



ELMEC IMPACT

Sustainability Report

2023

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The future of businesses lies in innovation	6

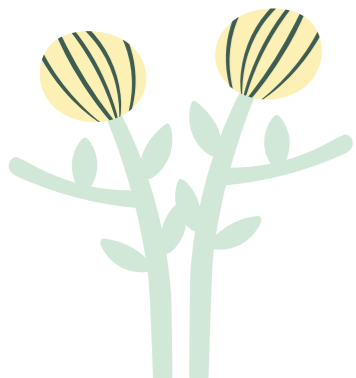
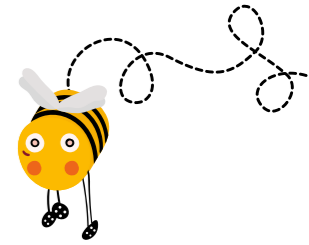
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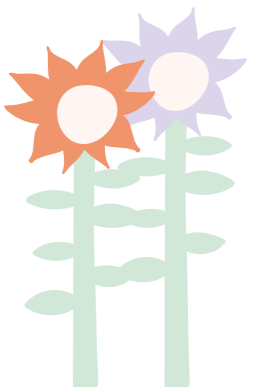
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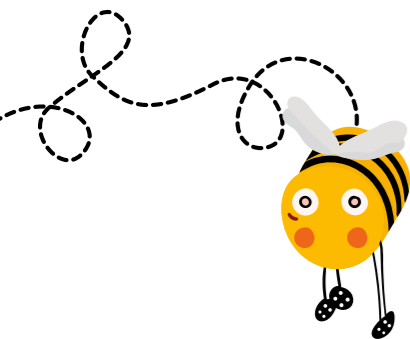


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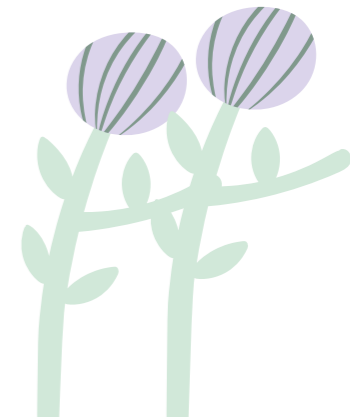
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Illustrations edited by Fabiana Deidda



Chairman's Letter to Stakeholders



Our manifesto embodies the principles that guide us every day. The “Good morning!” that is heard throughout our corridors is more than just a greeting. It is a tangible symbol of a positive and welcoming work environment, where personal responsibility and trust are the cornerstones of our operations.

These reflections guide us as we undertake each of our project, reminding us of the importance of integrity and trust in what we do. Continuing education is our investment in the future, a commitment that allows us to explore the potential of every single person and promote excellence. Despite being large enough to face complex challenges, our company size allows us to remain flexible and detail-oriented, maintaining a professional and reliable approach.

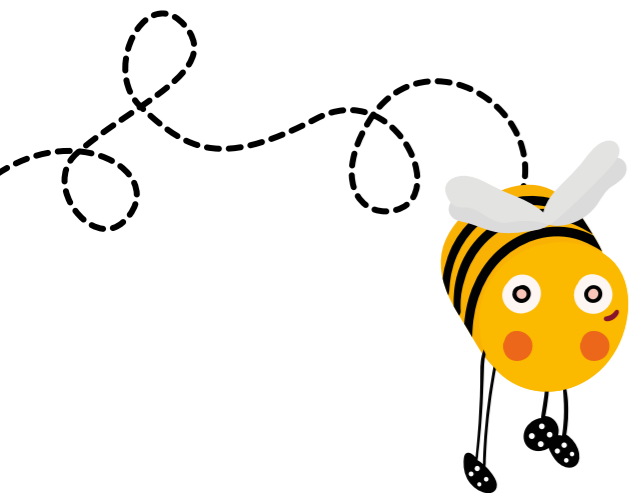
This balance between growth and attention to the individual is also reflected in our commitment to a stimulating and pleasant working environment. We firmly believe in our employees' well-being and are committed to supporting it with various initiatives, ranging from personal well-being to sports, from psychological support services to work-life balance initiatives.

Sustainability is a value that we integrate into our daily activities, trying to reduce environmental impact and promote responsible practices. Our goal is to give a positive contribution to the community and the environment around us, in line with the principles of our manifesto.



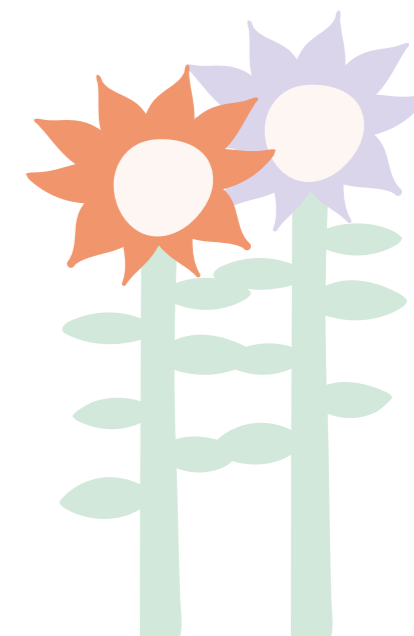
Rinaldo Ballerio - Chairman of Elmec Informatica spa
Alessandro Ballerio - CEO





The future of businesses lies in innovation

We are a 100% Italian company and have been in the IT business for over 50 years. We are able to achieve this thanks to the dedication of our 900-strong workforce, comprising 650 highly skilled technicians who work tirelessly from our Technology Campus in Brunello (VA).

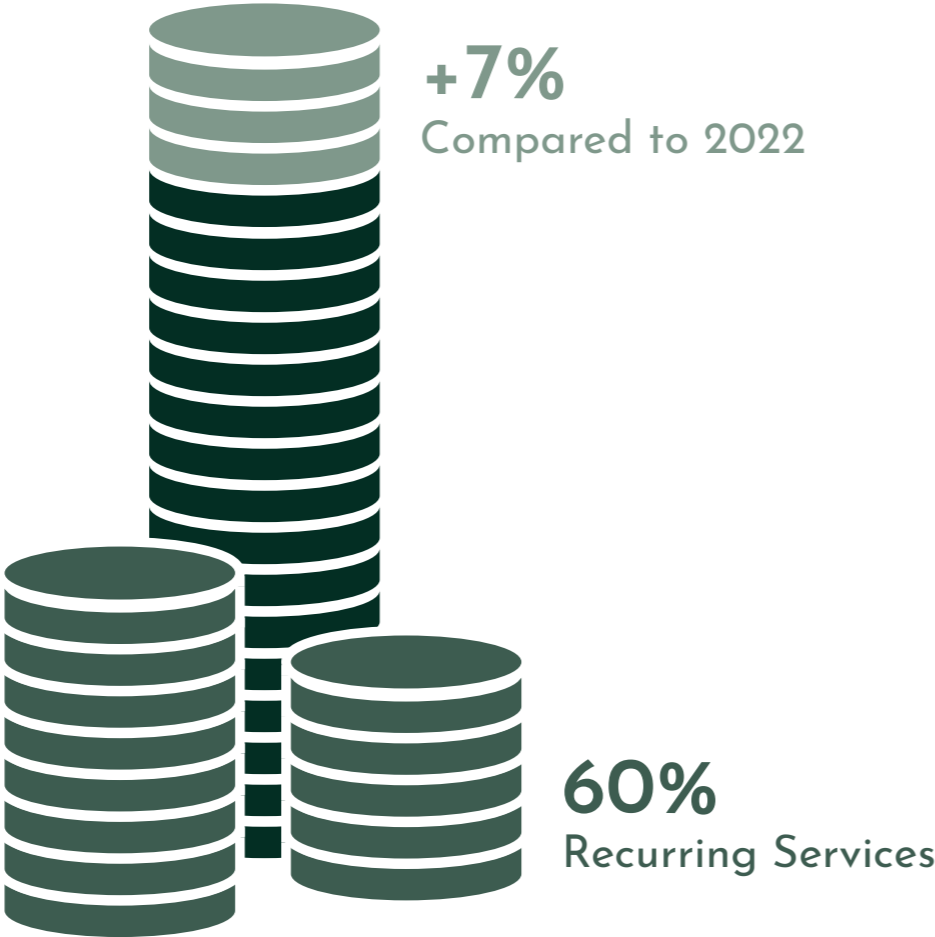




DATA AT GLANCE

Elmec in figures

166,5 MILLION
Total Turnover



702
Employees

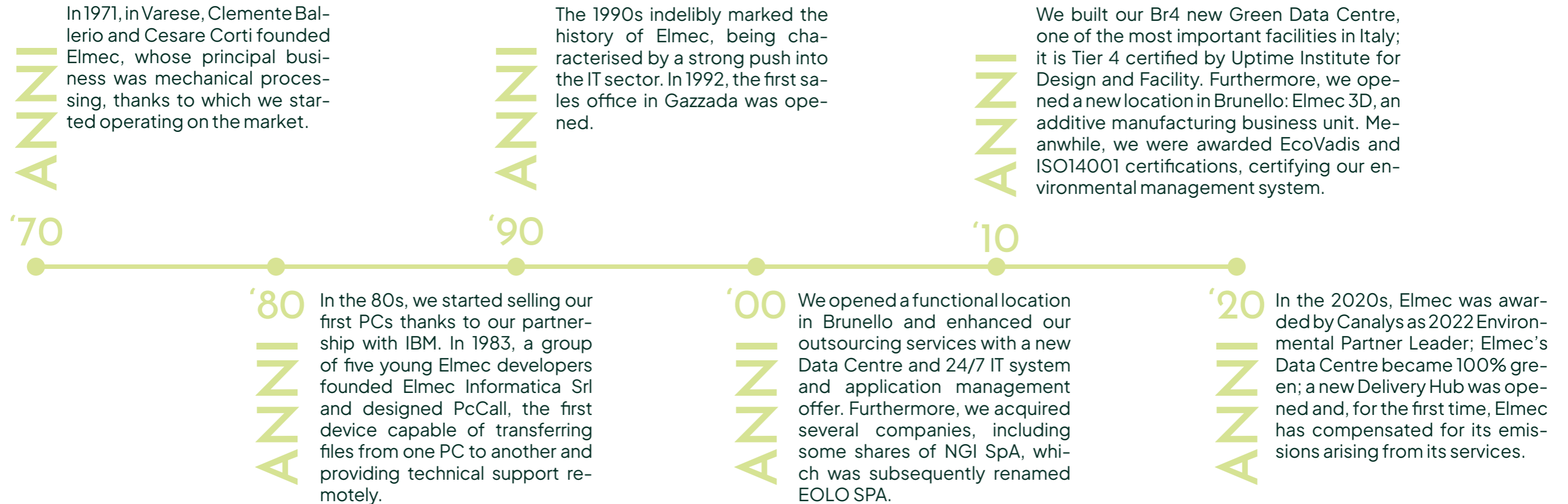


73%
IT Specialist



1. IDENTITY AND PROFILE

1.1 Our history



1.2 Elmec's structure and size

From punched cards, which were physically taken to warehouses, to a data centre that can offer physical and cloud storage solutions for several petabytes of information. For over 50 years, we have led businesses' digital evolution.

Elmec's workforce consists

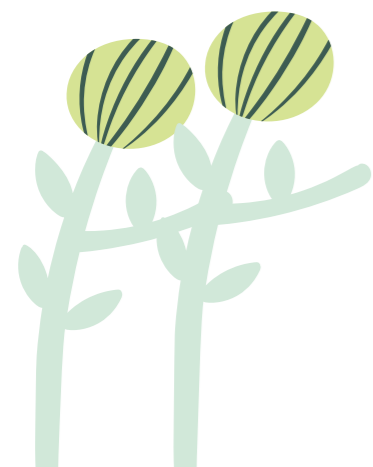
of 702 employees (as of December 31, 2023), 73% of whom are specialized technicians. The company's total revenue amounts to €166.5 million (as of December 31, 2023), with 60% coming from recurring services.

In our corporate ecosystem, there are many innovative

units synergistically interacting with each other for businesses' technological development; it is not just about Information Technology, but also cybersecurity, 3D printing, renewable energy, circular economy, connectivity, ERP and Internet of Things.



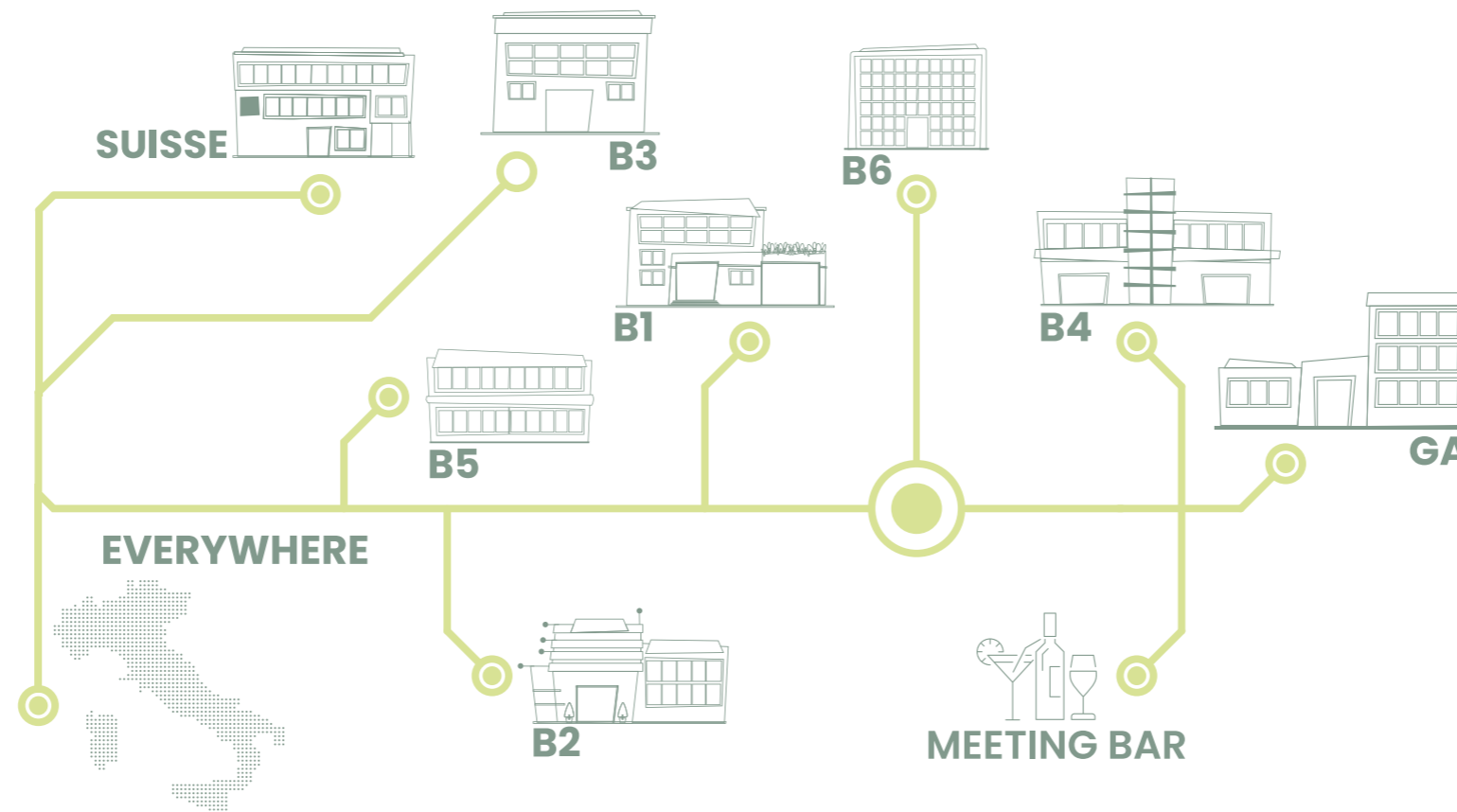
Our certifications



1.2.1 Elmec Informatica's campus

Elmec has several locations in Italy. In Lombardy, logistics and shipments are located at the 'B1' location at via Campo di Maggio, 41, Brunello, Varese, Italy. In Brunello, there are also our headquarters at Via Pret, 1 ('B2'), Elmec 3D business unit at Via Campo di Maggio 39, ('B3D'), our Competence Centre at Via Campo di Maggio, 45 ('B4') and our Innovation Centre at Via Campo di Maggio, 39 ('B5'). Our new 'B6' location, which is that of device refurbishment business unit, is at Via del Luguzzone, 2, Buguggiate, Varese, Italy. Another location is at Via Miglio, 4, Gazzada Schianno, Varese, Italy, which hosts Elmec SpA and Elmec Solar. In Lombardy, Elmec also has a business and technical location in Brescia at via Padova, 11; another business and technical location is in Padua, Veneto, at via Nona Strada,

23. A further business location is in Parma, Emilia-Romagna, at Stradello Marca-Relli Conrad, 9. Finally, Elmec has a business location in Rome at Piazza Luigi Sturzo 15.



B1 - Workplace Hub
Tech Hub (DaaS)
Logistics and Storage
Gym

B2 - Headquarter
Elmec4You
Bistrot

B3D - 3D Factory
Elmec 3D Lab

B4 - Home of your data
Data center (TIER IV)
Infrastructure Services
Competence Centers
Managed Services

B5 - Innovation Center
R&D
CybergON
Elmec 3D
Workplace
Elmec Solar
Everynet

B6 - Refurbished's House
Buytec

GA - Data center Gazzada

1.3 Vision, mission and code of ethics

VISION

We envision a future where technology is simple and accessible, that can improve your life and your work without being invasive.

We want to be the innovators helping your company achieve its goals, providing all our expertise and the best technologies on the market.

MISSION

Our mission is to be a reliable partner to our clients, suppliers, employees and associates, ensuring certified service quality standards, clear and transparent procedures and the chance to see our work at any time.

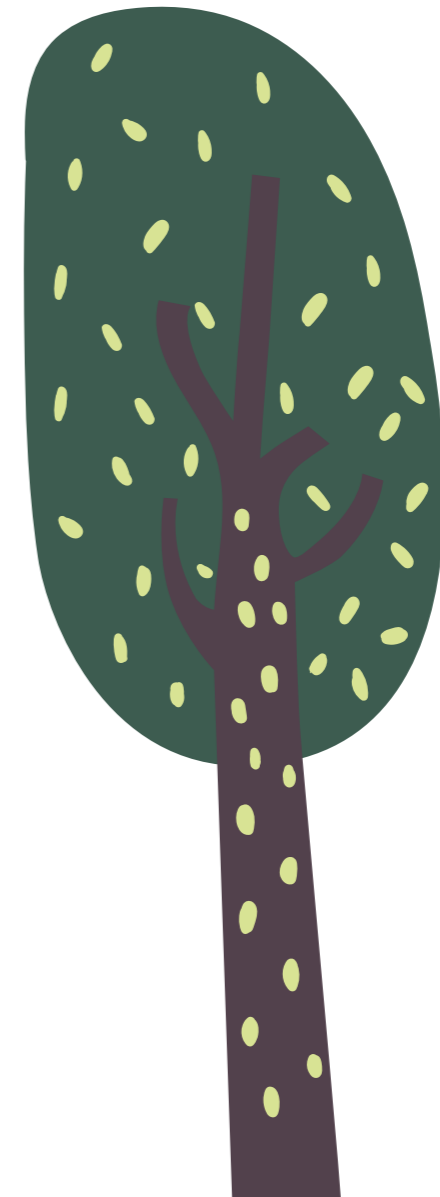
The services and technological solutions we offer stand out for our employees' high level of professional competence.

CODE OF ETHICS

Elmec has developed a Code of Ethics to define its ethical commitments in its activities and prevent any illegal behaviour. The Code establishes ethical principles and responsibilities for directors, employees, associates and agents, concerning business conduct, staff policies, accounting transparency, health, safety, environment, confidentiality, ethical standards towards third parties and implementation of the code.



The Code of Ethics can be viewed at the following link or by scanning the QR Code below:
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.

CYBERSECURITY

Over 50 specialized IT specialists protect businesses against cyber-attacks every day, at any time. Our service is completely integrated with those of Elmec. In the event of an incident, a single group will be in charge of securing and restoring systems.

SOFTWARE LICENSES

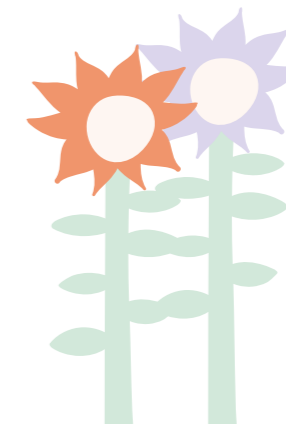
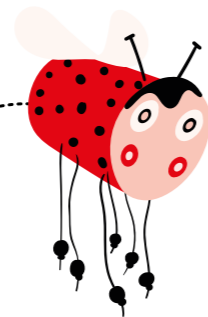
We have a team of people specialized and dedicated to managing the life cycle of software licenses. The "software advisory" approach allows us to quickly study the most suitable solution for our clients' ecosystem to optimize costs and actual needs.

USER PRODUCTIVITY

Thanks to our IT specialists, software tools and services, we help our clients' users be more productive. We ensure them 24/7 support, advanced technologies and security wherever they are working from: office, home, or while travelling. Furthermore, with the MyElmec software we allow you to have the devices, security and governance of the service provided under control.

INFRASTRUCTURE AND DATA

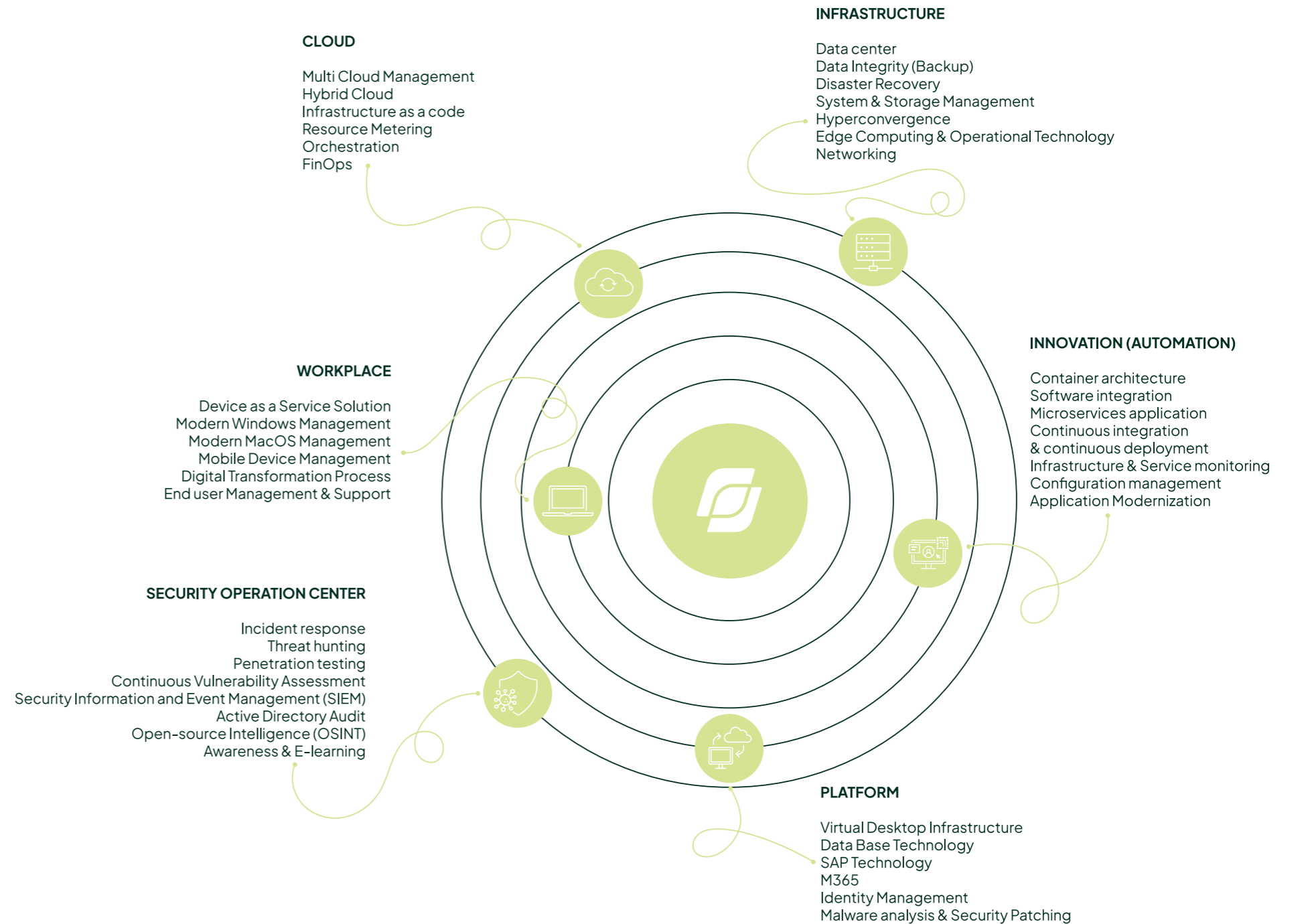
Elmec Informatica manages Infrastructures and data with a 'Best Cloud' approach, ensuring the infrastructure management anywhere, be it at clients' locations, at our Data Center or in cloud. We use automated processes and an integrated supply chain, supported by over 300 specialized IT specialists who constantly work to keep your infrastructure up to date and protected.



1.4 Business model

Elmec Informatica, based in Brunello (Varese, Italy) is an Italian IT service and solution provider that has been leading companies towards digitalization for over 50 years. Today Elmec has three main core businesses:

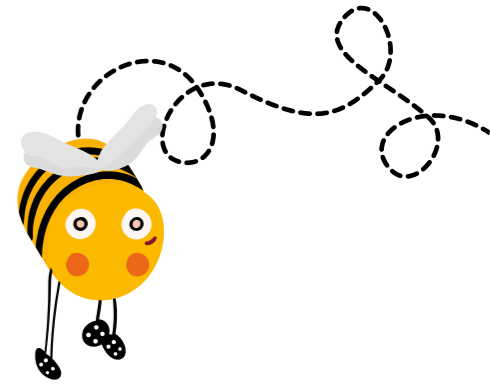
<p>CYBERSECURITY</p> <p>A dedicated business unit for services related to cyber security, with comprehensive expertise in both Hybrid Cloud and Digital Workplace offerings.</p> <p>USER PRODUCTIVITY</p> <p>predictive systems for workplace governance with a dedicated R&D technical team who ensures security, stability, performance and satisfaction for all users.</p>	<p>IT INFRASTRUCTURE</p> <p>A “Cloud Best” approach to design and manage your digital ecosystem with the best expertise in cloud, system, platform, security, and network.</p>
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1.5 Economic value directly generated, distributed and retained

The economic value generated and distributed (or “Value Added”) represents the wealth generated by Elmec Informatica during fiscal year 2023.

It is used to generally measure, in compliance with GRI 201 standard, Elmec’s ability to create value for its stakeholders.



	2023	2022	2021
ECONOMIC VALUE GENERATED	166.461	156.939	129.318
Distribution of the Economic Value Generated:	€'000	€'000	€'000
OPERATIONAL COSTS	81.870	85.320	72.771
STAFF - Value distributed to employees	36.835	33.429	30.138
FINANCERS - Value distributed to capital providers	672	214	47
INVESTORS (*) - Value distributed to shareholders		10.000	10.000
INVESTMENTS IN THE COMMUNITY (**) - Value distributed to the community	607	428	345
GOVERNMENTS AND PUBLIC ADMINISTRATION - Value distributed to public entities.	7.049	5.734	3.727
DISTRIBUTED TOTAL VALUE	127.033	135.125	117.028
RETAINED ECONOMIC VALUE	39.428	21.814	12.290

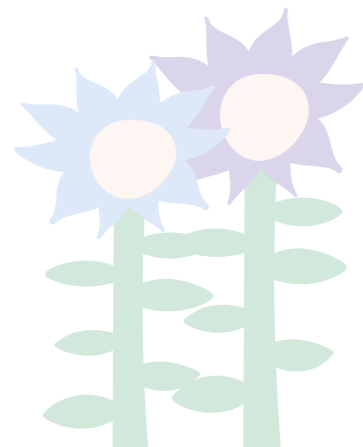


2. GOVERNANCE & SUSTAINABILITY STRATEGY

2.1 Governance structure

The corporate governance adopted by Elmec Informatica is structured according to the traditional system:

- Shareholders' Meeting (responsible for deliberating on matters provided by law and the company's bylaws);
- Board of Directors (responsible for the management of the Company);
- Board of Statutory Auditors (responsible for supervisory functions).



2.1.1 Board of directors

The Board of Directors ("BOD") is endowed with the broadest powers for ordinary and extraordinary administration, with the power to take all actions it deems appropriate to achieve the corporate purpose, excluding those reserved by law for the Shareholders' Meeting. The board oversees the Group's ordinary and extraordinary administration, including the definition of organisational, control and strategic guidelines. The BOD is made up of 4 directors, 2 of whom are shareholders. The executive members of the BOD are Alessandro Ballerio, Rinaldo Ballerio and Andrea Bottelli. The non-executive member, instead, is Nicola Ciniero. Their office began on 29/05/2023

and will last until the financial statement is approved on 31/12/2024. Rinaldo Ballerio, the CEO, is the 'actual' employer in accordance with Italian Legislative Decree No. 81/2008.

All directors have eligibility and good reputation requirements, as provided by law and other applicable provisions, and the Board of Statutory Auditors is the body that supervises the fulfilment of such requirements. The directors - individually and as a board - have been deemed adequately competent, highlighting an adequate accounting, finance and risk management and control knowledge and experience, including the management

and control of non-financial risks and sustainability. Directors' compensation and any benefits are defined at the shareholders' annual general meeting; no variable bonuses are awarded at this time. In the corporate structure, there are managers and officers for specific areas, such as the Data Protection Officer, the CSR Manager, the Health and Safety Manager, the Chief Information Security Officer, the IT Security Committee, etc. Each manager/officer assesses the impact and risks of his/her specific area of interest and keeps the directors up to date through reports or periodic meetings. Any information on strikes, as well as any communication with trade unions, is brought

to the Directors' attention during periodic meetings with the HR Department. With reference to reporting any critical topics from Elmec's stakeholders, such reports are managed by each department who periodically reports the information to the directors.

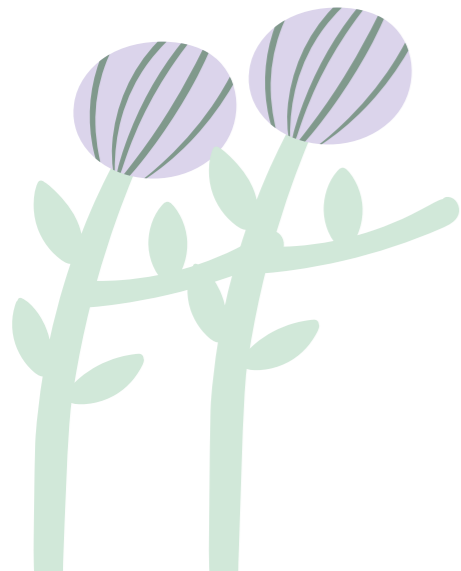
BOARD MEMBERS	POSITION	AGE GROUP
Rinaldo Ballerio	Chairman and CEO	Over 50
Alessandro Ballerio	CEO	Over 50
Andrea Bottelli	Board Member	Over 50
Nicola Ciniero	Board Member	Over 50

2.1.2 Board of statutory auditors

The Board of Statutory Auditors, appointed by the shareholders, is made up of three standing statutory auditors and two alternates. The Statutory Auditors remain in office for three fiscal years, they can be re-elected, and their office expires on the date of the shareholders' annual general

meeting called to approve the financial statement for the Board's third fiscal year. The Board of Statutory Auditors supervises Elmec's compliance with the laws, its Articles of Association and the principles of good administration, external auditors' independence.

COLLEGIO SINDACALE	RUOLO
Dr. Mentasti Fabio	Chairman of the Board of Statutory Auditors
Dr. Jemoli Luigi Alfredo	Standing Statutory Auditor
Dr. Marsegaglia Silvana	Standing Statutory Auditor



2.2 Identification and control of risks

Elmec Informatica carries out periodic assessments of the most significant risks concerning the Organisation and its operations. In some areas, there are some specific risk assessments:

Cyber security and privacy
Workers' health and safety
Regulatory liability pursuant to ex Italian Legislative Decree No. 231/2001.

With regards to workers' health and safety, Elmec has always promoted responsible behaviours, implementing any necessary preventive actions to preserve the health and safety of all employees.

Risk assessment concerning workplace health and safety does not merely aim to prevent and protect workers, but it is also extended to anybody present in our locations: visitors, clients, or suppliers.

Specifically, suppliers are subjected to strict qualification protocols, as provided in Art. 26 of Italian Legislative Decree No. 81/2008 et seq.

The Risk Disclosure Sheet can be viewed at the following link or by scanning the QR Code below:

www.elmec.com/documents/scheda-informativa-rischi.pdf



2.3 Model 231 and supervisory board

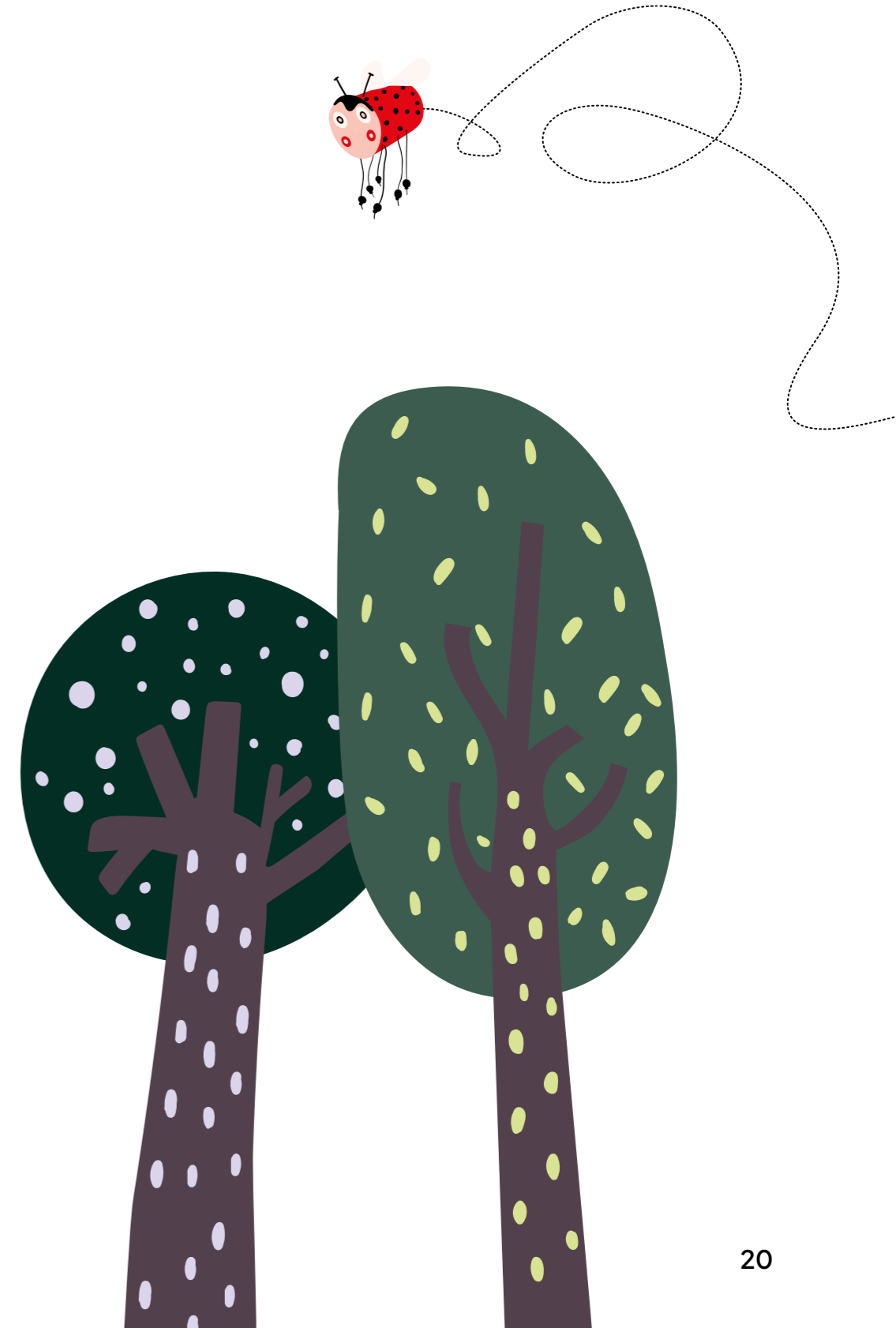
In application of Italian Legislative Decree No. 231/01, which introduces 'regulatory liability' of entities in Italy for crimes committed - in Italy or abroad - by directors, employees or other persons acting in the interest or to the benefit of such entities, Elmec Informatica SpA has adopted an Organisation, Management and Control Model.

This Model establishes Organisational measures and behavioural protocols which are implemented by means of internal procedures, and training and audit/assurance activities. The Model is constantly updated and improved, to both respond to continuous regulatory changes and adapt it to the corporate structure.

To supervise the Model's correct application, an independent supervisory body - made up of professionals outside Elmec and an insider - has been appointed. For this purpose, there are information flows to the independent supervisory body, and from this body to Elmec's top management.

The Organisation, Management and Control Model can be viewed at the following link or by scanning the QR code below:

<https://www.elmec.com/documents/modello-organizzativo-elmec-informatica.pdf>



2.4 Ethics and anti-corruption

Elmec considers that fighting corruption is one of its fundamental principles of conduct. We have been committed to promoting ethics in our business processes and adopting policies to prevent and combat corruption.

To reach these goals, Elmec has adopted a series of measures. First, we have established a corporate Code of Ethics which defines the values and principles that must be respected by all employees and business partners.

The Code of Ethics has been distributed to employees and all Addressees and is constantly updated to comply with regulatory changes and take best practices into account. Specifically, the Code has been recently reviewed precisely to better outline the main principles of conduct relating to sustainability topics; the following topics have been added:

- Assessment of ethical aspects in procurement
- Whistleblowers' rights
- Internal control and risk management
- Sustainability policy
- Climate change
- Sustainability strategy
- Responsibility towards community
- Privacy and personal data protection
- Communication to Stakeholders
- Sustainability governance

Secondly, Elmec has implemented an internal control system to ensure that business processes comply with anti-corruption laws and regulations. The internal control system is the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/01 which Elmec has implemented to prevent and mitigate several risks of crimes including the following:

- Corruption in judicial proceedings

- Corruption of persons performing a public service
- Incitement to corruption
- Private sector corruption

This system establishes that control procedures involving suppliers and business partners should be carried out to assess corruption risks and implement mitigation measures to reduce them.

