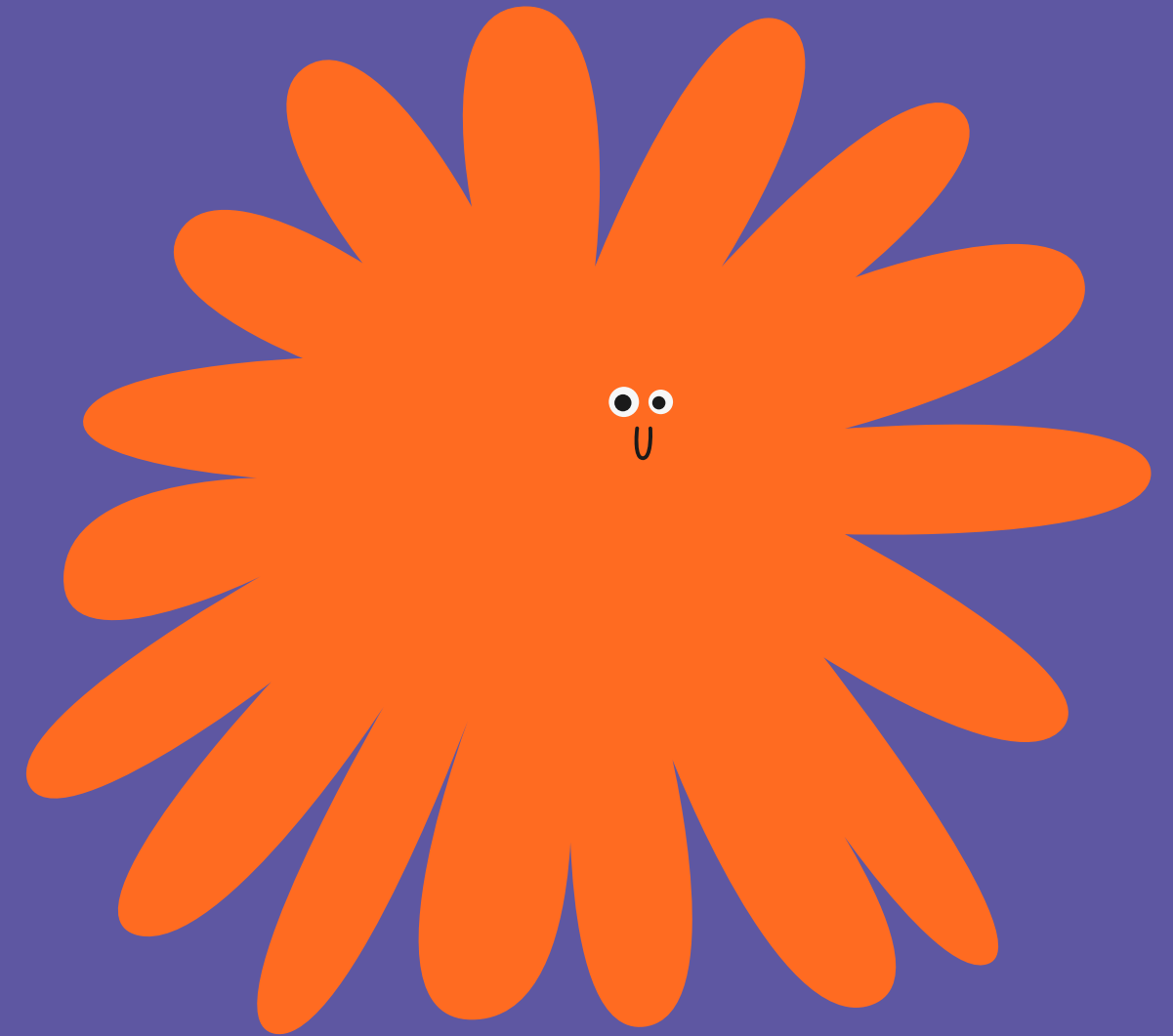
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4.3.4 Buytec

Mission

BuyTec's mission is to promote a culture of sustainable and conscious purchasing. The devices selected for refurbishment are high-quality and offer an excellent balance between performance and price. BuyTec educates its users to choose refurbished technology not only because it is cost-effective, but also to be part of something bigger — a concrete action to reduce the environmental impact of the IT sector.

BuyTec aims to help its community and all stakeholders take care of their devices, so their second life can last as long as possible. Through small measures and greater attention to maintenance, the company firmly believes that we can all contribute to a more responsible, waste-free future.

Vision

The BuyTec team envisions a future where its business model and initiatives help foster a widespread culture around refurbished technology — one free from prejudice, where users are informed and therefore more inclined to make conscious choices.

BuyTec is committed to bridging the digital divide by making access to technology a universal right.

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4.3.4 Buytec

Temi materiali

To strengthen its commitment to responsible business practices and guide the development of its sustainability governance, BuyTec has identified a set of material topics that reflect the company's priorities and the expectations of its stakeholders.

These material topics serve as the foundation for defining strategic actions, monitoring performance, and reporting progress in line with the principles of circular economy and corporate responsibility.

The identification of these topics has enabled BuyTec to formalize its approach to sustainability and integrate it consistently into its operational and decision-making processes.

The identified material topics are as follows:

Customer Education and Awareness

Right to Repair

Local Community

Carbon Handprint

Economic Accessibility and Digital Inclusion

E-Waste Management

Product Quality and Safety

Employee Health and Safety

Sustainable Packaging

Reduced Use of Virgin Materials

Shipment and Logistics Management

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4.3.4 Buytec

Raising awareness and educating customers about the benefits of purchasing refurbished devices is a cornerstone of BuyTec's sustainability strategy: encouraging responsible consumption behaviors helps to extend the technology lifecycle and reduce overall environmental impact. To this end, in 2024, 35 StudyTours were conducted at BuyTec's headquarters: these are experiential programs designed to showcase live the stages of the refurbishment process. Additionally, a robust communication effort was supported through monthly newsletters and a strong presence on social media channels. For the most interested users, dedicated courses were also offered on the principles of the circular economy, with a particular focus on best practices for evaluating and adopting refurbished devices. These activities directly engaged approximately 180 participants from companies, schools, and private individuals.

Local Community

Creating shared value in the territory where it operates is a strategic and value-driven commitment for BuyTec, aimed at strengthening its bond with the province of Varese and its social fabric.

In this context, BuyTec entrusts part of its refurbishment process — specifically, the meticulous cleaning of devices — to ABAD Coop, a social cooperative active in job inclusion initiatives and support for the most vulnerable groups in the area. In 2024 alone, the cooperative's team processed over 5,500 devices, making a significant contribution to the improvement of BuyTec's operational processes.

In parallel, the company provides tangible support to local schools and organizations — with around 80 entities supported over the past year — by donating work and learning tools to students and community groups.

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4.3.4 Buytec

Carbon Handprint

The quantification of CO_2 saved through the refurbishment process, known as the "carbon handprint," is a crucial element for positioning BuyTec's products as low environmental impact solutions. During 2025, a calculation methodology will be implemented to provide detailed data on the kilograms of CO_2 saved by refurbishing each device. This concrete information on the positive environmental impact generated by every single purchase will thus be made available to BuyTec's stakeholders and users of the online portal.
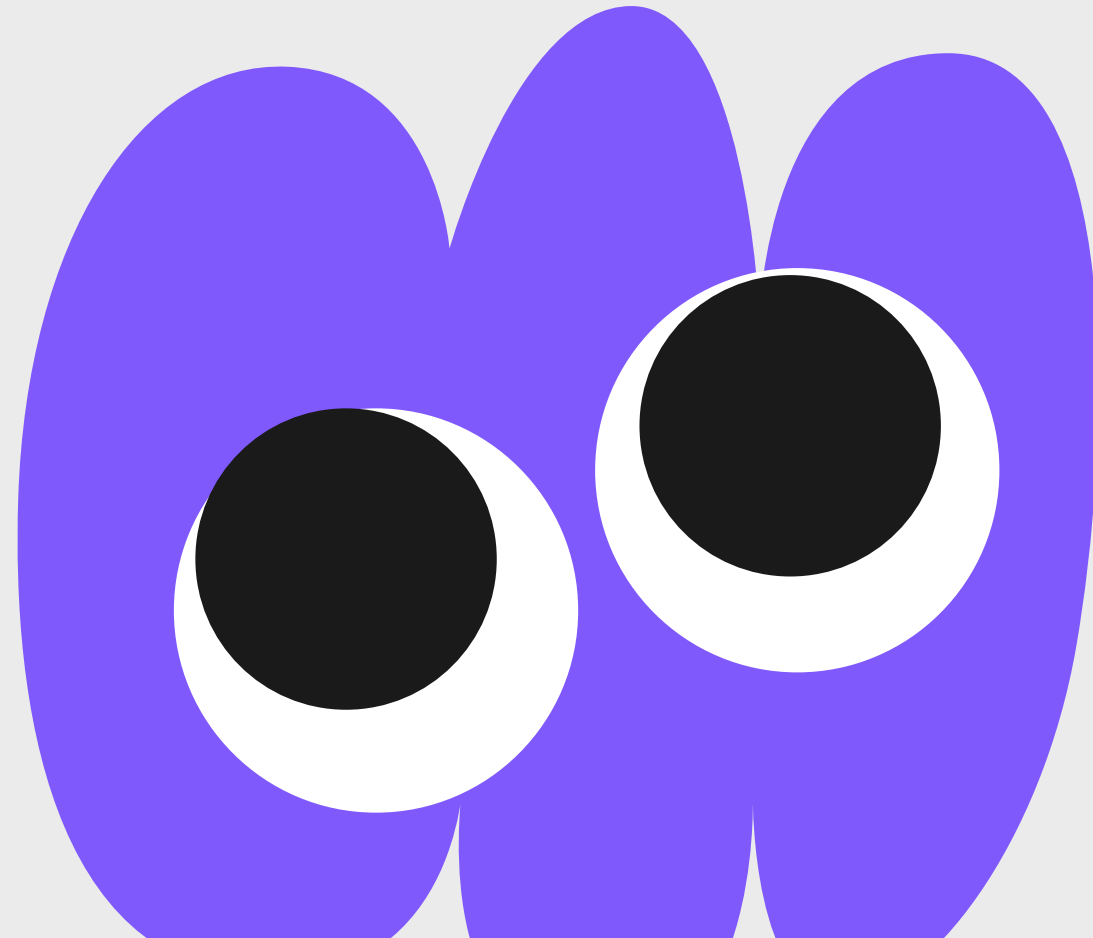
Right to Repair

The right to repair is a cornerstone of BuyTec's circular economy philosophy: extending the useful life of devices helps to combat planned obsolescence and reduce the negative impacts associated with the production of new technology. Through a structured process of comprehensive diagnostic analysis, repair interventions, and replacement of worn components, BuyTec is committed to refurbishing and repairing devices. Furthermore, it guarantees high-quality after-sales support. In fact, all devices sold come with a warranty of at least 12 months. Of the 7,890 devices processed in the past year, 98% underwent at least one minor repair aimed at improving device performance.

