

**SUSTAINABILITY
REPORT
2021**



DIGITAL 360
EMPOWERING INNOVATION



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Letter from the President



Dear stakeholders,

Supporting digital innovation in companies, public administrations and society in general was the founding reason for DIGITAL360 and has become its mission.

This mission certainly stems from the clear business vision and deep professional passion shared by all the Group's co-entrepreneurs, but it also expresses the profound awareness, rooted in the Group from the outset, that digital innovation is the main enabler of sustainable and inclusive economic growth, respectful of the environment and resources, and capable of enhancing even the most fragile and marginalised members of society.

This awareness will be the hallmark of our commitment to sustainability: both with respect to our internal organisation and in our approach to the market and all the different stakeholder communities.

It is within this groove that this first Group Sustainability Report fits, which stems from the awareness that ESG issues are not additional aspects to our business strategy and its concrete implementation, but are an integral part of it.

This document is, therefore, first and foremost a tool to give our stakeholders a concrete account of the Group's commitment in this direction.

In fact, it allows a reading, supplementary to the Financial Statements and the Management Report, of the ESG factors that are material to the sustainability of DIGITAL360's business model: from the search for the valorisation of the contribution, unique and original, of each of our collaborators, to the care for the relationship, not only commercial but also interpersonal, with all our clients; from the security and protection of the personal data entrusted to us, to the intense and two-way relationship with the academic and associative worlds; from the attention to the impact - ours and our clients' - on the environment to the search

for always new projects to have beneficial effects on the community in which we operate and on the weakest components of society; from the obsession to the ethicality of our actions to the governance tools of the organisation.

The Sustainability Report is, therefore, a true statement of commitment to our innovative, ethical and sustainable actions, indicating the activities and actions undertaken to manage and improve our impact on the environment, territory and people.

The publication of this first Sustainability Report accompanies the process, which began in 2021, with the transformation of DIGITAL360 into a Benefit Corporation and, therefore, with the definition and incorporation in the company's Articles of Association of the objectives of common benefit.

We are a Benefit Corporation by a choice motivated and sustained by profound reasons. The awareness of the need for a broad vision of the company's role, which finds in its relationship with the community the completion of its 'licence to operate', has been present in the Group's culture since its origins: on closer inspection, in fact, the concrete commitment to the community preceded rather than followed its formalisation in the amendment of the articles of association and in the qualification as a Benefit Corporation.

Even in this commitment to the common benefit, which has led us to collaborate with important partners in the non-profit world and in academic education, digital as a tool for social inclusion constitutes the characterising element of our actions, in line with the Group's mission.

The first Sustainability Report inevitably constitutes the beginning of a journey and, for this reason, induces us to look more at the path ahead than at the results achieved. Its narrative, however, in its numerical data and qualitative information, describes a Group that arrives at this appointment already able to boast a posture concretely and positively oriented in the right direction.

In the almost ten years since its foundation, the Group has built and made profitable its ability to create, disseminate and thus transform the culture of digital and innovation into concrete change. These are figures that the Sustainability Report has given us the opportunity to organically gather and report on: on the one hand, more than 100 digital assets (including online portals, web channels and newsletters) focused on innovation, used on average by 2.5 million unique users per month, and almost 900 events, also focused on digital innovation, to which 160.000 participants; on the other hand, more than 550 customers (including companies and public administrations) who have used our services to accelerate and/or improve their digital transformation path and, thus, modernisation and sustainable growth.

At the same time, we have invested in our internal organisation: an organisation made up of a young corporate population, with an average age of 38, characterised by a substantial gender balance, with a high cultural profile - 82% have a university degree or higher - and rich in different cultures due to the variety of human, university and professional backgrounds that characterise the people we have sought out and included over time.

First of all, we have invested in smartworking: always ingrained in the Group's culture and practices, it has enabled us to deal with the pandemic emergency and the change it has induced, including in the way we relate to customers, without significant impacts on the business and, in addition, with interesting reductions in emissions.

Then the protection of the personal data of all stakeholders, including in terms of security, pursued through the adoption of corporate policies and procedures and the identification of organisational roles to ensure their application and effectiveness.