Furthermore, Elmec promotes a culture of integrity among employees by organizing training sessions and raising awareness on transparency, ethical and anti-corruption topics. Finally, Elmec is committed to supporting ethical and anti-corruption initiatives nationally internationally. The following are some examples:

- Supporting the UN 2030 Agenda for Sustainable Development, a global action plan that commits governments, international organisations, the private sector and civil society to working together to achieve sustainable development goals by 2030
- Implementing corporate codes of ethics and whistleblowing procedures to report any unethical or corrupt behaviour
- Adopting environmental and social sustainability policies which promote corporate responsibility and environmental protection
- Participation in training and awareness programmes for employees to promote an ethical and transparent corporate culture

In 2022, our Board of Directors prepared and adopted an anti-corruption policy aimed to provide guidance for our directors, managers, employees, consultants, intermediaries

and all associates in their capacities, in order to ensure compliance with the applicable legislation and our values and principles of conduct.

With regards to reporting any illegal conduct or violation, Elmec Informatica has set up a whistleblowing channel to report any situations and circumstances that may be related to any corruption topics. In light of the new Italian Legislative Decree No. 24/2023, Elmec has updated its whistleblowing procedures to make them compliant with the new regulatory requirements.

Elmec Informatica reports specific indicators to monitor the 'anti-corruption' material topic, which did not identify any corruption cases or incidents involving Elmec's employees. Elmec's Code of Ethics establishes specific behaviours to mitigate conflict of interest risks.

The directors monitor any possible situations of conflict of interest during board meetings. Furthermore, any transactions with related parties are reported in Elmec's financial statement.

Elmec also analyses any complaints from stakeholders reported via the whistleblowing channel and plans improvement actions with the help of such stakeholders.

2.5 Governance and ESG strategy

2.5.1 Sustainability Governance

Over the last 3 years (2023, 2022, 2021), no monetary or non-monetary sanctions arising from the violations of laws and regulations have been imposed.

Elmec Informatica is committed to gradually improving the governance of ESG aspects to ensure respect for the environment and the protection of health, human rights and local communities. Elmec acknowledges the importance of sustainability as a fundamental element for its own development and that of the communities in which it operates. To ensure a sustainable governance, Elmec Informatica has adopted a series of corporate governance tools to implement sustainability principles.

Among these tools, it is worth mentioning ESG policies, adopted by the Board of Directors in 2022 to provide some guidelines for direc-

tors, managers, employees, consultants, intermediaries and all Elmec's associates to ensure behaviours are in line with the Code of Ethics and the best sustainability practices.

Furthermore, Elmec has assessed material ESG topics and developed a 2023-25 strategic sustainability plan - formally approved by the Board of Directors - which is the main tool of Elmec's highest governing body to plan and monitor actions and projects in order to achieve Elmec's ESG goals (see «Sustainability Plan» below for more information).

Internally, Elmec promotes a sustainability culture by adopting sustainable policies and practices, reducing waste, and implementing efficient and eco-friendly production processes.

The Plan was prepared by directly involving the executive board members who have defined strategic lines,

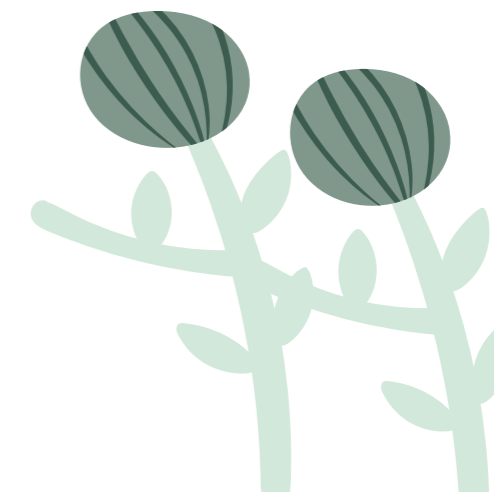
projects and the timeline in collaboration with the departments and operational areas directly involved in their accomplishment.

The Board of Directors periodically gathers information on the outcomes of the interactions with stakeholders, using it to support the approval processes of the Group's strategies, sustainability policies, the formalization Elmec's vision, mission and values statements.

Compliance with laws and regulations

COMPLIANCE WITH LAWS AND REGULATIONS	2023	2022	2021
Cases of non-compliance with laws and/or regulations punished.	0	0	0
Cases of non-compliance with laws and/or regulations punished with nonmonetary sanctions	0	0	0

In the last three years (2023, 2022 and 2021), no monetary or non-monetary sanctions were imposed because of violations of the regulations applicable to the Company laws and regulations).



2.5.2 Materiality assessment

As part of a continuing improvement process that consisted of complying with GRI standard no. 3, in 2022 Elmec updated the assessment of its material topics, i.e. those topics that significantly impact Elmec and its stakeholders on an economic, environmental and social level. This update had been necessary to respond to the requirements:

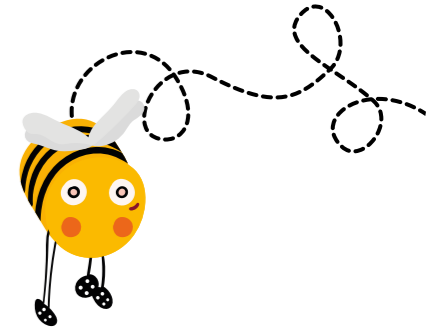
- Of GRI Universal Standard 3: Material Topics 2021, which requires that companies, report within their sustainability report, on all those ESG topics considered relevant because they are able to significantly influence or be influenced in the conduct of their business, based on a materiality analysis
- Of the necessity of developing a materiality matrix. According to this perspective, materiality analysis can no longer be self-referential and thus consider only the organization's point of view, but must also include that of stakeholders

Elmec has undertaken to update its materiality assessment on an annual basis.

- The assessment was updated by the ESG department through a process divided into the following stages:
- Analysis of Elmec's business model and activities.
- Benchmark identification of the material topics related to the industry in which Elmec operates.
- Preliminary ESG impact assessment by Elmec's managers.
- Internal and external stakeholder engagement (see paragraph 2.8.2)
- Materiality assessment of the topics identified.
- Approval by the BoD.

The assessment process involved Elmec's managers and stakeholders, who were asked to rate those ESG topics they thought had an impact on economy, the environment and stakeholders.

With reference to any possible impacts on Elmec, Top managers were involved in this process, as well as Elmec's directors who approved the assessment. In 2023, this assessment was considered still valid because no operational, organisational, or regulatory changes were detected that caused any significant consequences on the impacts detected by Elmec Informatica.



2.5.3 Material Topics

Cybersecurity and Privacy

Elmec prioritizes data security monitoring and privacy protection; both at its Data Centres and while delivering other services, Elmec processes a great number of clients' and employees' information, including personal, sensitive and confidential information; ensuring a correct use of data and information and preventing cyber-attacks to steal Elmec's and clients' personal data, as well as data breaches.



Sustainable Governance

Integrating ESG aspects in the Corporate Governance system and corporate strategy, in the management of shareholder and all stakeholder relations encouraging sustainable results, and creating long-term economic, social and environmental value. The ESG governance guidelines include respect for the interests of stakeholders, considering and responding to their needs.



Talent Development

In a market with little IT specialists, it is important to attract and retain talent through effective policies and the collaboration with universities. Offering professional development paths to ensure stimulating perspectives and specialised skills to employees for a skilled environment, and, at the same time, to deliver reliable services and develop cutting-edge technologies.



Diversity and Equal Opportunities

Respecting and valuing all kinds of diversity (generational, cultural, gender, etc.) is a critical success factor and one of the keys to innovation and competitiveness and prevents any form of discrimination by ensuring an inclusive, merit-based and equal working environment.



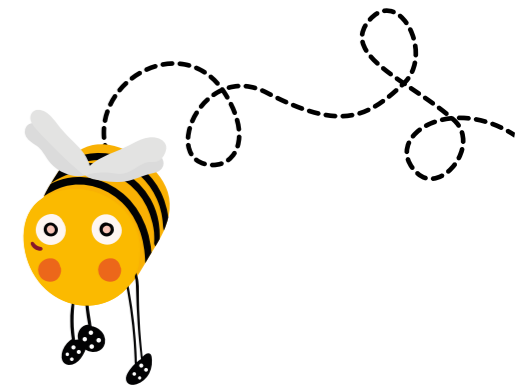
Workers' Health and Safety

Managing employees' health and safety risks, such as any risks of incidents that may occur during the performance of activities and duties, regardless of whether they are performed at the office or home, at the logistics' department, IT laboratories, Data Centres, or even clients' locations.



Working Conditions and Corporate Welfare

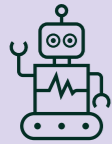
Balancing professional and personal life with a comfortable and stimulating working environment and work-life balance solutions that help employees improve their productivity and work experience..



2.5.3 Material Topics

Technological Development and Modernization

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



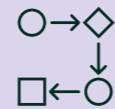
Ethics and Anti-Corruption Policy

Constantly fighting corruption with ethics and education. Corruption is an obstacle to economic growth and fair competition and has reputational risks.



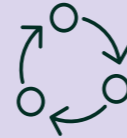
Responsible Supply Chain Management

Ethical supply chain management, with competitiveness enhanced by policies and goals, compliance with the highest ethical, social and environmental standards.



Circular Economy

Circular economy aims at sustainable growth, overcoming the 'production-consumption-disposal' linear economy with a regenerative approach that reduces waste and the use of virgin raw materials and energy.



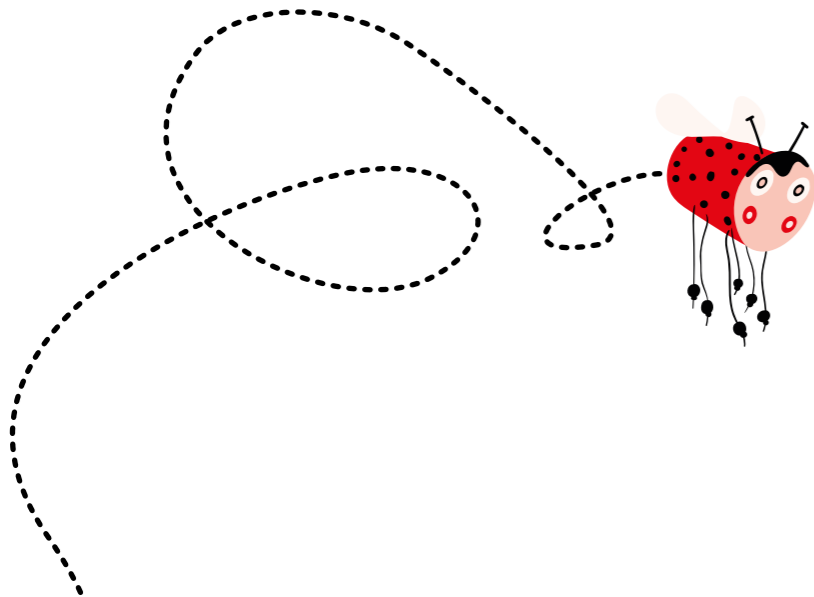
Emissions and Climate Change

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



Green Products and Green Services

Green computing includes low-environmental-impact data centres and energy-efficient electronic services by adhering to green design, green production, eco-friendly product use and disposal. Furthermore, we are committed to minimizing the impact of our locations and our people.

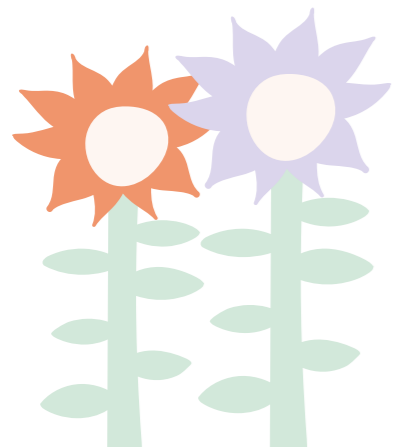
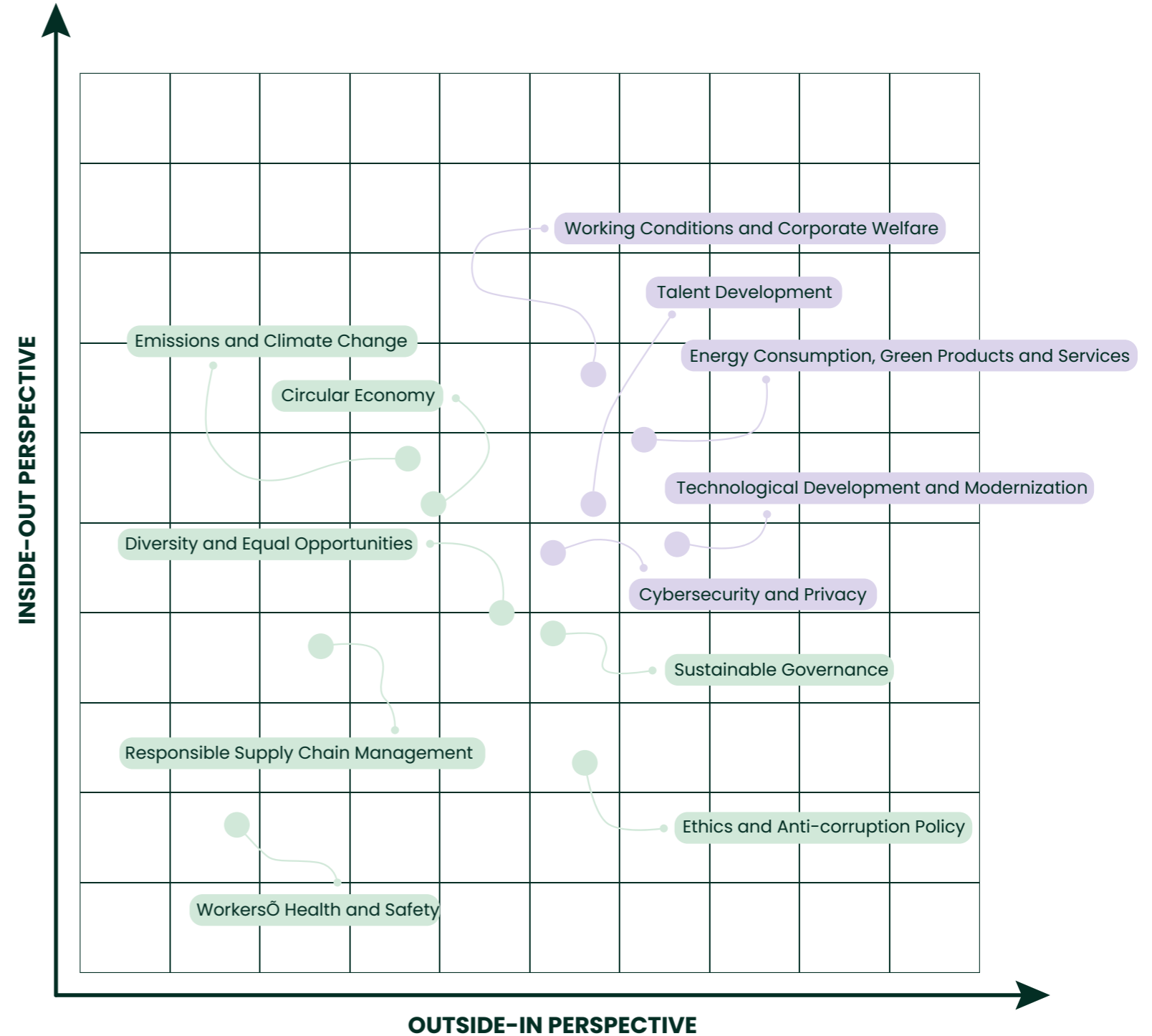


2.5.4 Materiality matrix

I 12 temi materiali identificati e valutati sulla base della metodologia precedentemente sono di seguito rappresentati rispetto alle due dimensioni dell'analisi:

- Significatività per Elmec (asse delle ascisse).
- Significatività per l'ambiente e gli stakeholder esterni (asse delle ordinate).

L'attività di analisi inside-out è stata effettuata sulla base dell'identificazione e della valutazione degli impatti secondo la metodologia di valutazione del GRI 3 e secondo una scala di rating interna.



2.6 Sustainability Plan and Sustainable Development Goals - SDGs

As part of the process of continuous improvement on sustainability topics undertaken by Elmec, a Sustainability Plan was defined in 2022 to strengthen ESG Governance and ensure maximum transparency with stakeholders. To define this Plan, several elements including material topics have been considered and added, which consider stakeholders' expectations, Elmec's strategic goals and the 17 Sustainable Development Goals (SDGs) to be reached by 2030 promoted by the United Nations, inspired by the "Ten Principles" of the United Nations Global Compact (UNGC).

The Sustainability Plan is monitored by CSR Manager every year during the preparation of the CSR Report. This process is made up of three stages: drafting, management and control.

The drafting of the 2023-2030 Sustainability Plan streamlines sustainability

strategy, goals, implementation methods and timing. Elmec's Sustainability Plan was prepared starting from the identified material topics thanks to, among others, stakeholder engagement activities. Then, for each material topic, goals were identified and, subsequently, one or more actions were defined to reach them.

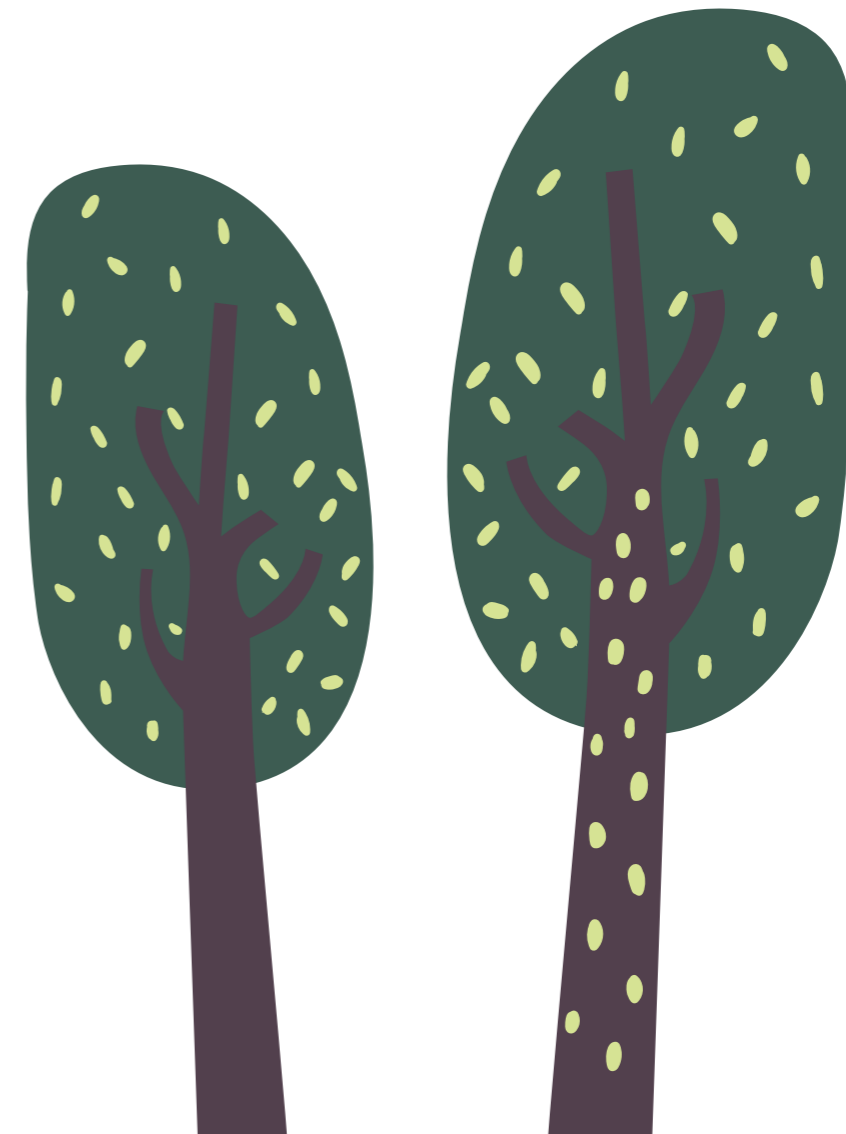
The preparation of the Plan has directly involved the executive board members who have defined the strategy, projects and timeline in collaboration with the departments and operational areas directly involved in their achievement.

The proposed Sustainability Plan as defined was submitted to and approved by the Board of Directors on 28.02.2023.

During management and implementation, the responsibility for achieving each goal included in the Plan is relied on the departments and operational areas that have

the necessary resources, tools and skills to achieve them.

On the next page, before presenting the Sustainability Plan in its entirety, Elmec's progress of the sustainable goals established for 2023 can be found.



2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Progress Status of The Goals for 2023

Not only did Elmec carry out most of the actions established in the Plan for 2023 in various areas - including energy consumption, green products and services, working conditions, corporate welfare, workers' health and safety, talent development, technological innovation, responsible supply chain management, and corporate ethics - but it also started a path towards medium- and long-term goals.

MATERIAL TOPIC	GOAL	TO BE REACHED BY	HOW WE ACHIEVED IT
Circular Economy	Improving the system detecting waste quantities produced by type and destination	2023	Elmec Informatica has internally developed an automated data collection system, involving the Information Systems department to facilitate the monitoring of company waste management
Energy Consumption, Green Products and Services	Renewing the ISO14001 environmental management system certification	2023	Elmec renewed its ISO 14001 certification
Emissions and Climate Change	Awarding a €500 bike-to-work bonus to employees who get to work by bike for at least 50 days in a year	2023	Bonus awarded in May 2023 to 6 employees who reached the target required by the project
Emissions and Climate Change	Starting reward and awareness programs for a sustainable driving style that leads to a progressive reduction of fuel consumption in the business vehicle fleet.	2023	This action has not yet been performed as it is being discussed in relation to the Plan's update
Working Conditions and Corporate Welfare	Proposing awareness and anti-smoking campaigns; discouraging the use of tobacco, thanks to a project by Regione Lombardia (the Region of Lombardy), through group sessions and internal education on the subject.	2023	Initiative carried out in November 2023 in collaboration with LILT Italia. 33 employees participated in the plenary awareness session. 9 of these then underwent a personalized program with LILT to stop smoking.
Working Conditions and Corporate Welfare	Undertaking a project to raise awareness of correct nutrition and create a connection between physical activity and eating calories at the company restaurant, thanks to a partnership with a supplier, "Maghetti", which offers healthy food and drinks in the vending machines at Elmec's locations.	2023	Elmec implemented several initiatives including adding healthy products in vending machines in collaboration with Maghetti, and relying on a nutritionist at the Headquarters, as part of a nutrition project in partnership with Compass. Specifically, information labels were introduced at the company restaurant indicating the calorie intake of each course. More options were also added to the menu to satisfy different dietary needs, such as sustainable meals and recommended options for daily calorie needs, considering the different needs of men, women and sportspeople.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs





MATERIAL TOPIC	GOAL	TO BE REACHED BY	HOW WE ACHIEVED IT
Working Conditions and Corporate Welfare	Awarding a €2,500 mothers' bonus to mothers on maternity leave	2023	Elmec Informatica awarded 9 mothers' bonuses in 2023 to its female employees
Working Conditions and Corporate Welfare	Providing a €300 book bonus to those who have school-age children	2023	Elmec Informatica awarded 126 book bonuses in 2023 to its employees
Workers' Health and Safety	Carrying out prevention activities by giving employees the chance to have free checks at agreed-upon medical centres.	2023	Elmec offered a complete blood count to all employees at the Beccaria medical centre in Varese. 66 colleagues had their check-up by going to the centre.
Workers' Health and Safety	Reducing non-compliance detected by workers' health and safety internal audits by engaging employees subjected to checks	2023	After these checks, follow-ups on the safety employees were carried out; they were specifically trained in this regard, in order to reduce non-compliance detected by such internal audits
Workers' Health and Safety	Promoting the partnership with EAP Italia that provides a telephone line (medical helpline) for people to be received, supported, informed and counselled.	2023	Elmec encouraged the use of this partnership with EAP Italia through targeted communications to managers and all employees.
Talent Development	Reorganising and mapping current staff skills to make training plans, re-skilling programs and review the current performance management system and the short-term incentive system	2023	Elmec, from performance-based assessment model, changed to a potential-based assessment model defined by objective parameters. This assessment determines whether flexible benefit bonuses should be awarded to employees. The assessment is carried out by the department managers.
Talent Development	Identifying each resource's skills and peculiarities through objective and transparent processes that allow employees to correctly orient themselves in their professional growth path (e.g., by defining a customized Job Path for each employee)	2023	Elmec implemented the 'skills mapping' tool to identify people's skills, also integrating technical certifications that certify their specific skills.

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL TOPIC	GOAL	TO BE REACHED BY	HOW WE ACHIEVED IT
Diversity and Equal Opportunities	Adding to the company policies a Diversity & Inclusion policy which deals with gender, generational and disability topics; leadership based on trust and respect.	2023	This activity is planned for 2024
Diversity and equal opportunities	Promoting the development of new tools to facilitate the working life of employees with disabilities (e.g. with Braille writings in meeting rooms, accessible toilets, tools making vending machines accessible, accessible company buildings)	2023	Elmec Informatica together with Elmec3D printed Braille writing to be attached at the entrance of all meeting rooms
Technological Development and Modernization	Promoting scientific research by financing scientific research initiatives in the Digital/Cloud field (e.g., observatories, universities, etc.)	2023	Elmec collaborated with its IT vendors to promote scientific research and sponsored events focused on digitalization such as the 2023 Canals forum, and the 2023 HPE Discover.
Cybersecurity and Privacy	Consolidating collaborations with higher technical institutes ('ITS'), universities and schools to do training and awareness activities on cybersecurity to attract talents who are trained and might be interested in	2023	CybergON, Elmec's cybersecurity business unit, organised "Capture the Flag", a training competition designed to engage students and let them experience professional cases to be solved
Responsible Supply Chain Management	Renewing Ecovadis certification	2023	Elmec renewed its Ecovadis certification in the first half of 2023
Responsible Supply Chain Management	Preparing and sending questionnaires to strategic suppliers with questions aimed at detecting ESG risks	2023	Elmec sent a questionnaire with ESG questions to its technological service providers.
Ethics and Anti-corruption Policy	Strengthening anti-corruption aspects in training courses for employees on Italian Legislative Decree no. 231	2023	Elmec organised an internal training course











2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Environment

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
CIRCULAR ECONOMY	Improving people's awareness and behaviour on waste recycling and reducing unsorted waste	1	Carrying out internal training activities on waste sorting methods and more responsible behaviour to reduce the quantities of unsorted waste					  
		2	Entering into agreements with waste disposal companies to manage the waste generated and guarantee a new life to some products (contacting specialized waste disposal suppliers to create gadgets, current recycling rate: 85%)					  
	3	Improving the system detecting waste quantities produced by type and destination					  	
	4	Engaging packaging and single-use plastic product suppliers in projects to reduce the volumes of plastic materials and/or replace them with renewable materials					  	
	5	Maximizing hardware recovery and reuse	Progressively increasing the amount of hardware recovered thanks to new initiatives with stakeholders such as clients, schools, associations and partners, considering that such amount of hardware depends on the number of devices that arrived at Elmec to be regenerated, as well as the minimum requirements for devices to be refurbished.					  













2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Environment

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
ENERGY CONSUMPTION, GREEN PRODUCTS AND SERVICES	Protecting the environment and reducing the consumption of energy and natural resources	6	Renewing the ISO14001 environmental management system certification					  
	Contributing to the development of Green initiatives	7	Supporting tree planting initiatives to encourage fight against soil erosion, and favour biodiversity enhancement, soil fertility protection, the creation of sustainable ecosystems and CO2 absorption, with consequent positive effects on the atmosphere					  
	Improving the datacenter's energy performance through internal generation from renewable sources	8	Increasing the capacity of existing solar panel systems to pursue a power saving goal, as well as getting advantages in terms of environmental impact by reducing pollution and CO2 emissions					











2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Environment

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS	
				2023	2024	2025	2030		
EMISSIONS AND CLIMATE CHANGE	Improving the system detecting and reporting CO2 emissions	9	Developing a calculation and reporting system to calculate direct and indirect CO2 emissions and specifically emissions arising from DAAS and Data Center.						
	Reducing CO2 emissions and fighting climate change	10	Awarding a €500 bike-to-work bonus to employees who get to work by bike for at least 50 days in a year						
		11	Using a progressively increasing number of green business cars (e.g., hybrid/electric cars)						
		12	Starting reward and awareness programs for a sustainable driving style that leads to a progressive reduction of fuel consumption in the business vehicle fleet.						







2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
WORKING CONDITIONS CORPORATE WELFARE	Improving employees' attention and awareness of a healthy lifestyle	13	Proposing awareness and anti-smoking campaigns; discouraging the use of tobacco, thanks to a project by Regione Lombardia (the Region of Lombardy), through group sessions and internal education on the subject.					
		14	Undertaking a project to raise awareness of correct nutrition and create a connection between physical activity and eating calories at the company restaurant, thanks to a partnership with a supplier, "Maghetti", which offers healthy food and drinks in the vending machines at Elmec's locations.					
	15	€2,500 mothers bonus awarded to mothers on maternity leave						
	16	Book bonus, €300 bonus awarded to those who have school-age children						
	17	Elmec everywhere project through the hiring of staff with the possibility of full remote working, with the idea of creating a staff reception system throughout Italy with an on boarding path equal to that of a person hired in person at the headquarters						


2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
HEALTH E SAFETY OF WORK RA-TORS	Staff health prevention	18	Prevention through free prevention visits in affiliated centers					
		19	Reduction of non-conformities detected by internal audits on workers' health and safety through the involvement of personnel subject to the checks					
		20	Agreement with EAP Italia, a partner company, for the provision of a telephone line (Medical Helpline) dedicated to the person for reception, support, information and counseling.					














2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
DEVELOPMENT OF TALENTS	Increase the skills and professional certifications of its people to guarantee reactivity to the constant and sudden changes in the reference market.	21	Reorganization and mapping of current staff skills in order to create training plans, re-skilling programs and review of the current performance management and short-term incentive system.					
	Attraction of the best talent on the market	22	Integration into the global evaluation system, for top management, with ESG goals on environmental and social topics (integration of Elmec economic goals 2024-2026)					
	Enhancement and loyalty of staff	23	Development of an approach oriented towards attracting and searching for personnel with techniques and strategies segmented and differentiated ad hoc based on the several types of candidates such as recent graduates, recent high school graduates, experienced workers and managers, through different proposals and methods of engagement based on to the profiles of the reference candidates. E.g., Elmec everywhere project					
		24	Identification of skills and peculiarities for each resource through objective and transparent processes for the preparation of ad hoc professional development paths (e.g. definition of a customised Job Path per employee)					

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
DIVERSITY AND EQUAL OPPORTUNITIES	Improve the gender wage gap	25	Identification of a set of indicators for monitoring the gender wage gap for all roles and categories of staff					 
	Strengthen the culture of Diversity & Inclusion in the company by enhancing what makes people different: age, sex, ethnic roots, religion, disability, sexual orientation, education or national origin.	26	Improve the set of KPIs for measuring the Company's performance towards young people (e.g., number of internships transformed into employment relationships, youth turnover rate, % of young people who participate in internal committees and cross-functional working groups, number of people hired under 30, number of promotions under 30)					  
		27	Integration of company policies with a Diversity & Inclusion policy that deals with gender, generational and disability topics leadership based on trust and respect.					  
		28	Development of new tools to facilitate the working life of staff with disabilities (e.g. braille writing in meeting rooms, toilets, facilitating tools in vending machines, company itineraries)					


2.6 Sustainability Plan and Sustainable Development Goals - SDGs

Social

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
TECHNOLOGICAL DEVELOPMENT AND MODERNIZATION	Promote scientific research	29	Promoting scientific research through the funding of scientific research initiatives in the digital/cloud environment (e.g. Observatories, Universities, etc.).					 

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
CYBERSECURITY AND PRIVACY	Improve the privacy risk detection system starting from help desk activities	30	Strengthening the incident management process by refining the system for detecting and classifying incidents with potential impacts on privacy aspects					
	Develop digital training services	31	Consolidation of partnerships with ITS, universities and schools to propose cybersecurity training and awareness activities in order to attract trained talent interested in the company's projects/initiatives in the future					 

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
SUSTAINABLE GOVERNANCE	Strengthen management's decision-making process on sustainability topics	32	Attivazione di un Comitato di Sostenibilità che si riunisce periodicamente per discutere delle questioni di Sostenibilità di Elmec, monitorare il raggiungimento degli obiettivi e target del Piano di Sostenibilità e valutare nuove iniziative in materia di ESG					
	Adopt ESG Risk Management tools	33	Development of an ESG risk management framework aimed at analysing ESG risks in compliance with the new CSRD directive					
	Integrate and improve the current set of ESG indicators with a view to adopting the new ESRS- European Sustainability Reporting Standard	34	Preparation of a gap analysis between the indicators ESG currently in use at the company and the new EFRAG standards					
	Strengthen the role of the Board of Directors in ESG projects	35	Introduction of resolutions regarding ESG projects into the Agenda of the Board of Directors meetings: approval of policies and procedures, approval of the Sustainability Report, participation of directors in some meetings of the sustainability committee					

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
RESPONSIBLE SUPPLY CHAIN MANAGEMENT	Constant monitoring of suppliers' sustainability performance	36	Renew Ecovadis certification					
	Detection of ESG risks of strategic suppliers	37	Prepare and send questionnaires to strategic suppliers with questions aimed at detecting ESG risks and their degree of management of sustainability topics					

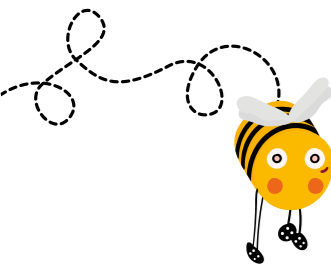
MATERIAL TOPIC	GOAL	#	ACTION TO ACHIEVE GOALS	DEADLINE				LINK SDGS
				2023	2024	2025	2030	
ETHICS AND ANTI-CORRUPTION POLICY	Staff training on Italian Legislative Decree 231 and anti-corruption matters	38	Strengthening anti-corruption aspects as part of training courses for employees on Italian Legislative Decree no. 231					

2.6 Sustainability Plan and Sustainable Development Goals - SDGs

In September 2015, the leaders of 193 UN member countries unanimously signed the 2030 Agenda, a plan that defines 17 sustainable development goals (SDGs) to be reached by 2030. These goals are made up of 169 targets and are a real call to action to promote sustainability. SDGs are not just for institutions, but also for other actors, such as businesses.

Elmec believes that the Sustainable Development Goals (SDGs) are an opportunity and a direction which Elmec can follow for its future development. Furthermore, Elmec has identified connections between the priorities defined in 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 ESG Governance reinforcement process, which began in 2022, Elmec Informatica has developed its policies on social and environmental topics, in line with the contents of its Code of Ethics. The Policies were approved by the Board of Directors on 17.03.2023 and shared with employees. These policies are available to everyone on Elmec's website.

The new policies adopted by Elmec are the following:

- Sustainability Policy
- Stakeholder Engagement Policy
- Human Rights Policy
- Anti-Corruption Policy
- Lobbying Policy
- Environmental Policy.

Policies, together with the Code of Ethics, are part of the Group's organisation, management and control model, in line with the principles and goals of the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001.

Starting from its Sustainability Policy, Elmec undertakes to continue to operate in compliance with human rights, ensuring the absence of any form of discrimination, and that it does not have recourse to forced or child labour. The Group ensures safe workplaces and maintains positive relationships with stakeholders and local communities.

The Stakeholder Engagement Policy establishes Elmec's commitment to maintaining fair and transparent relationships, based on mutual trust, with its interlocutors.

The Human Rights Policy reaffirms the commitment to respecting global Human Rights, a fundamental and non-ne-

gotiable value in our corporate strategy and culture. Our approach to human rights protection is inspired by international standards such as:

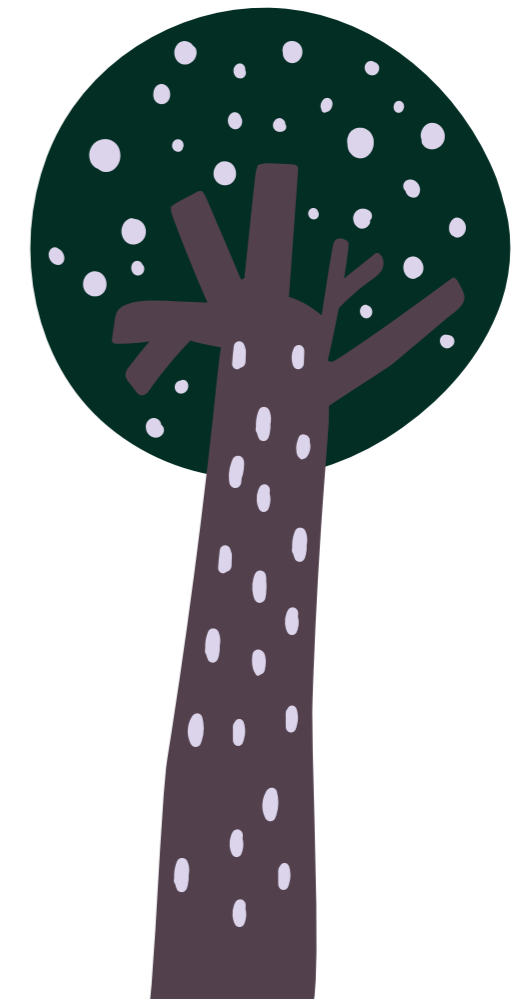
- The United Nations Declaration of Human Rights.
- The United Nations Convention on The Rights of the Child.
- The International labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and other relevant conventions
- The European Convention on Human Rights.

With the Anti-Corruption Policy, Elmec reaffirms its commitment not to tolerating and combatting corrupt activities in every way.

The Lobbying Policy reaffirms the behavioural principles to be adopted, in terms of compliance with the law, fairness, transparency and disclosure.

Finally, the Environmental Policy was drafted upon implementation of the ISO 14001-certified environmental management system and determines Elmec's commitments towards the environment and mitigating its impact.