4.3.4 Buytec

Promoting access to technology and fostering digital inclusion are among BuyTec's strategic objectives. To this end, agreements have been established exclusively for Elmec's client companies, allowing them to offer their employees dedicated discount codes for purchasing refurbished PCs on the website for personal use or for their families. To date, the initiative has been adopted by around 130 companies, with a potential reach of over 16,000 employees across Italy and Europe. In 2024, approximately 557 vouchers were redeemed. Additionally, within the company campus, a "Bazar" has been set up—a physical space where Elmec Informatica employees can purchase lower-grade devices with more visible signs of wear at even more affordable prices. In 2024, the Bazar recorded sales of around 300 devices. To encourage purchases during times of the year when technology becomes even more affordable, the company also periodically runs targeted commercial campaigns (Back-to-school, Black Week, Refurbished Week, etc.).

E-Waste Management

The accounting, management, and tracking of waste generated by the refurbishment process is essential to ensure maximum transparency and compliance with environmental regulations. BuyTec guarantees the monitoring of every device deemed unsuitable for refurbishment, tracking their shipment to authorized disposal centers and the quantities actually sent for scrapping. At the same time, the percentage of devices properly refurbished and returned to the market is recorded—a key metric to assess the operational effectiveness of the circular model. In 2024, the number of devices sent for scrapping was only 4% of all devices handled by the technical laboratory.

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4.3.4 Buytec

Ensuring high standards of quality and safety for refurbished devices is a priority for BuyTec, an essential element to protect customer trust in refurbished products and to enhance the circular economy model. Every device undergoing refurbishment is subjected to over 50 technical and functional tests aimed at certifying its performance, reliability, and operational safety. To safeguard the purchasing experience, all products also come with a 30-day trial period and a 12-month warranty, which guarantees prompt and transparent after-sales support. These measures enable the market to offer refurbished technological solutions that meet quality standards equivalent to those of new products.

Sustainable Packaging

Choosing sustainable packaging solutions represents a concrete and visible aspect of BuyTec's environmental commitment. All refurbished devices are delivered using completely plastic-free packaging made from 100% recycled cardboard, thereby reducing the use of virgin materials and contributing to the reduction of non-recyclable waste. The use of eco-friendly packaging reinforces BuyTec's responsible identity and provides the end customer with a purchasing experience consistent with the principles of the circular economy and environmental respect that guide the entire company's activities.
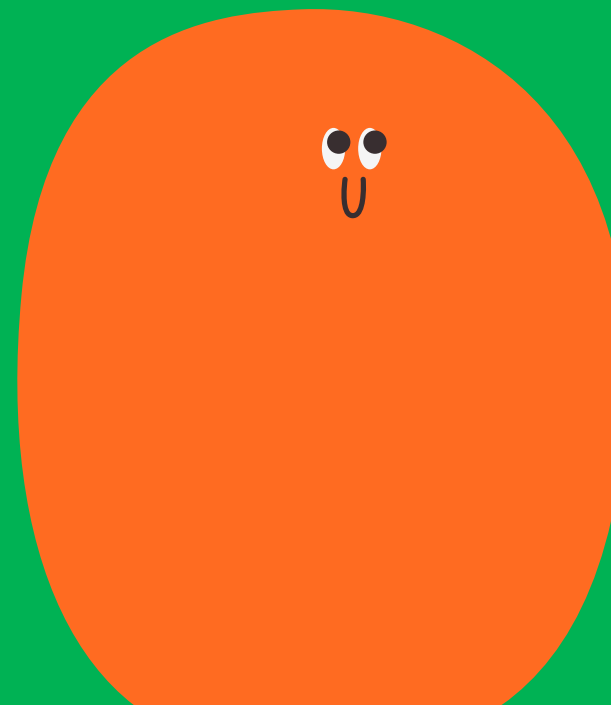
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4.3.4 Buytec

Reduced Use of Virgin Materials

Reducing the use of virgin raw materials is a cornerstone of the circular economy promoted by BuyTec, as it helps decrease the environmental impact associated with the production of new technology. To maximize resource reuse, the company leverages the expertise of its technical team to repair as many components as possible and consistently prioritizes the use of "healthy" parts recovered from previously processed devices: in 2024, over 45% of refurbished devices were repaired in this way. Additionally, devices with more noticeable cosmetic imperfections—but still fully functional—are sold through dedicated sales channels, giving value to every unit without resorting to new materials.
These practices demonstrate BuyTec's concrete commitment to limiting the demand for virgin raw materials and optimizing product life cycles.
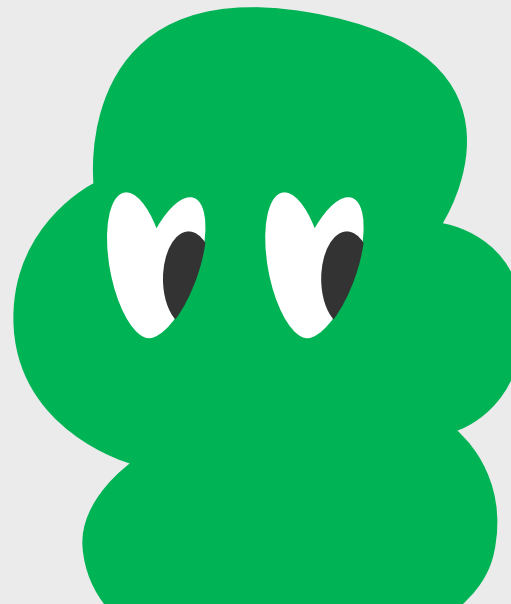
Shipping Management

The adoption of low environmental impact shipping practices is another area where BuyTec concretely applies its sustainability principles. To reduce the ecological footprint associated with logistics, the company selects transportation providers that operate with low-energy consumption vehicles and reduced CO_2 emissions. Additionally, all B2B deliveries are centrally planned, allowing devices destined for the same customer to be grouped into a single shipment: this optimizes loads, minimizes the number of trips, and contributes to a more efficient use of resources.

Thanks to these actions, BuyTec extends its commitment to a circular, low-impact economy to the delivery cycle, ensuring consistency between the entire refurbishment process and the company's vision focused on environmental responsibility.

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4.3.4 Buytec
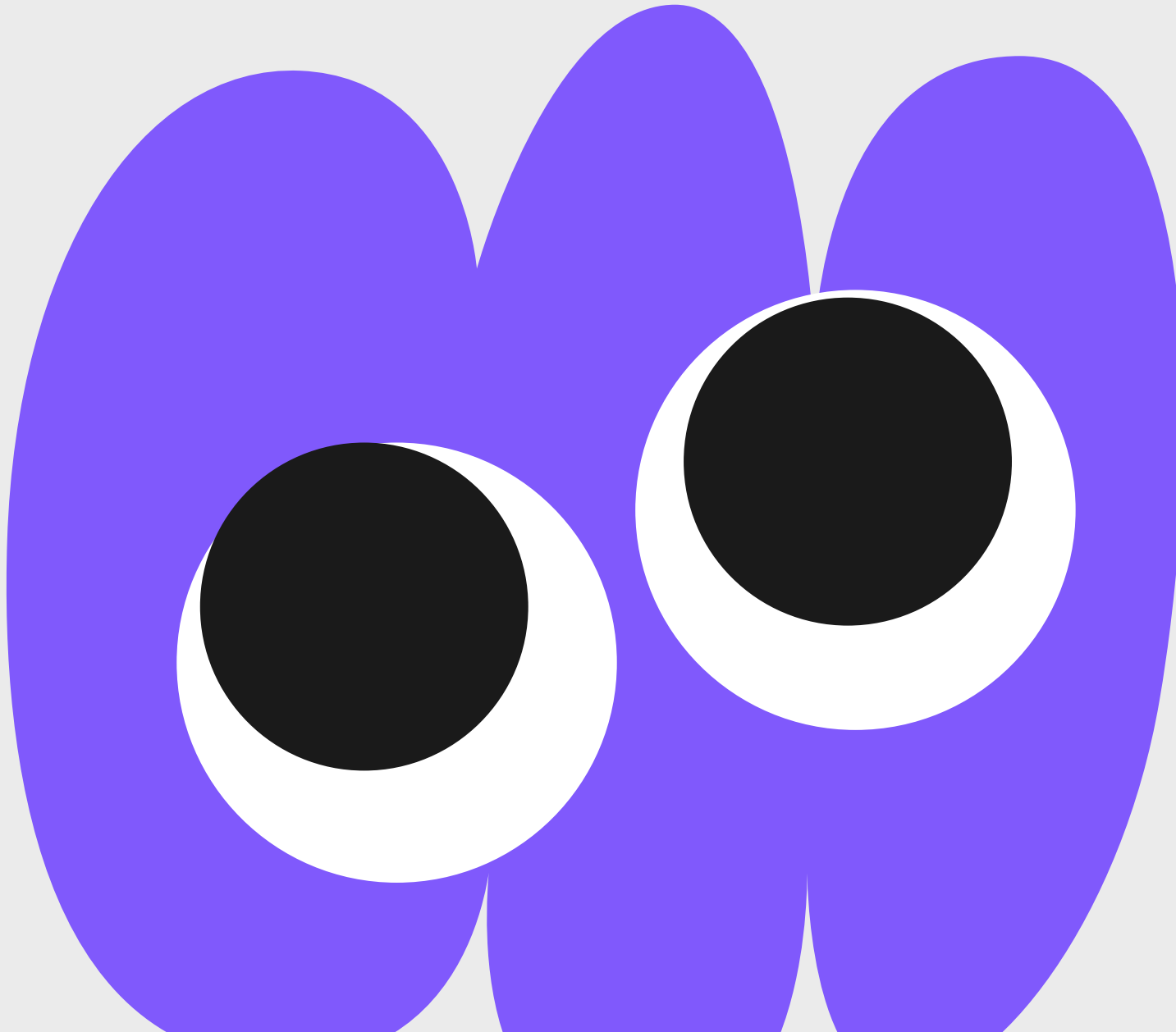
Employee Health and Safety