And also the adoption and dissemination of the Group's Code of Ethics, the implementation of tools to protect whistleblowing, compliance with regulations on corporate administrative responsibility with the adoption of the Organisation, Management and Control Model and the establishment of the Supervisory Board.

And much more, as described in detail in this document

The DIGITAL360 Group's path of sustainability is, therefore, a road that has only just begun but is already rich in concrete content, which crosses and enriches the significant economic results achieved and the important growth pursued, both organically and through acquisitions.

Our future will see an increasing integration between business strategies and sustainability, with a strengthening of the tools needed to know, understand and anticipate the expectations of our stakeholders and their needs, starting with customers and employees.

The strengthening of organisational controls on ESG issues, in close correlation with the statutory objectives of common benefit, will also make it possible to disseminate the culture of sustainability in strategic thinking as well as in the daily practice of the Group, in the design and implementation of services and in the clear and comparable reporting of key indicators.

Our most stimulating challenge is to honour these commitments with our Stakeholders, in the presence of a significant growth dynamic that is an inalienable part of our DNA and that obliges the entire corporate body to continuously relaunch the effort of innovation and improvement, internally and towards the market. On the other hand, the ability to overcome demanding challenges has been the hallmark of the Group's ten years of existence.

Happy reading.

Andrea Rangone
President, Digital360



Digital innovation as a lever for sustainable and inclusive growth

1.

1.1 One innovative SME, two business cores, multiple co-entrepreneurs

DIGITAL360 S.p.A. is an innovative SME and Società Benefit, listed on the Euronext Growth Milan Market (formerly AIM Italia) of Borsa Italiana since June 2017. It was born from university research - from a group of professors at the Politecnico di Milano who are passionate about technology and innovation - integrating in its growth path some of the most prominent figures in the world of digital innovation in Italy (entrepreneurs, managers and sector experts).

Its mission is to accompany companies and public administrations in the understanding and implementation of digital innovation, facilitating their encounter with the best technology providers. It pursues this mission through two Business Units:

- the first, called **Demand Generation**, helps digital service and solution providers (tech companies) communicate more effectively and connect with new customers;

An innovative SME born from university research listed on the stock exchange and growing rapidly. A Benefit Corporation with a clear mission.

- the second, called **Advisory&Coaching**, works alongside companies and public administrations to support them in their digital transformation path.

Both Business Units share a fundamental asset of the Group: **the DIGITAL360 Network**, which includes all publications and portals dedicated to the themes of digital transformation and business innovation and is the point of reference in Italy for managers, professionals, policy makers, politicians, tech companies, start-ups and public administrations. In addition to being a direct enabler

of many of the services of the Demand Generation Business Unit, the Network actually also plays a key role at the go-to-market level of both business lines, allowing new prospects to be identified on an ongoing basis and the business model to be 'scaled up' to the small and medium-sized enterprise market.

Both Business Units follow an innovative approach, based on proprietary assets (in addition to the DIGITAL360 Network, highly engineered know-how and technology platforms delivered as-a-service), which is revolutionising their markets (MarTech and ConsulTech).

Since its inception in 2012, DIGITAL360 has always pursued **a strategy strongly focused on growth**, both organically and through acquisitions. In recent years, the Group has grown at an average annual rate (CAGR) of 40%, about half organically and the rest through acquisitions. Acquisitions have always had a dual purpose, in addition to accelerating growth:

- consolidate highly fragmented markets (and this is what we managed to do, for example, in the market for demand generation services for tech companies, where we quickly became by far the largest player in the Italian market);
- bring on board DIGITAL360 smart co-entrepreneurs with the same vi-

sion and culture as us (there is no doubt that it is thanks to the team of these co-entrepreneurs that we can confidently set the course for growth in the coming years).

A major boost to our growth came from our listing on the stock exchange. We landed in 2017 on the Borsa Italiana market dedicated to innovative SMEs, Euronext Growth Milan (EGM), formerly known as AIM Italia. Demonstrating investors' appreciation for DIGITAL360's achievements is the performance of our stock, which quadrupled in value from listing to the close of the 2021 Annual Report.