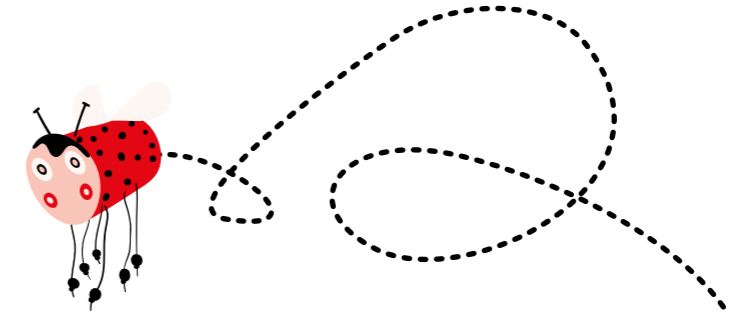
At the time of their implementation, the policies are distributed to employees by a specific e-mail and made available on Elmec's intranet. All departments are responsible for the policies' implementation and compliance by employees. Beginning in 2023, these policies have been included in the on-boarding package to inform new employees.



2.8 Our stakeholder

By 'stakeholders', Elmec Informatica means all those who have any kinds of interest or expectations - social, economic, professional and human - towards Elmec. Clarity, transparency and fairness are the principles that inspire our relationship with all internal and external stakeholders.

Stakeholder identification is an essential starting point to define sustainability reporting processes and materiality assessment. For fiscal year 2023, our «stakeholder map» was confirmed. We identified the following stakeholder categories:



STAKEHOLDER CATEGORIES

CLIENTS: Elmec is committed to providing national and international clients with customized and high-quality IT solutions, guaranteeing their satisfaction and loyalty.

EMPLOYEES: Elmec is committed to providing its employees with a safe, healthy and stimulating working environment, giving them professional development and growth opportunities.

SUPPLIERS: Product and technical service suppliers and consultants with whom Elmec collaborates to offer clients quality services and better manage its organisation.

FINANCIAL INSTITUTIONS: Funding bodies and banks that contribute to Elmec's growth and development.

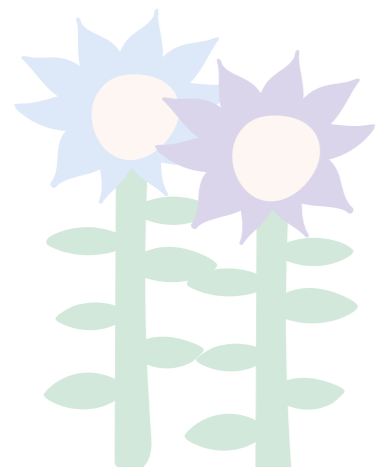
INSTITUTIONS: Governmental, regional, provincial and municipal entities.

ASSOCIATIONS, COMMUNITIES AND TERRITORY: Trade associations, sports and cultural associations, charities, educational institutions (schools and universities) and non-profit organisations.

MEDIA AND PUBLIC OPINION: social media, TV, local and national newspapers and publications.

INNOVATION COMMUNITY: Technological partners and others operating in the industry.

INVESTORS: Elmec's shareholders who ensure its economic, environmental, social and governance sustainability.



2.8.1 Stakeholder engagement initiatives

When developing a social responsibility strategy, it is essential to define a company's reference context to consider all the persons, whether internal or external, whose activity affects that company's operations and vice versa.

Elmec Informatica, who has always been committed to strengthening the social value of its business activities, is specifically committed to carefully managing relationships with stakeholders.

Since we, as Elmec, are convinced that an attentive monitoring of the expectations of each of our stakeholders can be a valid tool to increase trust in us, identify new opportunities and manage risks, in 2022 we carried out a Stakeholder Engagement activity. This activity, which consists of a systematic engagement of Elmec's key stakeholders on relevant topics, was conducted following the methodology of the "AccountAbility 1000 (AA1000)" standard, which is the most globally recognised.

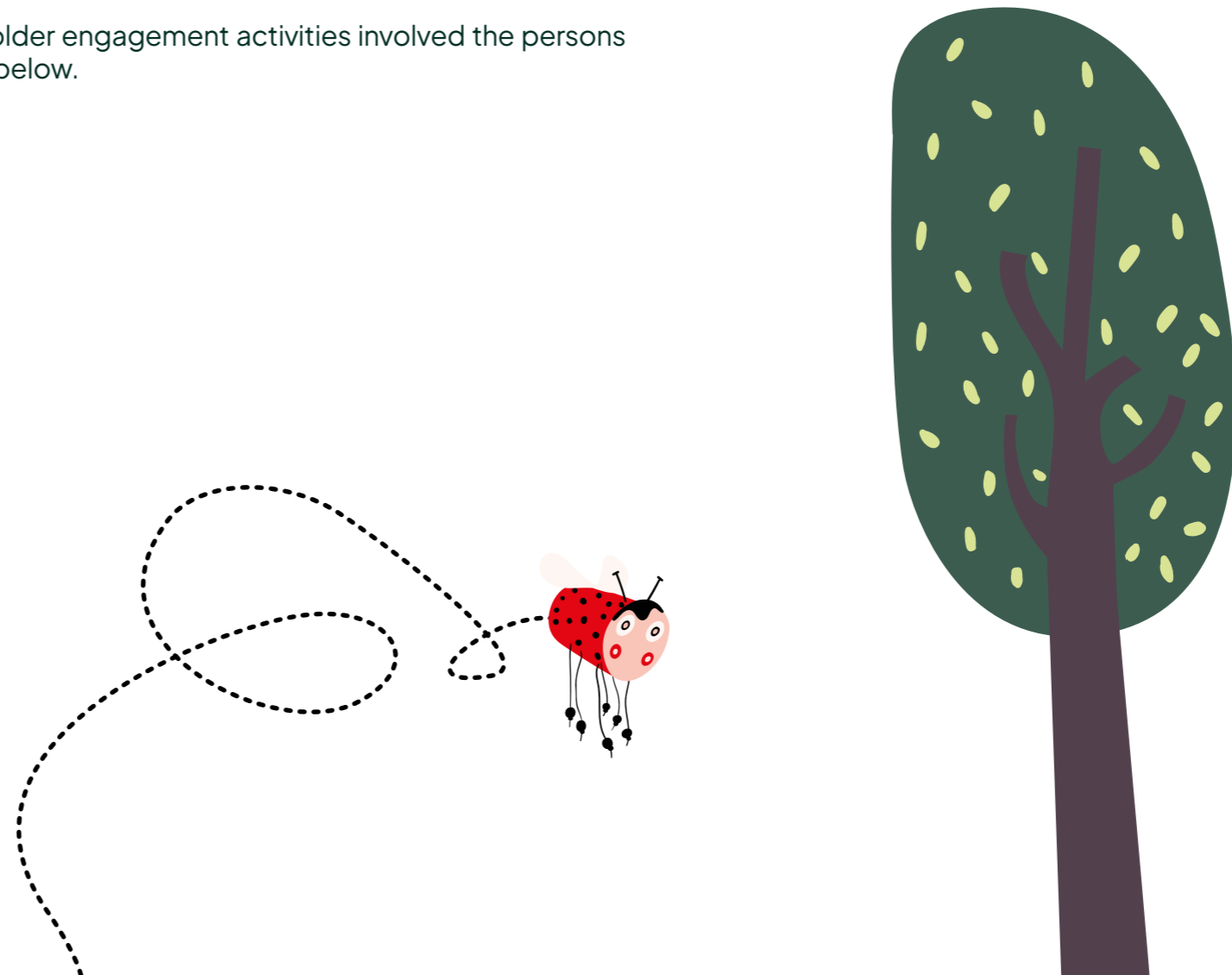
The Stakeholder Engagement strategic goals can be summarized as follows:

- Developing and reinforcing relevant relationships.
- Building relationships based on mutual trust.
- Identifying stakeholders' expectations on material topics.
- Improving corporate decision-making processes.
- Improving risk management.
- Reinforcing competitiveness and reputation.
- Monitoring new social needs, market demands and emerging trends.
- Influencing stakeholders to improve their decision-making processes that have an impact on Elmec.

The main stages of this process can be summarized as follows:

- Stakeholder mapping
- Definition of the engagement strategic goals
- Identification of material topics for stakeholders
- Identification of the most effective engagement methods.
- Performance of stakeholder engagement activities.
- Review and feedback.

The stakeholder engagement activities involved the persons in the table below.



2.8.1 Stakeholder engagement initiatives

STAKEHOLDER CATEGORY	ENGAGEMENT ACTIVITIES	MAIN TOPICS DISCUSSED
CLIENTS	<ul style="list-style-type: none"> Round table at Elmec's headquarters Study tours 	<ul style="list-style-type: none"> Products and services offered and circular economy Opportunity to undertake shared sustainable projects and initiatives
EMPLOYEES	<ul style="list-style-type: none"> Anonymous questionnaire Training and engagement on ESG topics Monthly internal newsletter 	<ul style="list-style-type: none"> The questionnaire explored in detail all the ESG topics and required an assessment of those considered to be most significant
SUPPLIERS	<ul style="list-style-type: none"> Remote round table Study tours 	<ul style="list-style-type: none"> Elmec's commitment to reducing food waste and circular economy in the food and catering industry Welfare and talent development
FINANCIAL INSTITUTIONS	<ul style="list-style-type: none"> Round table at Elmec's headquarters Study tours Periodic result communications 	<ul style="list-style-type: none"> Personal data protection, staff topics and energy efficiency Sustainability governance
INSTITUTIONS	<ul style="list-style-type: none"> Tavola rotonda presso la sede di Elmec Relazioni con le Amministrazioni Comunali Study tours 	<ul style="list-style-type: none"> Impegno di Elmec nel supportare la digitalizzazione degli Enti Pubblici Consumo energetico, welfare e sviluppo dei talenti
ASSOCIATIONS, COMMUNITIES AND TERRITORY	<ul style="list-style-type: none"> Round table at Elmec's headquarters Relations with the municipal offices Study tours 	<ul style="list-style-type: none"> Elmec's commitment to supporting the digitalisation of public bodies Energy consumption, welfare and talent development
MEDIA AND PUBLIC OPINION	<ul style="list-style-type: none"> One-on-one meetings Study tours 	<ul style="list-style-type: none"> Staff, emissions and climate change issues

The active involvement of all stakeholders allowed Elmec to identify the material topics. Here are the main findings:

- From the round table that was attended by some of Elmec's most important clients, the importance of environmental topics emerged, and, specifically, those related to circular economy, energy consumption, green products and services, emissions in the atmosphere and their consequent impact on climate change. Such persons agreed on the importance of adding green products/services to Elmec's offer, providing specific details in this regard.
- From meetings with financial institutions - i.e. three of the major banks contributing to Elmec's growth and development - the importance of protecting the personal data stored at Elmec's Data Centres emerged, as well as the topics related to Elmec's employees, considered as indispensable resources for the delivery of the services which Elmec offers to its clients. The same persons further agreed on the importance of the sustainability governance reinforcement process undertaken by Elmec.



2.8.1 Stakeholder engagement initiatives

- From the survey given to a hundred of Elmec's employees, the topics identified as particularly sensitive were those related to responsible supply chain management, ethics and anti-corruption policy, and circular economy of the products/services offered by Elmec to its clients.
- The main topics that came out from the round table that was attended by various types of associations - including four schools (two universities and two high schools), a non-profit organisation, a sports association and a trade association - are both those related to employees, with a focus on the importance of talent development and management - a topic which is very dear to all the training institutions involved - and those related to the environment, specifically the importance of Elmec's energy consumption management as an energy-intensive company, and its ability to offer an increasing number of low-impact products and services.
- Similar results came out from the meeting with institutions, in which the persons involved were mayors of the three main local towns and villages in which Elmec operates, and representatives of provincial and regional entities and those of the Italian Chamber of Commerce.
- In addition to the importance of the topics above, Diversity and equal opportunities, Talent development, working conditions and work-life balance were considered as material topics. Furthermore, all the institutions believed that Elmec's virtuous behaviour can act as a driving force among the companies around Varese.
- The interview with the consultant who manages media and press relations showed that, among the main topics,

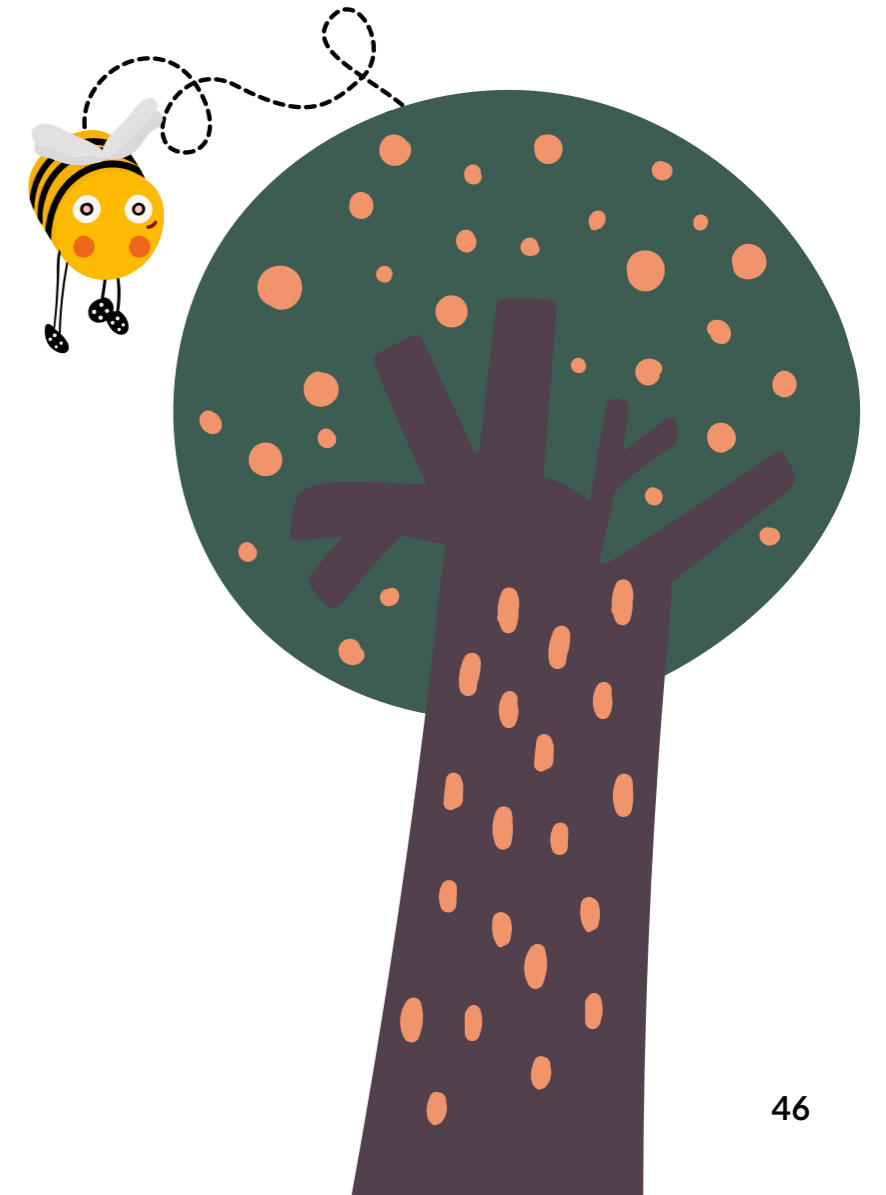
there are those related to employees, including working conditions, corporate welfare and work-life balance management, as well as environmental topics, including energy consumption, green product offer, and the importance of managing corporate carbon footprint.

The Stakeholder Engagement results are periodically brought to the Board of Directors' attention to be assessed and integrated into Elmec's sustainability strategy.

In 2023, the ESG department organised an event called "ESG Community Lab" at Elmec's headquarters. At this event, highlights of the 2022 sustainability report were shown. Around thirty of Elmec's stakeholders attended the ESG Community Lab, including clients, suppliers and representatives of associations, who were involved in the round tables and workshops to share knowledge and opinions on the following aspects:

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

The workshops were conducted by internal and external experts who coordinated the working groups.





3. HUMAN RESOURCES

3.1 Risks and material topics

At Elmec Informatica, human resource management is a key element to our success. However, we are aware of the risks and the material topics that need to be addressed.

One of the main risks we have to manage is competition in the IT industry, which might lead to the loss of our talents to the benefit of other companies. For this reason, we are committed to providing a stimulating working environment, with professional growth opportunities in the organisation.

We also understand that working in the IT industry can be stressful and challenging, especially when working on projects that have a deadline. For this reason, we ensure that we offer a healthy and safe working environment, with training programmes on stress and workload management and the promotion of work-life balance.

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

Finally, we know that diversity and inclusion are material topics for human resource management in an IT service company. For this reason, we promote an inclusive corporate culture that values background, gender and opinion diversity to create a fair and productive working environment for all our employees.

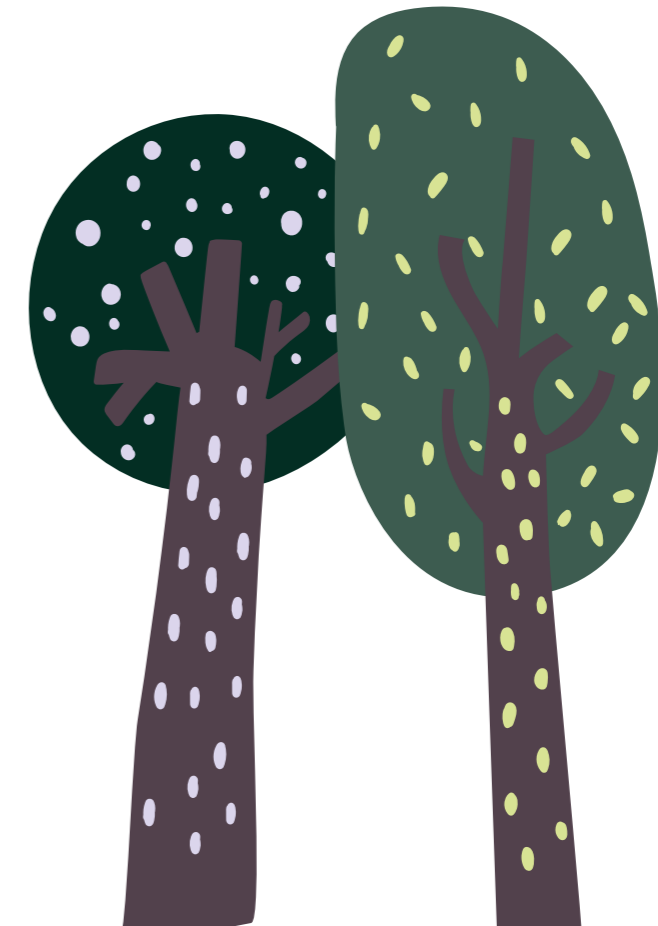
Based on the materiality assessment and the non-financial information and data collection, the human resource topics that are material to Elmec, about which information is provided in this chapter, are as follows:

- Working Conditions and Corporate Welfare
- Talent Development
- Diversity and Equal Opportunities
- Workers' Health and Safety

The impacts assessed by Elmec Informatica in its materiality assessment concerning human resource topics are as follows:

- Impacts on employees and associates in terms of equal opportunities arising from Elmec's diversity actions
- Human resource management policies and programmes aimed at enhancing skills, training, welfare and clear and defined career plans facilitate employees' attraction by creating positive impacts on human capital development and people's sense of accomplishment.
- Adequate incentive and performance assessment processes create impacts on valuing merit and equal opportunities, as well as employees' well-being.
- Impacts on workers' health and safety related to the onset of new pandemics in the absence of an adequate protection and prevention system
- Impacts on workers' health arising from workplace incidents.

Before addressing the details of material topics concerning employees, some information about staff composition and turnover is provided below.



3.2 Staff composition

At the end of 2023, Elmec Informatica had 702 employees (compared to 642 at the end of 2022). This 9% increase was mainly due to Elmec's business growth and expansion of its activities, which required the recruitment of new employees to meet market needs.

In terms of staff composition by gender, at the end of 2023 73% of employees were men (compared to 74% in 2022) and 27% were women (compared to 26% in 2022). Since Elmec Informatica is a business operating in the IT industry with mostly male employees, we recognize that the socio-economic context of Varese, a small town located between Milan and

Switzerland, constitutes a significant challenge for the promotion of gender equality, as human resource selection is influenced by the strong competition between businesses in this highly competitive region in terms of talent attraction.

In terms of professional categories, the figures for the end of 2023 show that 93% of employees were in clerical roles (compared to 92% in 2022), 6% were in managerial positions (compared to 7% in 2022) and 1% were in top management roles (unchanged from 2022).

Please refer to the table below for details on the staff, divided by professional category and gender.

	CLERKS		MANAGERS		TOP MANAGERS		TOT. M	TOT. W
	M	W	M	W	M	W		
Employees as of 12/31/2021	394	153	37	7	8	1	439	161
Total employees by job classification as of 12/31/2021	547		44		9		600	
Employees as of 12/31/2022	430	161	36	7	7	1	472	169
Total employees by job classification as of 12/31/2022	591		43		8		642	
Employees as of 12/31/2023	471	180	33	7	10	1	514	188

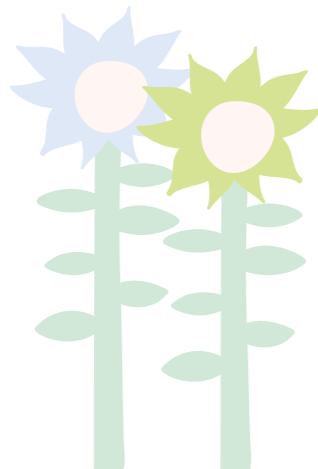
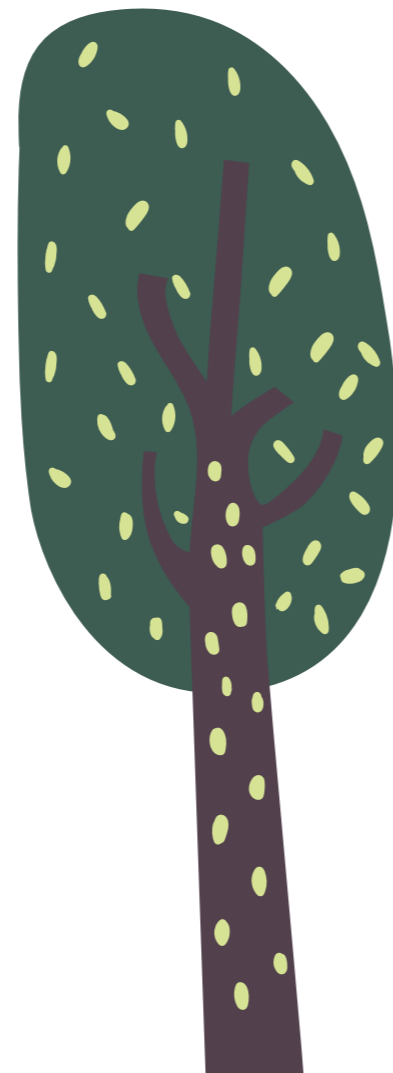
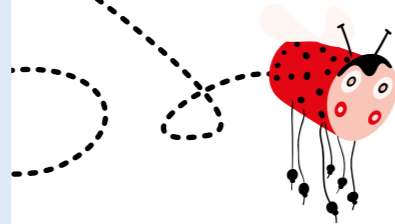
Analizzando la forza lavoro per fascia d'età, nel 2023 il 51% dei dipendenti ha meno di 30 anni (54% nel 2022), il 24% ha tra i 31 e i 40 anni (23% nel 2022), per un totale di persone con meno di 40 anni di età pari al 75% (77% nel 2022), del totale. La tabella sotto fornisce i dettagli sulla composizione della forza lavoro suddivisa per fascia d'età e genere.

	UP TO 30		31-40 YEARS		41-50 YEARS		OVER 50		TOTAL
	M	W	M	W	M	W	M	W	
Employees as of 12/31/2021	219	53	108	53	61	29	51	26	600
Employees as of 12/31/2022	274	72	96	50	59	24	44	23	642
Employees as of 12/31/2023	281	78	111	56	70	25	52	29	702

In 2023, 29 temporary workers including 7 women, and 22 men also worked with Elmec Informatica (42 people in 2022)

3.3 Diversity in the workforce

Elmec Informatica recognizes the importance of diversity among employees. We are committed to ensuring that our workforce reflects the diversity of the society in which we operate in terms of gender, ethnicity, skills and cultural backgrounds. To reach this goal, we have adopted policies that promote access to career opportunities in a fair and non-discriminatory way.



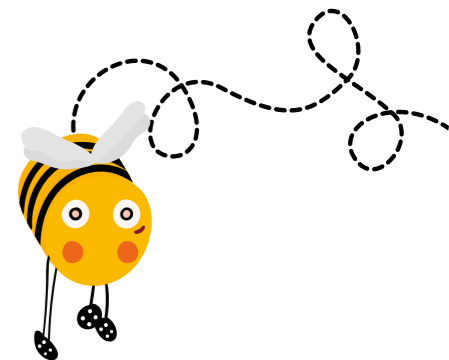
Staff turnover is an important factor to consider in any business, as it can affect business continuity and efficiency. A high turnover rate might suggest human resource management problems, and topics relating to the working environment or corporate culture. Furthermore, the loss of experienced employees can negatively impact the quality of the work done and customer relations. On the contrary, a low turnover rate might suggest good human resource management, a positive working environment and a company's ability to provide employees with growth and development opportunities. Therefore, monitoring staff

turnover is crucial to understand a company's organisational health and implement any corrective measures, if necessary. Furthermore, a low turnover rate can also be a competitive advantage for a company, as it helps retain experienced and motivated employees who can contribute to long-term business success.

Turnover (meaning the difference between new recruitments and exits) is 9% (compared to 7% in 2022 and 11% in 2021). The initiatives to retain employees implemented by Elmec Informatica are mainly addressed to potentially critical roles. Staff turnover can be po-

3.3.1 Turnover

sitively explained by one's opportunity to acquire new skills, work in a more stimulating environment or advance career. A moderate turnover rate can bring new ideas and perspectives, improving a company's efficiency and productivity. However, it is important to balance the attraction of new talents with the stabilization of experienced employees, ensuring continuity and knowledge of the company.

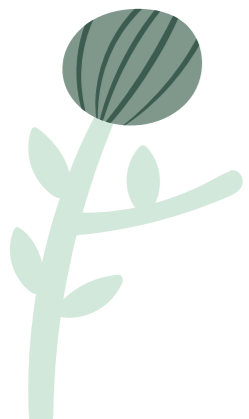


3.3.1 Turnover

2021	MEN	WOMEN	TOTAL
Employees as of 31.12.2020	394	141	535
Hired in 2021	104	35	139
Left in 2021	59	15	74
Employees as of 31.12.2021	439	161	600

2022	MEN	WOMEN	TOTAL
Employees as of 31.12.2021	439	161	600
Hired in 2022	108	28	136
Left in 2022	74	20	94
Employees as of 31.12.2022	473	169	642

2023	MEN	WOMEN	TOTAL
Employees as of 31.12.2022	473	169	642
Hired in 2023	116	41	157
Left in 2023	75	22	97
Employees as of 31.12.2022	514	188	702

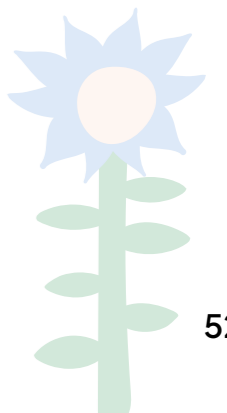


3.3.1 Turnover

2021	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees as of 31.12.2020	486	41	8	535
Hired in 2021	129	8	2	139
Left in 2021	68	5	1	74
Employees as of 31.12.2021	547	44	9	600

2022	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees as of 31.12.2021	547	44	9	600
Hired in 2022	132	4	0	136
Left in 2022	88	5	1	94
Employees as of 31.12.2022	591	43	8	642

2023	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees as of 31.12.2022	591	43	8	642
Hired in 2023	157	0	0	157
Left in 2023	92	5	0	97
Employees as of 31.12.2022	656	38	8	702



3.4 Working conditions and corporate welfare

As Elmec, we are committed to becoming the best employer we can be, constantly providing our employees with professional growth opportunities.

We are aware of the importance of work-life balance and have activated services to improve our employees' quality of life, both at work and in their personal life. A comfortable and stimulating working environment is essential to ensure employee productivity and work experience. Providing work-life balance is an important investment in creating a healthy, productive and rewarding working environment for all.

With respect to human resource management, Elmec has identified the potential risks that may affect productivity and quality, such as a high turnover rate or absenteeism, lack of training and professional update. To mitigate these risks, Elmec has imple-

mented a series of initiatives to improve employee retention, such as creating a career plan, a skill development programme and an incentive system. Furthermore, Elmec is committed to guaranteeing employees' constant training and professional update, by organising internal and external courses, and to ensure employees are aware of professional development opportunities at Elmec.

Elmec has adopted a human resource management system which allows for the identification and management of the main potential risks in this regard.

Elmec has adopted a series of policies and procedures to ensure effective and responsible human resource management. In particular, Elmec has developed specific policies and procedures concerning the following:

Workplace health and safety: Elmec has adopted a series of policies and procedures to guarantee its employees' health and safety in the workplace. In particular, Elmec has a Manager of the Prevention and Protection Service (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 departments and teams. This process consists of analysing professional profiles and the skills required for each position, the use of objective assessment tools and the adoption of equality and non-discrimination criteria. Furthermore, Elmec constantly reviews recruitment and selection processes to ensure their effectiveness and the adequacy of the selected profiles.

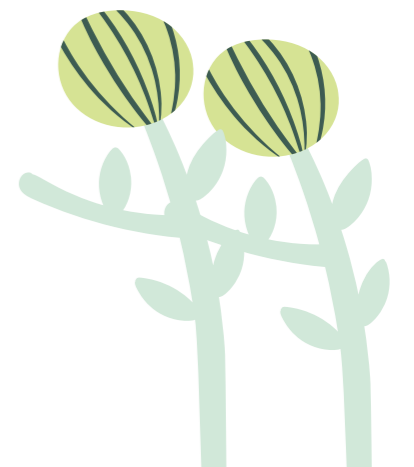
Training and development: Elmec offers training programmes for all employees to ensure that professional skills are maintained and developed. Furthermore, Elmec has a defined training management procedure. The assessment of training needs, the definition of individual learning paths, the delivery of courses and the check of the programmes' effectiveness are carried out every year.

Performance assessment: Elmec assesses the performance of its employees through a performance management system that consists of the definition of measurable goals and the assessment of their achievement. Performance assessment is an important tool to define individual development plans and to award bonuses and incentives.

Well-being and welfare: Elmec has defined policies and procedures to manage its employees' well-being and welfare, in order to promote a healthy and pleasant working environment. In particular, Elmec offers psychological support and counselling services, work-life balance services and wellness programmes organised in collaboration with associations and professionals in the field. Elmec constantly checks the effectiveness of the policies and procedures adopted, in order to continue to improve the management of its employees and ensure respect for their rights.

Elmec's HR department plays a crucial role in staff management and company policy implementation.

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 that of new resource selection and recruitment process.

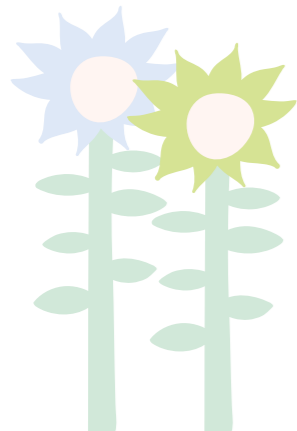


3.4.1 Corporate welfare initiatives

Elmec has many work-life balance solutions, including a gym with the presence of a personal trainer, a restaurant offering healthy and balanced meals, an annual sports tournament and many other initiatives like Elmec4You and Elmec4Sport.

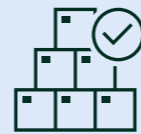
Furthermore, Elmec has implemented many welfare and environmental sustainability initiatives: a water fountain, refillable eco-friendly detergents and a second-hand market for all employees. The most peculiar element is the willingness to spread a po-

sitive culture together with the services available. Elmec promotes a culture based on simplicity and trust, offering self-service purchases without any control over payments. Compared with 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 board game room, a party area, an optometric prevention program at the headquarters and free visits with a nutritionist.



Corporate Welfare

- Books bonus
- Sustainable mobility bonus
- Energy bonus
- Flexible benefits



Easy Shopping at Elmec

- Shopping delivery
- Pop-up shops
- Agreements with local facilities
- Emporium
- Eco-friendly detergents
- Second-hand market



Sports for All

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



Group Initiatives

- Team buildings
- Elmec4you
- Elmec4sport
- Social game room
- Company vegetable garden
- Party zone
- E-game room
- Book club



Everyday Services

- Shoemaking
- Tailoring
- Car wash
- Package delivery
- Library
- Restaurant
- Gym
- Water fountain



Preventive Health Care

- For Men
- For Women
- Eye screening tests
- Helpline
- Sports medical examinations
- Nutritionist at Elmec
- Free complete blood count
- Doctor at Elmec
- Medication delivery
- Agreements with local facilities



3.4.1 Corporate welfare initiatives

3 FOOD AREAS



4 MENUS DESIGNED BY NUTRITIONIST
(men, women, sustainable, sports)

73.519
MEALS PROVIDED

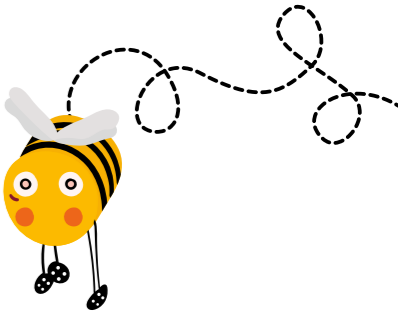


ELMEC BISTROT: The Zero-Waste Corporate Restaurant

Elmec's restaurant is a place where quality, sustainability and well-being are combined. In addition to high-quality raw materials from Italy and the Mediterranean, this restaurant uses innovative, industry 4.0 machinery.

Furthermore, the restaurant is strongly focused on nutrition, informing employees on the calorie intake of dishes and offering seasonal and sustainable products. Reducing food waste is another priority thanks to the chance to take home leftovers, which are stored

carefully. This shows Elmec's commitment to the environment and sustainability. Finally, the restaurant is a multifunctional space for recreational events and training sessions, or corporate events, generating a comfortable and stimulating environment for employees. Our focus on creating a work-life balance is a major investment to provide a healthy, productive and rewarding working environment for all employees.



High-quality ingredients, zero waste and multifunctional spaces

3.4.1 Corporate welfare initiatives

ACTIVE USERS BY SEX*

*of total employees

60% Women



57% Men



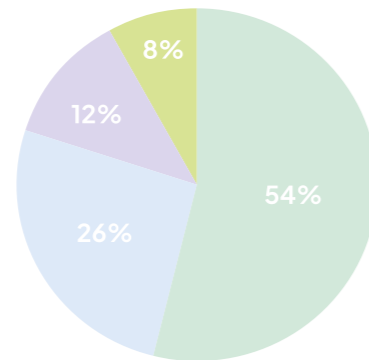
USERS BY AGE

0-24 YEARS: 12%

25-34 YEARS: 54%

35-49 YEARS: 26%

50-64 YEARS: 8%



THE CORPORATE GYM: the house of sports, free for all employees

In Elmec's gym, employees can find equipment from TechnoGym, a fitness leader, and a wide range of machinery that helps them strengthen and tone muscles and do aerobic exercises.

Furthermore, this gym is open to all employees for free and at flexible times to allow everyone to maintain a healthy and balanced lifestyle. Twice a month, a per-

sonal trainer is present to support employees with helpful training advice.

In Elmec's gym, employees can benefit from a comfortable and technologically advanced environment in which they can work out on a regular basis, improving their health and wellness.

371 TOTAL USER SUBSCRIBED



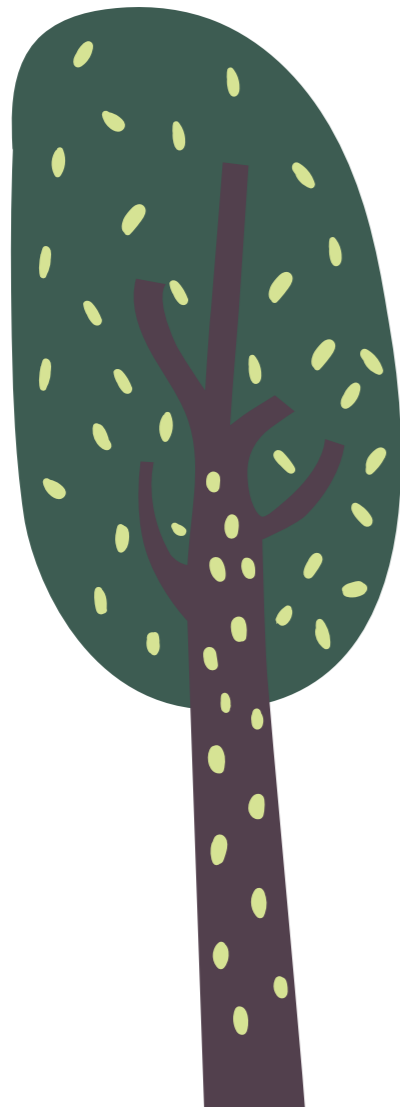
KM TRAVELLED SINCE OPENING:

2550 KM



A Space for Employees' Wellness

3.4.1 Corporate welfare initiatives



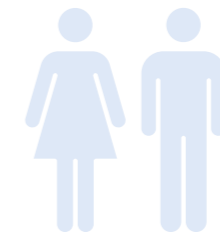
YOGA ROOM: classes for all levels accompanied by a teacher.

During 2023, we inaugurated an on-campus Yoga room, an oasis for our employees' well-being. Here, we offer a wide selection of courses diligently prepared and taught by a certified Yoga coach.

We offer, among others, the ancient disciplines of Hatha and Mindfulness, sun salutation sessions, Vinyasa flow Zen and postural Yoga. Every course is designed to improve physical and mental health, creating a regenerative space where participants can relieve stress and reestablish inner balance.

Our Yoga room is accessible to all employees and at flexible times so as to meet all the work needs. Our goal is to create a welcoming and comfortable environment, where each person can feel reassured and inspired to explore their physical and mental potential.

Through this initiative, we intend to promote a healthy and sustainable lifestyle among our employees, giving them a precious chance to take care of themselves and cultivate their well-being deeply and constantly.



86

ENROLLED TO COURSES

6 TYPES OF COURSES



4 LESSONS PER WEEK



Sala Yoga: equilibrio per il corpo e per la mente

3.4.1 Corporate welfare initiatives



38

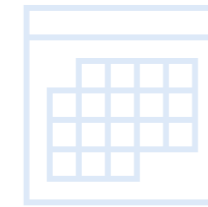
ACTIVE VOLUNTEERS

ELMEC4YOU: The Beating Heart of Elmec's Internal Initiatives

Elmec4you is an important internal non-profit organisation dedicated to promoting employee well-being through work-life balance.