Ensuring the health and safety of workers is a core principle for BuyTec, particularly given the specific operational challenges involved in handling electronic components, batteries, and chemicals during the refurbishment process. Accordingly, the refurbishment laboratory has been designed to comply with ESD (Electrostatic Discharge) standards, safeguarding both the devices and the safety of personnel. All workstations are equipped with safety gear mandated by current regulations and undergo regular inspections. In 2024, BuyTec recorded zero injuries and zero incidents within the laboratory.

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4.4 Other Environmental Initiatives

Collection and Donation of Used Clothes

We collect donations of used clothes from our employees to donate them to local charitable organizations.

Coffee Capsules with Reusable Cups

We have installed self-service coffee machines in the break rooms, allowing people to prepare coffee using capsules. Additionally, we have provided all colleagues with washable and reusable cups to significantly reduce the use of disposable cups.

Beehives for Beekeeping

It is estimated that about 90% of the food we eat is influenced by the pollination work of bees, which are constantly at risk due to climate change and pollution. As Elmec, we have decided to contribute to biodiversity preservation by placing five beehives in front of our Green Data Center.

Sustainability Week

Since 2021, we have celebrated "Sustainability Week," a series of initiatives aimed at contributing to the reduction of greenhouse gas emissions, the development of corporate volunteering activities, and the reduction of plastic use. In this third edition, we also involved our clients by organizing an event to let them experience firsthand the services available every day to Elmec employees on-site.

Plastic aware

In all our locations, there is a project aimed at the progressive elimination of plastic.
In the break areas, free beverage dispensers have been installed, allowing people to freely refill water using reusable cups and bottles.
Additionally, we purchase fully recyclable stirrers and cups for hot drinks dispensed by the machines in our offices.
These initiatives have enabled us to reduce the sale of plastic bottles by 75%.

Disposal of Batteries, Light Bulbs, Expired Medications, and Eyeglasses

Batteries, light bulbs, and medications are hazardous materials if not disposed of properly. At our offices, we have created Eco Boxes—collection points that allow our employees to dispose of hazardous waste easily, free of charge, and safely.
In addition to these, we also collect used eyeglasses: these items are often thrown away or forgotten even if they are still in good condition. Through this collection effort, we aim to give these items a second life.
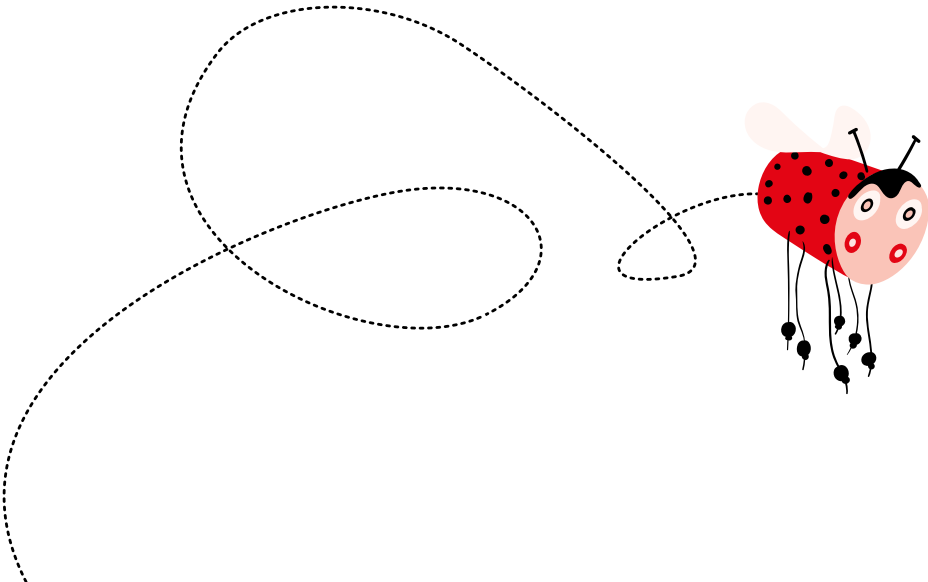
4.4 Other Environmental Initiatives

Reuse Market

Promoting a culture of sustainability can also be achieved through simple yet effective actions. One such action is making items we no longer use available to others. This small gesture can have a significant impact on reducing waste and encouraging responsible resource consumption. To support this behavior, we created the company Reuse Market—an innovative virtual and physical platform where colleagues can exchange unused items and give them a second life.

Thanks to this initiative, not only is waste reduced and a more sustainable lifestyle promoted, but a sense of community is also fostered within the company.

Refillable Eco-Friendly Detergents

As previously mentioned, one of the Elmec offices is equipped with self-service dispensers for eco-friendly detergents. This initiative is part of the Plastic Aware project, and in 2024 it helped us avoid using over 1,500 traditional hard plastic detergent bottles.

Moreover, the Lavaverde refill detergents are three times more concentrated, allowing significant product savings.

4.5 Compliance with Environmental Regulations

For Elmec Informatica, compliance with applicable regulations, including environmental ones, is an essential principle. The company considers its internal control system an effective tool to ensure adherence to environmental laws and regulations, helping to mitigate the risks of non-compliance and incomplete or lacking knowledge of the applicable regulations at each operational site.

During 2024 and previous years, Elmec Informatica has not been subject to any sanctions related to non-compliance with applicable environmental regulations, confirming the effectiveness of its approach to compliance management and environmental responsibility.

5. MARKET AND TERRITORY, SUPPLIERS, CUSTOMERS, PARTNERS, AND LOCAL COMMUNITY
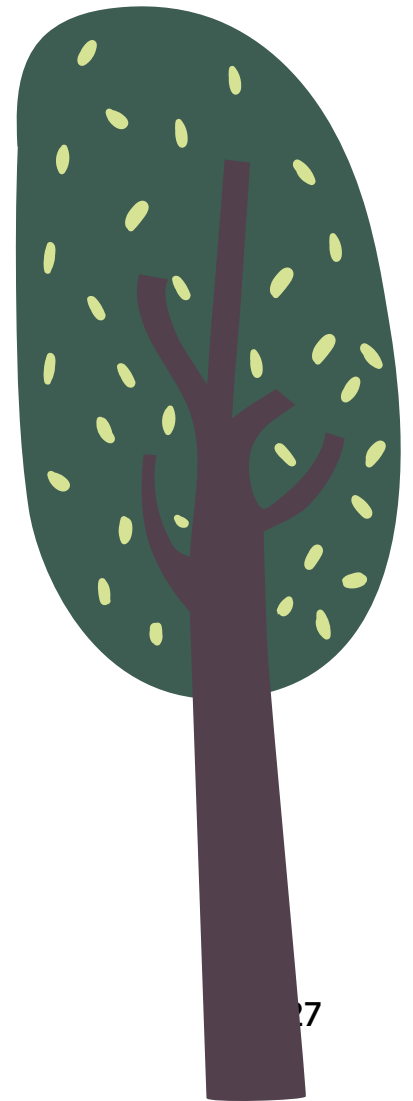
5.1 Elmec's Social Role and Relevant Issues

For over 50 years, Elmec has dedicated its passion and expertise to supporting the local community's development through social integration, cultural and sports initiatives, monetary and technological donations, volunteering, and relationships with schools and healthcare facilities.

Over time, Elmec has built strong ties with some of the most important sports organizations in the area: we sponsor the Serie A basketball team Pallacanestro Varese, the football team Varesina, and for several years we have supported the famous cycling race "Tre Valli Varesine." The company strongly believes in the importance of sports within the educational journey of young people, which is why we have sponsored Robur et Fides, one of the main youth sports clubs in the province of Varese, for many years.

In 2024, we sponsored 30 local sports organizations with a total contribution of €206,373.55.

In 2024, we also began a fruitful collaboration with the Italian Union of the Blind and Visually Impaired (UICI), an organization that protects the rights of people with visual disabilities, promoting their autonomy, social inclusion, and employment. As part of this partnership, Elmec employees were invited to cycle, run, or walk at least 50 km within a 50-day period. For every participant who reached the goal, Elmec committed to donating €50.00. The project was launched on June 7, 2024, and concluded on July 29, with a total of 24,133 km covered and a donation of €15,000.00 to UICI.

5.2 Responsible management of the supply chain

Ethical management of the supply chain is a crucial issue for Elmec Informatica, as the company recognizes the importance of acting sustainably and responsibly not only within the organization but also in its relationships with suppliers.

The supply chain represents a significant source of environmental, social, and economic impact, and Elmec Informatica is aware that it must ensure its suppliers respect the company's ethical principles and values.

In this chapter, we will examine Elmec Informatica's policies and practices regarding ethical supply chain management, analyzing the challenges encountered and the results achieved.

In particular, we will discuss supplier monitoring activities, collaboration with business partners to promote sustainability, actions taken to foster transparency and accountability within the supply chain.

It is emphasized that, to date, no significant potential or actual impacts have been identified in Elmec's supply chain.