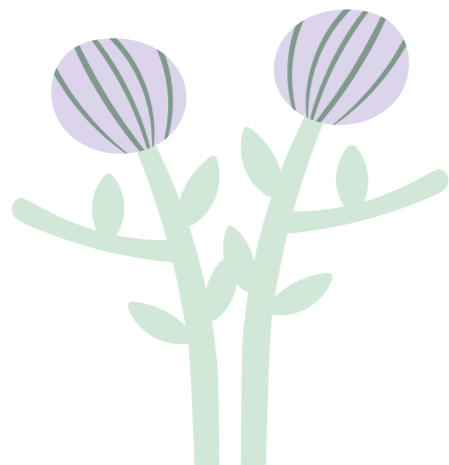
By a constant and close relationship with local entities, Elmec4You manages agreements with such entities, organises events and coordinates the stakeholders involved in improving corporate welfare.

Thanks to its activity, Elmec4you constitutes a fundamental reference point for Elmec's life after working hours, contributing to creating a healthy, productive and rewarding working environment for all employees.



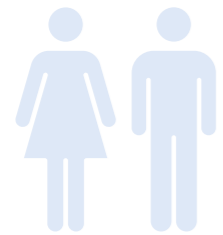
20

EVENTS ORGANISED FOR EMPLOYEES IN 2023



An association of volunteers, a real driving force of initiatives

3.4.1 Corporate welfare initiatives



250
CLUB MEMBERS

KM MADE
94.000 KM

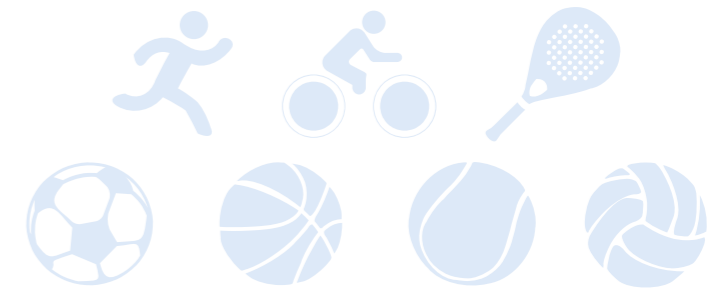
ELMEC4SPORT: When Playing Sports Depends on People's Commitment Too

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

This community includes runners, swimmers, football players, basketball players and much more. Elmec-4sport's basic feature is people's willingness to use their experience to the benefit of others. Elmec provi-

des the necessary facilities and funds, but without people's enthusiasm and passion nothing would be possible.

Thanks to this project, some colleagues took part in the 2023 Chianti Eco-marathon and achieved extraordinary results.



7 SPORTS!
(BASKETBALL, BEACH VOLLEYBALL, CYCLING, FOOTBALL, PADEL, RUNNING, TENNIS)

An association of volunteers,
a genuine engine of initiatives

3.4.1 Corporate welfare initiatives



1000 KG
AMOUNT OF
CHOCOLATE SOLD
IN 2023



500 KG
AMOUNT OF
RICE SOLD IN
2023



450 LT
AMOUNT OF
APPLE JUICE SOLD
IN 2023

ELMEC4YOU EMPORIUM

At one of our locations we have created the Elmec4you emporium, a real shop where employees can buy seasonal and local products at convenient prices. This shop collects products from businesses near Elmec and businesses who have shared with us part of our fifty-year history. At the emporium, colleagues purchase and pay on their own.

REFILLABLE ECO-FRIENDLY DETERGENTS

We have added self-service, refillable eco-friendly detergent dispensers. Every employee can go to the dispensers, take the detergents and pay on their own. The value of this project lies not only in offering a service at our workplace, but also in contributing to our goal to eliminate plastic and spread a culture of mutual trust at Elmec.



850 LT
AMOUNT OF
DETERGENT SOLD
IN 2023



21 KG
CO2 SAVED THANKS
TO BOTTLE REUSE

3.4.1 Corporate welfare initiatives

WATER FOUNTAIN

As a further demonstration of its commitment to the environment, Elmec has built a water fountain available to all employees for free, which has dispensed 10,400 litres of fresh water since its placement (February 2022).

This service reduces plastic bottle consumption that employees would otherwise have to buy to drink during the workday, improving their quality of life at work and that of the environment around us. The water fountain is also available after work, and employees can refill their bottle and take it home.

Thanks to small efforts like this, we can make a difference and contribute to making a better world.



10.400 L
WATER DISPENSED
since placement



6.900
1.5-LITER-SIZED
PLASTIC BOTTLES
SAVED

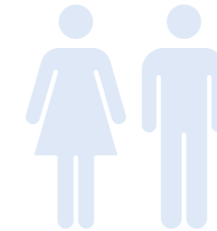


555 KG
CO2 SAVED
avoiding 1.5-liter-sized
plastic bottle production
and transportation.

ANNUAL SPORTS TOURNAMENT

To have fun with a good sense of competition, a corporate tournament is organised every year which includes various sports - basketball, beach volleyball, football and padel - and in which over 300 colleagues participated. This event is longed for by colleagues and their families, who can also take part in the competitions.

By doing so, Elmec not only promotes sports as a way to maintain physical and mental health, but also a sense of belonging and collaboration between colleagues and families.

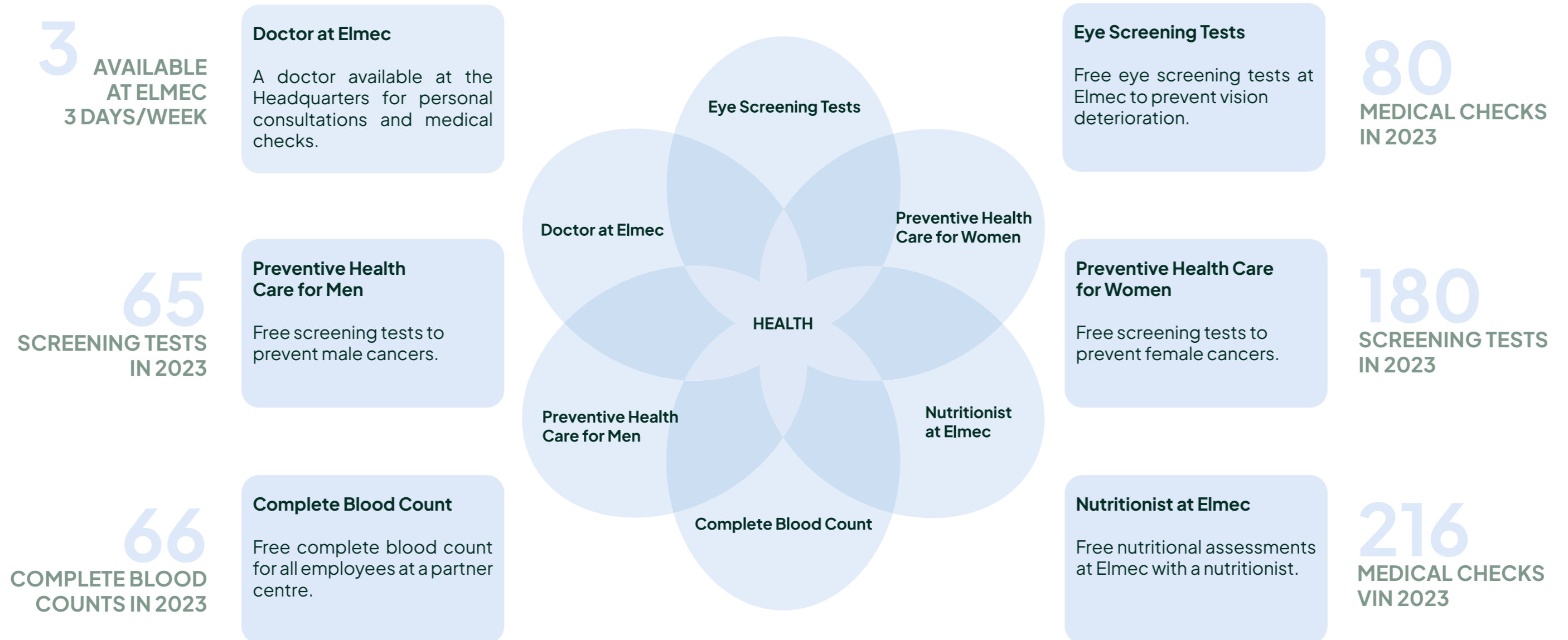


300
COLLEAGUES WHO
PARTICIPATE

4 COMPETITIVE
SPORTS



3.4.1 Corporate welfare initiatives



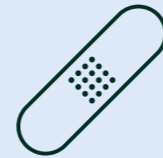
3.4.1 Corporate welfare initiatives

For Elmec, employees' health is fundamental. We recognize the importance of creating a safe and healthy working environment for our employees, as their health and well-being are vital to our business success. For this reason, we have implemented many preventive measures to ensure that our employees are able to work in a safe and healthy environment.

We have invested in tools and resources that help our employees adopt healthy lifestyles, such as fitness, nutrition and mental well-being programmes. Furthermore, we have established a regular screening programme to ensure our employees are in good health and any health problems are identified and treated promptly.

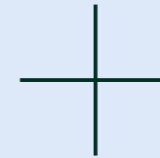
Medication Delivery

Employees can order medications from a partner pharmacy and have them delivered to Elmec.



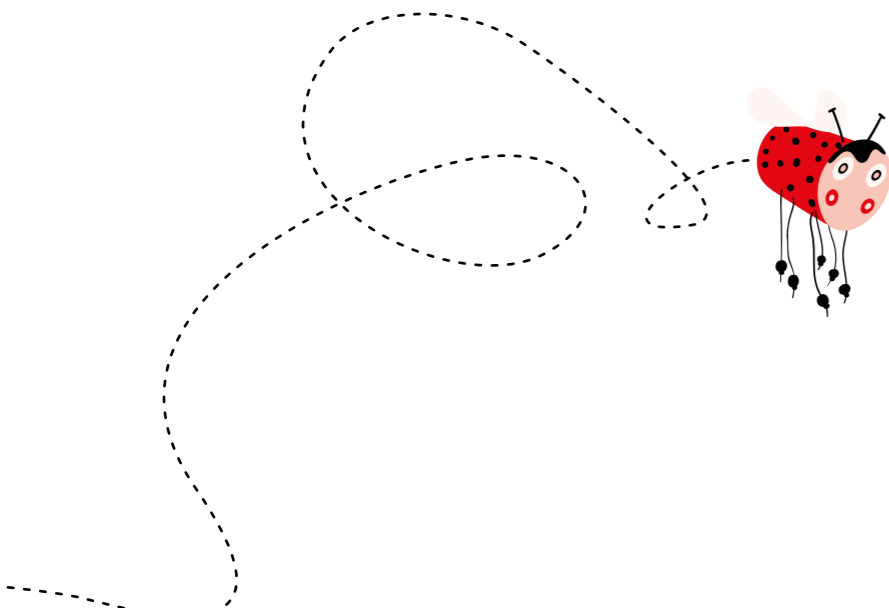
Agreement for Medications at Lower Prices

At the same pharmacy, employees are entitled to a 15% discount on all medications.



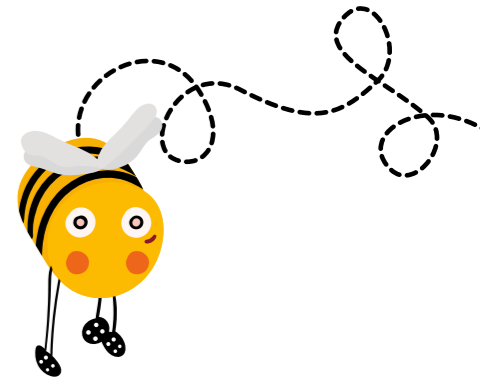
Pending Medication

Every year we collect some of the most common medications to donate them to



3.4.1 Corporate welfare initiatives

Elmec provides some full-time employees with a wide range of benefits, including supplementary health care, life and disability insurances and social security benefits. Below is a list of bonuses available to all employees:



Flexible benefits

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



Book bonus

The programme consists of awarding a €300 flexible-benefit bonus for every school-age child of every employee. The goal is to facilitate the purchase of educational materials for our employees' children, such as textbooks, teaching tools or other school materials.



Sustainable mobility bonus

To encourage the use of the bicycle as a means of transportation to go to work, we have implemented a sustainable mobility bonus programme. It consists of awarding a €500 flexible-benefit bonus for employees who choose to use the bicycle as a means of transportation to go to work at least 50 times a year.



Parents bonus

Elmec Informatica recognizes the importance of supporting employees' path to parenthood and has implemented a special bonus for new parents. A €500 flexible-benefit bonus is awarded to all new mums and dads. Furthermore, to support new mums in such a significant time, Elmec Informatica awards new mums another €2,000 flexible-benefit bonus.



3.4.1 Corporate welfare initiatives

Nutritionist at elmec

A nutritionist is available at Elmec twice a week, and the first assessment is free for all employees. The nutritionist's main task is to provide personalized nutritional advice to help employees find their nutritional balance and understand the value of a correct combination of nutrients.

Lombardy WHP Programme

Elmec joined the WHP project sponsored by Regione Lombardia (the Region of Lombardy) to promote the health and well-being of its employees. This project consisted of a series of activities and interventions to create a safer and more welcoming working environment by promoting a healthy lifestyle, preventing and valuing workers' mental health.

Sports medical examinations

Non-competitive sports medical examinations are important for the safety of employees who use the free corporate gym. All employees can have their examination at an agreed-upon price to assess their health condition and identify the most suitable physical activity; they can also have – again, at an agreed-upon price – a competitive sports medical examination.

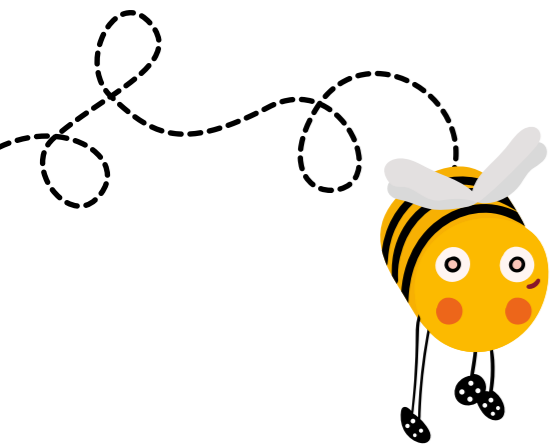
Defibrillators for the community

Cardiac arrest is one of the main causes of death in industrialized countries, and defibrillation time speed is a critical factor that determines patients' survival. To ensure health and safety, Elmec has decided to provide each of our locations with semi-automatic AEDs. Furthermore, the village of Brunello has been equipped with two AEDs, providing an important emergency response tool in the event of a cardiac emergency.

Help line: Free Personal Support Service All Year, Every Day at Every Time

It is addressed to all employees who must handle situations that might challenge their well-being and the health of their relationships, both at work (stress, anxiety, depression, role topics, relationship with the boss and co-workers, etc.), and in their personal life (parenting, caregiving, emotional and mental distress). This service, designed to promote individual empowerment and increase self-determination, is divided into the following sections:

- Telephone helpline, which is confidential, immediate and guaranteed 24/7 with qualified professionals to answer and stabilize emotional state and highlight aspects to think or become aware of.
- Modules of in-person and/or virtual psychological sessions with a short and solution-oriented approach.
- Management Consultation: support to managers and the HR department.
- Guidelines on legal, fiscal and social welfare matters.



3.4.2 Performance and Career Paths

All employees are assessed every year through an assessment process. Every six months - in June and November - the managers hold interviews with their employees. Any of managers' offers to change salaries and bonuses are submitted to the HR department and approved by the directors.

Top managers are subject to assessment by the directors at least every six months with the support of the HR department.

Their remuneration, which includes fixed and variable portions and any benefits, is updated, if necessary, during the assessment.

2021	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees who received an annual performance assessment	547	44	9	600
Total employees as of 31/12/2021	547	44	9	600
Percentage of employees who received periodic performance and career assessment	100%	100%	100%	100%

2022	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees who received an annual performance assessment	591	43	8	642
Total employees as of 31/12/2022	591	43	8	642
Percentage of employees who received periodic performance and career assessment	100%	100%	100%	100%

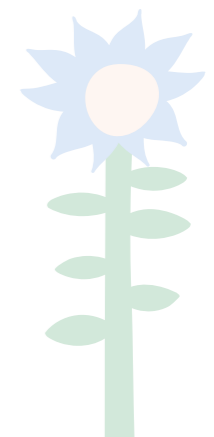
2023	CLERKS	MANAGERS	TOP MANAGERS	TOTAL
Employees who received an annual performance assessment	651	40	11	702
Total employees as of 31/12/2023	651	40	11	702
Percentage of employees who received periodic performance and career assessment	100%	100%	100%	100%

3.4.2 Performance and Career Paths

2021	MEN	WOMEN	TOTAL
Employees who have received an annual performance review	439	161	600
Total employees	439	161	600
Percentage of employees who received a periodic performance 'and career assessment	100%	100%	100%

2022	MEN	WOMEN	TOTAL
Employees who have received an annual performance review	473	169	642
Total employees	473	169	642
Percentage of employees who received a periodic performance 'and career assessment	100%	100%	100%

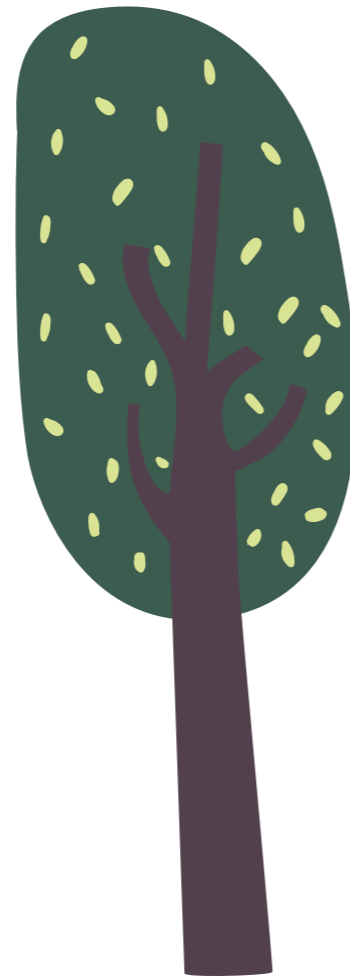
2023	MEN	WOMEN	TOTAL
Employees who have received an annual performance review	514	188	702
Total employees	514	188	702
Percentage of employees who received a periodic performance 'and career assessment	100%	100%	100%



3.5 Talent development

Elmec Informatica recognizes the importance of talent development to ensure its long-term sustainability. For this reason, it has implemented various initiatives to promote the professional growth of its employees. In particular, Elmec Informatica offers training programmes and on-the-job training to allow employees to acquire new skills and improve those already acquired.

Furthermore, Elmec promotes its employees' participation in innovative projects, stimulating creativity and problem-solving skills. Thanks to these initiatives, Elmec Informatica is able to value its internal talents, attract the best resources in the market and ensure a high level of satisfaction and motivation among employees, thus contributing to its sustainability.



3.5.1 Training

Elmec's approach includes both internal skills development paths and the spreading of a digital culture in the community. The goal of internal learning paths is to build and increase the professional skills established by their respective models, give value to potential, assess and reward excellent performances and protect specific technical knowledge; it is an ever-evolving comprehensive approach.

To ensure the constant development of employee skills, Elmec Informatica has implemented various types of training programmes. In particular, Elmec offers technical training programmes such as software development and cyber security, management training programmes such as project management and leadership, and transversal training programmes such as soft skills and customer experience.

The goals of Elmec Informatica's training programmes

are the continuous development of employee skills, and the promotion of a corporate culture based on professional excellence.

In 2023, Elmec offered 19,274 hours of training, +8% than 2022 (17,787 hours); per capita training hours: 27. 93% of the hours provided involved clerks. The training provided to employees was mainly related to the following subject areas:

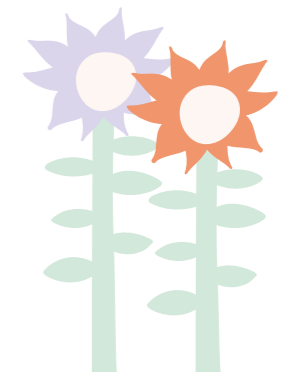
- Corporate training: 3,296 h
- Rules, regulations and quality: 3,534 h
- Professional: 5,155 h
- Workers' Health and Safety: 1,891 h
- Cybersecurity: 1,619 h
- Soft skills: 1,871 h
- Sustainability: 1,113 h
- ICT: 805 h.

The training provided to employees was almost entirely made up of internal courses. Elmec Informatica's amount of training

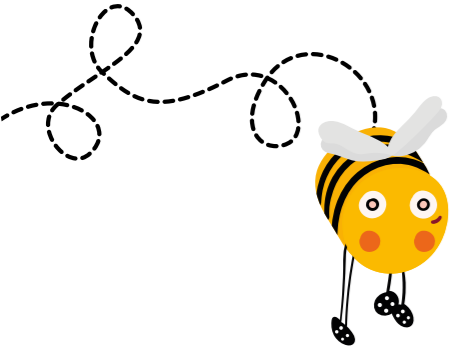
investments in 2023 was 85,694 euros.

Please note that by "corporate training" we mean training on internal tools, procedures and policies.

In particular, the main costs incurred were related to soft skills (34,777 euros), Professional/Operating training (26,589 euros) and cyber security (24,283 euros).



3.5.1 Training



Training hours provided 2022	CLERKS				MANAGERS				TOP MANAGERS				TOTAL	
	M		W		M		W		M		W		N.	ORE
SUBJECT AREA	N.	ORE	N.	ORE	N.	ORE	N.	ORE	N.	ORE	N.	ORE		
Workers' 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 Rules	1.043	3.171	365	941	32	149	17	62	0	0	0	0	1.457	4.323
regulations and 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
Cybersecurity	565	906	211	338	14	30	7	9	3	9	0	0	800	1.292
Professional /Operation training	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 hours		11.565		4.963		867		181		207		5	7.271	17.787

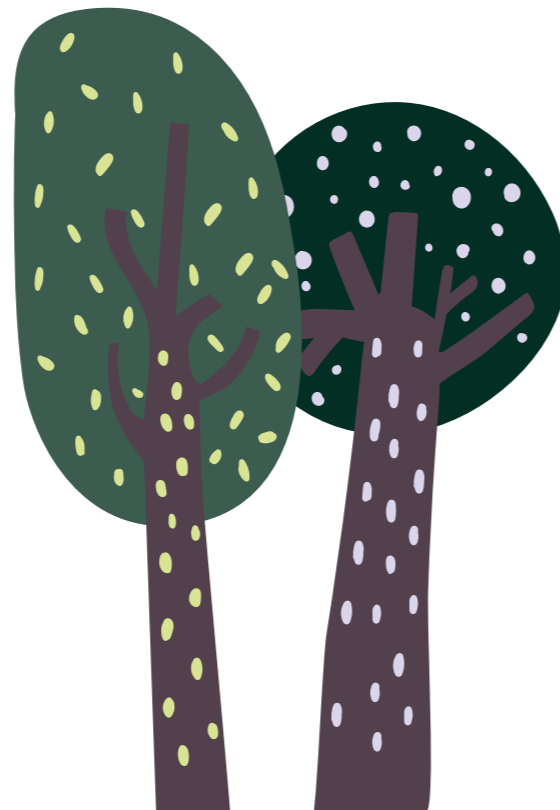
Training hours provided 2023	CLERKS				MANAGERS				TOP MANAGERS				TOTAL	
	M		W		M		W		M		W		N.	ORE
SUBJECT AREA	N.	ORE	N.	ORE	N.	ORE	N.	ORE	N.	ORE	N.	ORE		
Workers' health and safety	205	1.409	64	426	4	49	1	7	0	0	0	0	274	1.891
Soft Skills	137	1.167	46	432	14	230	2	25	2	17	0	0	201	1.871
ICT Rules	116	532	50	266	3	6	0	0	1	1	0	0	170	805
regulations and 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
Cybersecurity	182	1.059	90	489	10	38	3	19	5	14	0	0	290	1.619
Professional /Operation training	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 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

Hours of training provided in the different subject areas in 2023:

The table above shows the number of training hours, and the number of people engaged in training on different subject areas. As stated in the 2022 Sustainability report, Elmec has included sustainability among the subject areas of training, with a total of 1,113 hours. Unlike 2022, Onboarding does not appear in the 2023 section.

This change is due to the integration of onboarding training hours into other subject areas, in order to allow for a detailed analysis of the topics also while introducing new employees. Please note that training data for 2021 are not available because the reporting system was introduced from the year 2022.



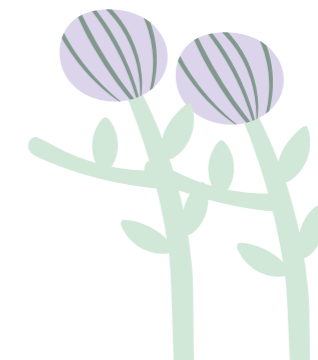
Employee skills mapping and learning and re-skilling plan creation

Mapping employee skills and creating learning plans and re-skilling programmes are essential strategies to ensure the professional growth of employees and an organisation's competitiveness. Mapping skills contributes to identifying existing skills of employees and any gaps that can be filled by training.

Creating customized learning plans and re-skilling programmes contributes to developing the necessary skills to effectively perform current tasks and preparing employees for future roles and challenges.

Furthermore, these programmes can improve operational efficiency and reduce costs, reducing the

need to recruit outside staff to bridge any skill gaps. Finally, creating a continuous learning environment can improve employees' motivation and engagement, contributing to maintaining a highly skilled and motivated team.

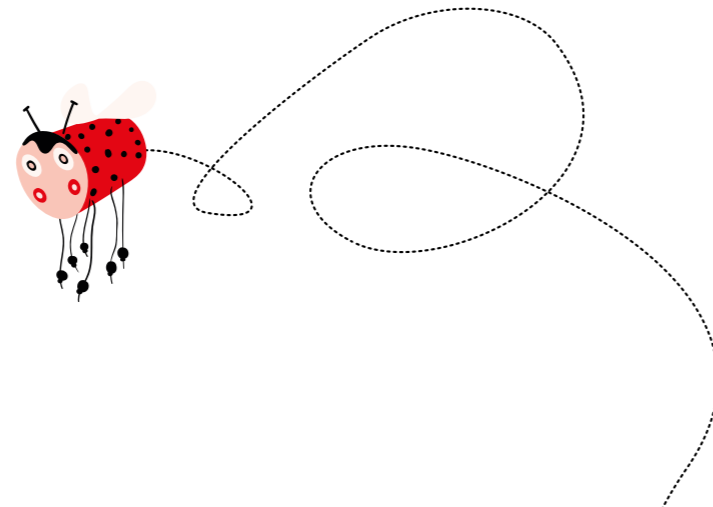


3.5.1 Training

Integration of ESG goals for top management into the system

The integration of a set of ESG (Environmental, Social, and Governance) targets for top managers is an important corporate strategy to ensure an organisation's long-term sustainability. The ESG set includes goals and metrics that assess Elmec's behaviour in terms of environmental, social and governance impact. The integration of these goals into top managers' performance management system, such as strategic planning, risk assessment and remuneration, allows Elmec to ensure its alignment of ESG goals with its business strategy and consequent engagement of top managers in its sustainable management.

Thus, the integration of ESG targets can contribute to improving Elmec's reputation, reducing risks and creating long-term value for stakeholders including employees, clients, investors and society as a whole.



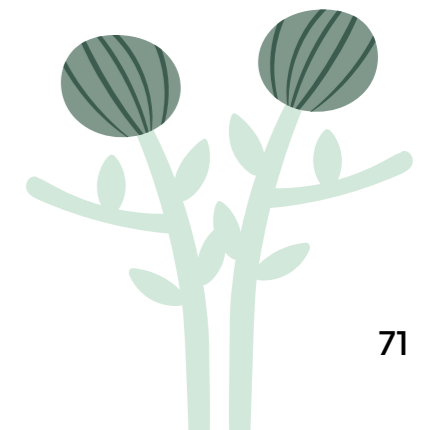
Career Paths for Employees

Elmec Informatica values the talent and professional growth of its employees, offering numerous career development opportunities. Elmec's approach to career development is focused on the individual to ensure that each employee has access to the training and development opportunities that best suit their needs.

To support the career development of its employees, Elmec Informatica offers a wide range of training and professional development programmes. These include internal and external training courses, mentoring and coaching programmes, attendance at industry conferences and events, and teamwork development opportunities. Furthermore, Elmec Informatica promotes a culture of continuous learning, encouraging

employees to share their knowledge and skills with colleagues and take ever greater responsibilities.

Finally, Elmec Informatica promotes a culture of innovation and adaptation to market changes; thus, employees are constantly aware of new technologies and new working methods. 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

Training Internal Initiatives

Technical certifications

Elmec's employees are fully engaged in a continuing education path in IT, acquiring technical certifications during the course of the year to keep themselves up to date and provide a cutting-edge service.

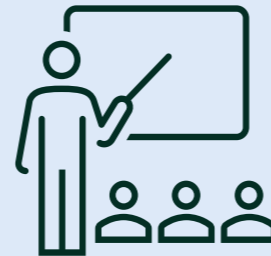


2.156 certifications earned in 2023

Continuing education and assessment process

Training hours provided

A comprehensive approach, encompassing both IT and soft skills.



19.284 h hours of training provided

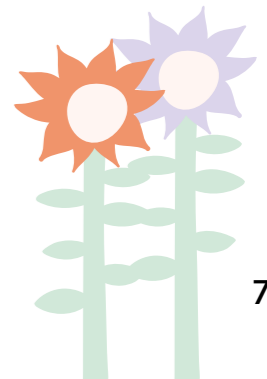
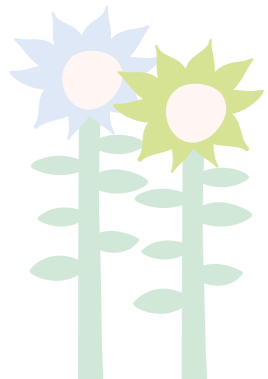
Assessment Process

Assessment Process

All of Elmec's employees receive a periodic assessment of their work.



100% of employees receive a performance assessment

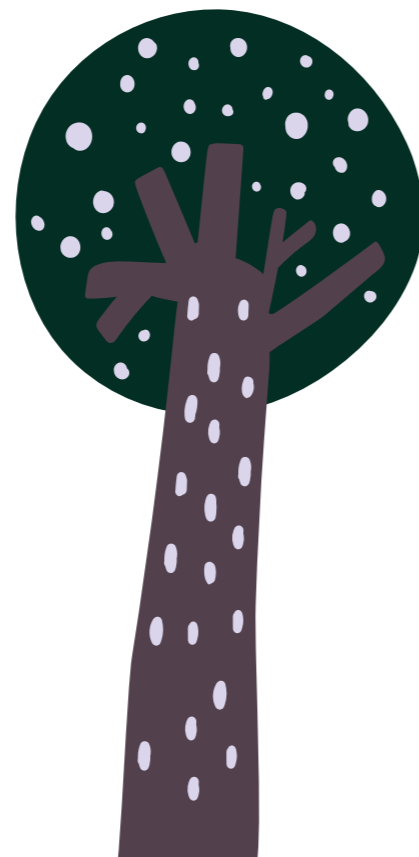


3.5.1 Training

Internal initiatives related to the topic of soft skills training

Soft skills are crucial to business growth and success, as they contribute to building positive employee relationships, and improve communication, time management and problem solving. To support our employees in their development, we offer a series of training courses, including mindfulness to manage stress, public speaking to improve communication skills, drama to enhance creativity and leadership, and trust and confidence to increase self-confidence.

These courses aim to improve the transversal skills of our employees and create a positive and productive working environment for all and are promoted and encouraged by Elmec4You.



Mindfulness

- course dedicated to people managers

Public speaking

- 100 colleagues enrolled in the first edition

Self-defence

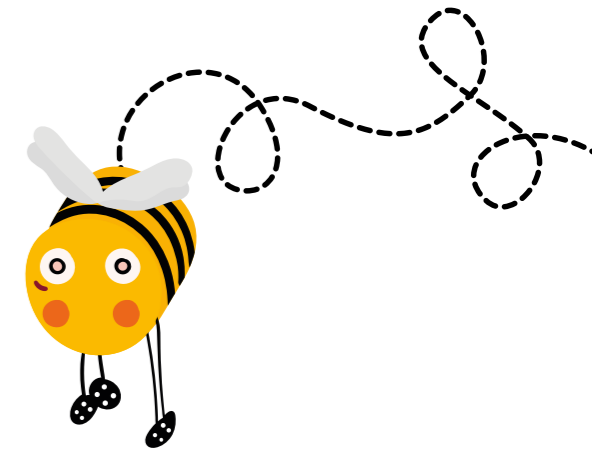
- 60 colleagues enrolled in the latest edition

Troupe

- 20 actors
- 2 shows/year
- Average audience: 150 people

Training on Trust and Confidence

+50 colleagues engaged

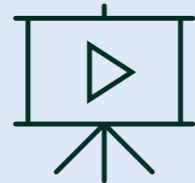


3.5.1 Training

Internal initiatives related to the theme of training:

Professional Integration Programmes

Our professional integration programmes provide young people with the training and skills for a stimulating career based on continuous learning.



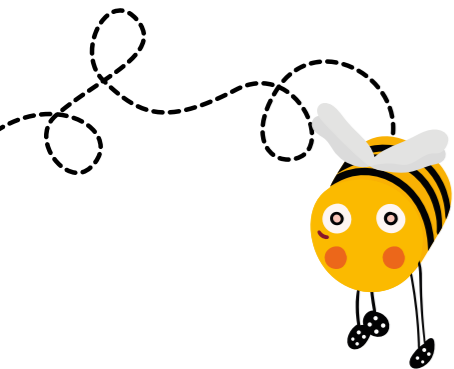
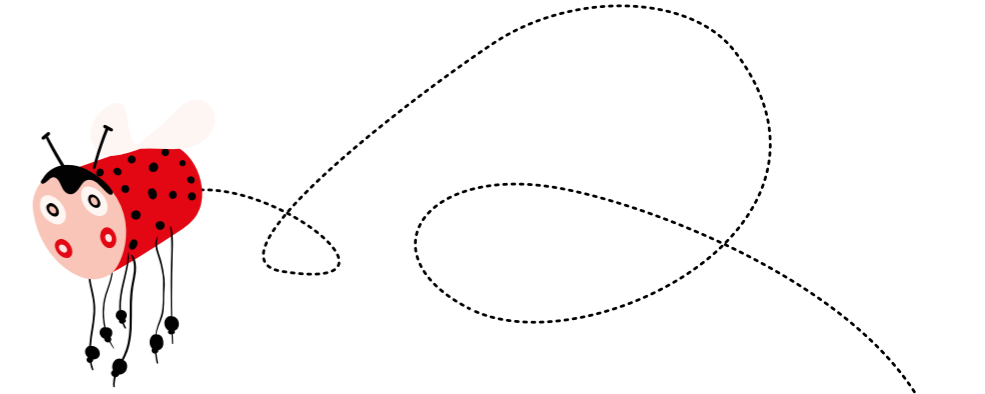
Selection and Recruitment Process

Our selection and recruitment process is extremely rigorous, based on merit and an attentive and meticulous assessment of candidates' skills, experience and potential.



Start program

Our Start programme provides comprehensive and personalized training for all new hires, ensuring they are ready to work effectively and productively from day one.



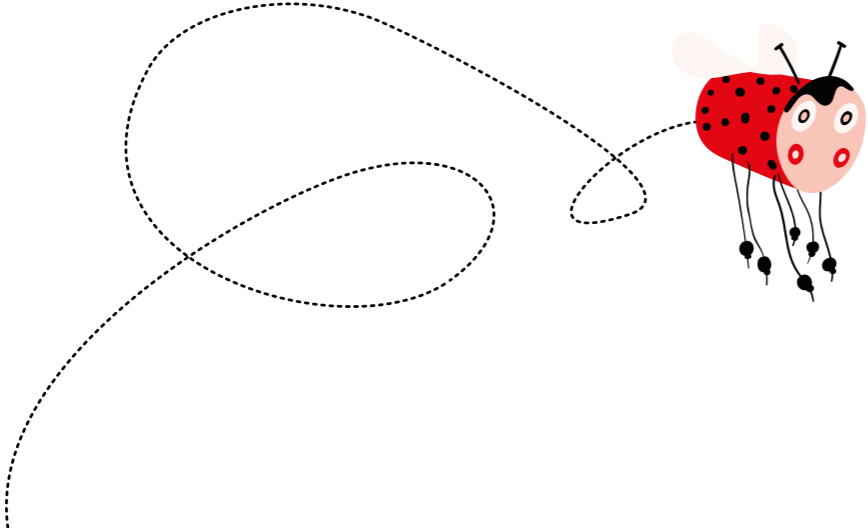
3.5.1 Training

Technical Certifications

Elmec's results derive from the highly skilled people who make up our business: 702 employees 73% of whom are IT specialists with top certifications, who respond to the needs of our clients 24/7. In 2023, 2,156 technical certifications were earned.

2156
Tot. Dispense
In the 2023

SAP SAS ORACLE	ITIL PRINCE 2 DEVOPS AGILE	HP LENOVO APPLE DELL LOGITECH	IBMAWS CISCO VMWARE VEEAM NETAPP CHECKPOINT MICROSOFT HPE SOPHOS KUBERNETES ANSIBLE
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3.6 Diversity and Equal Opportunities

For Elmec, managing diversity means identifying and respecting differences in a common context of corporate culture. Therefore, we pursue the exclusion of any type of discrimination, particularly gender, age, nationality, ethnic origin, ideology and religious beliefs by operating in accordance with the laws, contractual obligations, practices, customs and culture of each of the differences that characterize us. In our view, diversity is an important value that must be preserved and valued to encourage our development as a business.

As referred to in our Sustainability Policy, Elmec is committed to ensuring equal opportunities for all employees in all positions.

At the end of 2023, 69% of Elmec Informatica's employees were men (compared to 74% in 2022) and 31% women (compared to 26% in 2022).

93% of employees have a

full-time contract (compared to 88% in 2022). Part-time employees constitute 7% of the workforce (compared to 12% in 2022), 61% of whom are women.

Elmec Informatica has included a Diversity and Inclusion Policy in its sustainability plan, together with training and awareness programmes for employees, to ensure a working environment without discrimination and promote a corporate culture based on equality and mutual respect.

The tables below summarize the details of staff composition by contract type (full-time and part-time, fixed-term and permanent) divided by gender.

	2021			2022			2023		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
Full-time employees	405	152	557	451	136	587	496	160	656
Part-time employees	34	9	43	22	33	55	18	28	46
Total employees	439	161	600	473	169	642	514	188	702

	2021			2022			2023		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
Fixed-term employees	421	124	557	451	136	568	496	160	656
Permanent employees	18	37	43	22	33	74	18	28	46
Total employees	439	161	600	473	169	642	514	188	702

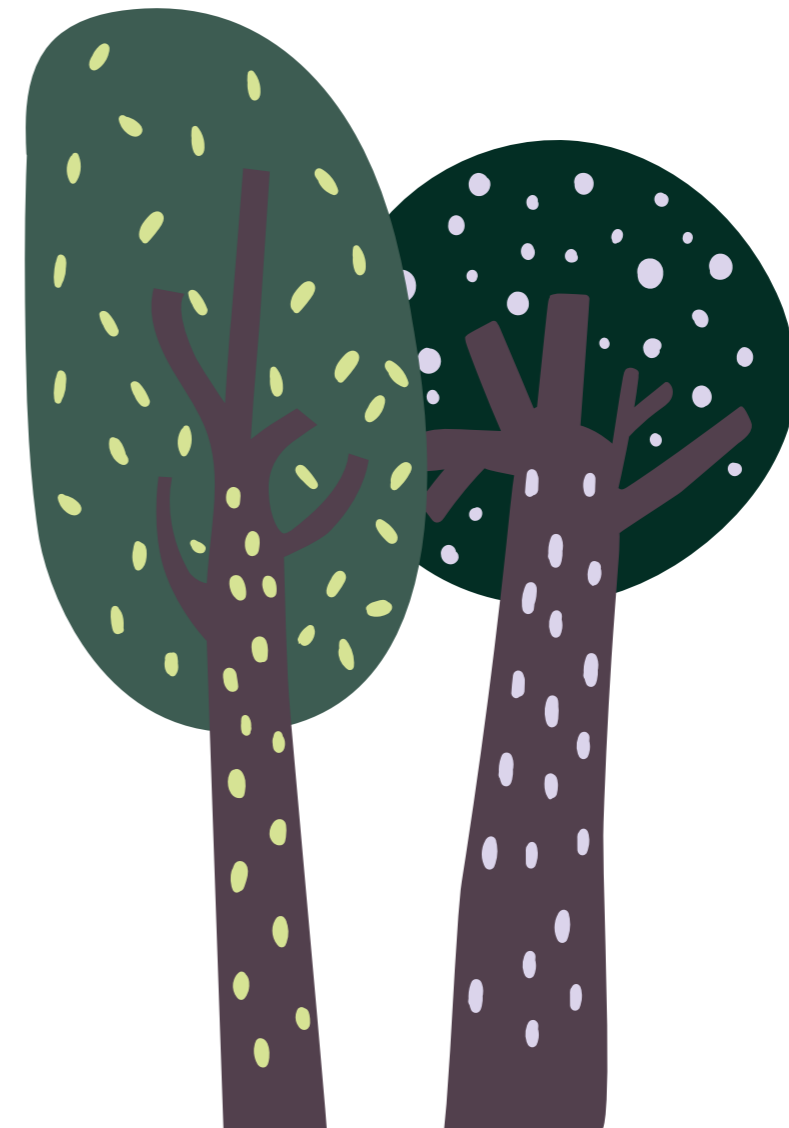
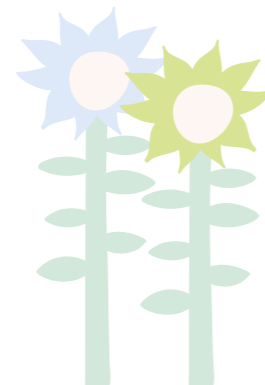
3.6 Diversity and Equal Opportunities

Development of New Tools to Facilitate the Working Lives of Employees with Disabilities

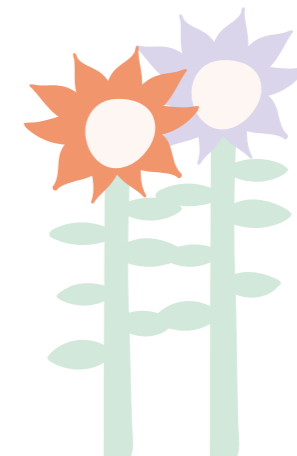
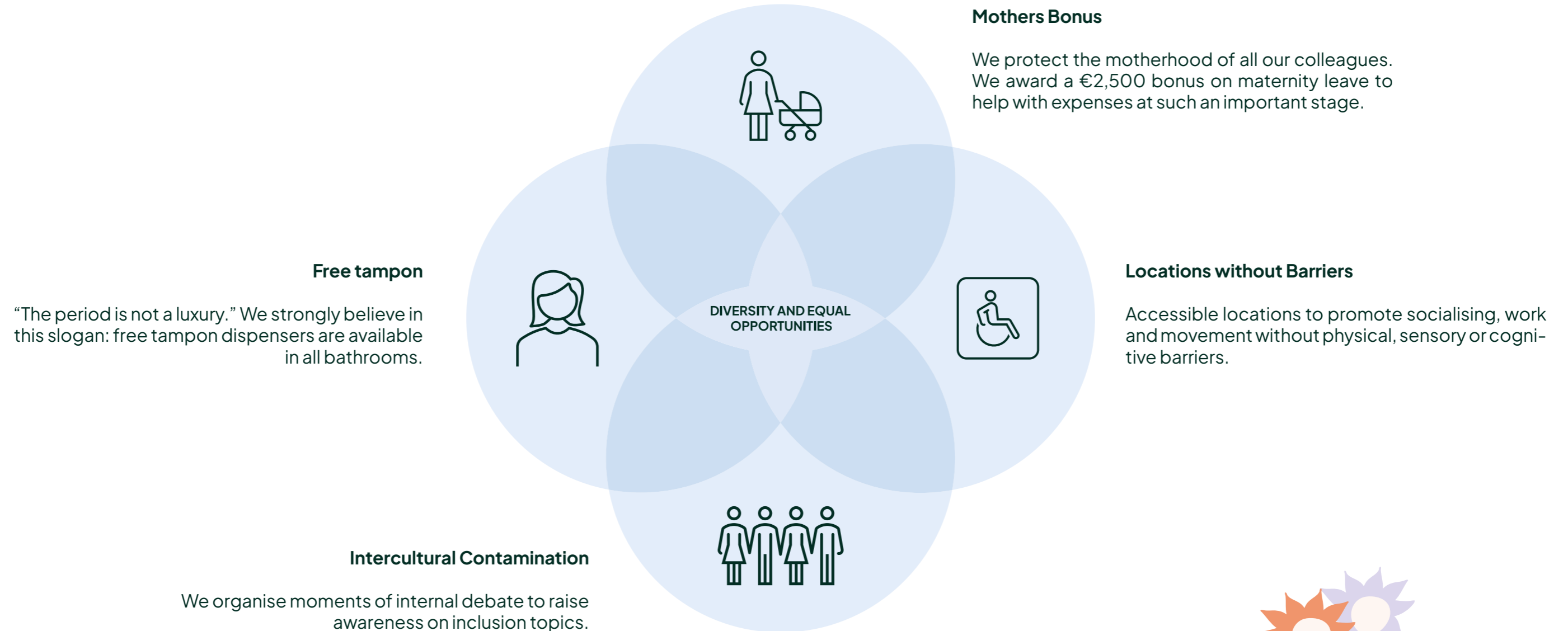
Elmec Informatica recognizes the value of including people with disabilities and their contribution to the professional world. We are committed to removing the barriers that prevent people with disabilities from reaching their employment potential by providing the tools and resources necessary to ensure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

For this purpose, we have developed new tools to facilitate the working lives of employees with disabilities, including Braille writings to recognize spaces and work tools. Furthermore, we work every day to make our locations without architectural barriers to ensure accessibility for all our employees.

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



3.6 Diversity and Equal Opportunities



3.6.1 Gender wage Gap

The salaries for each contractual category are defined in compliance with the legislation and national collective labour agreements.

The remuneration policy aims to recognize, in an equitable and concrete way, people's commitment and contribution to Elmec's success. Compensation levels depend on people's positions and responsibilities, so as to reflect the required experience and skills, the level of excellence proven and the general contribution given to the business, without any discrimination. Individual bonuses (variable elements of remuneration) related to the achievement of quantitative and qualitative goals are awarded to employees holding positions of responsibility.

Elmec Informatica is committed to ensuring equal treatment for men and women, both in terms of salary and career opportunities. At Elmec, our goal is to eli-

minate any gender inequality; to achieve this target, we have implemented measures to identify any wage gaps between men and women to correct them and ensure equal pay.

To date, we have found some wage gaps between our male and female employees and will work hard to eliminate them in the future.

Our performance assessment system includes objective and transparent criteria to ensure equal treatment of all employees, regardless of their gender or ethnic group. Furthermore, we have adopted policies to ensure equal salaries among employees holding similar positions with the same responsibilities.

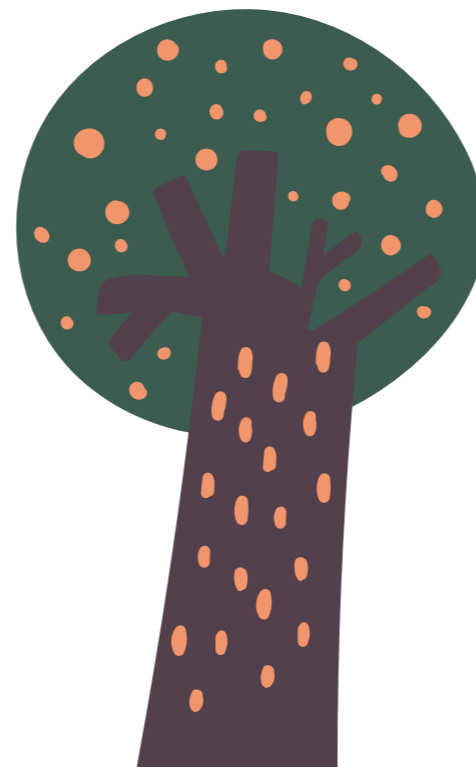
AVERAGE GROSS ANNUAL WAGE GAP MEN WOMEN 2022		
Clerks	Managers	Top Managers
4%	11%	32%

AVERAGE GROSS ANNUAL WAGE GAP MEN WOMEN 2023		
Clerks	Managers	Top Managers
8%	8%	30%

The table above shows the average gross annual wage gap between men and women, divided by job category.

With respect to both clerks and managers, there is an 8% wage gap between women and men. Such gap will be the subject of an in-depth analysis in 2024, as established by our Sustainability Plan, in order to

analyse the specific causes arising from this gap. With respect to top managers, the detected gross annual wage gap is due to functional and organisational reasons since the role, job duties and the reporting hierarchical level of the only female top manager are not homogeneous with respect to the role, job duties and reporting hierarchical level of male top managers.



3.6.2 Culture on Diversity & Inclusion

Elmec Informatica promotes an inclusive and diversity-based culture, which values diversity among people and considers it a source of enrichment.

At Elmec, we are committed to ensuring that all our employees feel accepted and respected. To achieve this, we have implemented policies and initiatives promoting diversity, inclusion and non-discrimination through

employee training, for example, and the organisation of events to celebrate cultural differences. Over the course of 2023, no cases of alleged discrimination were reported to Elmec (same as 2021 and 2022).

To raise awareness on diversity and inclusion, in 2023 we organised an interesting project: a basic digitalisation course for women victims of violence.

This initiative was carried out in collaboration with the Fondazione Felicità Morandi and engaged some female colleagues who volunteered as their teachers. The course modules covered various areas, including the use of the Microsoft Office package, e-mail management, the creation of an effective curriculum vitae, digital identity management, protection from cyber threats and respon-

sible use of social media. At the end of the course, Elmec donated a refurbished computer to all the women who attended the course. The goal of this initiative was twofold, raising awareness among employees on the importance of sharing our skills with people in disadvantaged situations and giving back to our community through our expertise.

3.7 Workers' Health and Safety

We believe that workers' health and safety are crucial to the well-being and productivity of our employees. At Elmec, we are committed to adopting preventive measures and reducing workplace incidents.

We have implemented adequate precautions to manage risks, developed training projects, and verified their compliance with laws and regulations. Our

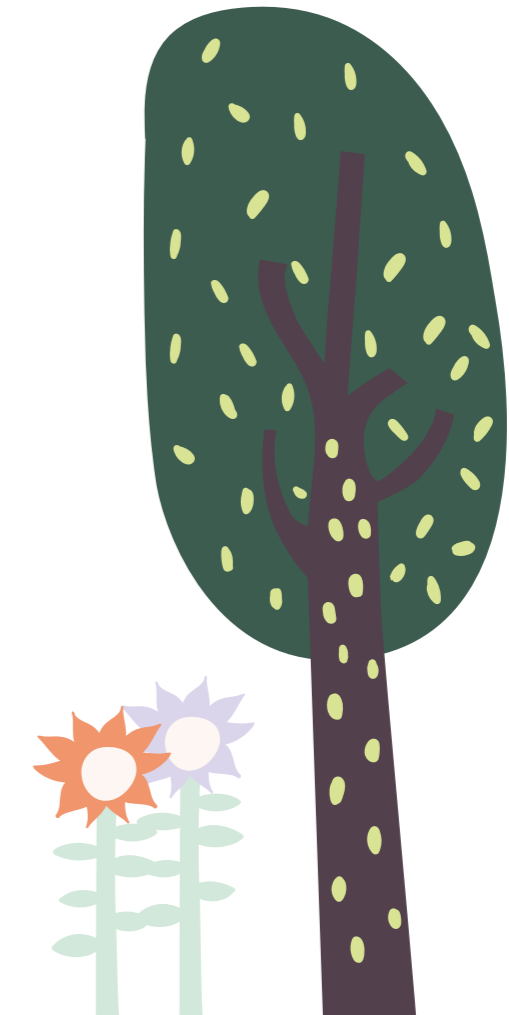
task is focused on providing training courses on risks in the workplace. In this context, we have hired the Prevention and Protection Service Manager, who supports activities by constantly analysing incidents, or potential incidents, with the help of periodic external consultants.

We promote employee awareness and training by consulting with the workers' safety representative

(RLS) and the appointed department managers. On a regular basis, we provide workplace safety training and encourage our employees to follow balanced work habits and manage stress effectively.

In 2023, a total of 1,891 hours of workplace health and safety training were provided, which constitute 10% of the total training hours. In 2023, 1 workplace incident occurred, which

resulted in a 40–120-day prognosis; no incidents involving external staff occurred.



3.7 Workers' Health and Safety

Elmec Informatica actively engages its employees in workplace health and safety management, organising information sessions and training during which employees are encouraged to provide feedback on the topics addressed. Elmec Informatica adopts a proactive approach to the health and safety of its employees by joining the Regione Lombardia Workplace Health Promotion (WHP) programme. Through workplace inspections and risk assessments, we identify any dangers and assess any risks related to employees' activities. We promote workers' health through initiatives such as the promotion of a healthy lifestyle and the supply of ergonomic equipment also for home working.

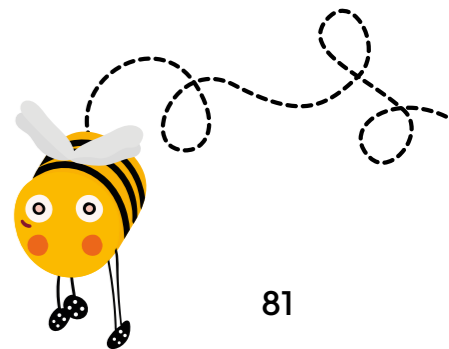
We also offer occupational health services, which include periodic medical check-ups, employee health assessments and the management of illness and workplace injury ca-

ses. Confidentiality of employees' personal data is ensured in accordance with privacy laws and regulations and industry best practices. All these activities are coordinated by Elmec's Prevention and Protection Service Manager (RSPP). To identify and eliminate dangers and minimize risks, we have a Health and Safety manager and a team of emergency management staff, as well as constantly monitoring our workplaces.

We constantly communicate the initiatives implemented and adopt an approach based on information and knowledge sharing, giving rise to a spirit of collaboration between employees and managers. Workplace health and safety training is periodically assessed to meet the needs of employees, designing various types of free training also during working hours.

2023	INJURIES AT WORK											
	number of injuries (permanent employees)			number of injuries (temporary employees)			number of injuries (non-employee)			total number of accidents at work		
type of occupational injury	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
fatal accidents	0	0	0	0	0	0	0	0	0	0	0	0
accidents with serious consequences (prognosis > 120 days)	0	0	0	0	0	0	0	0	0	0	0	0
accidents with prognoses between 40 and 120 days	1	0	1	0	0	0	0	0	0	1	0	1
accidents with prognoses < 40 and 120 days	0	0	0	0	0	0	0	0	0	0	0	0
total occupational accidents recorded in the period	1	0	1	0	0	0	0	0	0	1	0	1

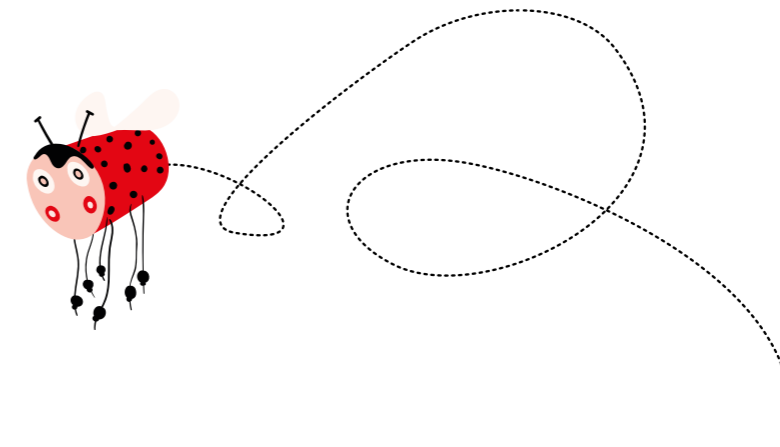
2023: The occupational injury that occurred during the year, recorded 87 days in terms of days of absence and involved the fall of an employee wearing anti-injury and non-slip shoes.



3.7 Workers' Health and Safety

2022	INJURIES AT WORK											
	number of injuries (permanent employees)			number of injuries (temporary employees)			number of injuries (non-employee)			total number of accidents at work		
type of occupational injury	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
fatal accidents	0	0	0	0	0	0	0	0	0	0	0	0
accidents with serious consequences (prognosis > 120 days)	0	0	0	0	0	0	0	0	0	0	0	0
accidents with prognoses between 40 and 120 days	0	0	0	0	0	0	0	0	0	0	0	0
accidents with prognoses < 40 and 120 days	0	0	0	0	0	0	0	0	0	0	0	0
total occupational accidents recorded in the period	0	0	0	0	0	0	0	0	0	0	0	0

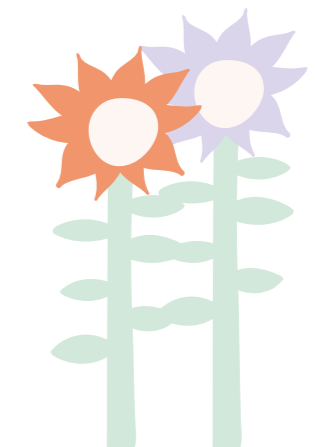
There were no accidents in 2022.
It should be noted that the number of accidents was corrected (from 3 to 0) because a review of the data showed that they were commuting accidents that occurred therefore on the way to the workplace.



3.7 Workers' Health and Safety

2021	INJURIES AT WORK											
	number of injuries (permanent employees)			number of injuries (temporary employees)			number of injuries (non-employee)			total number of accidents at work		
type of occupational injury	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
fatal accidents	0	0	0	0	0	0	0	0	0	0	0	0
accidents with serious consequences (prognosis > 120 days)	0	0	0	0	0	0	0	0	0	0	0	0
accidents with prognoses between 40 and 120 days	0	0	0	0	0	0	0	0	0	0	0	0
accidents with prognoses < 40 and 120 days	1	0	1	0	0	0	0	0	0	1	0	1
total occupational accidents recorded in the period	1	0	1	0	0	0	0	0	1	1	0	1

2021: Regarding the case of injury that occurred during the year, it was 1 incident. It should be noted that the number of injuries was corrected (from 3 to 1) because a review of the data revealed that two commuting injuries had also been counted.



3.7 Workers' Health and Safety

There were no cases of occupational disease in 2021, 2022 and 2023.

2023	NUMBER OF OCCUPATIONAL DISEASES (PERMANENT EMPLOYEES)			NUMBER OF OCCUPATIONAL DISEASES (PERMANENT EMPLOYEES)			TOTAL NUMBER OF OCCUPATIONAL DISEASES		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
type of occupational diseases for:									
cases of occupational diseases detected	0	0	0	0	0	0	0	0	0
cases of fatal 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 (PERMANENT EMPLOYEES)			TOTAL NUMBER OF OCCUPATIONAL DISEASES		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
type of occupational diseases for:									
cases of occupational diseases detected	0	0	0	0	0	0	0	0	0
cases of fatal 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

2021	NUMBER OF OCCUPATIONAL DISEASES (PERMANENT EMPLOYEES)			NUMBER OF OCCUPATIONAL DISEASES (PERMANENT EMPLOYEES)			TOTAL NUMBER OF OCCUPATIONAL DISEASES		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
type of occupational diseases for:									
cases of occupational diseases detected	0	0	0	0	0	0	0	0	0
cases of fatal 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 Workers' Health and Safety

Days of absence recorded:

2023	PEOPLE WITH PERMANENT CONTRACTS			PEOPLE WITH TEMPORARY CONTRACTS			TOTAL NUMBER OF DAYS OF ABSENCE		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
Days of absence									
Days of absence due to work-related 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*	PEOPLE WITH PERMANENT CONTRACTS			PEOPLE WITH TEMPORARY CONTRACTS			TOTAL NUMBER OF DAYS OF ABSENCE		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
Days of absence									
Days of absence due to work-related 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

2021	PEOPLE WITH PERMANENT CONTRACTS			PEOPLE WITH TEMPORARY CONTRACTS			TOTAL NUMBER OF DAYS OF ABSENCE		
	M	W	TOTAL	M	W	TOTAL	M	W	TOTAL
Days of absence									
Days of absence due to work-related injuries	7	0	7	0	0	0	7	0	7
Days of absence due to occupational diseases	0	0	0	0	0	0	0	0	0
Total days of absence	7	0	7	0	0	0	7	0	7

*There are zero days of absence in 2022. It should also be noted that the number was corrected (from 120 to 0) because a review of the data showed that it was 3 commuting injuries.

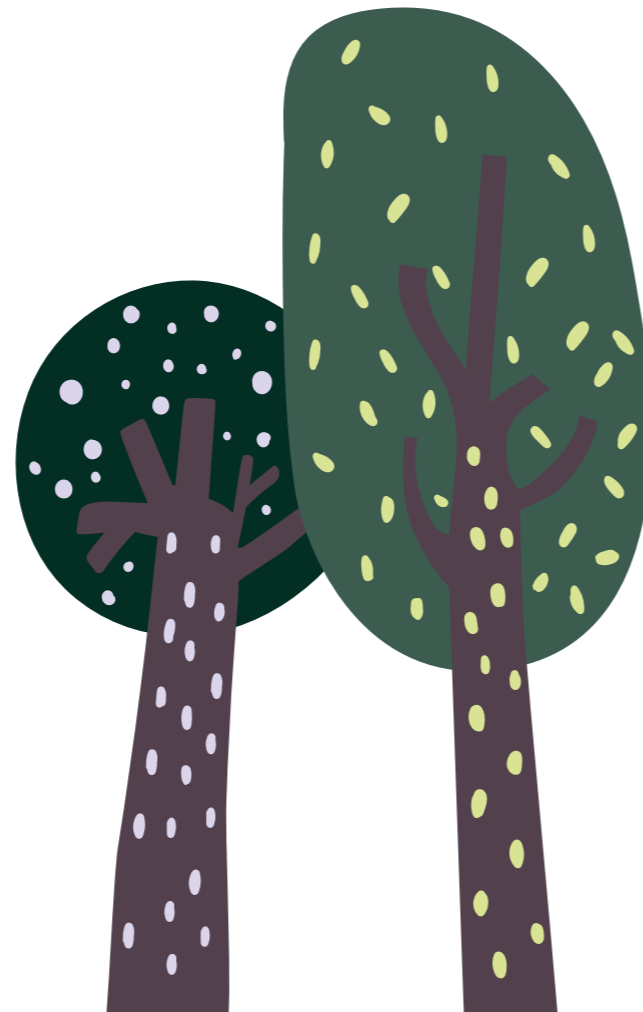
3.8 Labour Relations and Employment Protection

All Elmec Informatica's employees are covered by applicable national collective labour agreements as established by the Italian legislation. The metalworkers' national CCNL is applied to 99% of employees.

Elmec Informatica respects employees' right to organise in trade unions and collectively negotiate their working conditions. Elmec is committed to maintaining an open and constructive dialogue with union representatives and respects the rights of employees. Furthermore, it guarantees stable and secure employment for its staff, paying attention to the need to balance work and personal life.

In conclusion, at Elmec Informatica we are committed to promoting diversity, inclusion and non-discrimination, ensuring equal

opportunities and a safe and healthy working environment for all employees. We will continue to work on constantly improving policies and initiatives to create an increasingly equitable and sustainable workplace.



LABOUR RELATIONS 2023			
	M	W	TOTAL
CCNL metalworking Industry	504	187	691
CCNL industry executives	9	0	9
total employees covered by CCNL	1	1	2
total employees covered by CCNL	514	188	702
total employees	514	188	702
percentage of employees covered by CCNL	100%	100%	100%

LABOUR RELATIONS 2022			
	M	W	TOTAL
CCNL metalworking Industry	466	168	634
CCNL industry executives	6	0	6
total employees covered by CCNL	1	1	2
total employees covered by CCNL	473	169	642
total employees	473	169	642
percentage of employees covered by CCNL	100%	100%	100%

LABOUR RELATIONS 2021			
	M	W	TOTAL
CCNL metalworking Industry	431	160	591
CCNL industry executives	7	0	7
total employees covered by CCNL	1	1	2
total employees covered by CCNL	439	161	600
total employees	439	161	600
percentage of employees covered by CCNL	100%	100%	100%

3.9 Our Non-Material Topics

3.9.1 Corporate Life

Elmec Informatica has implemented many initiatives to create a positive and pleasant working environment for its employees. This includes promoting team building initiatives, creating comfortable workspaces, promoting work-life balance, and organising social and well-being events for employees.

Elmec believes that a positive working environment can increase employee motivation and confidence, improve their ability to face everyday challenges, and encourage greater collaboration, creativity and innovation. Elmec is committed to providing a working environment that encourages the development of employees, their happiness and Elmec's own success.

Team building

At Elmec Informatica, team leaders strongly believe that team cohesion is essential to Elmec's success. For this reason, on a regular basis, various team building initiatives are organised for employees. There can be many types of teams building initiatives: sports activities, team games, brainstorming sessions, in-house hackathons and many more.

The main goal of team building initiatives is to encourage collaboration between colleagues, sharing ideas, communication and effective problem solving. Not only do team building initiatives improve relationships between colleagues,

but they also increase motivation, productivity and creativity within a company. Furthermore, these initiatives are an opportunity for employees to better get to know each other outside the workplace, thus creating a more pleasant and stimulating working environment.

Corporate Library

At Elmec, there is a library for employees, where they can borrow books and bring their own read books from home to share them with their colleagues.

3.9.2 Volunteering

In 2023, Elmec launched the third edition of its volunteer initiative called "50X50 challenge", an ambitious and very significant project for our local community.

The challenge was simple but demanding: Elmec's employees were asked to run, walk or cycle 50 kilometres in 50 days. Once the goal was reached, Elmec would donate €50 to the Fondazione Felicita Morandi, a non-profit organisation located in Varese whose goal is to fight violence against women. Elmec's response to this initiative - and that of its employees - was extraordinary. Over 23,000 kilometres were made in total and €12,810 were donated to contribute to building a kitchen at the women safe house.

Elmec's commitment to this initiative shows once

more its strong social responsibility and its desire to make a difference in the community in which it operates.

As mentioned in the Diversity and Inclusion paragraph, this project has resulted in a collaboration with the Fondazione Felicita Morandi which, subsequently, led to the organisation of a basic digitalisation course for 6 women who stayed at the safe house and the donation of a PC to each attendee.

This donation constitutes one of the many monetary donations that Elmec Informatica makes to various entities located in the Province of Varese and beyond.



3.9.3 Respect for human rights, a growing issue

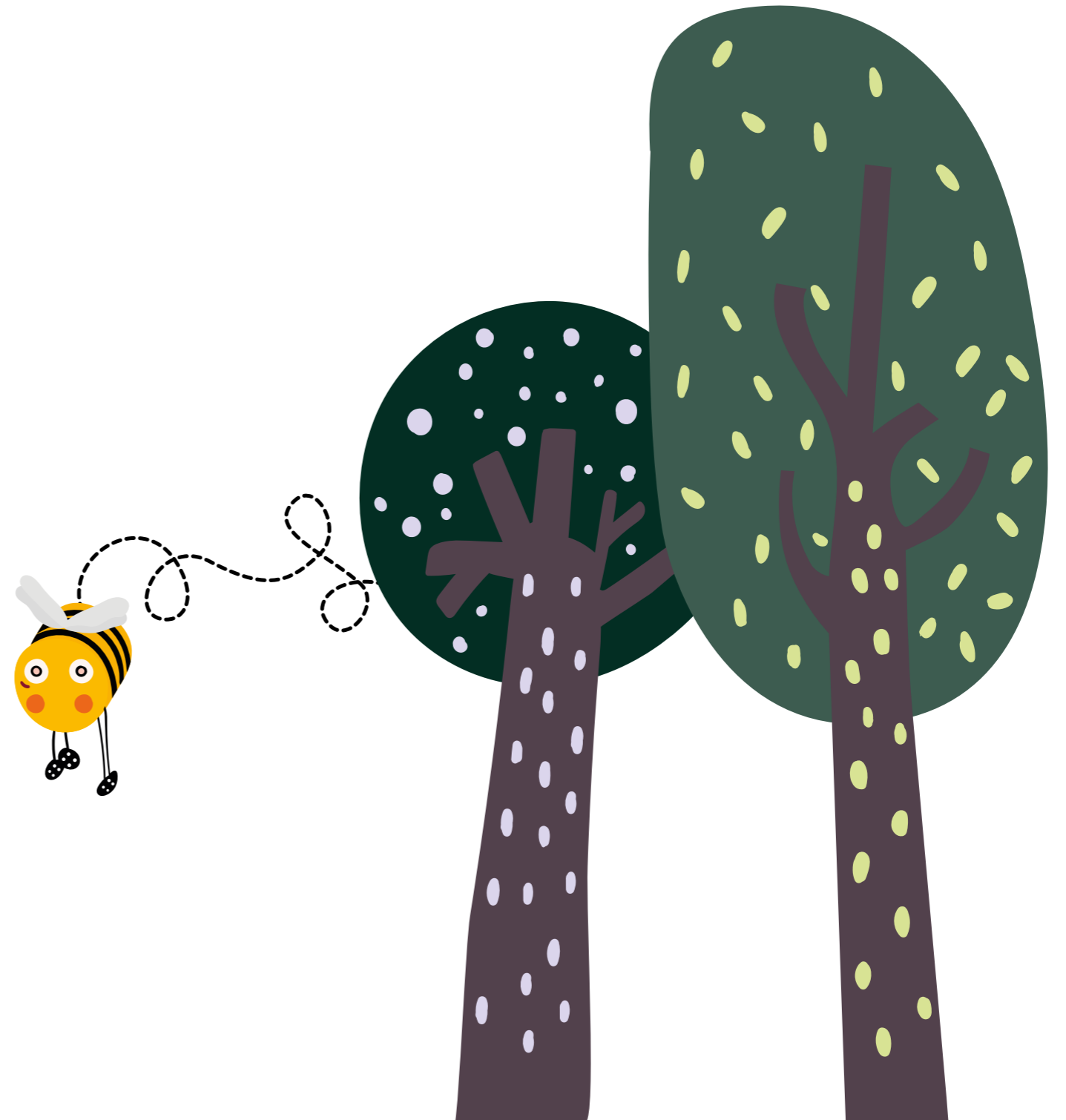
Elmec tends to adopt a holistic and active approach to protect the fundamental rights of all individuals.

In particular, our policy establishes respect for human rights as the basic principle to ensure that all people engaged in our activities, from employees to suppliers, are treated equally and respectfully. Furthermore, we value diversity and adopt the principle of non-discrimination to create an inclusive and welcoming working environment for all. With regard to working conditions, we are committed to ensuring a safe and healthy working environment for all our employees, opposing forced labour and human trafficking. We also respect working hours and offer fair pay and benefits to our employees.

Furthermore, we undertake not to use child labour at any stage of our activities,

always ensuring workplace health and safety for all our employees. We also take working environment topics very seriously, adopting measures to ensure a sustainable and eco-friendly working environment.

Our policy also establishes freedom of association and collective bargaining, recognising employees' right to organise in trade unions and negotiate their own working conditions. We also respect the privacy of our employees and are committed to involving local communities and any stakeholders in our activities. Ultimately, Elmec Informatica's human rights policy is an important step forward towards protecting the fundamental rights of all individuals involved in our activities. We are proud to adopt these principles and actively work to ensure their actual application.





4. ENVIRONMENTAL ASPECTS

4.1 Environmental risks and topics relevant to Elmec

Precisely in 1971, the first Elmec was founded; that company was very different from the current Elmec, but it was already committed to imagining sustainable development, going beyond a merely economic growth. We try to involve people in initiatives not just to mitigate the effects of climate change and reduce waste, but also to adapt and compensate. As a business operating in the tech industry, Elmec Informatica must face a number of challenges and risks related to the environment. In particular, the key topics that need to be considered are:

Energy consumption and green services:

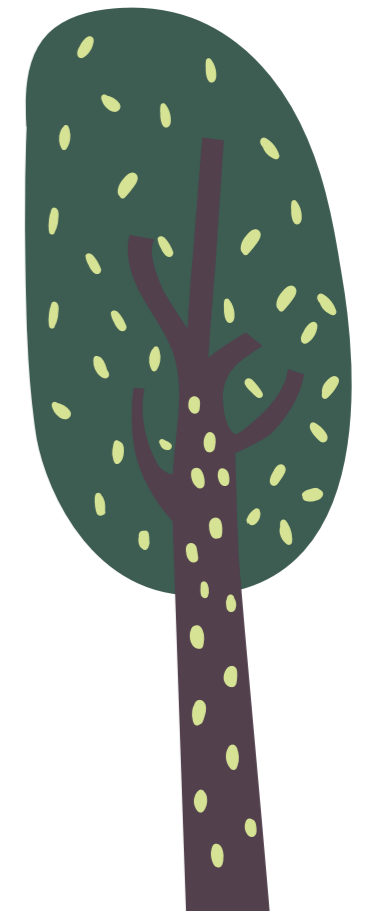
It is important for Elmec Informatica to invest in sustainable technologies, such as the use of recyclable materials, the energy efficiency of products and the use of renewable energy sources. This can increase demand from clients who give an ever-growing value to environmental sustainability. Furthermore, Elmec Informatica reduces its energy consumption, for by, for example, using low-consumption technologies or adopting energy consumption monitoring and control systems.

Circular Economy:

Elmec Informatica implements circular economy models based on reconsidering the life cycle of products and their refurbishment and reintroduction into the market. We also include waste management; we manage our waste correctly through, for example, its separate collection and recycling. We pay the greatest attention to waste management from decommissioned technological equipment.

Emissions and Climate Change:

Elmec Informatica monitors its greenhouse gas emissions and works to reduce them. It also considers the effects of climate change on its activities by reducing plastic, for example, and supporting initiatives that promote environmental sustainability.

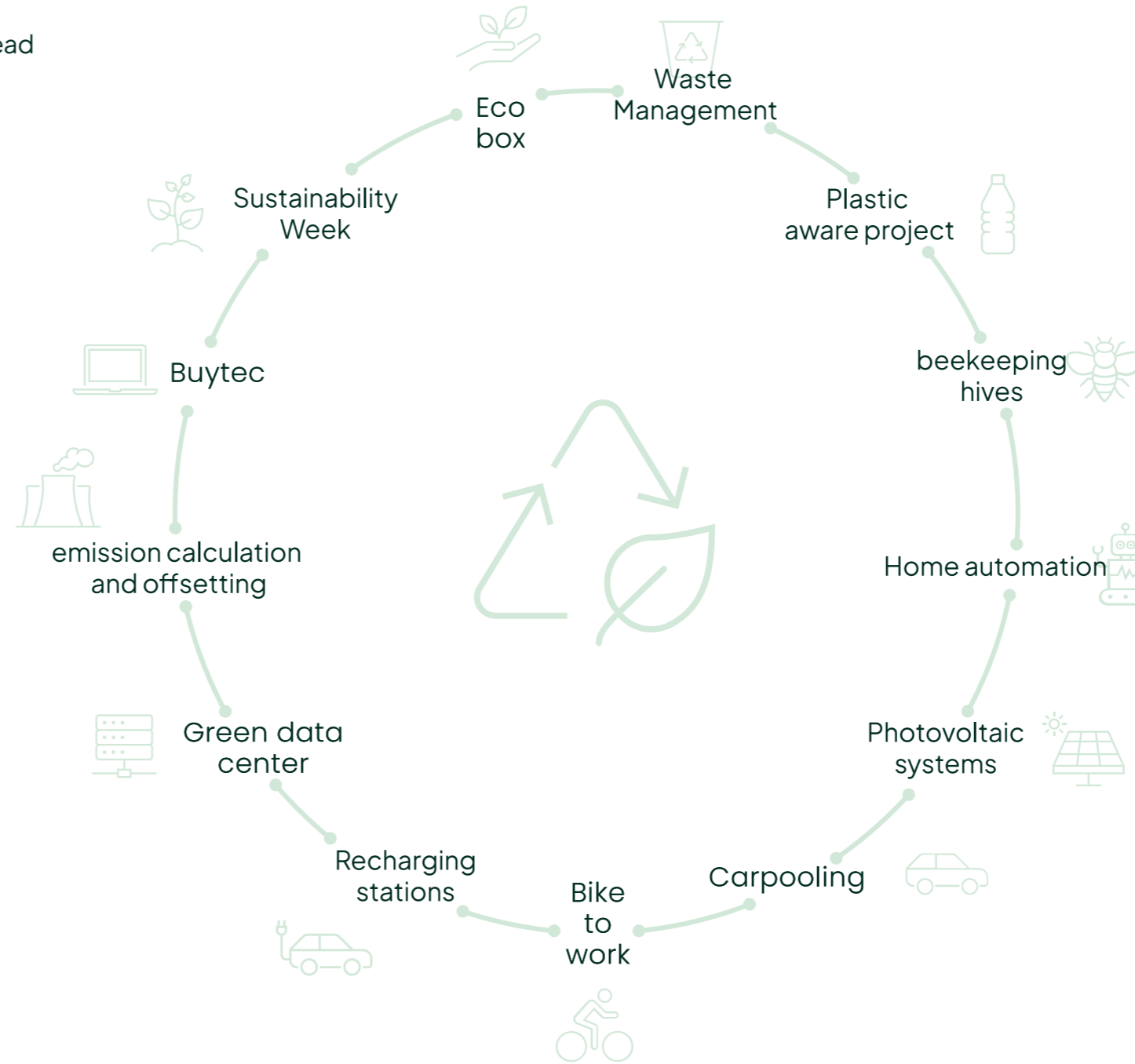


4.1.1 Environmental Protection

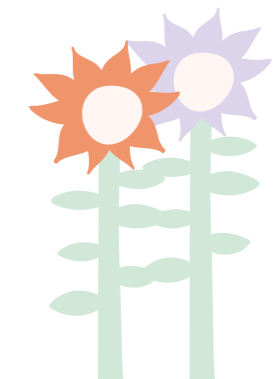
Elmec is committed to sustainability by trying to best interpret essential values such as Reduction, Recycling and Reuse. Thanks to this spirit, not only does Elmec intend to raise public awareness on sustainability topics, but also to promote a long-term cultural change, to make sustainability a value shared by community as a whole.