Our ESG Certifications

Ecovadis

EcoVadis monitors supplier sustainability across 150 sectors and 110 countries. Global multinational companies use EcoVadis to assess suppliers in over 95 countries. Elmec holds a SILVER certification.

ISO 14001

ISO 14001 is an international standard for environmental management that provides a management framework to protect the environment, prevent pollution, and reduce energy and resource consumption.

Lenovo 360

Lenovo 360 Circle is a collaborative sustainability initiative that brings together Lenovo's partners and stakeholders to accelerate the transition toward a circular economy and responsible environmental impact management. In this context, in 2024 Elmec moved from Connect member to Learn member.

HP Amplify Impact

HP Amplify Impact is a partner program aimed at driving significant change in HP's three Sustainable Impact pillars: planet, people, and communities. Elmec's program has been certified as Changemaker, the highest evaluation level.

5.3 Supplier Evaluation and Management

The estimated total number of suppliers is approximately 780. Elmec regulates its relationships with suppliers in accordance with its Code of Ethics.

Elmec primarily sources from some of the main international players in the distribution of IT materials and services, both for the provision of device-as-a-service and for the machines necessary for the operation of the data center. Primary suppliers in turn source from the main global IT brands and have a presence in Italy. This choice, carefully considered, is based on the belief that only a strategic and accurate sourcing can ensure the reliability and quality of the IT products and services offered.

Among the main secondary suppliers, necessary for the proper functioning of the operational offices and office activities, are the catering service provider, the vending machine supplier, the company car supplier, and the cleaning company.

Elmec, as a company attentive to the importance of supporting local economies, seeks to engage suppliers of support and services related to the operation and maintenance of its buildings who are locally established.

Although Elmec does not have a formal green procurement policy, it strives to prioritize sustainability aspects in the supplier selection process. This principle is mainly reflected in the following procurement areas:

- Procurement for internal operations: Elmec seeks to favor local suppliers to reduce CO_2 emissions resulting from transportation, and to use environmentally friendly materials.

- Procurement for service delivery: The choice of commercial partners for the delivery of Elmec's services is particularly oriented towards environmental sustainability and energy saving.

Elmec is attentive to maintaining long-term relationships with its suppliers, fostering close collaboration for the continuous improvement of the quality of products and services offered.
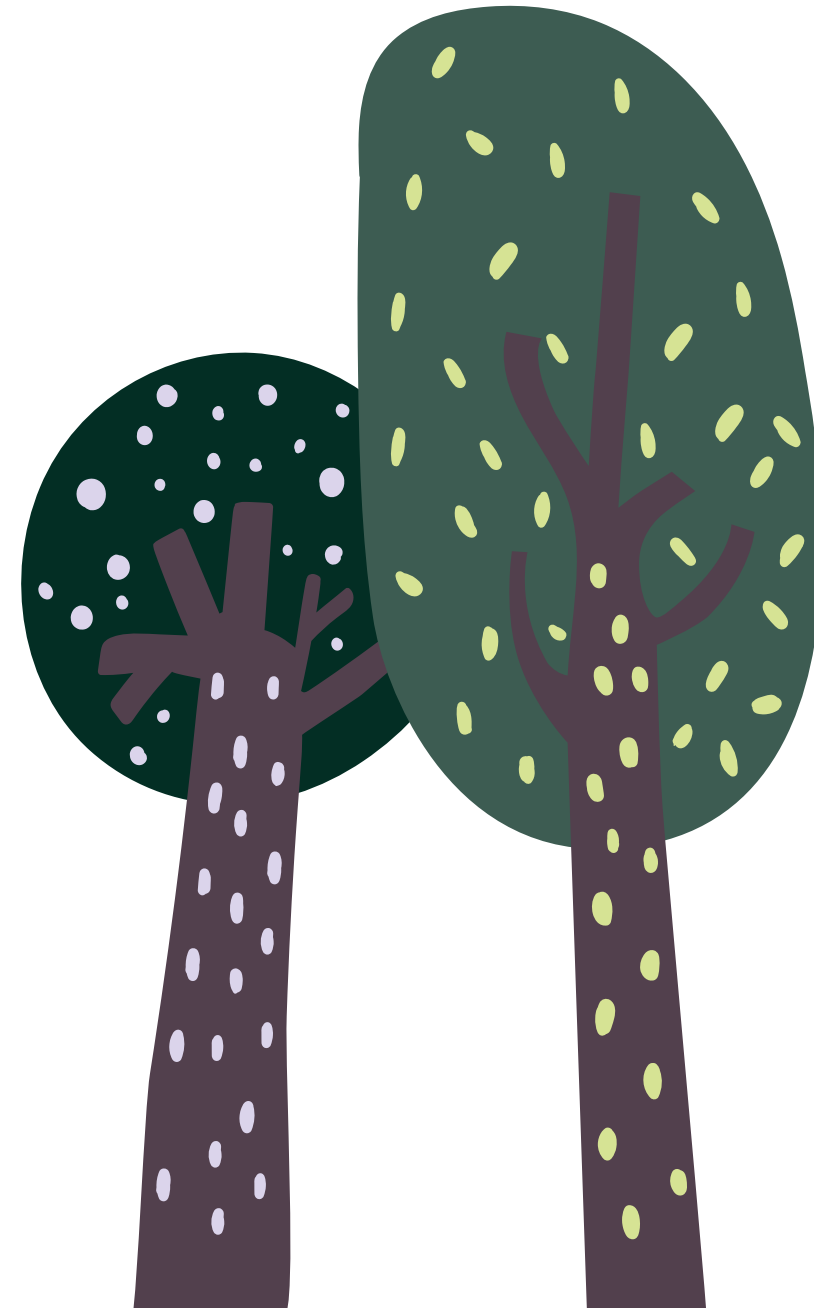
5.3 Supplier Evaluation and Management

Elmec considers its suppliers a fundamental component of its success; the company aims to be a serious, loyal business partner who respects commitments made. Supplier selection is based on company procedures and in compliance with criteria and requirements such as opportunity, the pursuit of the best quality-price ratio, sustainability, reputation, and organizational solidity of the counterpart (including the ability to meet the procurement schedule). No potential supplier possessing the necessary requirements is excluded from competing to offer their products/services.

For all supplies, including work and consultancy contracts, the evaluation related to the reasons for the choice and the price applied is reasonably and adequately formalized and documented, according to company procedures. The compensation to be paid is strictly commensurate with the service indicated in the contract, and payments are made to the party as defined by the contract.

To date, Elmec does not carry out ESG audits on suppliers, neither during selection nor throughout the collaboration period. However, at the end of 2023, a pilot initiative was launched with some of the company's strategic suppliers, mainly IT service providers, introducing an evaluation questionnaire called "Green Procurement." The goal is to deepen ESG issues and identify potential risks within the supply chain. The supplier questionnaire currently covers five key areas:

- General information about the supplier
- Health, safety, and environment
- Quality management system
- Privacy and information security
- ESG aspects

In 2024, we increased the number of suppliers to whom the questionnaire was submitted. We are committed to increasing the number of evaluated suppliers next year, also thanks to the introduction of Responsible Purchasing Guidelines that will concretely structure the supplier evaluation process.

It should also be noted that Elmec Informatica is attentive to prohibiting behaviors among its employees such as:

- Abuse of any dominant position with economically dependent suppliers by inducing them, with the prospect of subsequent advantages, to enter into overall unfavorable contracts.
- Receiving gifts or other forms of benefits not directly attributable to normal courtesy relations.

It is important to underline that 11% of the budget dedicated to suppliers was invested in local suppliers from the province of Varese, mainly for the purchase of supplies necessary for the operational functioning of the company's offices.
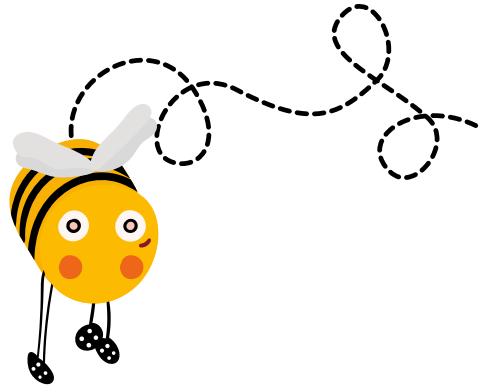
ESG SUPPLIER ANALYSIS	2024	2023	2022
Number of new suppliers used in the reporting period selected and evaluated based on their environmental and social impact	7	0	0
Number of new suppliers used in the reporting period	233	257	213
% of new suppliers used in the reporting period selected and evaluated according to environmental and social criteria	3%	0%	0%
Total number of suppliers selected and evaluated based on their environmental and social impact	44	21	0
Number of suppliers evaluated based on their social impact operating with negative or potentially negative social impacts	0	0	0
Percentage of the purchase budget used for local suppliers located in the Province of Varese	11%	11%	10%

5.4 Customer and Partner Management

Elmec has about a thousand customers mainly from the Italian territory, while its technology partners are some of the most important global companies in the IT sector such as Apple, HP, Lenovo, Pure Storage, and HPE. The company primarily offers its customers data center services and device-as-a-service, governed by contracts and the company's code of ethics. Elmec strives to establish long-term relationships with its customers, also through subscription-based services sold under multi-year contracts
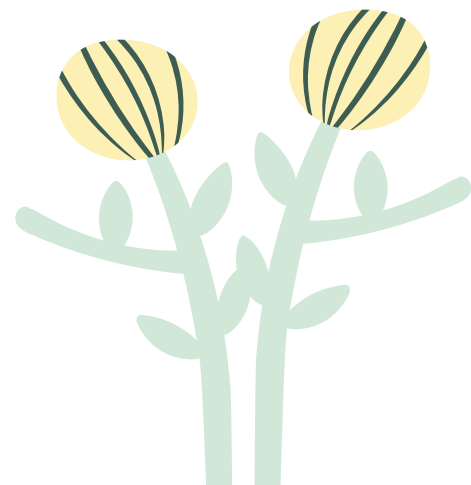
5.5 Initiatives in Collaboration with Technology Partners

Sustainable Net

The Sustainable Net project was introduced with the aim of ensuring greater transparency regarding the ESG performance of our main technology partners, thereby promoting more informed purchasing decisions. Specifically, the analysis involved the main vendors for both the Device as a Service (DaaS) service — Apple, HP, Lenovo, and Microsoft — and the MIS service — Cisco, Fortinet, HPE, NetApp, Nutanix, and Pure Storage. Through a rigorous methodological approach, which involved collecting and synthesizing data from sustainability reports and company websites, the project identified key qualitative and quantitative indicators for each ESG macro-area. This dual evaluation method provides an integrated, concise, and detailed view of the sustainability strategies adopted by the partners.
This project represents a fundamental tool for Elmec to foster the creation of a responsible technological ecosystem, aligned with the highest standards of sustainability and social responsibility.

White paper con IDC

Elmec and Pure Storage for a sustainable and high-performing data center.

A white paper prepared by IDC to investigate sustainable and efficient data center development in Italy.

https://www.elmec.com/datacenter/sostenibilita/index.html

5.5 Initiatives in Collaboration with Techno-logy Partners

HP Amplify impact partner program

HP Amplify Impact is an important global sustainability program for HP's commercial partners, aimed at promoting environmental and social sustainability across all products and business processes. Elmec, as an HP commercial partner, has chosen to join this program to demonstrate its strong commitment to supporting the company's sustainability goals.

Through participation in the HP Amplify Impact program, Elmec has committed to rigorously following sustainable solutions and promoting sustainability throughout its supply chain and business activities. This means Elmec actively strives to reduce the environmental impact of its products and business processes and to ensure respect for human rights and workers throughout the supply chain.

Moreover, as part of the program, Elmec gains access to a wide range of resources and tools provided by HP, such as training portals, guidelines for integrating sustainability into commercial negotiations, and informational videos that help embed sustainable practices within its business processes. This clearly demonstrates Elmec's tangible commitment to contributing to a more sustainable future and working alongside HP to achieve shared sustainability goals.

Participation in the HP Amplify Impact program not only represents a strong commitment to sustainability but also confirms Elmec's focus on adopting responsible business practices.
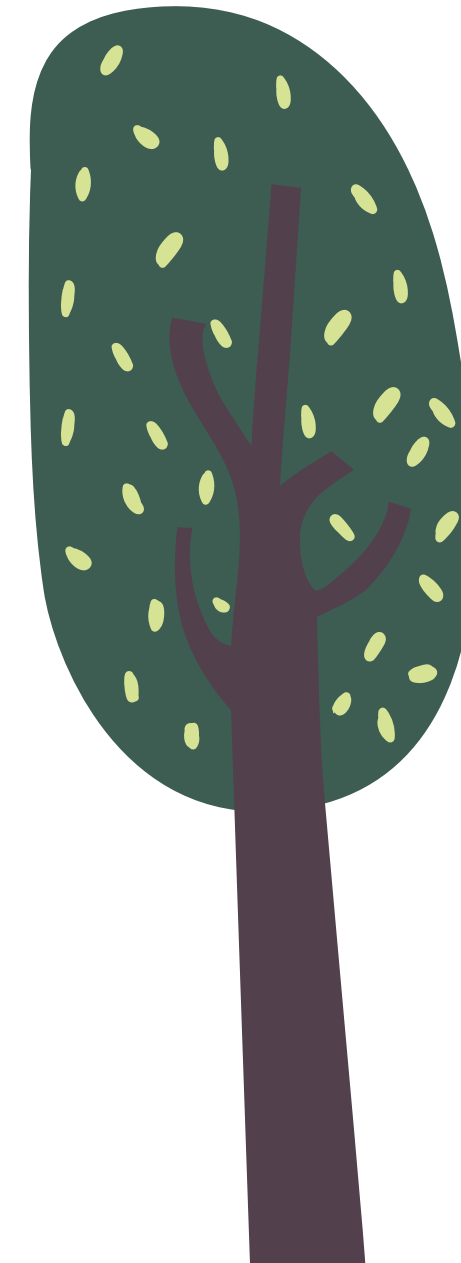
5.6 Technological development and modernization

Technological innovation represents one of the fundamental pillars of social and economic progress.
Elmec, as a company committed to sustainability, believes that continuous technological development is a crucial factor for improving citizens' quality of life and responding to the needs of sectors such as public administration and healthcare.
Information Technology, in particular, can offer solutions capable of optimizing processes, increasing efficiency and transparency, and improving the delivery of services to citizens.

In this context, Elmec aims to invest in research and the implementation of cutting-edge technologies, with the goal of contributing to an increasingly modern, sustainable, and inclusive society.
In this section of the sustainability report, we will analyze the impacts of IT solutions developed by Elmec on citizens and local communities, examining the opportunities and challenges on the path toward ever more advanced digitalization.

Audio-narrated Computer Museum

Elmec houses a computer museum that captures half a century of digital evolution.
In 2021, to celebrate our fiftieth anniversary, we decided to renew it by making it audio-narrated through the voices of Elmec technicians.

Innovation and Cybersecurity Events

Elmec has demonstrated a strong commitment to innovation and modernization by organizing public events at its campus. These events have been an opportunity to better understand the company, its technologies, and initiatives, while also creating an environment of collaboration and idea exchange.

E.T. Extra Thinkers

On May 17, 2024, Elmec hosted the event E.T. Extra Thinkers at its Brunello (VA) Campus. The event was dedicated to exploring the lights and shadows of artificial intelligence through concrete use cases and testimonies from companies in various sectors about its impact on the world of work.
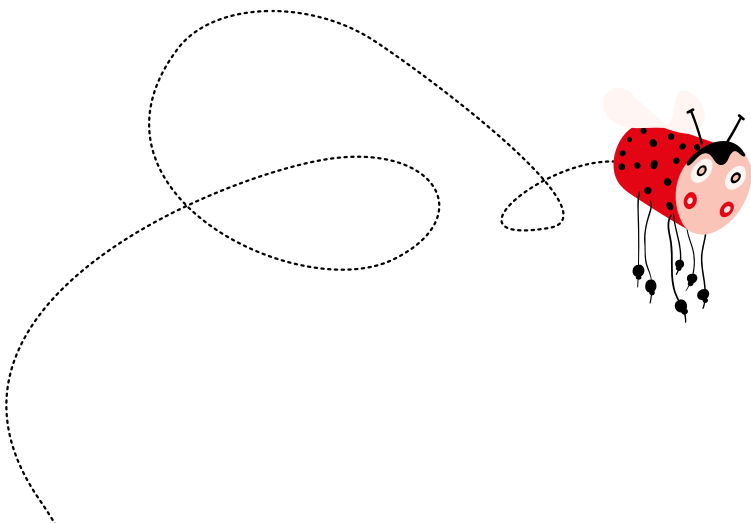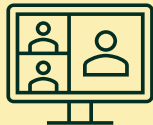
5.6 Technological development and modernization

Ivo goes to school

The IVO Robot: we developed a solution that allows hospitalized children or those who need to spend a long period of convalescence at home to connect via video streaming with their own classroom thanks to a tablet held by the child, a robot present in the classroom, and the connection provided by EOLO.

Cyber park

On October 16, 2024, as part of the Cyber Week organized by Elmec and CybergON, Cyber Park was held at the Elmec Campus, an event dedicated to cybersecurity, featuring workshops and thematic tables on the evolution of threats, fake news, and cybersecurity strategies.

In previous editions of the event, Cyberthings was launched, a podcast aimed at informing about risks related to people's digital identity. The podcast is available for free on the following platforms: Apple Podcast, Amazon Music, Spotify.
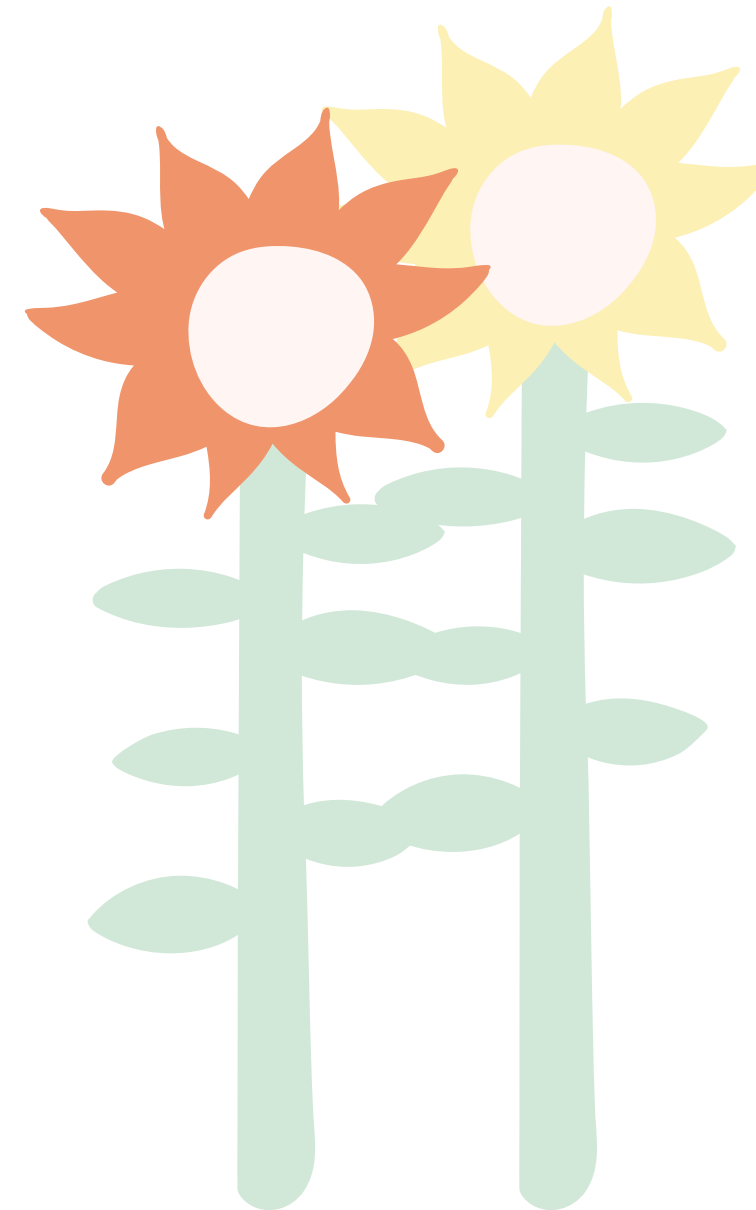
5.6 Technological development and modernization
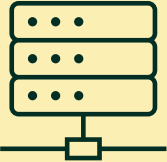
Study tour

The Elmec Informatica Study Tour project offers an experience to discover Digital Transformation at our Technology Campus in Brunello, Varese. Visitors can choose from over 10 stops, such as a visit to the certified Data Center, the 3D printing lab, the Innovation Center, the cybersecurity department, and the renewable energy department. During the visit, visitors can interact with the company's technicians and discover the innovative solutions developed for businesses.