Thus, Elmec conveys a sustainability vision that goes beyond mere technical and engineering aspects to encompass a broader and more complex idea that considers the social and cultural aspects related to sustainability. In other words, Elmec intends to show that sustainability is not just a question of technology and infrastructure, but also - and most importantly - a question of shared culture and values, which are essential to ensure a sustainable future for generations to come.

Elmec's initiatives to spread a sustainable culture:



In 2021, 2022 and 2023, Elmec earned the ISO 14001 certification, which is based on an environmental management system international standard. This certification proves that Elmec adopts a structured and systematic approach to monitor, manage and improve its environmental performances.



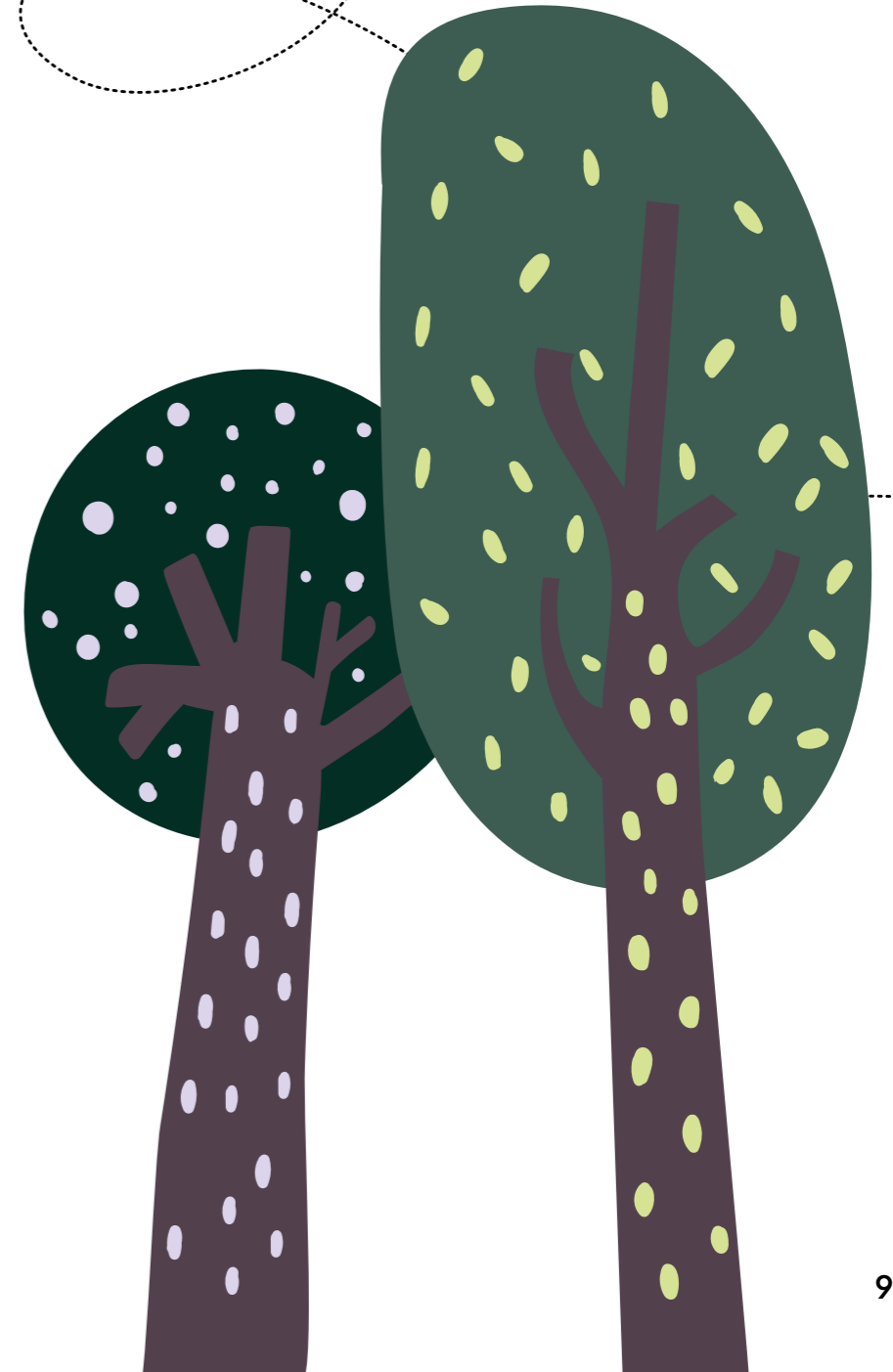
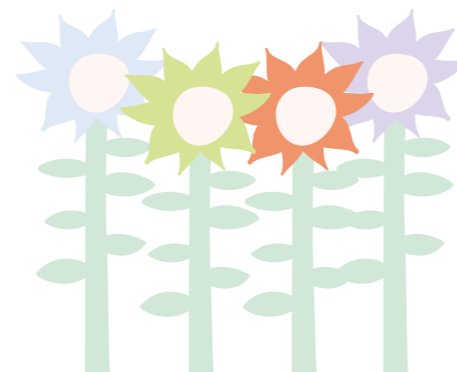
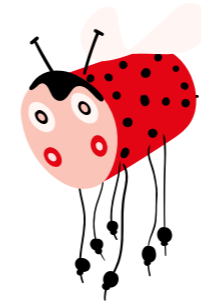
4.1.2 Environmental Policies

Elmec Informatica, like many other companies, has recognized the importance of adopting sustainable environmental policies to reduce the environmental impact of its activities. To reach this goal, Elmec has adopted a series of measures, including energy consumption reduction through the use of low-consumption technologies and the implementation of monitoring and control systems.

Furthermore, Elmec Informatica has started a waste management programme, which consists of recycling and correctly disposing of the materials used in its activities, as well as promoting waste and packaging reduction practices. Elmec has also implemented 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 adopted a sustainability policy which can be viewed at the following link:

https://hub.elmec.com/hubfs/Elmec_Informatica_Policy_Sostenibilita.pdf



4.2 Energy consumption green products and services

Green data center 100% renewable energy

In 2021, 2022 and 2023, we took a big step forward towards a sustainable future. We purchased enough renewable energy to fully power our Green Data Centre in terms of annual power consumption. This milestone is a big step in our path towards reducing our CO2 emissions and our negative environmental impact.



Why Is It a Green Data Centre?

Here are the features distinguishing our TIER IV certified data centre:

Reclaimed industrial area

A fully reclaimed 13000 m² industrial area



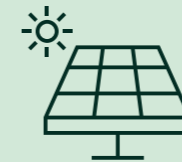
Cooling system

Smart cooling system



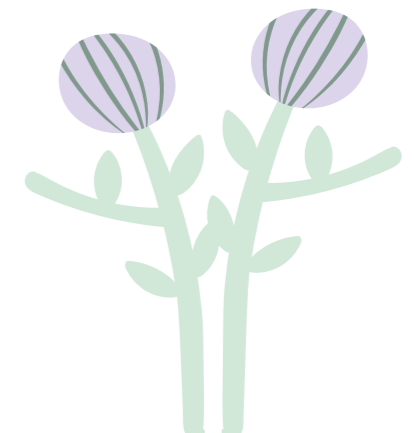
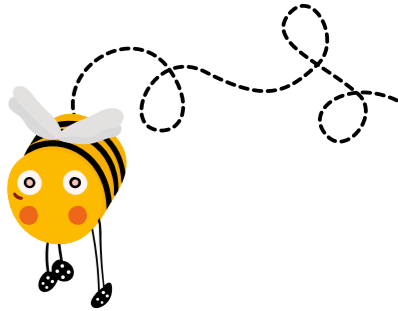
Solar panels

Solar panels provided by Elmec Solar



Energy efficiency index

PUE: 1.15%.
Global average: 1.8%



4.2 Energy consumption green products and services

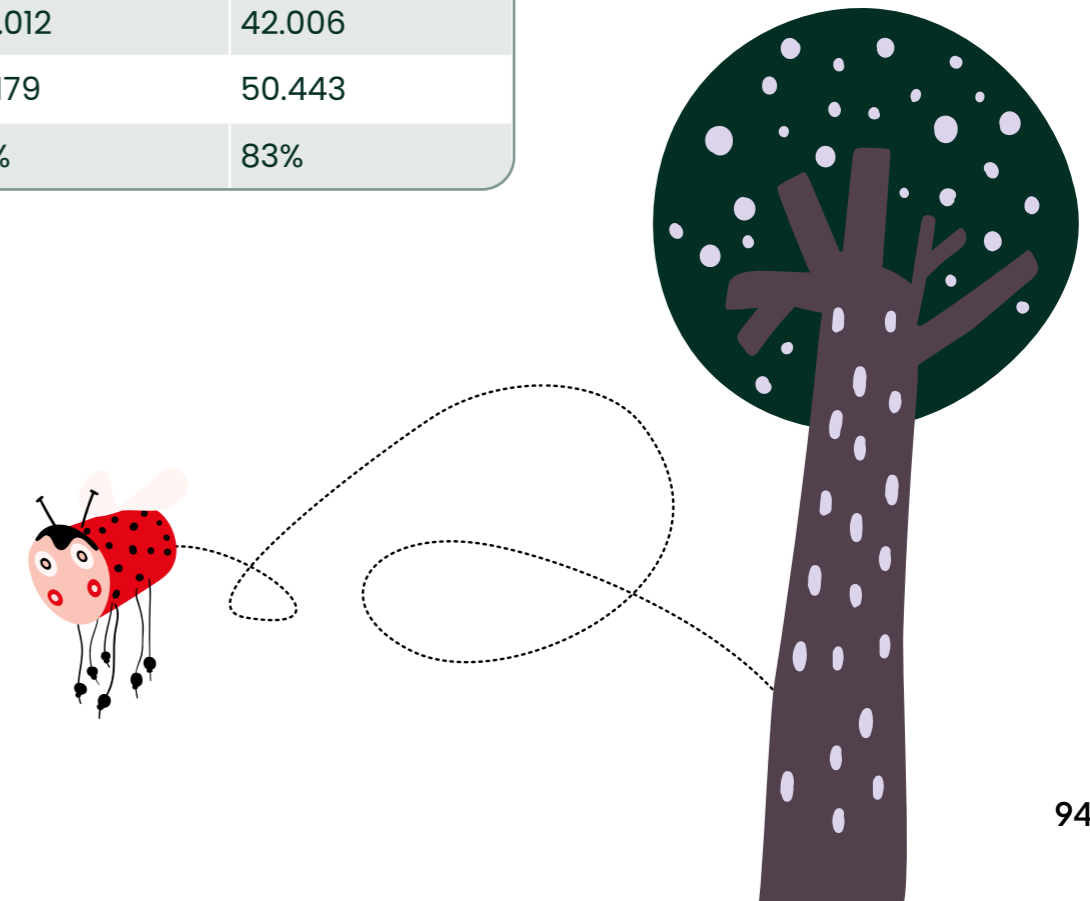
PURCHASED ENERGY	Unit of measurement	2023	2022	2021
Non-renewable energy				
Electricity	Mwh	2.105	1.857	2.127
Natural gas	m ³	20.663	34.993	24.122
Renewable energy				
Solar	Mwh	297	182	205
Data Center (purchased energy with certificate of origin)	Mwh	3.862	3.699	2.966

The increase in our power consumption was mainly due to the expansion of our campus and the increase in the number of employees, whereas the decrease in gas consumption was determined by a modernization of some buildings and the disposal of gas-powered systems and replacement with power powered systems.

GREEN PRODUCTS AND SERVICES	2023	2022	2021
Number of "green certified" hardware sold/rented to customers	51.173	66.012	42.006
Total hardware sold/rented to customers	51.173	81.179	50.443
% of "Green Certified" hardware out of total hardware sold/rented to customers	100%	81%	83%

By "Green Certified devices" we mean technological devices that have obtained Energy Star or EPEAT certification. These certifications prove that the devices comply with rigorous environmental and energy efficiency standards, thus contributing to reducing environmental impact and promoting sustainable practices in the tech industry. The

increase in green devices managed by the company in 2023 compared to 2022 was driven by a more conscious choice of our technology partners. We favoured Energy Star or EPEAT certified devices, ensuring excellent energy performance and reduced impact on the environment.

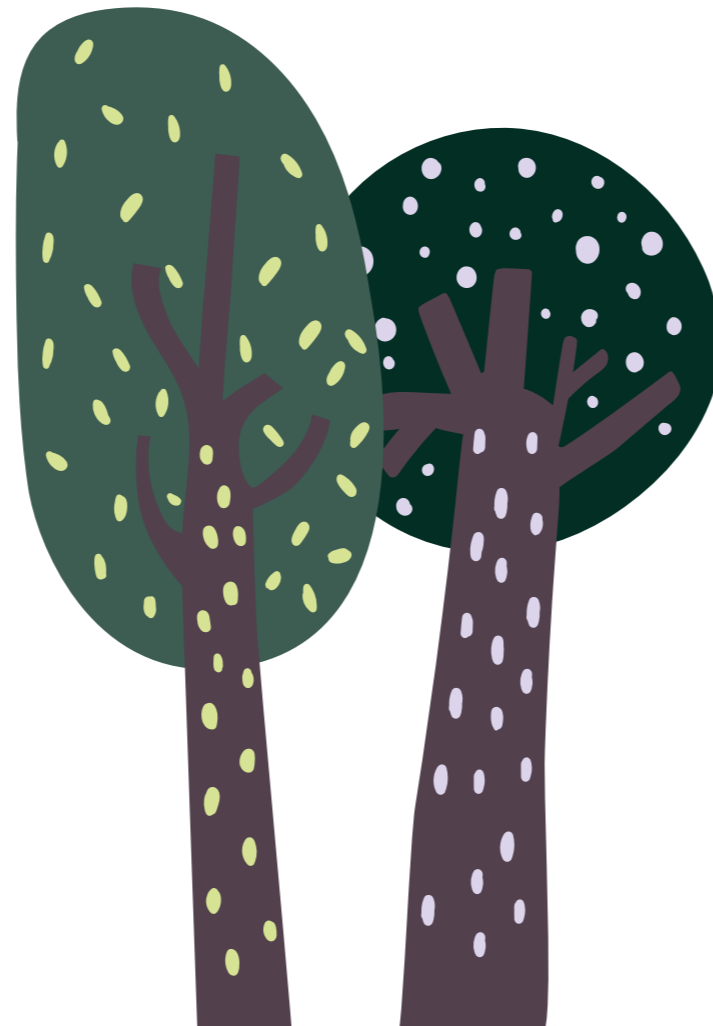
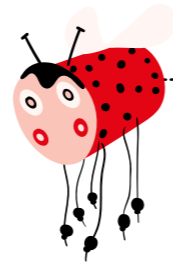


4.2 Energy consumption green products and services

Recharging stations for Electric Cars

By placing Recharging stations for electric vehicles, Elmec has committed itself to acting against climate change.

For us, the use of renewable energy sources is an excellent tool to achieve this goal, as well as the many other internal initiatives already adopted to reduce Elmec's consumption and carbon footprint. Our 3 Recharging stations are available to our visitors for free.



4.2.1 Circular Economy

Elmec Informatica's circular economy strategy focuses on reducing waste through responsible device disposal, choosing low-consumption products and services and optimizing device management through MyElmec.

We also work with partners who share the same sustainable strategy. We have implemented various measures for the disposal of broken devices through certified partners, we use packaging made with recyclable materials that comply with current rules, and, thanks to our close

partnership with Buytec, we promote device reuse at the end of their lease period.

We also donate up to 10% of devices at the end of their lease (DaaS) to a charity, who uses them to the benefit of others in accordance with a perspective of circular economy.

Waste management must also be considered in this process. With reference to our ISO 14001 Management System, each location has adopted specific procedures that regulate waste management and ensure - first of all - compliance with laws and regulations, but also continuous performance improvement to reduce the amount of waste generated and ensure its recycling.

4.2.2 Water Resources

Elmec's water resources mainly come from the municipal water supply, used for the sanitation of our facilities. Additionally, Elmec discharges water from an artesian well, which is used to cool our Data Centre. The following consumption figures are shown below:

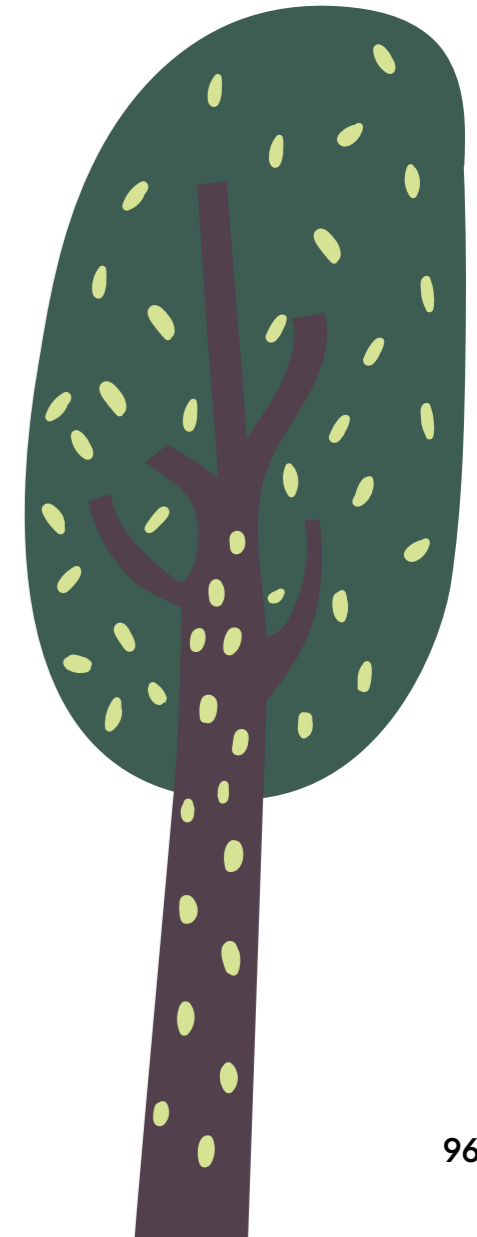
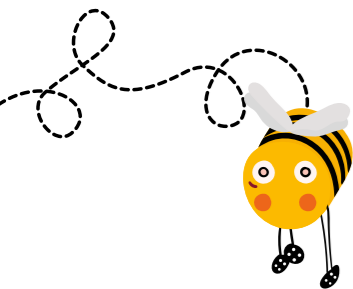
- Sanitary water discharged in 2021, 2022 and 2023.
- Water discharged to cool data centre.

The increasing trend in water consumption may be due to the continuing growth of our campus following the recruitment of new employees.

Discharged water	2023	2022	2021
Unit of measurement: M ³	8	7	3

Data center water use	2023	2022	2021
Aqueduct withdrawal [mc]	971	1.970	1.744
Withdrawal wells [mc]	3.204	1.989	1.756
Total withdrawal [mc]	4.175	3.959	3.500
Total IEC use [mc]	2.022	2.030	2.010

* IEC means Indirect Evaporative Cooling i.e., the cooling system for data center rooms.



4.2.3 Material Environmental Topics

Circular economy

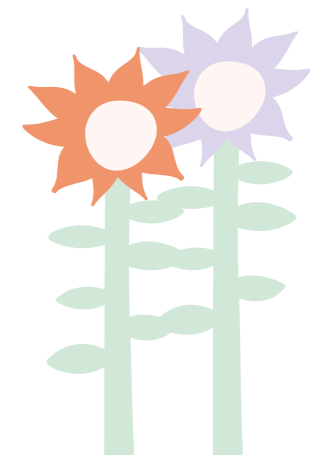
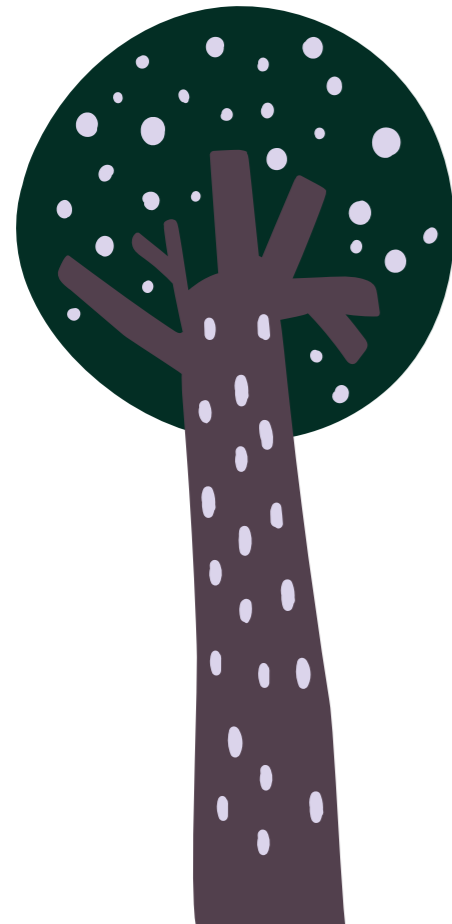
Thanks to Buytec, we give a second life to the devices we supply to businesses during digital workplace lease. It is a choice which extends the duration of products which are thus used well beyond their normal time in a complex historical and macro-economic context characterised by a shortage of commodities. Furthermore, we correctly manage the waste generated at our locations, trying to raise awareness among employees on its correct separate collection and reduction principle.

Emissions and Climate Change

Elmec monitors its greenhouse gas emissions both in-house and in its business offer. We also work to reduce them and potentially compensate them. We take the effects of climate change on our business seriously by reducing plastic, for example, and supporting initiatives that promote environmental sustainability and item and waste recycling.

Energy consumption and green products and services

At our locations, we do our best to reduce energy consumption by using home automation, renewable energy and small – but important – measures to reduce impact. With reference to service delivery, Elmec is committed to finding the best solutions from a quality and environmental standpoint.



4.3 Emissions and Climate Change

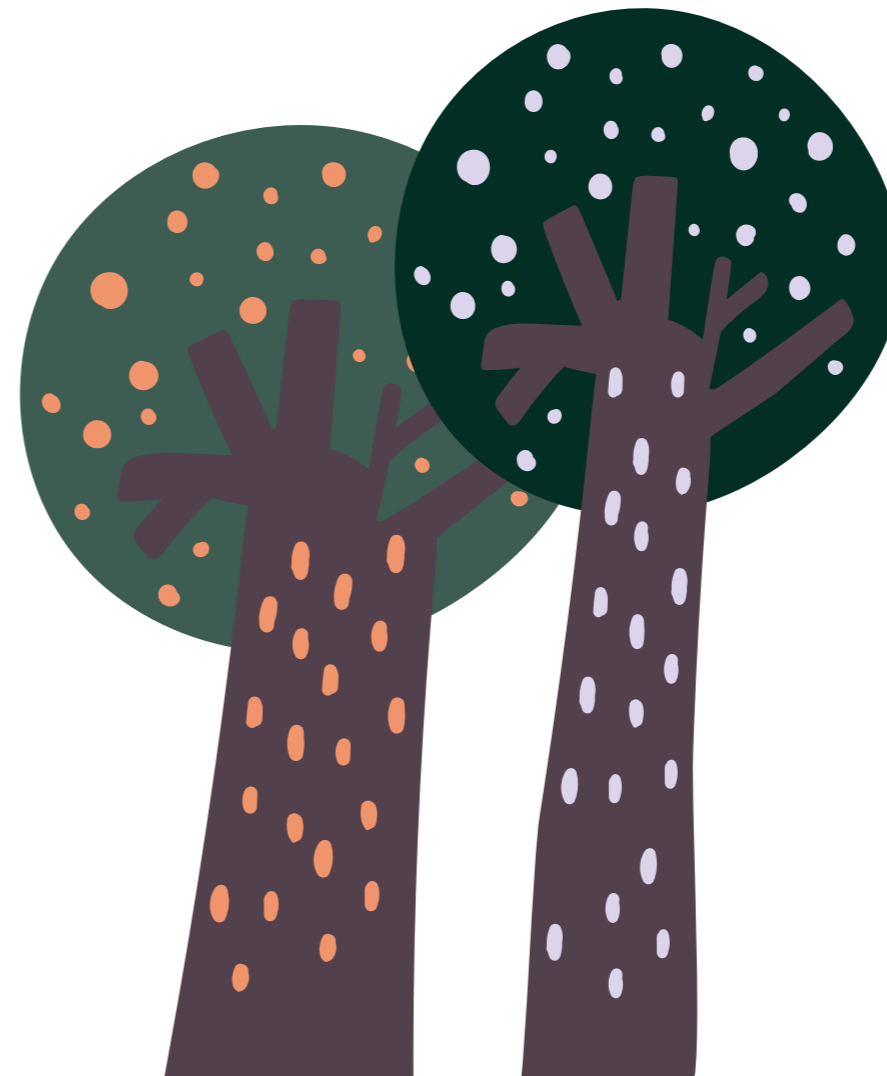
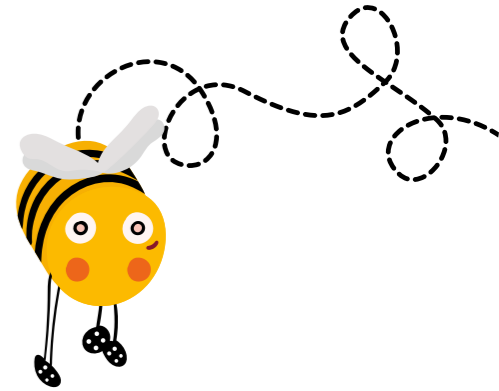
4.3.1 Energy Sources

Although our locations were designed based on fossil energy sources, Elmec is inclined to optimize the management of existing systems to reduce consumption. Elmec's goal is to optimize the management of these systems, minimize energy waste and, when possible, turn fossil energy sources into renewable energy sources.

Our data centre is a clear example that goes to this direction. Since 2021, Elmec has chosen to fully power it with renewable energy. Furthermore, Elmec's locations are equipped with solar panel and geothermal systems and new generation LED lamps, which allow us to halve consumption compared to traditional lamps. On average, every year all solar panel

systems owned by Elmec generate 297 MWh, contributing to saving 160,325 kg of CO₂.

Home automation also plays a crucial role in reducing consumption. There are numerous sensors in Elmec's buildings which allow energy consumption to be optimized based on weather condition and outside temperature. Lighting and heating are adjusted according to needs.



4.3.2 Greenhouse Gas Emissions

In 2023, Elmec Informatica detected and calculated greenhouse gas emissions to measure the impacts of its activity on climate change and analyse any improvement areas in terms of reduction opportunities. The Kyoto Protocol considers 6 greenhouse gases:

- Carbon dioxide (CO₂).
- Methane (CH₄).
- Nitrous oxide (N₂O).
- hydrofluorocarbons (HFC).
- perfluorocarbons (PFC).
- sulphur hexafluoride (SF₆).

In particular, the data relating to CO₂ (equivalent) emissions has been reported based on GRI indicators no. 305-1 Direct emissions ("scope 1"), 305-2 Indirect emissions ("scope 2") and 305-3 Other Indirect Emissions, using Elmec's consumption data and emission factors provided by Climate Partners, as well as renowned databases such as Ecoinvent and DEFRA

(Department for Environment Food & Rural Affairs). Elmec's direct emissions of greenhouse gases (Scope 1) mainly derive from the internal burning processes of natural gas used for heating and the use of fossil fuels (diesel and petrol) to fuel the business vehicle fleet.

To calculate CO₂ indirect emissions (Scope 2) relating to power purchased by third parties and used both for the data centre and locations, market-based and location-based approaches have been used as suggested by the GHG Protocol.

Emission scope 2 location-based



The location-based approach uses the energy mix of the national power grid. The positive aspect of the location-based approach is it reflects the power that has actually been consumed, i.e. that of the power grid. According to this method, to reduce emissions into the atmosphere, energy consumption and volumes must be reduced.

Emission scope 2 market-based



The market-based approach considers carbon emissions generated by the specific power supplier. This approach highlights the choice to consume certified renewable energy, instead of purchasing power produced with fossil fuels.

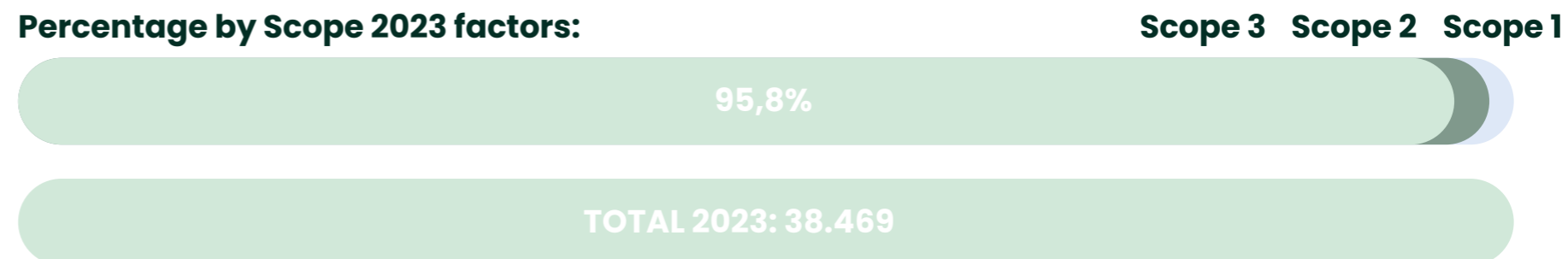
4.3.2 Greenhouse Gas Emissions

The calculation of other indirect emissions (scope 3) for 2023 has been extended, inclusive seven more categories than those previously considered. This decision was taken by Elmec to be able to assess the actual impact of its activities in a more in-depth and comprehensive way. In 2023, Elmec generated a total of 38,469 tonnes of CO₂ (compared to 3,505 tonnes in 2022). In particular, in 2023, 59.9 tonnes of CO₂ per employee were emitted. As can be seen from the summary table below, the greatest impact was derived from scope 3 emissions, which amounted to 36,853.8 tonnes of CO₂ (compared to 1,959 tonnes in 2022), that is 95.8% of Elmec's total emissions. The significant difference from the previous year can be fully attributed to the extension of the Scope 3 emissions calculation and the inclusion of all the categories established

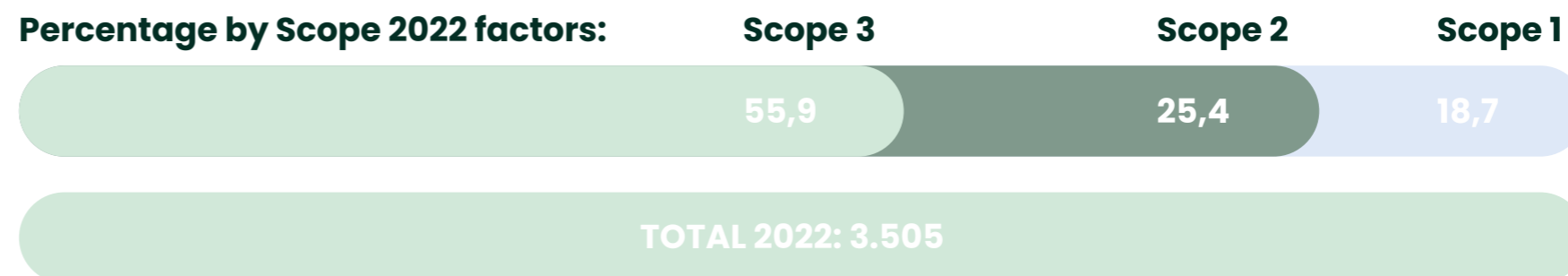
by the GHG Protocol and the GRI, to guarantee a full and detailed calculation. The new categories of emissions related to scope 3 taken into consideration were:

- Purchased goods and services (in 2022 only material goods, and not services, were considered services)
- Capital goods
- Upstream transportation and distribution
- Downstream transportation and distribution
- Use of sold products
- End-of-life treatment of sold products
- Outbound leasing activity

Percentage by Scope 2023 factors:



Percentage by Scope 2022 factors:

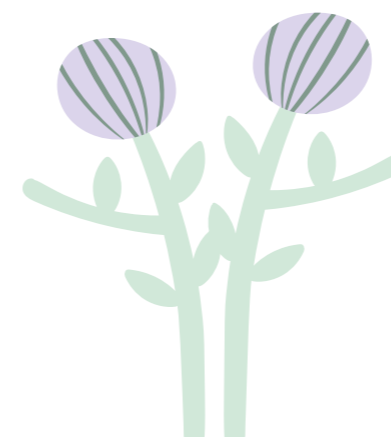


4.3.2 Greenhouse Gas Emissions

	2023	2022
Emission factors	Emissions[t CO2]	Emissions[t CO2]
Scope 1	604,4	654,7
Scope 2	1.010,4	891,4
Scope 3	36.853,8	1.959,1
Purchased goods and services	4.889,2	223,8
Capital goods	26.485,4	
Fuel and energy related activities	457,5	632,6
Upstream transportation and distribution	14,5	
Waste generated in operations	17,4	2,7
Business travel	127,9	111,7
Employee commuting	1.191,1	992,5
Downstream transportation and distribution	1,5	
Use of sold products	854,1	
End-of-life treatment of products sold	0,2	
Downstream leased assets	2.815,1	
General results	38.468,6	3.505,1

In the table above, significant changes in CO2 emissions between 2022 and 2023 can be seen, reflecting both challenges and progress in corporate sustainability. It is important to consider that some categories established by the GHG protocol for the calculation of scope 3 emissions, such as Cooling, fugitive emissions, Upstream leased assets, Processing of sold products, Franchises and Investments, have not been applicable for the industry and operational structure of Elmec Informatica. A particularly interesting is the notable reductions in natural gas and fuel consumption, with a significant 41% decrease in natural gas consumption and a 2% in fuel consumption. This result was achieved mainly thanks to the transition towards more sustainable energy sources for campus buildings. At the same time, there was a 13% increase in power consumption

from the grid, mainly due to the increasing number of on-campus employees and the conversion mentioned above. The inclusion of purchased services in the «purchased good and services» category should also be highlighted, which led to a review of the distribution of emissions along the company value chain, significantly influencing the overall assessment of CO2 emissions. Furthermore, it is important to consider that the 17% increase in flights and 9% increase in employees driving vehicles is directly related to the increase in staff, especially in Elmec's technical area. The increase in activities at clients' locations has inevitably contributed to an increase in transport-related emissions.



4.3.2 Greenhouse Gas Emissions

Calculation of emissions from Managed Infrastructure services and Device as a Service

In 2023, Elmec Informatica refined the reporting of Gas emissions for two of its main services: Managed Infrastructure Services (MIS) and Device as a Service (DaaS). These calculations were performed in accordance with the principles of the GHG Protocol, analysing scope 1, scope 2 and scope 3 emissions.

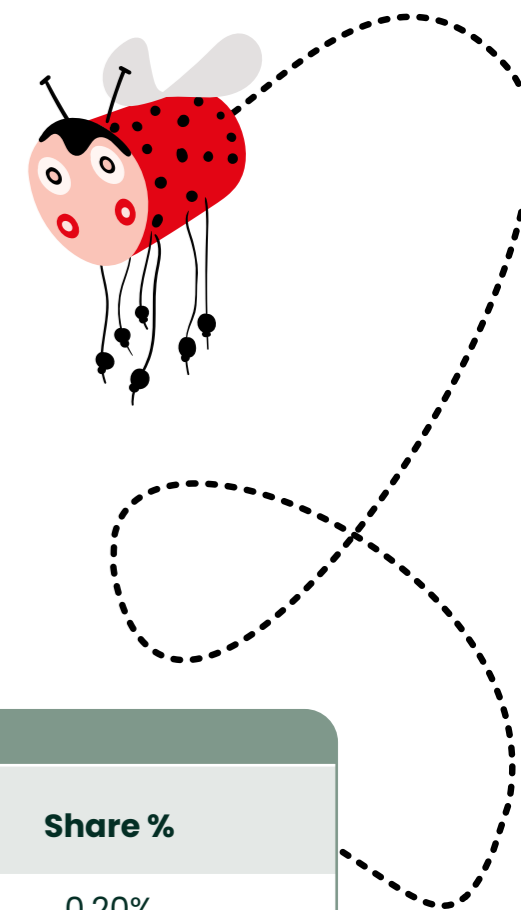
Elmec's goal was to understand the specific impact generated by its services and communicate the data to stakeholders, particularly to clients who requested it. With regards to Managed Infrastructure Services, activities such as maintenance and auxiliary services necessary for the functioning of the data centre, power consumption, emissions related to fuels and water used to cool server rooms have been considered, as well as emissions deriving from

other company services necessary for the functioning of the data centre (through allocation of the corporate carbon footprint data). These calculations enabled us to obtain a unit value of emissions (expressed in g CO₂) of the service, which can be used to provide individual clients with information about the CO₂ emissions resulting from their investment. With regards to Managed Infrastructure services, the method used to distribute emissions to individual clients is, therefore, a spend-based method. With regards to the Device as a Service (DaaS), we have adopted a calculation approach based on detecting the environmental impact related to each device leased by our clients, with a particular focus on laptops. Because we deal with both Apple and other brands, we have differentiated this

calculation between Apple devices and those using a Microsoft operating system. The activities considered to calculate the impact of DaaS include the full life cycle of the service: from procurement and processing, with the emissions related to the production of the device, to inbound logistics and configuration activities carried out by our team.