The Technology Campus is located half an hour from Milan and covers an area of 130,000 square meters. In 2024, more than 1,200 people visited the campus, coming from companies, clients and prospects, suppliers and partners, trade associations, schools, and universities. Internal staff have dedicated over 200 hours (60 in 2023) to the study tours.

Cybersecurity

Workplace e international

Ecosistema IBM power

CSR

Innovation

Internet of things

Data center and managed services

Renewable Energy

Device as a service

"To live an unprecedented experience, where people will be immersed in a reality that creates ideas, but above all, puts them into practice—while respecting the territory, the environment, and the people who inhabit these spaces every day."

Rinaldo Ballerio, President of Elmec Informatica.
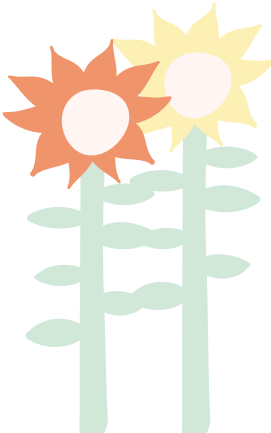
5.6 Technological development and modernization

	2024	2023	2022
Revenue from cybersecurity services (cybersecurity revenue growth)	6,6 MLN €	4.9 MLN €	3 MLN €
Number of events on digitalization and cybersecurity that Elmec attended or helped promote/organize	4	15	10

Ticket	2024	2023	2022
Tickets	23.045	16.020	8.747
Warnings	2.963	2.075	482
Service requests	1.737	1.815	1.016
Operations	0	193	69
Other	**27.745**	**20.103**	**10.314**

The above-mentioned digitalization events addressed various topics aligned with sustainability and technological innovation. These topics include cybersecurity, renewable energy, circular economy, cloud computing, and technological innovation. Elmec's participation in these events demonstrates the company's ongoing commitment to promoting sustainable and innovative solutions in the market, while always maintaining a strong focus on data and process security. It is noted that, during 2024, Elmec did not suffer any external cyberattacks resulting in data breaches, unavailability of data and information, or service interruptions. However, in its cybersecurity support activities for its clients, Elmec assisted them in the analysis and management of one cyber incident affecting their systems.

The following categories are represented in this table:
• Warnings: generic intervention requests indicating potential issues or situations that, unlike incidents or events, may not immediately cause service interruptions but still require attention and monitoring to prevent escalation into more serious problems.
• Service requests: standardized IT service requests which may include access requests, hardware/software configurations, information requests, etc. This type of service request does not cause service interruptions.
• Operations: daily and routine activities for managing and executing IT services. This category includes system monitoring, user access management, patch management, and other routine activities to ensure IT services operate efficiently and comply with established standards.
• Other: daily and routine activities for managing and executing IT services. This category includes system monitoring, user access management, patch management, and other routine activities to ensure IT services operate efficiently and comply with established standards.
The increase in the number of tickets recorded in 2024 compared to previous years is mainly due to company growth and the expansion and strengthening of the service team composed of technicians with specific skills. This new structure enables better management and resolution of the tickets handled.

5.7 Cybersecurity and privacy

Cybersecurity sustainability means having a holistic view of risk management related to cyberattacks. It's a fact that security vulnerabilities have a strong impact on business continuity. Cyberattacks can trigger cascading effects that may jeopardize the stability of communities and governments.

Ensuring data security and privacy protection is a top priority for Elmec, which handles large volumes of information—often personal, sensitive, and confidential—both in its Data Centers and through other services provided to clients and employees.

Guaranteeing the proper use of data and information and preventing cyberattacks aimed at stealing personal or corporate data, as well as avoiding data breaches, are essential objectives for the company.

Elmec has a dedicated Business Unit called CybergON, focused on cybersecurity services, with extensive expertise across both Hybrid Cloud and Digital Workplace offerings.

The Security Operations Center (SOC) monitors suspicious behaviors (Detect) on client infrastructures and, if found to be malicious, acts to block them (Respond).

CybergON combines technologies and skills to create a unified protection strategy, leveraging services such as AD Audit, Continuous Vulnerability Assessment, and training programs.

The synergy between CybergON and Elmec Informatica is a competitive advantage, as it ensures a robust cybersecurity policy backed by proven expertise in infrastructure protection and remediation.

Over the past few years, there have been no claims related to customer privacy violations, with or without data loss.

The Privacy Management Model (MOP) was updated recently and includes all procedures required by EU Regulation 679/2019. Among these is the Data Breach Management Procedure, which strengthens the detection and assessment system for incidents that may lead to data breaches and requires the maintenance of a Data Breach Register to track and monitor all such events. To date, no such incidents have occurred.

Lastly, Elmec Informatica has a Data Protection Committee, a multidisciplinary body responsible for overseeing cybersecurity and privacy matters in collaboration with the Data Protection Officer.

Some key figures from CybergON:

	2024	2023	2022
Number of incidents	17.587	8.958	4.114
Number of data breach	0	0	0

The term incident refers to unexpected events that have caused interruptions in IT services or reductions in service quality, potentially impacting cybersecurity. These events can be reported by end users or detected through Elmec's automatic and periodic monitoring systems, with the goal of ensuring a rapid resolution to restore service quality levels as quickly as possible. None of these events resulted in data breaches or critical situations from a cybersecurity or privacy compliance standpoint.

CYBERGON

68
Clients trained in 2024

34
Weekly bulletins sent on cybersecurity

4
Articles published on the blog

5
Ransomware cases handled in 2024

15.300
Daily check per client
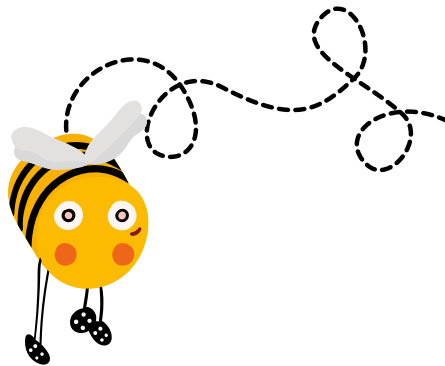
5.8 Customer Relations

Elmec is aware that its success is closely linked to the success of its clients. The company strives to be a competent and reliable partner, providing clients with solutions tailored to achieve their goals.

In its relationships with clients, Elmec bases its conduct on principles of transparency, fairness, honesty, efficiency, professionalism, and respect for laws protecting fair competition. Specifically, the Code of Ethics requires recipients to:

• Follow internal procedures for managing client relationships;

• Provide, efficiently and courteously, within contractual limits, high-quality services that meet clients' reasonable expectations and needs;

• Supply accurate and comprehensive information about products and services so that clients can make informed decisions.

Contracts with clients, as well as all forms of communication and interaction, including advertising messages, must comply with legal requirements and adhere to principles of simplicity, clarity, and completeness, avoiding any deceptive or unfair practices.

Moreover, conduct must be based on respect, cooperation, and collaboration, acting in good faith and fairly, honoring contractual obligations, and ensuring the requested performance.

Since 2023, thanks to our commitment, we calculate the emissions generated by our DaaS and MIS services. This allows us to offset these emissions and guarantee our clients the purchase of carbon-neutral services.

Finally, all personnel are expected to act proactively and participatively, aligned with the responsibilities assigned to their roles, and in full collaboration with other activities and roles.

Practices such as corruption, illegitimate favors, collusive behavior, solicitations—directly or through third parties—for personal or career advantages for oneself or others are strictly prohibited.

All the above information is publicly available within the company's Code of Ethics.

APPENDIX

A. Methodological Note

Reporting Model

The Sustainability Report contains information related to environmental and social topics, personnel matters, respect for human rights, and the fight against corruption, as well as the associated risks, to the extent necessary to ensure an understanding of the activities carried out by Elmec Informatica, its performance, results, and the impact of its actions.

This Sustainability Report refers to the 2024 fiscal year and was approved by the Board of Directors on June 3, 2025. The document is available in PDF format in both Italian and English on the internet at: elmec.com/csr.

The GRI Standards, published by the Global Reporting Initiative ("GRI"), which are currently the most widely used and internationally recognized sustainability reporting standards, have been identified by Elmec Informatica as the "reference standards" for preparing this document. The GRI Content Index is available in the Appendix.

The reporting principles considered in the preparation of the Sustainability Report are accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, and verifiability or relevance, in line with the applicable regulations and GRI Standards.

Information is provided according to the "comply or explain" principle: therefore, if policies are not implemented in one or more relevant thematic areas, the reasons for this choice are explained in the document.

The Sustainability Report, prepared taking into account the results of stakeholder engagement activities, includes information regarding the value added produced and distributed by the Group.

Reporting Process

The preparation process of the Sustainability Report is coordinated by the CSR Team, under the direction of the ESG Coordinator.

The reporting process is based on the analysis of the provisions and indicators deemed useful from the GRI Standards in terms of applicability and relevance, as further defined by the materiality analysis.

The Sustainability Report includes comparative data from the previous fiscal year, where available.

A. Nota metodologica

Paragraph 5.3 provides a qualitative description of the supply chain.
The reporting process for qualitative and quantitative information, mainly related to material topics, involves the use of reporting forms sent to each functional manager.
Information not collected through the reporting forms was gathered through direct engagement with Elmec's stakeholders via interviews.

Reporting Model

The reporting scope of the Sustainability Report coincides with Elmec Informatica S.p.A.

GRI Standard

This Sustainability Report has been prepared with reference to the GRI Standards – Global Reporting Initiative and in accordance with the guidelines of GRI 1: Foundation Principles 2021. The document contains data and information that reflect the economic, environmental, and social impacts of Elmec Informatica and that may substantially influence the assessments and decisions of stakeholders.

Materiality Analysis

Materiality is the principle of the GRI – Global Reporting Initiative Standard (GRI 3 – Material Topics 2021), chosen by Elmec Informatica as the reference standard to report information related to the organization's most significant economic, environmental, and social impacts, including those concerning human rights and their management.
For each reporting period, Elmec commits to continuously reviewing its material topics.
In this context, "impact" refers to the effect (positive or negative) that an organization has on the economy, the environment, and/or society.
A topic can be relevant, and therefore potentially material, based on any one of these dimensions, also considering a combination of internal and external factors, such as the company's purpose, vision, and overall mission, the adopted strategy, and concerns directly expressed by stakeholders.
The analysis of material topics was conducted in coordination with Stakeholder Engagement activities, through the assignment of a rating to evaluate impacts from an outside-in perspective.

A. Methodological Note

Subsequently, this analysis was expanded to also consider the inside-out perspective, that is, the impacts that Elmec Informatica's activities generate on the environment, people, and the economy.

Elmec, through the involvement of an internal working group composed of the company's frontline management, carried out the following analysis phases to determine the material topics, as required by GRI 3 – Material Topics 2021, and illustrated in the following framework:

• Understanding the organizational context

• Identification of current and potential impacts

• Assessment of the scope of impacts

• Prioritization of the most significant impacts for reporting

The ESG topics identified by Elmec as "material" are indicated in paragraph 2.5.3.

Review of Information

The criterion identified by Elmec to determine the materiality of a change or error in data and comparative information reported in previous Sustainability Reports is linked to the assessment of whether such change or error could significantly influence the decision-making process of the Stakeholders.

Contacts

The contact persons for information regarding the report are:

TRUST AND SUSTAINABILITY DIRECTOR
Elisa Bisceglia: Elisa.bisceglia@elmec.it

ESG MANAGER
Luca Sardella: Luca.sardella@elmec.it

WEBSITE
Elmec.com/csr
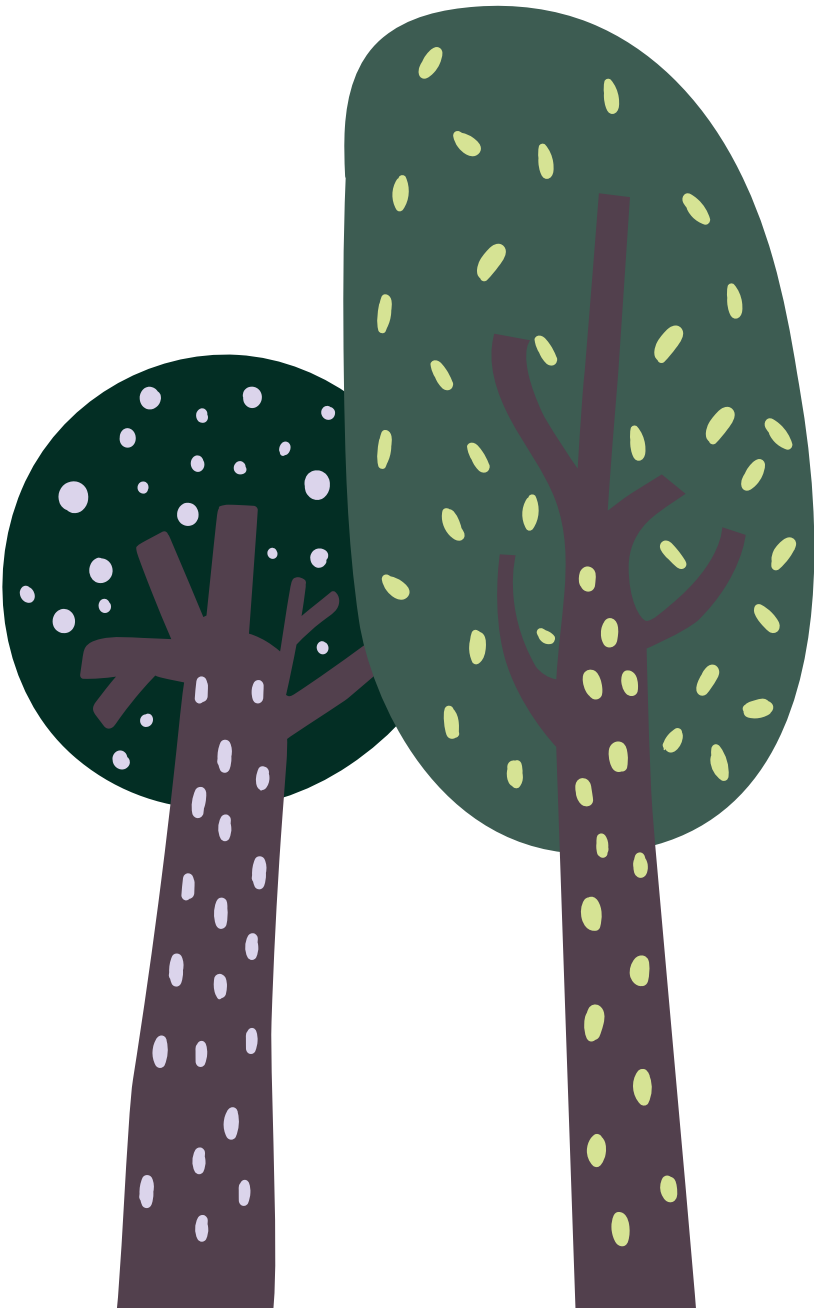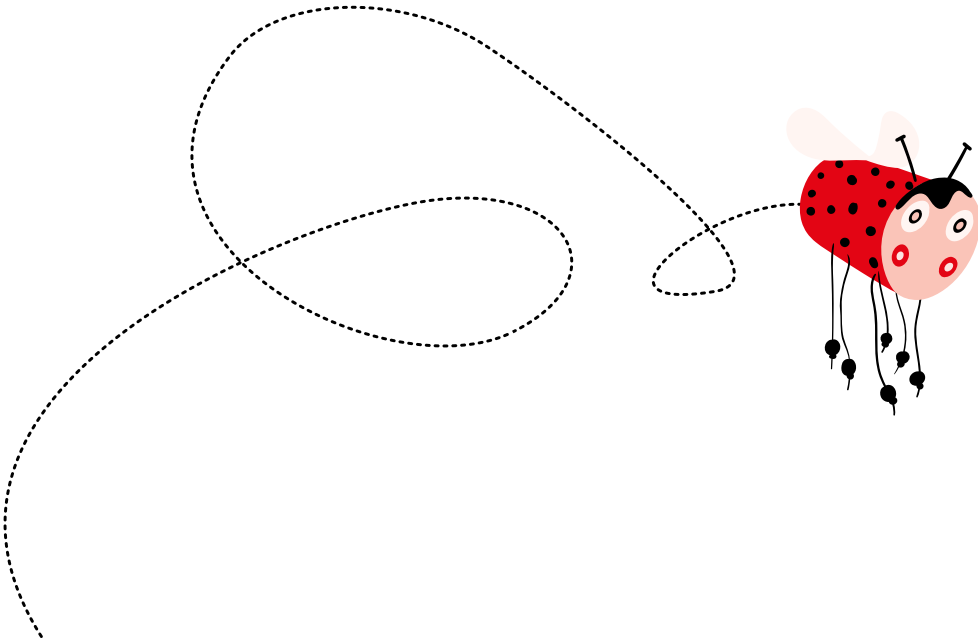
B. GRI content index

The GRI Content Index provides an overall view of the information reported by the company, indicates where such information can be found, and helps data users access it; moreover, it shows which GRI Standards and disclosures have been used by the company.

Statement of Use	ELMEC INFORMATICA S.p.A. has reported the information included in this GRI Content Index for the period from January 1, 2022, to December 31, 2022, with reference to the GRI Standards.
Used: GRI 1	GRI 1: Foundation — 2021 version
Relevant sector standards:	N/A

GRI Standard / Other Source	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Omitted requirements	Reason	Explanation	
General Disclosures						
Working Conditions and Corporate Welfare	**1. The organization and its reporting practices**					
	2-1 Organizational details	1.2.1 The Elmec Informatica Campus				
	2-2 Entities included in the organization's sustainability reporting	A. Methodological Note – Reporting Boundary				
	2-3 Periodo di rendicontazione, frequenza e referente	A. Methodological Note • Reporting model • Contacts				
	2-4 Restatement of information	A. Methodological Note • Review of information				
	2-5 External assurance	Not applicable as the report is not subject to external assurance				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Omitted requirements	Reason	Explanation	
General Disclosures						
GRI 2 – General Disclosures – 2021 version	**2. Activities and workers**					
	2-6 Activities, value chain, and other business relationships	1.1 Elmec's History; 1.2 Elmec's Structure and Size; 1.4 Business Model; 5.2 Responsible Supply Chain Management; 5.3 Supplier Evaluation and Management; 5.4 Customer and Partner Management				
	2-7 Employees	3.2 Workforce composition; 3.3 Workforce diversity; 3.3.1 Employee turnover; 3.6 Diversity and equal opportunity				
	2-8 Non-employee workers	3.3 Workforce diversity				
	3. Governance					
	2-9 Governance structure and composition	2.1 Governance Structure; 2.1.1 Board of Directors; 2.1.2 Board of Statutory Auditors				
	2-10 Appointment and Selection of the Highest Governance Body	2.1.1 Board of Directors				
	2-11 Chairperson of the Highest Governance Body	2.1.1 Board of Directors; 2.4 Ethics and Anti-Corruption				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
General Disclosures						
GRI 2 – General Disclosures – 2021 version	2-12 Role of the highest governance body in overseeing the management of impacts	1.3 Vision, mission, and code of ethics; 2.1.1 Board of Directors; 2.5.1 Sustainability governance; 2.5.2 Materiality analysis; 2.8.2 Stakeholder engagement initiatives				
	2-13 Delegation of responsibility for managing impacts	2.1.1 Board of Directors; 2.6 Sustainability plan and Sustainable Development Goals - SDGs				
	2-14 Role of the highest governance body in sustainability reporting	2.5.1 Sustainability governance; A. Methodological note – Reporting model				
	2-15 Conflicts of interest	2.4 Ethics and anti-corruption				
	2-16 Communication of critical concerns	2.1.1 Board of Directors				
	2-17 Collective knowledge of the highest governance body	No measures adopted				
	2-18 Evaluation of the performance of the highest governance body	No measures adopted				
	2-19 Remuneration policies	2.1.1 Board of Directors; 3.4.2 Performance and career paths				
	2-20 Process for determining remuneration	2.1.1 Board of Directors				
	2-21 Ratio of annual total compensation		Indicator not reported	Confidentiality constraints		