Other activities considered are outbound logistics to clients and the return of the device to Elmec Informatica at the end of the lease period. Finally, we have considered device life cycle management, such as re-manufacturing, procurement of replacement materials, and disposal of parts that can no longer be used. To ensure we have a full picture on the matter, we have integrated these assessments with emissions de-

riying from other corporate services necessary for DaaS activities (through the allocation of corporate carbon footprint data)



Emissioni Managed Infrastructure services		
Emission source	Emissions [kg CO ₂]	Share %
Raw material	1.277,48	0,20%
Power	74.457,42	10,20%
Heating	5.434,86	0,70%
General emissions	651.000,00	88,90%
General results	732.169,8	100,0%

4.3.2 Greenhouse Gas Emissions

Computing emissions from Managed Infrastructure services and Device as a Service

Emissions Device as a service (Microsoft)		
Emission factors	Emissions[kg CO2]	Share %
Device and preprocessing	281,8	78,7%
Production	0,5	0%
Distribution and storage	66,85	18,7%
End of life management	0,01	0%
Allocated general emissions	9,48	2,6%
General results	358,18	100,0%

Results relating to the single device with DaaS

Emissions Device as a service (Apple)		
Emission factors	Emissions[kg CO2]	Share %
Device and preprocessing	229,56	75%
Production	0,5	0%
Distribution and storage	66,85	18,7%
End of life management	0,01	0%
Allocated general emissions	9,48	2,6%
General results	305,94	100,0%

Results related to individual product with DaaS service

General emissions of Managed Infrastructure Services and Device as a Service

Service	Emission[t CO2]
Managed Infrastructure services	732
Device as a service	811
Totale	1543

The total emissions of the Device as a Service have been calculated using a methodology that involves the average of the emissions generated by individual workstations, both with Apple devices and devices belonging to the Microsoft category, multiplied by the total number of DaaS services sold by Elmec informatica in 2023. This calculation allowed us to obtain an accurate estimate of the overall DaaS emissions offered by Elmec during the year.

Offsetting emissions from Managed Infrastructure services and Device as a Service

Elmec has chosen to offset the emissions generated by its Managed Infrastructure Services and Device as a Service in partnership with Climate Partners. For this purpose, Elmec has financed two climate projects: one for the redevelopment of the Campo dei Fiori Regional Park, in the province of Varese, and a renewable energy project in India. However, it was only the renewable energy project in India that has allowed us

to earn compensatory carbon credits. This decision reflects Elmec's willingness to become aware of the need to limit the environmental impact generated by its activity. This first compensation experiment highlighted the importance of finding solutions and methods to reduce the volumes of emissions at the source. Therefore, Elmec is working to assess all the factors that contribute to the generation of emis-

sions and to make improvements that will reduce CO2 emissions in the future. The tracking page of the climate projects that Elmec Informatica has chosen to offset the emissions of its services is available at the following link:

climatepartner.com/22624-2311-1001

4.3.2 Greenhouse Gas Emissions

Home Automation

At our locations, there are numerous sensors that allow us to optimize energy consumption in relation to weather condition. Lighting and heating are automatically adjusted according to needs. Furthermore, we collect rainwater thanks to specific sensors.



Bike to work

At Elmec, we have created a bike to work zone, a place where bicycles can be parked and repaired. As an incentive we award a €500 flexible-benefit bonus to all employees who go to work by bicycle 50 times in a year. In 2023, 6 bonuses were awarded.



Free Meal Voucher for Sustainable Mobility

In 2023, Elmec introduced an important incentive to go to work by sustainable means: a free meal at the corporate restaurant. By “sustainable means” we mean carpooling, public transportation, electric vehicles, bikes or e-scooters and walking. In 2023, 535 vouchers were given.



Zero Mile Project

Through the Zero Mile project we are monitoring how much CO2 we are able to save through home working and the use of video conferences. On our company intranet, employees can enter their saved kilometres on a daily basis. In 2023, Elmec’s employees saved 1,204,564 km, compared to 803,287 km in 2022.



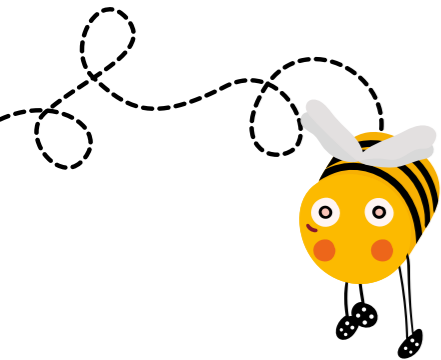
Carpooling

Our goal is to reduce our CO2 emissions to almost zero. To do this, we are convinced that the contribution of our employees plays a fundamental role. We encourage carpooling in every way, connecting colleagues from neighbouring areas and guaranteeing them reserved parking spaces at our locations. There were 220 people who used the carpooling tool.



Solar Panel Systems

Our locations are equipped with solar panel, geothermal systems and new generation LED lamps, which allow us to save 50% of energy with respect to traditional lamps. This year, all the in-house solar panel systems generated 297 Mwh (compared to 180 Mwh in 2022). The increase is due both to more favourable weather condition compared to the previous year and ordinary maintenance activities which allowed us to improve the efficiency of the panels that had been already placed.

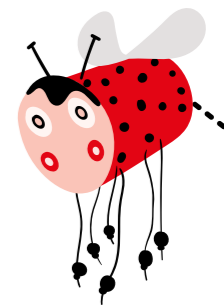
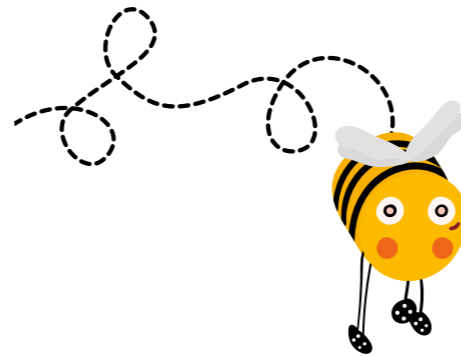


4.3.3 Waste Management

To manage waste responsibly, Elmec has implemented various measures, including the creation of areas dedicated to the separate collection of waste and subsequent disposal via a town council's channel or authorized transporters and disposers. These actions involve different persons, such as employees, clients and suppliers. The choice of business partners is also influenced by the quality of the packaging used to protect and contain products.

The adequate management of waste from electrical and electronic equipment is crucial both for the protection of the environment and the recovery of precious materials. The correct disposal of special waste, harmful materials and printer toners entails responsibility towards the environment and institutions and is entrusted to specialized external companies.

For many years, Elmec has given clients a waste retrieval and disposal service, relieving them from the obligations established by the Consolidated environmental law. Elmec deals with the management of the waste generated by its activities, whereas a part of the waste is managed by clients who purchase or lease the technological devices supplied by Elmec. To reduce environmental impact, Elmec is committed to reducing the quantity of packaging to be disposed of to the bare minimum, working to provide solutions with the least amount of packaging possible.



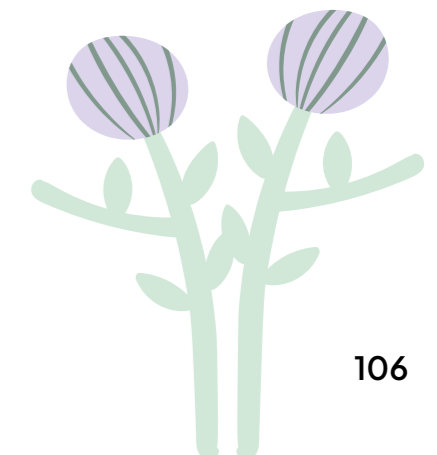
Waste by type	WASTE PRODUCED IN 2023 PER CATEGORY			WASTE PRODUCED IN 2022 PER CATEGORY			WASTE PRODUCED IN 2021 CATEGORY		
	Hazardous waste	non hazardous waste	Total waste	Hazardous waste	non hazardous waste	Total waste	Hazardous waste	non hazardous waste	Total waste
Unit of measurement: kg									
Solid waste	1.385	25.575	26.960	1.370	25.361	26.731	997	32.691	33.688
Liquid waste	97	-	97	-	-	-	-	-	-
Total waste	1.482	25.575	27.057	1.370	25.361	26.731	997	32.691	33.688

4.3.3 Waste Management

Recycled-reused waste BY TYPE OF RECYCLING REUSE 2023	Hazardous waste			Non-hazardous waste		
	Onsite	Offsite	Total	Onsite	Offsite	Total
Unit of measurement: kg						
Chemical-physical treatment	-	197	197	-	60	60
Recycling	-	807	807	-	19.725	19.725
Other recovery operations	-	478	478	-		
Total recycled-reused waste	-	1.482	1.482	-	19.785	19.785

Recycled-reused waste BY TYPE OF RECYCLING REUSE 2022	Hazardous waste			Non-hazardous waste		
	Onsite	Offsite	Total	Onsite	Offsite	Total
Unit of measurement: kg						
Chemical-physical treatment	-	-	-	-	332	332
Recycling	-	1.345	1.345	-	22.510	22.510
Other recovery operations	-	-	-	-	-	-
Total recycled-reused waste	-	1.345	1.345	-	22.842	22.842

Recycled-reused waste BY TYPE OF RECYCLING REUSE 2021	Hazardous waste			Non-hazardous waste		
	Onsite	Offsite	Total	Onsite	Offsite	Total
Unit of measurement: kg						
Chemical-physical treatment	-	-	-	-	-	-
Recycling	-	997	997	-	31.947	31.947
Other recovery operations	-	-	-	-	-	-
Total recycled-reused waste	-	997	997	-	31.947	31.947

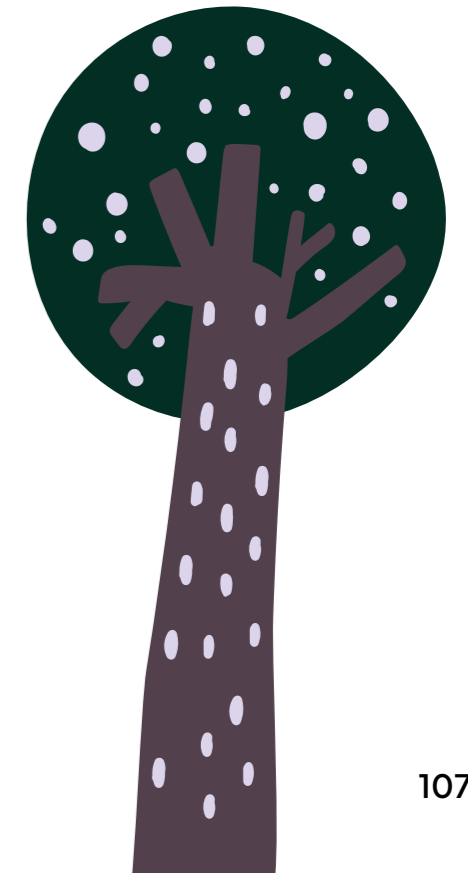
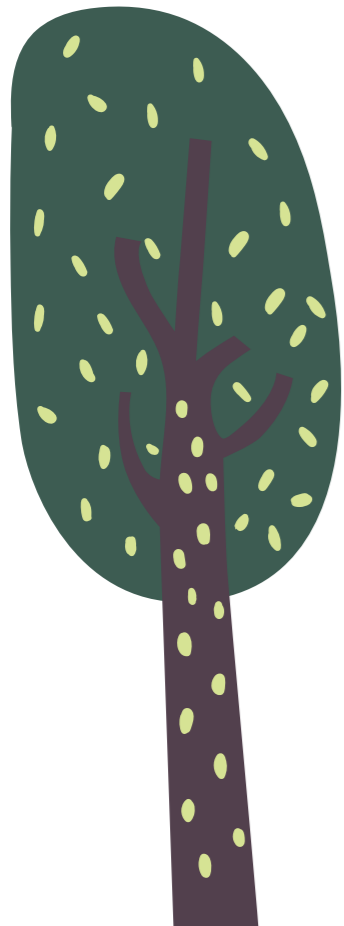


4.3.3 Waste Management

non-recycled waste year 2023	Waste removed from disposal	
Unit of measure: %	Hazardous waste	Non-hazardous waste
Solid waste	-	23%
Liquid waste	-	-
Total	-	23%

non-recycled waste year 2022	Waste removed from disposal	
Unit of measure: %	Hazardous waste	Non-hazardous waste
Solid waste	2%	10%
Liquid waste	-	-
Total	2%	10%

non-recycled waste year 2021	Waste removed from disposal	
Unit of measure: %	Hazardous waste	Non-hazardous waste
Solid waste	-	5%
Liquid waste	-	-
Total	-	5%



4.3.3 Waste Management

NON-RECYCLED WASTE BY TYPE OF DISPOSAL																		
Unit of measurement: kg	Hazardous waste 2023			Non-hazardous waste 2023			Hazardous waste 2022			Non-hazardous waste 2022			Hazardous waste 2021			Non-hazardous waste 2021		
	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total
Incineration (with energy recovery)	-	-	-	-	-	-	-	25	25	-	179	179	-	-	-	-	-	-
Incineration (without energy recovery)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Landfill / landfill	-	-	-	-	5.790	5.790	-	-	-	-	2.340	2.340	-	-	-	-	1.741	1.741
Other disposal operations*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Non-recycled waste by type of disposal	-	-	-	-	5.790	5.790	-	25	25	-	2.519	2.519	-	-	-	-	1.741	1.741

**For other disposal operations we mean, by way of example, discharge, open combustion, deep injection. The difference in the volume of non-recycled hazardous waste between 2023 and 2022 is attributable to the increase in business activities linked to the production of such waste in the period considered.*

Elmec produces hazardous waste which includes electronic devices, neon tubes, nickel-cadmium batteries and hazardous substance packaging. The hazardous waste produced by Elmec which requires specialized treatment is disposed of through an authorized external disposer, who is able to manage the type of waste to be eliminated and guaranteeing maximum environmental and

health safety. Elmec has managed different types of waste through targeted disposal and recycling processes, respecting environmental laws and regulations. Waste management activities involved the safe treatment of organic, plastic, paper, oil and fat waste, with an approach focused on efficiency and environmental sustainability, in compliance with current laws and regulations.

Elmec has also implemented various policies aimed at reducing materials and improving environmental sustainability. For example, the original packaging used for technological devices is reused for future packaging, thus avoiding the production of new materials and reducing the amount of produced waste. Among Elmec's projects to reduce non-hazardous waste, we mention a paper compac-

tor, implemented in 2020, which allows us to reduce the volume of paper and cardboard waste.

4.3.4 Hardware recovery

Buytec

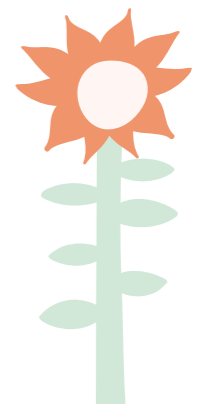
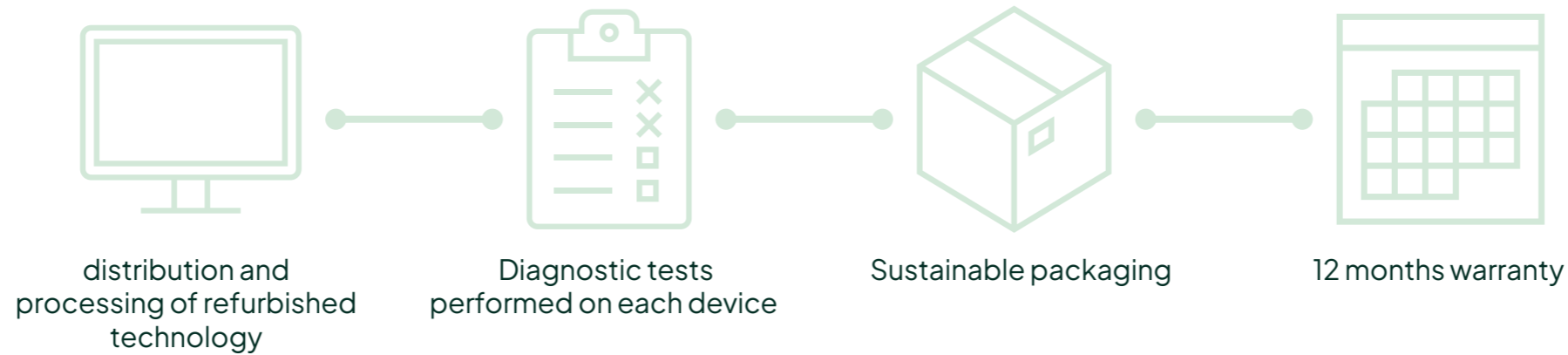
Buytec is an Elmec Group company dedicated to circular economy projects. The company has developed solid expertise in the reconditioning and distribution of technology from the business arena in the B2C market. Its main goal is to minimize waste and offer a second life to a large number of devices. Thanks

to its focus on the circular economy, Buytec achieved great success in 2023 by distributing 5,175 (5,500 in 2022) refurbished devices in Europe through its canal

Buytec bazar

At Elmec's headquarters we inaugurated the Buytec Bazar, a showroom where Elmec's employees can purchase C-graded refurbished tech products at very convenient prices. Smartphones, computers and tablets are available to colleagues, who can purchase them and pay for them on their own. This project has two great ad-

vantages: extending the life cycle of the products by at least two or three years and promoting access to business devices at very competitive prices for Elmec's employees. In 2023, more than 2,000 devices were sold to employees (compared to over 1,500 in 2022).



4.4 Other environmental initiatives

Collection and donation of used clothing

We collect used clothes donated by our employees to donate them to local charities.



Coffee capsule with reusable cups

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



Hives for Beekeeping

It is estimated that around 90% of the food we eat is influenced by the pollination of the bees, whose life is constantly in danger due to climate change and pollution. As Elmec we have decided to make our contribution to maintaining biodiversity by placing five beekeeping hives in front of our Green Data Centre.



Sustainability Week

Since 2021 we have been celebrating the “Sustainability Week”, i.e. a series of initiatives to contribute to the reduction of greenhouse gas emissions, the development of corporate volunteering activities and the reduction in the use of plastic materials. In this third edition we also engaged clients, organising an event to let them experience the on-site services that are available to Elmec’s employees every day.



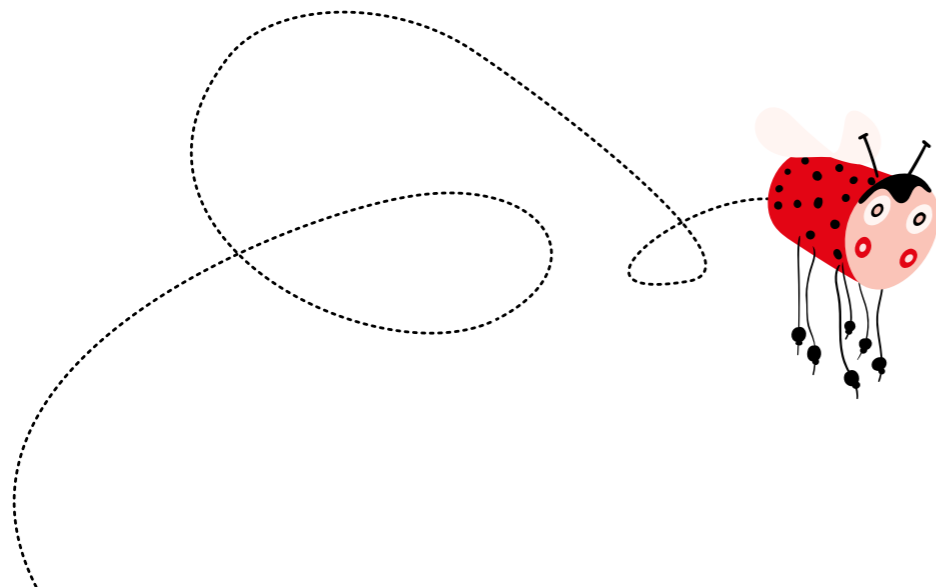
Plastic aware

At all our locations, there is a project to progressively eliminate plastic. Free-beverage dispensers have been placed in the break rooms from which employees can freely full up reusable glasses and bottles with water. Furthermore, we purchase fully recyclable stirrers and small cups for hot drinks dispensed by the vending machines. These initiatives have allowed 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 very dangerous if not collected and disposed of correctly. At our locations we have created Eco-Boxes - collection points to allow our employees to dispose of hazardous waste easily, for free and safely. Eyeglasses that are no longer used are added to the collection: these items are often thrown away or forgotten despite their being. By collecting these items, we try to give a second life to them too.



4.4 Other environmental initiatives

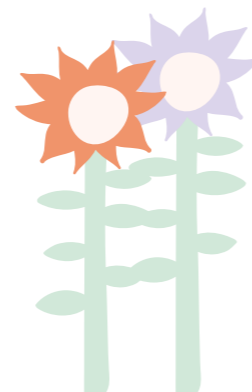
SECOND-HAND MARKET

The spreading of a sustainability culture is a goal that can be reached also through simple but effective gestures. One of these consists in making available to others items we ourselves no longer use. This small gesture can have a significant impact on reducing waste and responsible consumption of resources. To promote this type of behaviour, we created the corporate second-hand market, an innovative virtual and physical market where colleagues can exchange previously used 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 created within the company.

ECO-FRIENDLY REFILLABLE DETERGENTS

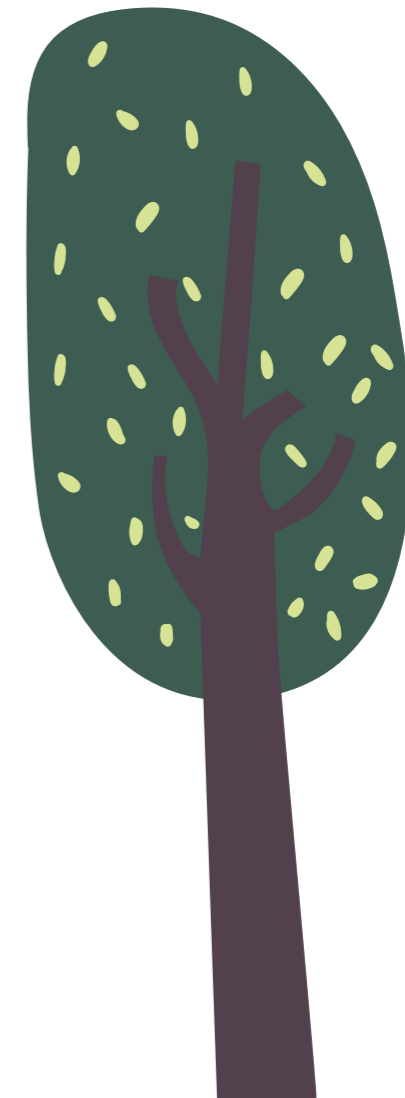
As already mentioned previously, self-service eco-friendly detergent dispensers are available at one of Elmec's locations. This initiative is part of the 'Plastic Aware' project, and in 2023 it helped us save over 1,000 traditional hard plastic detergent bottles.

Furthermore, the Lavaverde refillable detergents are three times more concentrated and allow for large quantity product saving.



4.5 Compliance with environmental regulations

For Elmec Informatica, compliance with applicable laws and regulations, including the environmental, is a fundamental element. Elmec believes that the internal control system, whose goal is to ensure compliance with environmental laws and regulations, is able to mitigate any risks of non-compliance and any incomplete and/or lack of knowledge of the applicable environmental laws and regulations wherever it operates. During 2023 and the previous years, no sanctions were imposed on Elmec Informatica as a result of non-compliance with applicable environmental laws and regulations





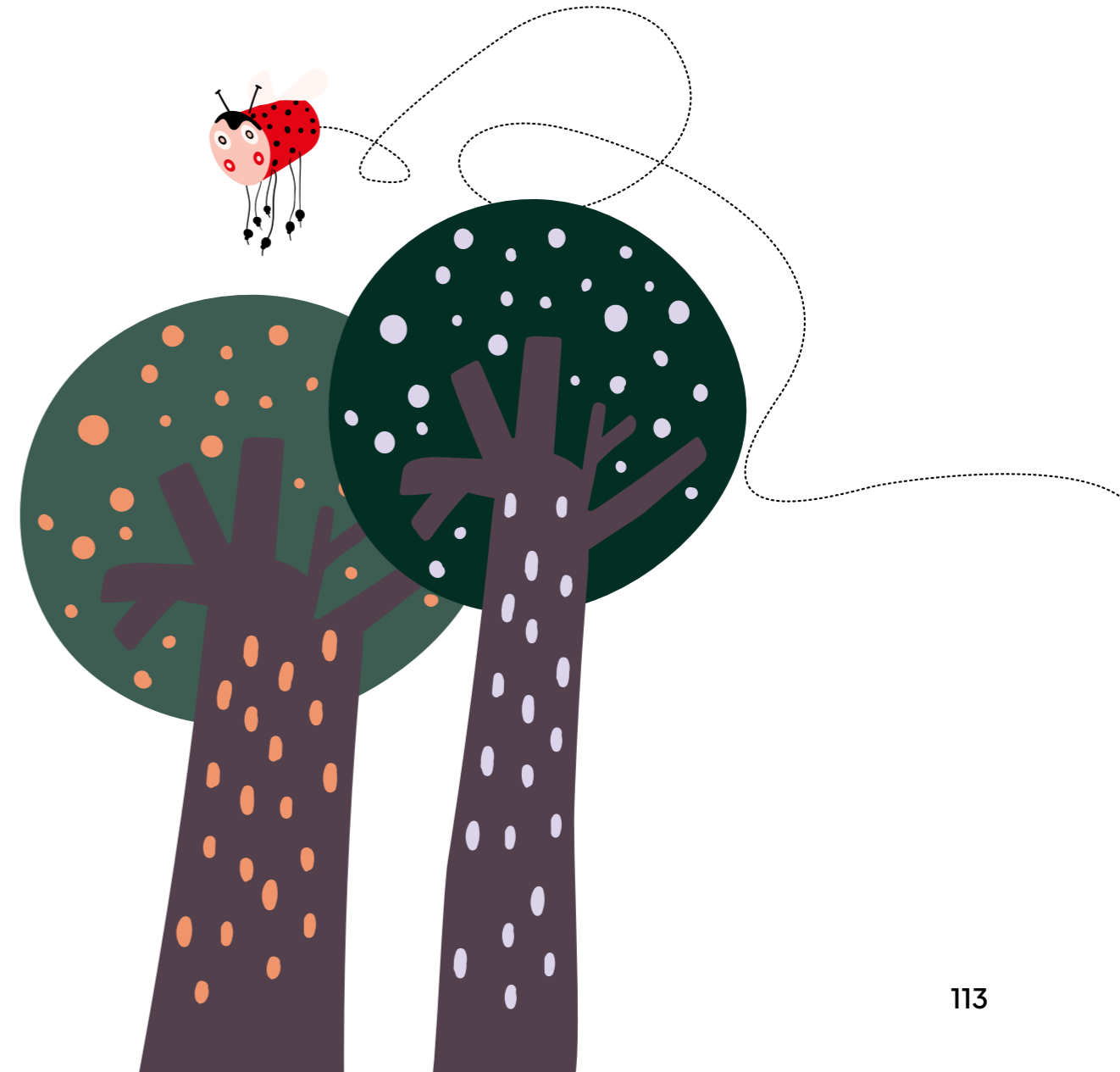
**5. MARKET AND TERRITORY, SUP-
PLIERS, CUSTOMERS, PARTNERS
AND THE LOCAL COMMUNITY**

5.1 Elmec's social role and relevant topics

The year 2023 was a year of growth for Elmec, as evidenced by the total economic value generated by the company, which was €166.5 million, up 6% from 2022, when it had been €157 million, and up 29% from 2021, when there was a total generated value of €129 million. A significant portion (49%, or €82 million) of the generated value is used to cover operating costs, primarily for the purchase of raw materials (€43 million) and services (€19 million). 37 million € was allocated to the workforce, while 672 thousand € was allocated to commitments to capital suppliers, mainly in the form of interest payments and other financial charges. The value transferred to the public administration including various taxes due amounted to 7 million €. Finally, 607 thousand € was allocated to communities in the form of sponsorships and contributions to non-profit associations.

For more than 50 years, Elmec has been making its passion and expertise available to the area to foster its development through social integration, cultural and sports initiatives, monetary and technological donations, volunteer work, and relations with schools and health facilities. Over time, Elmec has forged strong ties with some of the most important sporting entities in the area: we are a sponsor of the Serie A basketball team Pallacanestro Varese and for several years we have supported the famous "Tre Valli varesine" bicycle race. The company believes strongly in the importance of Sport within the educational path of girls and boys, which is why we have been sponsoring Robur et Fides, one of the main youth sports clubs in the province of Varese, for years now. In 2023 we began a fruitful partnership with the Felicita Morandi Foundation of Varese, an

organization dedicated to assisting women victims of violence. As part of this partnership, last year Elmec employees were invited to bike, run or walk at least 50 km within a 50-day period. For each participant who reached the goal, Elmec would pledge to donate €50 to the Felicita Morandi Foundation, thus contributing to the construction of a kitchen at the shelter for women victims of violence. The project was launched on June 6, 2023, and ended on July 28, with a total of 23,000 km travelled and a €12,000 donation to the Felicita Morandi Foundation.



5.2 Responsible Supply Chain Management

Ethical supply chain management is a crucial issue for Elmec Informatica as it recognises the importance of acting in a sustainable and responsible way not only within the organisation, but also in its relationship with suppliers. The supply chain is an important source of environmental, social and economic impact, and Elmec Informatica is aware of the need to ensure that its suppliers respect its ethical principles and values. In this chapter, we will examine Elmec Informatica's policies and practices regarding the ethical management of the supply chain, analysing

the challenges encountered and the results achieved.

In particular, we will discuss supplier monitoring activities, collaboration with business partners to promote the sustainability of actions undertaken to promote transparency and responsibility in the supply chain. It is highlighted that no significant potential or actual impacts have been identified to date in Elmec's supply chain.

Our ESG Certifications

Ecovadis

EcoVadis monitors the sustainability of suppliers in 150 industries and 110 countries. Global multinationals use EcoVadis to assess suppliers in over 95 countries. Elmec has the SILVER certification.



ISO 14001

Considering an environmental management international standard that provides a management structure to protect the environment, prevent pollution and reduce energy and resource consumption.



Environmental partner leader

Elmec was assessed by Canalis to measure sustainability practices in the IT industry. The result of this assessment led us to be awarded as an Environmental Partner Leader for 2022.



HP Amplify Impact

HP Amplify Impact is a partner programme to drive a significant change in the three pillars of HP's Sustainable Impact: planet, People and Community. Elmec was certified as Changemaker, the highest assessment level.



5.3 Evaluation and management of suppliers

The estimated total number of suppliers is about 780. Elmec regulates its relationship with suppliers in accordance with its code of ethics.

Elmec primarily procures from some of the leading international players in the distribution of IT materials and services, both for the delivery of device as a service and for the machines needed to operate the data center. The primary suppliers in turn procure from the world's leading brands in the IT world and have a presence in Italy.

This properly thought-out choice is based on the belief that only strategic and accurate sourcing can guarantee the reliability and quality of the IT products and services offered.

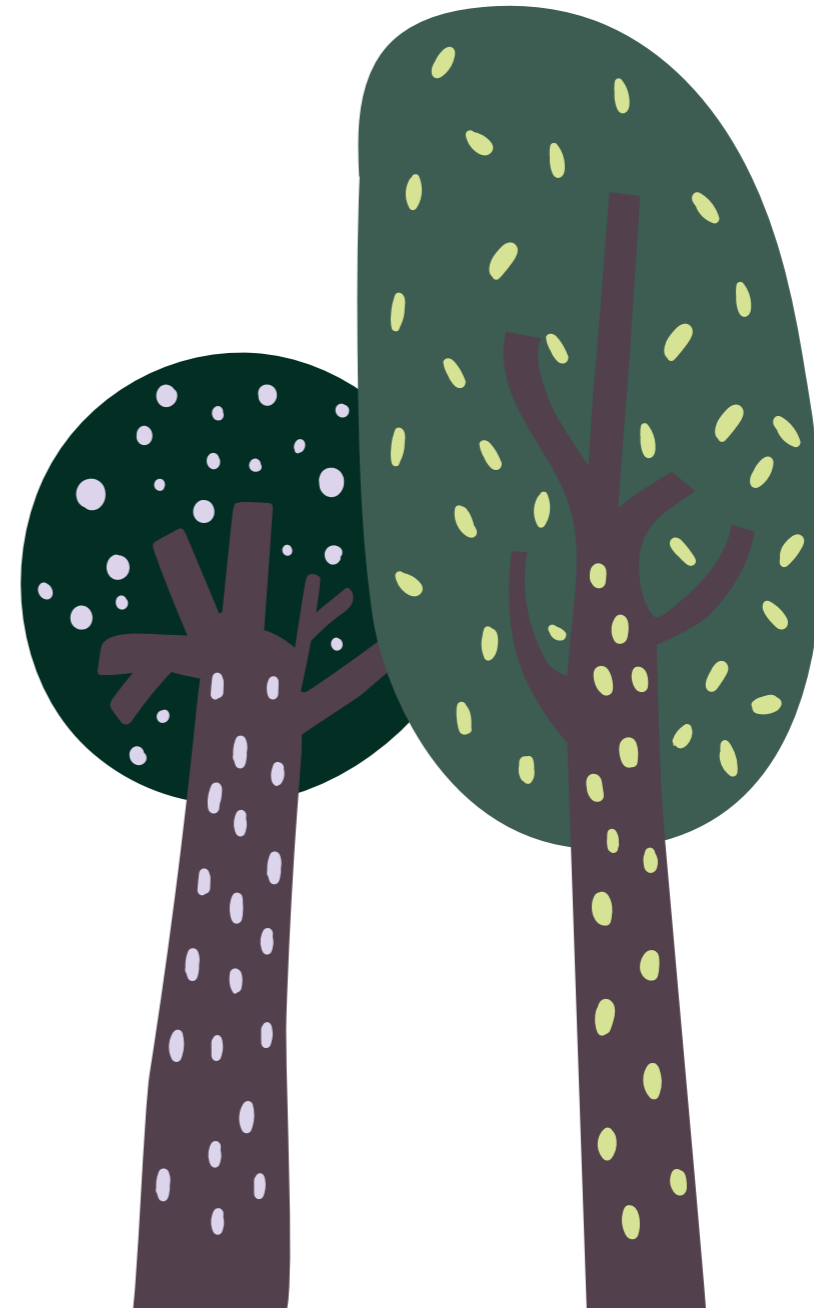
The main secondary suppliers, which are necessary for the proper functioning of the operational offices and office operations, include the food service provider, vending machine supplier, company car sup-

plier, and cleaning company. Elmec, as a company attentive to the importance of supporting local economies, seeks to use suppliers of support and services related to the operation and orderliness of its buildings who are locally rooted.

While Elmec does not have a formal policy for managing green procurement, it tries to prioritize the sustainability aspect within the supplier selection process in every way. This principle is mainly manifested in the following procurement areas:

- Procurement for internal operation: Elmec seeks to prioritize local suppliers, to reduce CO2 emissions resulting from travel, and environmentally friendly materials.
- Procurement for service delivery: Elmec's choice of business partners for service delivery is particularly focused on environmental sustainability and energy conservation.

Elmec is careful to maintain long-term relationships with its suppliers, fostering close cooperation for continuous improvement in the quality of products and services offered.



5.3 Evaluation and management of suppliers

Elmec considers its suppliers a fundamental component of its success; we want to be a serious partner, loyal in business and respectful towards the commitments made. The selection of suppliers is carried out based on Elmec's procedures and in compliance with the criteria and requirements of opportunity, search for the best value for money, sustainability and reputation and organizational solidity of the other party (including its ability to respect the supply plan). Any potential suppliers who have the necessary requirements, is not precluded from competing to offer its products/services.

For all supplies, including work and consulting agreements, the assessment relating to the reasons for the choice and the price applied is reasonably and adequately formalized and documented, as established by the company pro-

cedures.

The compensation to be paid are only related to the service indicated in the agreement, and payments are made to the person as defined by such agreement.

Elmec currently does not carry out any ESG audits on suppliers either during selection or during the course of the partnership. However, a pilot initiative was launched at the end of 2023 with some of Elmec's strategic suppliers - mainly IT service providers - introducing an assessment questionnaire called "Green Procurement". The goal is to delve deeper into ESG topics and identify any potential risks within the supply chain. The questionnaire for suppliers is currently divided into five key areas:

- General information about the supplier
- Health, safety and environment
- Quality management

- system
- Privacy and cybersecurity
- ESG aspects

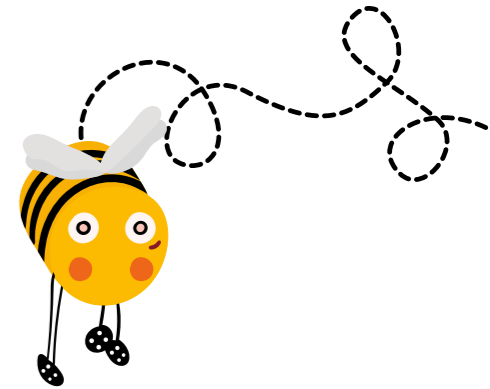
For next year, we are planning to extend this questionnaire to all of Elmec's suppliers, in order to promote greater transparency and environmental and social responsibility along the whole supply chain.

The results of this process will be included in the next sustainability report. It is also specified that Elmec Informatica does not tolerate any behaviours among its employees such as:

- Abuse of any position of power with economically dependent suppliers, inducing them, with the promise of subsequent advantages, to stipulate unfavourable contracts.
- Receiving any gifts or other forms of benefits, not directly attributable to normal courtesy relations.