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
General Disclosures						
GRI 2 – General Disclosures – 2021 version	**4. Strategia, politiche e prassi**					
	2-22 Statement on sustainable development strategy	Letter from the President to stakeholders				
	2-23 Policy commitments	1.3 Vision, mission, and code of ethics; 2.4 Ethics and anti-corruption; 2.7 Social and environmental policies and guidelines				
	2-24 Integration of policy commitments	2.6 Sustainability plan and Sustainable Development Goals (SDGs); 2.7 Social and environmental policies and guidelines; 5.3 Supplier evaluation and management				
	2-25 Processes for addressing negative impacts	2.4 Ethics and anti-corruption;				
	2-26 Mechanisms for seeking clarification and raising concerns	2.3 Model 231 and Supervisory Body; 2.4 Ethics and anti-corruption				
	2-27 Compliance with laws and regulations	2.5.1 Sustainability governance; 4.4 Compliance with environmental regulations				
	2-28 Membership in associations	Confindustria and Univa 2.7 Group policies and guidelines in the social and environmental field; 2.8 Our stakeholders; 2.8.1 Stakeholder Engagement initiatives; B. GRI Content Index				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
General Disclosures						
GRI2 – General Information – 2021 version	**5. Stakeholder engagement**					
	2-29 Approach to stakeholder engagement	Letter from the Chairman to stakeholders				
	2-30 Collective agreements	2.1.1 Board of Directors; 3.8 Labor relations and employment protection				
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	1.5 Directly generated, distributed, and retained economic value				
Material topics						
GRI3-Temi materiali - versione 2021	**1. Guidance on determining material topics**					
	2. Disclosure on material topics					
	3-1 Process for determining material topics	2.5.3 Materiality analysis; 2.5.5 Materiality matrix; A. Methodological note				
	3-2 List of material topics	2.5.4 Material topics				
Energy consumption, green products and services						
GRI3-Material topics version 2021	3-3 Management of material topics	2.7 Group policies and guidelines in the social and environmental field; 4.1 Environmental risks and issues relevant to Elmec; 4.1.2 Environmental policies; 4.2.3 Material topics of an environmental nature				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	4.2 Energy consumption of green products and services				
	302-4 Reduction of energy consumption	4.1.2 Environmental policies; 4.2 Energy consumption of green products and services; 4.2.3 Environmental material issues				
	302-5 Reduction of energy requirements of products and services	4.2 Energy consumption of green products and services				
Emissions and climate change						
GRI3-Material topics version 2021	3-3 Management of material topics	2.7 Group policies and guidelines in the social and environmental field; 4.1 Environmental risks and issues relevant to Elmec; 4.1.2 Environmental policies; 4.2.3 Material environmental issues; 4.3.1 Energy sources; 4.3.2 Greenhouse gas emissions				
GRI 305: Emissions 2016	305-1 Direct greenhouse gas (GHG) emissions (Scope 1)	4.3.2 Greenhouse gas emissions				
	305-2 Indirect greenhouse gas (GHG) emissions from energy consumption (Scope 2)	4.3.2 Greenhouse gas emissions				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
GRI 305: Emissioni 2016	305-5 Reduction of greenhouse gas (GHG) emissions	4.3.2 Greenhouse gas emissions				
Circular economy						
GRI3-Material topics version 2021	3-3 Management of material issues	2.7 Group policies and guidelines in the social and environmental field; 4.1 Environmental risks and issues relevant to Elmec; 4.1.1 Environmental protection; 4.1.2 Environmental policies; 4.2.1 Circular economy; 4.2.3 Material environmental issues; 4.3.4 Waste management				
GRI 306: Waste 2020	306-1 Waste generation and significant impacts related to waste	4.3.3 Waste management				
	306-2 Management of significant impacts related to waste	4.3.3 Waste management				
	306-3 Waste generated	4.3.3 Waste management				
	306-4 Waste not sent to landfill	4.3.3 Waste management				
	306-5 Waste sent to landfill	4.3.3 Waste management				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
GRI3-Material topics version 2021	3-3 Management of material topics	3.1 Risks and issues relevant to Elmec; 3.5 Talent development; 3.5.1 Training				
GRI 404: Training and education 2016	404-1 Average number of training hours per year per employee	3.5.1 Training				
	404-3 Percentage of employees receiving regular performance and professional development reviews	3.4.2 Staff evaluation				
Diversity and equal opportunities						
GRI3-Material topics version 2021	3-3 Management of material topics	2.7 Social and environmental policies and guidelines; 3.1 Risks and issues relevant to Elmec; 3.6 Diversity and equal opportunities; 3.6.2 Culture of Diversity & Inclusion				
GRI 405: Diversità e pari opportunità 2016	405-1 Diversity in governance bodies and among employees	2.1.1 Board of Directors; 2.1.2 Board of Statutory Auditor 3.2 Composition of personnel; 3.3 Composition of the workforce				
	405-2 Ratio of basic wages and salaries of women to those of men	3.6.1 Gender wage Gap				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective measures taken	No cases detected in 2024				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
Worker health and safety						
GRI3-Material topics version 2021	3-3 Management of material topics	2.2 Identification and monitoring of risks; 3.1 Risks and issues relevant to Elmec; 3.4 Working conditions and corporate welfare; 3.7 Health and safety of workers				
GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	3.7 Health and safety of workers				
	403-3 Occupational health services	3.7 Health and safety of workers				
	403-4 Worker participation and consultation on occupational health and safety programs and related communication	3.7 Health and safety of workers				
	403-5 Training of workers on occupational health and safety	3.5.1 Training; 3.7 Health and safety of workers				
	403-6 Promotion of workers' health	33.7 Health and safety of workers; 3.4.1 Company welfare initiatives for workers				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
GRI 403: Occupational health and safety 2018	403-9 Accidents at work	3.7 Worker health and safety				
	403-10 Occupational disease	3.7 Worker health and safety				
Working conditions and corporate welfare						
GRI3-Material topics version 2021	3-3 Gestione dei temi materiali	3.1 Rischi e temi sul personale rilevanti per Elmec; 3.4 Condizioni di lavoro e welfare aziendale; 3.4.1 Iniziative di welfare aziendale				
GRI 401: Employment 2016	401-1 Assunzioni di nuovi dipendenti e avvicendamento dei dipendenti	3.3.1 Turnover del personale				
	401-2 Benefici per i dipendenti a tempo pieno che non sono disponibili per i dipendenti a tempo determinato o part-time	3.4.1 Iniziative di welfare aziendale				
Responsible Supply Chain Management						
GRI3-Material topics version 2021	3-3 Management of material topics	5.2 Responsible supply chain management; 5.3 Supplier evaluation and management				
GRI 414: Social assessment of suppliers 2016	414-1 New suppliers that have been selected using social criteria	5.3 Supplier evaluation and management				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Stan-dard di settore GRI
			Omitted re-quirements	Reason	Explana-tion	
Technological development and modernization						
GRI3-Material to-pics version 2021	3-3 Management of material to-pics	5.6 Technological development and modernization				
Ethics and the fight against corruption						
GRI3-Material to-pics version 2021	3-3 Management of material to-pics	2.4 Ethics and anti-corruption; 2.7 Social and environmental policies and guidelines; 5.5 Customer relations				
GRI 401: Employ-ment 2016	205-1 Operations assessed to de-ter-mine risks related to corrup-tion	2.4 Ethics and anti-corruption				
	205-2 Communica-tion and trai-ning on anti-corruption regula-tions and procedures	2.4 Ethics and anti-corruption				
	205-3 Confirmed in-cidents of corrup-tion and measures taken	2.4 Ethics and anti-corruption				
GRI 415: Public policy 2016	415-1 Political con-tributions	No contributions made to political parties				
Cybersecurity and privacy						
GRI3-Material to-pics version 2021	3-3 Management of material is-sues	5.7 Cybersecurity and privacy				
GRI 418: Custo-mer privacy 2016	418-1 Substantiat-ed complaints re-garding violations of customer privacy and loss of cus-tomer	5.7 Cybersecurity and privacy				

B. GRI content index

GRI Standard / Other Source	Disclosure	Location	Omission			N. rif. Standard di settore GRI
			Omitted requirements	Reason	Explanation	
Sustainable governance						
GRI3-Material topics version 2021	3-3 Management of material topics	2.5.1 Sustainability governance				
Human rights (child labor, forced or compulsory labor)						
GRI3-Material topics version 2021	3-3 Management of material topics	2.7 Social and environmental policies and guidelines; 3.9.3 Respect for human rights, a growing issue				
Freedom of association and collective bargaining						
GRI3-Material topics version 2021	3-3 Management of material topics	3.8 Labor relations and employment protection				
Water						
GRI 303: Water and effluents 2018	303-3 Water withdrawal	4.2.2 Water resources				