It is important to highlight that 11% of the budget de-

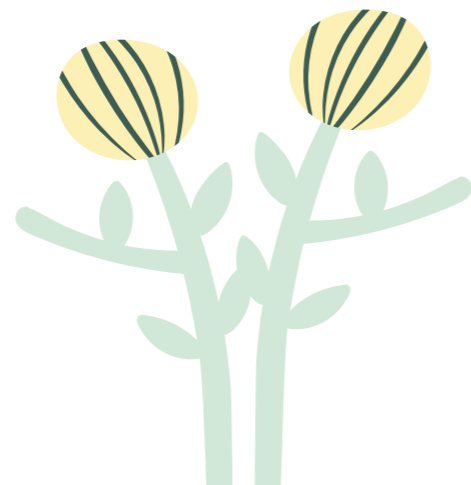
icated to suppliers was invested in local suppliers in the province of Varese, mainly for the purchase of supplies needed for the operational functioning of Elmec's locations



ESG ANALYSIS OF SUPPLIERS	2023	2022	2021
Number of new suppliers used in the reporting period selected and evaluated based on their environmental and social impact	0	0	0
Number of new suppliers used in the reporting period	257	213	228
% of new suppliers used in the reporting period selected and evaluated according to environmental and social criteria	0%	0%	0%
Overall number of suppliers selected and evaluated based on their environmental and social impact	21	0	0
Number of suppliers assessed on the basis of their social impact that operate with negative or potentially negative social impacts	0	0	0
Percentage of the purchasing budget used for local suppliers or those located in the Province I of Varese	11%	10%	9%

5.4 Customer and partner management

Elmec has around a thousand clients, mainly from Italy, while the technology partners are some of the most important global companies in the IT industry such as Apple, HP, Lenovo, Pure Storage and HPE. Elmec offers its clients mainly data center services and Device as a Service, regulated by agreements and the company code of ethics. Elmec seeks to establish long-term relationships with its clients, including through recurring services, based on multi-year agreements.



5.5 Initiatives in collaboration with technology partners

#verdecomeelmec project

#verdecomeelmec is a digital section created by Elmec to promote sustainability on a business level. It contains a wide range of content created in collaboration with the company's technology partners, including innovative solutions, interviews with industry experts and success stories of companies that have adopted sustainable solutions.

The section raises awareness on the importance of sustainability and is an example of how companies can promote positive change. Some of the contents are included below:

White paper with IDC

Elmec and Pure Storage for a sustainable and high-performance data centre.

A white paper by IDC to investigate the sustainable and efficient development of data centres in Italy.

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

Conscious innovation

The sustainability path of Elmec and HPE.

In this #VerdeComeElmec article, we write about our shared values together with HPE.

<https://www.wired.it/branded/article/concetto-di-sostenibilita-definizione-elmec-hpe/>

Green workplace

The search for a zero-impact device with Apple.

In this #Ver-deComeElmec article we write about our sustainable workplace offer with Apple products and DaaS.

<https://blog.elmec.com/business-sostenibile-produzioni-apple>

5.5 Initiatives in collaboration with technology partners

HP Amplify impact partner program

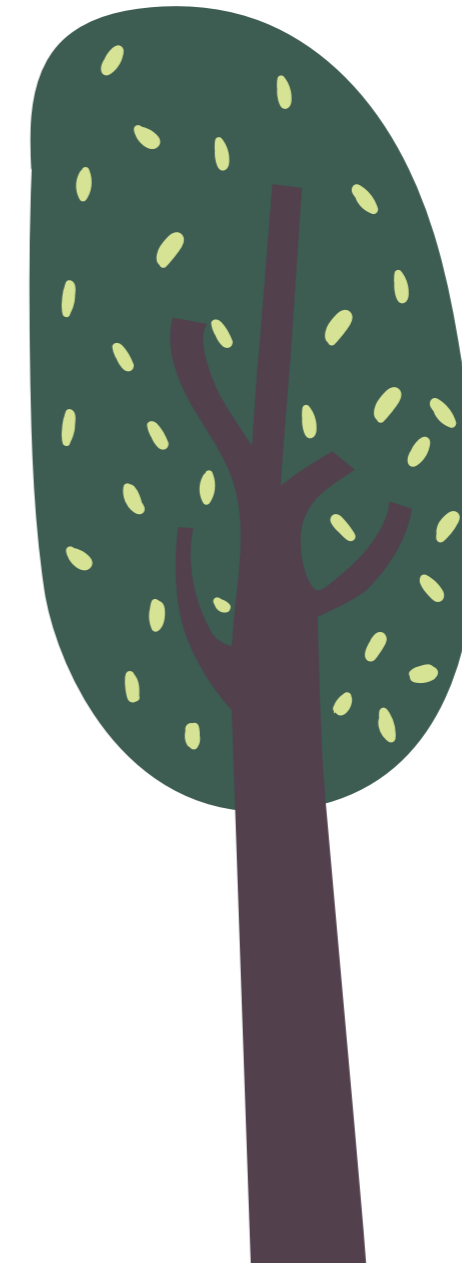
HP Amplify Impact is a major global sustainability programme for HP's business partners, which aims to promote environmental and social sustainability in all products and business processes. Elmec, as a business partner of HP, has chosen to join this program to prove its strong commitment to supporting the company's sustainability goals.

By joining the HP Amplify Impact programme, Elmec has committed to rigorously following sustainable solutions and promoting sustainability throughout its supply chain and busi-

ness activities. This means that Elmec is actively committed to reducing the environmental impact of its products and business processes, and to ensuring respect for human and workers' rights throughout the supply chain.

Furthermore, as a member of the programme, Elmec has access to a wide range of resources and tools provided by HP, such as training portals, guidelines for sustainability influence in business negotiations and videos containing information that help to integrate sustainable practices into your business pro-

cesses. This tangibly proves Elmec's commitment to contributing to a more sustainable future, and to working with HP to reach shared sustainability goals. Not only is joining the HP Amplify Impact programme a strong commitment towards sustainability, but it also confirms Elmec's attention to the adoption of responsible business practices.



5.6 Technological Development and Modernisation

Technological innovation is one of the fundamental pillars of social and economic progress.

As a company committed to sustainability, Elmec believes that continuous technological development is a crucial factor to improve the quality of life of citizens and meet the needs of industries like public administration and healthcare. Information technology, in particular, can offer solutions that can optimize processes, increase efficiency and transparency, and improve the use of services by citizens. In this context,

Elmec aims to invest in research and implementing cutting-edge technologies, in order to contribute to an increasingly modern, sustainable and inclusive society.

In this part of the sustainability report, we will analyse the impacts of the IT solutions developed by Elmec on citizens and local communities, examining the opportunities and challenges of the path towards increasingly advanced digitalisation.

Audio-narrated IT Museum

At Elmec, there is an IT museum preserving half a century of digital evolution. In 2021, to celebrate our fiftieth anniversary we decided to renovate it by making it audio-narrated by the voices of Elmec's IT specialists.



Hackathon

Hackathon at Elmec means innovation. Since 2018 (with the exception of 2020 due to the pandemic) every year we have organised an edition of this activity according to different logics and forms: from opening it to the territory to create jobs, as in the edition in which the winner was recruited, to an internal challenge to design a tool that took our employee service management to the next level.



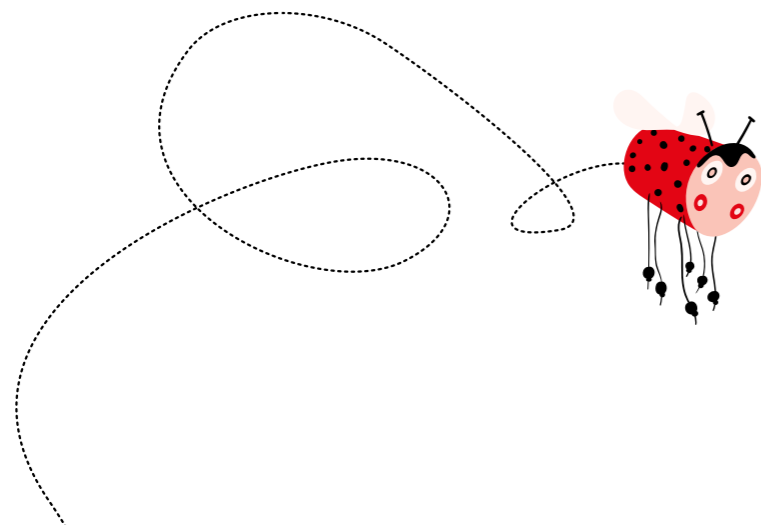
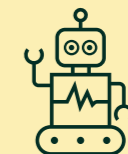
One click meeting

In partnership with Logitech, we have created an integrated video conferencing tool for easy and smart collaboration in every situation. This project allowed us to help local companies maintain business continuity during the pandemic and eliminate digital divide.



Ivo Goes to School

The IVO Robot: we have developed a solution that allows hospitalized children, or those who have to spend a long time at home for health reasons, to connect with their livestreamed class thanks to a tablet, in the child's hands, a robot, which is in the classroom, and the Internet connection offered by EOLO.



5.6 Technological Development and Modernisation

Events on innovation and cybersecurity

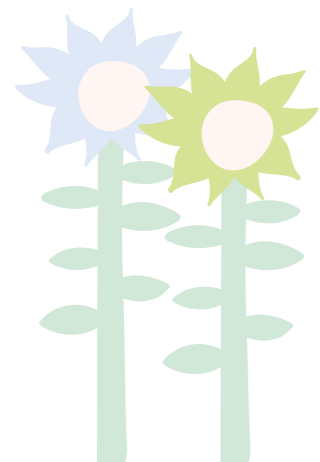
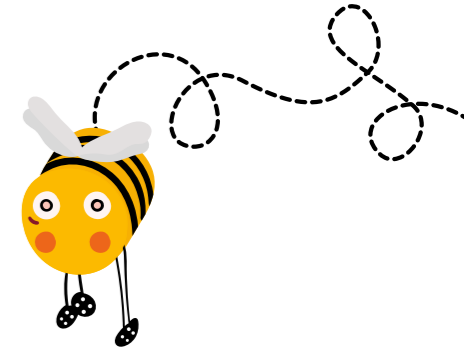
Elmec has demonstrated a strong commitment to innovation and modernization by organising events open to the public on its campus. These events were an opportunity for the local community to learn more about the company, its technologies and its initiatives, while creating an environment for collaboration and the exchange of ideas.

EXPO OF THE IMPOSSIBLE

The 'Expo of the imPOSSIBLE' was held at the Elmec Informatica Campus on July 12, 2023, and was focused on imPOSSIBLE projects printed for humanity. In this edition, room was given to those who are working to improve the well-being of people with projects that could revolutionize various fields: from the creation of transplantable bioartificial organs to innovative surgical techniques based on 3D printing, and prostheses and medical devices. It was not just about listening, but also – and above all – touching the items in the exhibition area.

CYBERTHINGS

On October 18, 2023, Elmec and CybergON organised the second edition of "Cyberthings", an event on cyber security where the first Elmec-produced podcast entitled "Cyberthings" was launched and presented. The podcast, which can be found on the main streaming platforms for free, has the main purpose of informing on the risks relating to people's digital identity. The podcast is available on the following platforms: Apple Podcast, Amazon Music, Spotify.



5.6 Technological Development and Modernisation

Study tour

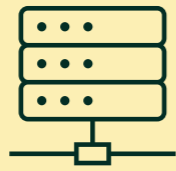
The Elmec Informatica Study Tour project offers an experience to discover Digital Transformation at our Technological Campus in Brunello, Varese. Visitors can choose between over 10 stops, such as the certified Data Centre, the 3D printing laboratory, the Innovation Centre, the cybersecurity department and the renewable energy department.

During the visit, guests can interact with Elmec's IT specialists and find out the innovative solutions developed for businesses. The Technological Campus is located half an hour away from Milan and covers an area of 130,000 square metres. In 2023, over 1,100 people from companies, clients and prospective clients, suppliers and partners, trade associations, schools and universities visited the campus and there were 60 hours (62 in 2022)

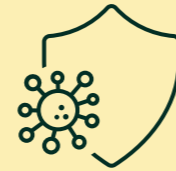
that Elmec's employees dedicated to the study tours.

This data was taken from the time dedicated to study tours for clients. Below are the tour stops available to visitors:

Data center and managed services



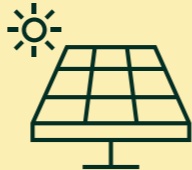
Cybersecurity



CSR



Renewable Energy




Workplace e international




Innovation



Device as a service



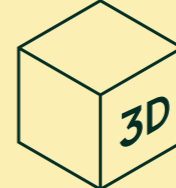
IBM Ecosystem power



Internet of things

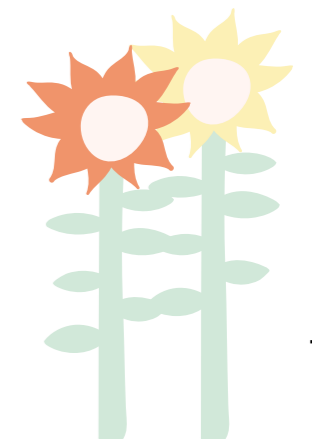


3D Print



“Going on a study tour means living an unprecedented experience, where people will be immersed in a reality that makes ideas but, most importantly, puts them into practice while respecting the community, the environment and the people who stay in these spaces every day”

Rinaldo Ballerio,
president of
Elmec informatica.

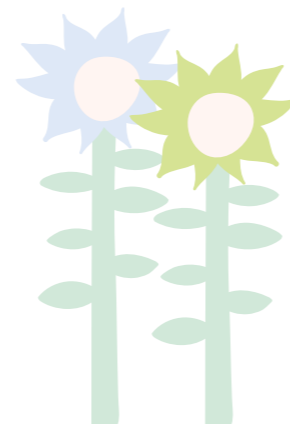


5.6 Technological Development and Modernisation

	2023	2022	2021
Security services turnover IT (increase in cybersecurity turnover)	4,9 MLN €	3 MLN €	1,45 MLN €
Number of events on digitalisation and IT security in which Elmec participated or contributed to promoting/organising	15	10	10

The digitalisation events mentioned above addressed various topics in line with sustainability and technological innovation. These topics include cybersecurity, renewable energy, circular economy, cloud computing and technological innovation. Elmec's participation in these events shows its constant commitment to promoting sustainable and innovative solutions in the market, always maintaining high attention to data and process security. It should be noted that, in 2023, Elmec did not suffer any external cyber-attacks with consequences in terms of

data breach, unavailability of data and information and/or service disruptions. However, Elmec, in its cybersecurity assistance to its clients, supported the latter in the assessment and management of 1 IT incident that affected their systems.



Ticket	2023	2022	2021
Warning	16.020	8.747	4.600
Service requests	2.075	482	119
Operations	1.815	1.016	415
Other	193	69	35
Total	20.103	10.314	5.169

The following categories are represented in this table:

- Warnings: generic requests for intervention that indicate potential problems or situations requiring attention which, unlike incidents or events, may not immediately cause interruptions to services, but which require no attention and monitoring to prevent them from turning into more serious problems.
- Service requests: standardized requests for IT services which may include access requests, hardware/software configurations, requests for information, etc. These

types of service requests do not cause service disruptions.

- Operations: daily and routine operations for the management and performance of IT services. This category includes system monitoring activities, user access management, patch management and other routine activities to ensure that IT services operate efficiently and in accordance with established standards.
- Other: daily and routine activities for the management and performance of IT services. This category includes system monitoring activities, user access manage-

ment, patch management and other routine activities to ensure that IT services operate efficiently and in accordance with established standards.

The increase in the number of tickets recorded in 2023 compared to previous years is mainly due to a growth in the company workforce and the expansion and consolidation of the service team made up of IT specialists with specific skills. This new structure allows for better ticket management and processing.

5.7 Cybersecurity and privacy

Cybersecurity sustainability means having a holistic vision of the management of associated risks to cyber-attacks, and it is a fact that security vulnerabilities have a strong impact on the operational continuity of businesses. Cyberattacks can have cascading repercussions that can compromise the stability of communities and governments.

Data security and privacy protection are priorities for Elmec which, at its Data Centres and in the delivery of other services, processes large amounts of information from its clients and employees, including personal, sensitive and confidential information. Ensuring the correct use of data and information and preventing cyber-attacks aimed at stealing Elmec's and clients' personal data, as well as data breaches are priorities for Elmec. Elmec has a business unit named CybergON, dedicated to cybersecurity ser-

vices with pervasive skills in both Hybrid Cloud and Digital Workplace. The Security Operations Centre (SOC) detects and analyses suspicious behaviour that occurs on the Client's infrastructure (Detect) and, if malicious, intervenes to block it (Respond). CybergON combines technologies and skills to create a unique protection strategy, based, among others, on services such as AD Audit, Continuous Vulnerability Assessment and training. The synergy between CybergON and Elmec Informatica is a competitive advantage because it allows for a solid cybersecurity policy combined with proven expertise in infrastructure protection and remediation without data loss.

The Privacy Organisational Model (MOP) was updated in 2022; it includes all the procedures required by EU Regulation no. 679/2019. Among these, there is the

Data Breach management procedure which strengthens the system for detecting and evaluating an incident that can lead to a data breach and requires the constant update of a "Data breach register", in which all data breach events that occur must be recorded and monitored. To date, no events of this type have been recorded. Finally, Elmec Informatica is equipped with a Data Protection Committee, i.e. a multidisciplinary Committee who monitors aspects related to Cybersecurity and privacy in collaboration with the Data Protection Officer.

Some numbers of CybergON:

	2023	2022	2021
Incident number	8.958	4.114	1.200
Data breach number	0	0	0

The term "incident" indicates unexpected events that have led to disruptions of IT services or reductions in the quality of services, also with potential impacts on cybersecurity. Such events can be reported by end users or detected through automatic and periodic monitoring by Elmec with the aim of a rapid resolution to restore service quality levels in the shortest time. None of these events resulted in data breaches or critical situations from the cybersecurity standpoint and/or violations of privacy laws and regulations.



2000

Users trained every year



34

Monthly publications



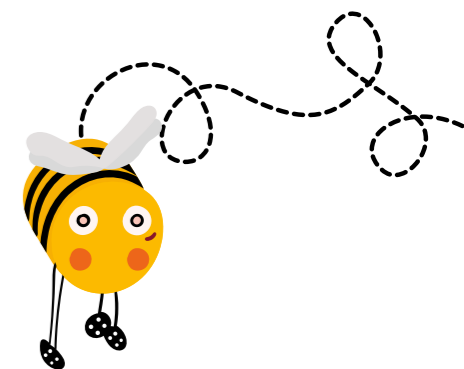
7000

Daily check per client



22

Ransomware management every year



5.8 Customer relations

Elmec is aware that its success is closely linked to the success of its customers. Elmec works to be a competent and reliable partner and to give its clients adequate solutions to reach their goals.

In relationships with its customers, Elmec bases its behaviour on transparency, fairness, honesty, efficiency and professionalism criteria, as well as compliance with the regulations aimed at protecting fair competition.

In particular, the Code of Ethics requires Addressees to: Comply with internal procedures for managing relationships with clients. Provide, with efficiency and courtesy, within the limits of contractual provisions, high quality services that satisfy the client's reasonable expectations and needs; Provide accurate and understandable information about products and services so that clients can make

informed decisions.

The contracts stipulated with clients and all forms of communication and relationships with them, including advertising messages, must comply with the provisions of the law and follow criteria of simplicity, clarity and completeness, avoiding any deceptive and/or incorrect practice.

Furthermore, conduct is required to be based on respect, cooperation and collaboration, acting with loyalty and in good faith, being compliant with the contractual obligations undertaken and ensuring the required services.

Finally, we require to operate in a proactive and participatory manner, in line with the responsibilities assigned to everybody's role and in full cooperation with different activities and roles.

Corrupt practices, illegal favours, collusive behaviour,

any direct or indirect solicitations of personal and career advantages for oneself or others are prohibited.

All the information cited above is publicly available in Elmec's code of ethics.





APPENDIX

A. Methodological note

Reporting model

The Sustainability Report contains information relating to environmental, social and personnel-related topics, respect for human rights and the fight against corruption, and the risks connected to these, to the extent useful for ensuring understanding - the activities carried out by Elmec Informatica, their progress, their results and the impact produced by them.

This Sustainability Report refers to the 2023 financial year and was approved by the Board of Directors held on 21 May 2024. The document is available in PDF format in Italian and English on the Internet at: elmec.com/csr. The GRI Standards, published by Global Reporting Initiative ("GRI"), which are currently the most widespread and recognized at an international level in the field of sustainability reporting, have been identified by Elmec Informatica as "Re-

ference standards" for the preparation of the document. The GRI Content Index is available in the Appendix - This. The reporting principles considered for the drafting of the Sustainability Report are accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability or relevance, in line with what is required by the standard - reference matrix and the GRI Standards. The information is provided in the logic of the "comply or explain" principle: therefore, in the event that any policies are not implemented in one or more of the material topics, the reasons for this choice. The Sustainability Report prepared considering the results of the stakeholder engagement activity, it includes information regarding the added value produced and distributed by the Group.

Reporting process

The process of drafting 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 of the GRI Standards in terms of applicability and relevance, as better defined by the materiality assessment.

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

A. Methodological note

GRI Standard

A qualitative description of the supply chain is provided in paragraph 5.3. The process of reporting qualitative and quantitative information, mainly relating to material topics, involves the use of reporting forms sent to each department manager. The information not managed with the reporting forms was identified through the direct involvement of Elmec's interlocutors, through interviews.

This Sustainability Report was drafted with reference to the GRI Standards - Global Reporting Initiative and in application of the indications of GRI no. 1: Fundamental Principles 2021. This document contains data and information that reflects the economic, environmental and impacts of Elmec Informatica and can substantially influence the assessments and decisions of stakeholders.

ding those on human rights and their management. For each reporting period, Elmec undertakes to continuously review its material topics. In this context, "impact" refers to the effect (either positive or negative) that an organisation has on the economy, the environment and/or society. A topic can be relevant, and therefore potentially material, based on only one of these dimensions, even with reference to a combination of internal and external factors, including but not limited to the objects, the vision and the general mission of the Company, the strategy that has been adopted and the concerns directly expressed by interested parties.

scale to assess the impacts from the outside-in perspective.

Materiality Assessment

Materiality is the principle of GRI - Global Reporting Initiative Standard (GRI 3 - Material Topics 2021), chosen by Elmec Informatica as the reference standard for reporting information relating to the most significant economic, environmental and social impacts of the organisation, inclu-

The activity of assessing material topics was carried out together with that of Stakeholder Engagement, by implementing a rating

Reporting model

The scope of the Sustainability Report concerns the company Elmec Informatica SpA



A. Methodological note

Subsequently, this assessment was also considered from the inside-out perspective, i.e. the impacts that Elmec Informatica's activity generates on the environment, people and the economy. Elmec, through the involvement of an internal working group made up of the company's front lines, carried out the following analysis phases, in determining the material topics, as required by GRI 3-Material Topics 2021 and illustrated in the following scheme:

- Understanding the context of the organisation
- Identifying current and potential impacts
- Assessing the extent of impacts
- Prioritizing the most important 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 significance of a change or error in the data and comparative information of previous years, reported herein, concerns the assessment that such change or error is capable of significantly influencing the decision-making process of the Stakeholders.

Contacts

The reference contacts for information regarding the budget are:

TRUST AND SUSTAINABILITY DIRECTOR

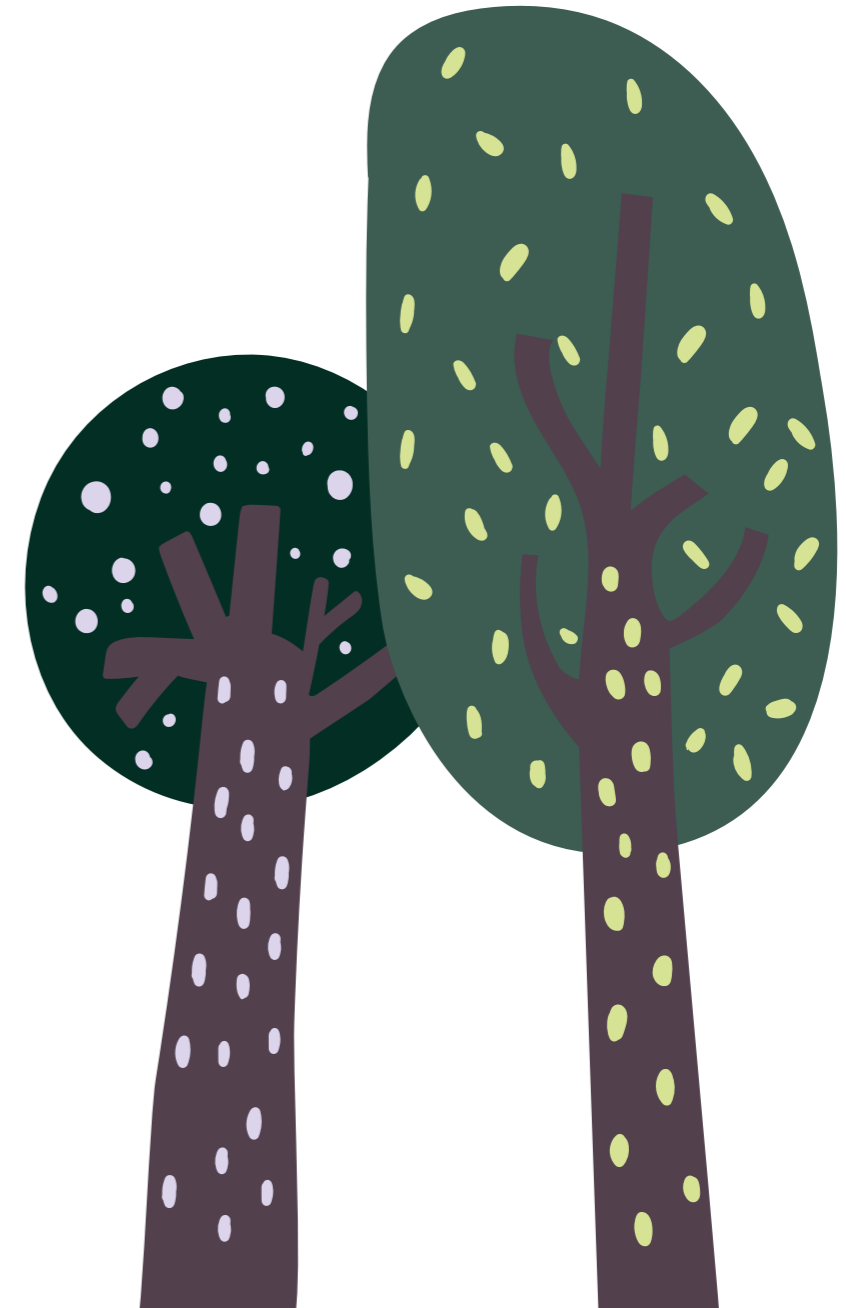
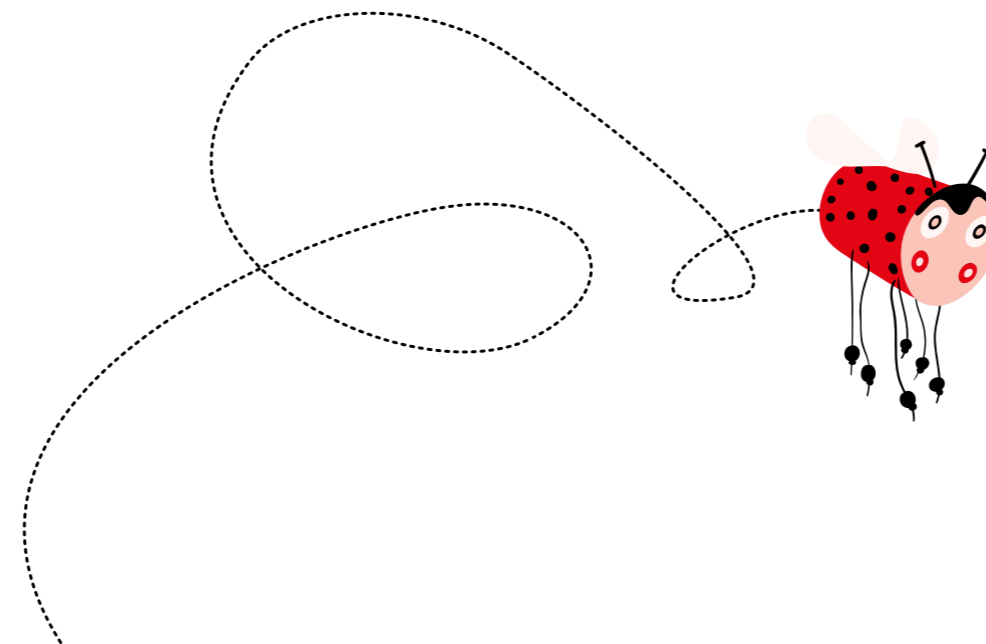
Elisa Bisceglia: Elisa.bisceglia@elmec.it

ESG COORDINATOR

Luca Sardella: Luca.sardella@elmec.it

WEB SITE

Elmec.com/csr



B. GRI content index

The GRI content index offers an overall view of the information reported by the company, indicates where the latter can be found and helps data users to access it; furthermore, it shows which GRI Standards and disclosures have been used by the company.

Declaration of use	ELMEC INFORMATICA S.p.A. has reported the information included in this GRI content index for the period from 1 January 2022 to 31 December 2022 with reference to the GRI Standards.
GRI 1 used	GRI 1 - Fundamental Principles - 2021 version
Industry standards relevant GRIs	N/A

Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Requirement omitted	Reason	Explanation	
General disclosures						
1. The organisation and its reporting practices						
CONDITIONS OF WORK AND WELFARE CORPORATE	2-1 Organisational details	1.2.1 The Elmec Informtica campus				
	2-2 Entities included in the organisation's sustainability reporting	A. Methodological note - Reporting perimeter				
	2-3 Reporting period, frequency and contact point	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 financial statements are not subject to external assurance				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards	
			Require- ment omit- ted	Reason	Explana- tion		
General information							
GRI2- General in- formation - 2021 version	2. Activities and Employees						
	2-6 Activities, value chain and other business relationships	1.1 History of Elmec; 1.2 Elmec's structure and size; 1.4 Business model; 5.2 Responsible supply chain management; 5.3 Evaluation and management of suppliers; 5.4 Customer and partner management					
	2-7 Employees	3.2 Staff Composition; 3.3 Diversity in the workforce; 3.3.1 Staff Turnover; 3.6 Diversity and Equal Opportunities					
	2-8 Workers who are not employees	3.3 Diversity in the workforce					
	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 Nomination and selection of the highest governance body	2.1.1 Board of directors					
	2-11 Chair of the highest governance body	2.1.1 Board of Directors; 2.4 Ethics and anti-corruption					

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
General information						
GRI2- General in- formation - 2021 version	2-12 Role of the highest governan- ce body in overseeing the mana- gement of impacts	1.3 Vision, mission and code of ethics; 2.1.1 Board of Direc- tors; 2.5.1 Sustainability governance; 2.5.2 Materiality asses- sment; 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 Sustai- nable Development Goals - SDGs				
	2-14 Role of the highest governan- ce 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 governing body	2.1.1 Board of Directors				
	2-18 Evaluation of the performan- ce of the highest governing body	No measures taken				
	2-19 Remuneration policies	2.1.1 Board of Directors; 3.4.2 Performance and career paths				
	2-20 Process to determine remuneration	2.1.1 Board of Directors;				
	2-21 Annual total compensation ratio			Indicator not repor- ted	Confiden- tiality con- straints	

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
General information						
GRI2- General in- formation - 2021 version	4. Strategy, policies and practices					
	2-22 Statement on sustainable development strategy	Chairman's Letter 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 Embedding policy commitments	2.6 Sustainability Plan and Sustainable Development Goals – SDGs; 2.7 Social and environmental policies and guidelines; 5.3 Evaluation and management of suppliers				
	2-25 Processes to remediate negative impacts	2.4 Ethics and anti-corruption				
	2-26 Mechanisms for seeking advice and raising concerns	2.3 Model 231 and Supervisory Board; 2.4 Ethics and anti-corruption				
	2-27 Compliance with laws and regulations	2.5.1 Sustainability Governance; 4.5 Compliance with environmental regulations				
	2-28 Membership associations	Confindustria and Univa 2.7 Social and environmental policies and guidelines; 2.8.1 Our stakeholders; 2.8.2 Stakeholder Engagement Initiatives keholder Engagement; C. GRI Content Index				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
General information						
GRI2- General in- formation - 2021 version	5. Stakeholder engagement					
	2-29 Approach to stakeholder engagement	Chairman's Letter to Stakeholders				
	2-30 Collective bargaining agreements	2.1.2 Board of Directors; 3.8 Labour Relations and Employment Protection				
GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	1.5 Economic value directly generated, distributed and retained				
Material Topics						
GRI 3-Material Topics-2021 ver- sion	1. Directions on how to determine material themes					
	2. Information on material topics					
	3-1 Process to determine material topics	2.5.2 Materiality Analysis; 2.5.4 Materiality Matrix; Methodological note				
	3-2 List of material themes	2.5.3 material themes				
Energy consumption, green products and services						
GRI 3-Material Topics-2021 ver- sion	3-3 Management of material topics	2.7 Social and environmental policies and guidelines; 4.1 Environmental risks and topics relevant to Elmec; 4.1.2 Environmental policies; 4.2.3 Material Environmental Topics				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	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 Material topics of an environmental nature				
	302-5 Reduction of the energy requirements of products and services	4.2 Energy consumption of green products and services				
Emissions and climate change						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material topics	2.7 Group policies and guidelines in the socio-environmental field; 4.1 Environmental risks and topics relevant to Elmec; 4.1.2 Environmental policies; 4.2.3 Material topics of an environmental nature; 4.3.1 Energy sources; 4.3.2 Greenhouse gas emissions				
GRI 305: Emis- sions 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				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
GRI 305: Emis- sions 2016	305-5 Reduction of GHG emissions	4.3.2 Greenhouse gas emissions				
Circular Economy						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material topics	2.7 Social and environmental policies and guidelines; 4.1 En- vironmental risks and topics relevant to Elmec; 4.1.1 Environ- mental protection; 4.1.2 Environmental policies				
GRI 306: Waste - 2020 version	306-1 Waste generation and signi- ficant waste-related impacts	4.3.3 Waste Management				
	306-2 Management of significant waste-related impacts	4.3.3 Waste Management				
	306-3 Waste generated	4.3.3 Waste Management				
	306-4 Waste diverted from dispo- sal	4.3.3 Waste Management				
	306-5 Waste directed to disposal	4.3.3 Waste Management				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
GRI3-Material topics - 2021 version	3-3 Management of material topics	3.1 Risks and topics relevant to Elmec; 3.5 Talent development; 3.5.1 Training				
GRI 404: Training and education 2016	404-1 Average number of hours of training per year per employee	3.5.1 Training				
	404-3 Percentage of employees who receive periodic evaluations of their performance and professional development	3.4.2 Staff evaluation				
Diversity and equal opportunities						
GRI3-Material topics - 2021 version	3-3 Management of material topics	2.7 Policies and guidelines in the socio-environmental field; 3.1 Risks and topics relevant to Elmec; 3.6 Diversity and equal opportunities; 3.6.2 Culture on Diversity & Inclusion				
GRI 405: Diversity and equal opportunities 2016	405-1 Diversity in governance bodies and among employees	2.1.1 Board of Directors; 2.1.2 Board of Statutory Auditors 3.2 Composition of staff. 3.3 Composition of the workforce				
	405-2 Ratio of basic salary and remuneration of women compared to men	3.6.1 Gender wage Gap				
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective measures adopted	No cases detected in 2022				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
Occupational Health and Safety						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material to- pics	2.2 Identification and control of risks; 3.1 Risks and topics re- levant to Elmec; 3.4 Working conditions and corporate wel- fare; 3.7 Worker health and safety				
GRI 403: Salute e sicurezza sul lavoro 2018	403-1 Occupational health and safety management system	3.7 Worker health and safety				
	403-3 Occupational health servi- ces	3.7 Worker health and safety				
	403-4 Worker participation, con- sultation, and communication on occupational health and safety	3.7 Worker health and safety				
	403-5 Worker training on occupa- tional health and safety	3.5.1 training; 3.7 Worker health and safety				
	403-6 Promotion of worker health	3.7 Worker health and safety; 3.4.1 Iniziative di welfare azien- dale				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
GRI 403: Occupational Health and Safety 2018 version	403-9 Incidents at work	3.7 Health and safety of workers				
	403-10 Occupational disease	3.7 Health and safety of workers				
Working conditions and corporate welfare						
GRI3-Material topics - 2021 version	3-3 Management of material topics	3.1 Risks and personnel topics relevant to Elmec; 3.4 Working conditions and corporate welfare; 3.4.1 Corporate welfare initiatives				
GRI 401: Employment 2016	401-1 Hiring of new employees and employee turnover	3.3.1 Staff turnover				
	401-2 Benefits for full-time employees that are not available to temporary or parttime employees	3.4.1 Corporate welfare initiatives				
Responsible supply chain management						
GRI3-Material topics - 2021 version	3-3 Management of material topics	5.2 Responsible supply chain management; 5.3 Evaluation and management of suppliers				
GRI 414: Social evaluation of suppliers 2016	414-1 New suppliers who have been selected using social criteria	5.3 Evaluation and management of suppliers				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
Technological development and modernization						
GRI3-Material topics - 2021 version	3-3 Management of material topics	5.6 Technological development and modernization				
Ethics and fight against corruption						
GRI3-Material topics - 2021 version	3-3 Management of material topics	2.4 Ethics and fight against corruption; 2.7 Policies and guidelines in the socio- environmental field; 5.5 Relationships with clients				
GRI 401: Employment 2016	205-1 Operations assessed to determine risks relating to corruption	2.4 Ethics and fight against corruption				
	205-2 Communication and training on anticorruption regulations and procedures	2.4 Ethics and fight against corruption				
	205-3 Confirmed incidents of corruption and measures taken	2.4 Ethics and fight against corruption				
GRI 415: Public Policy 201	415-1 Political contributions	No contributions made to political parties				
Cybersecurity and privacy						
GRI3-Material topics - 2021 version	3-3 Management of material topics	5.7 Cybersecurity and privacy				
GRI 418: Customer privacy 2016	418-1 Substantiated complaints regarding violations of customer privacy and loss of customer data	5.7 Cybersecurity and privacy				

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Standard GRI/ Other source	Information	Location	Omission			N. rif. GRI industry standards
			Require- ment omit- ted	Reason	Explana- tion	
Sustainable governance						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material to- pics	2.5.1 Sustainability governance;				
Human rights (child labour, forced or compulsory labour)						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material to- pics	2.7 Policies and guidelines in the socio-environmental field; 3.9.3 Respect for human rights, a growing issue				
Freedom of association and collective bargaining						
GRI3-Material topics - 2021 ver- sion	3-3 Management of material to- pics	3.8 Trade union relations and employment protection				
Water						
GRI 303: Water and tributaries 2018	303-3 Water withdrawal	4.2.1 Circular economy				