Thanks to this significant growth, as at 31.12.2021 the Group had 340 employees and collaborators, total assets of EUR 34,861,000, net revenue of EUR 31,175,000 and total capitalisation of EUR 91 million.

Our activities are coordinated from the headquarters in Via Copernico 38 in Milan, with support from the Rome office, while from 2021 the Group will also operate in Catania.

1.2 Digital and increasingly sustainable and inclusive: this is our future

Our mission is to accompany businesses and public administrations in the understanding and implementation of digital innovation, encouraging them to meet the best technology providers. All this would not have

Since our inception, we have been promoting digital innovation as an engine for sustainable and inclusive growth of the economy and society.

been possible if we had not kept our vision in mind: digital innovation as an engine for sustainable and inclusive development of the economy and renewal of businesses and public administrations. We are convinced that our core business, digital innovation, is the most important lever to accelerate economic growth and increase the productivity and competitiveness of any organisation, public or private, contributing to growing GDP and employment. But digital innovation is also a powerful lever to promote better economic development:

- **sustainable**, reducing waste, resource consumption, pollution and thus protecting the natural ecosystem as a whole; and
- **inclusive**, making it possible to reduce inequalities and frailties of all kinds and thus creating real opportunities for all to enter the world of work.

In 2020, we decided to formalise our commitment in all these areas, starting the path, which took shape in 2021, to become a Benefit Corporation: a company that in the exercise of its activities, in addition to its profit-making purpose, has one or more aims of common benefit. The path to becoming a Benefit Corporation was an opportunity, thanks to the Benefit Impact Assessment (BIA) questionnaire, to measure our sustainability performance in managing resources in five areas: community, environment, customers, governance and employees.

On 1 June 2021, we completed this process, with **the recognition of the Benefit Society status**. The changes to the Articles of Association that such recognition entails include the appointment of an 'Impact Manager' and the publication of a report on the pursuit of common benefit, to be attached to the Annual Report. Every year, therefore, we will tell how DIGITAL360 is able to positively affect the community in which it operates, in a virtuous circle between improved economic-financial results and social impact. Illustrating and analysing, in a dedicated document, the results achieved by DIGITAL360 in pursuing the aims of common benefit also offers the entire company community an important opportunity: that of

reflecting on its commitment to sustainability and inclusiveness, formalising it and giving greater impetus to all the Group's initiatives. As we will see in detail in Chapter 3, this is a challenge that DIGITAL360 faces not only by collaborating with training institutions, but also by creating concrete opportunities to transform digital skills into opportunities for growth.

1.3 Innovating and knowing how to innovate

At DIGITAL360 we seek to concretely apply our vision - digital innovation as an engine for sustainable and inclusive development of the economy and renewal of businesses and public administration - to innovate both the way we work and our processes (internal innovation) and the services we offer our customers (external innovation).

Already since 2016, to support the significant effort and investment made in innovation both internally and externally, the Group has had a dedicated Innovation Team. Our Innovation Team has as its main objective the continuous research and development of innovative practices. Not only that, the team also has the fundamental task of verifying the effectiveness of the new technological solutions implemented, with the aim of accelerating business growth and enabling new value propositions,

both in the reference market and in new markets. In this context, we have established the figure of the **Chief Innovation Officer**, who oversees internal and external innovation processes and acts as a link between the business functions and the software development team.

External innovation

Below we summarise, for each Business Unit, the main stages of the external innovation process and the main results achieved.

Demand Generation

Innovation in the Demand Generation

THE VISION AND MISSION OF DIGITAL360

La vision

Digital innovation as an engine for sustainable and inclusive development of the economy and renewal of businesses and public administration.

La mission

Accompanying companies and public administrations in understanding and implementing digital innovation and facilitating their encounter with the best technology providers.



THE COMMON-BENEFIT PURPOSES OF DIGITAL360

The purposes of common benefit we have identified for the DIGITAL360 Group are summarised in four points:

- 1** the dissemination of digital culture at all levels, with the aim of accelerating the process of digital innovation in the economic-productive fabric, public administration and society as a whole, with important beneficial effects on the country's competitiveness, productivity, sustainability and inclusiveness;
- 2** mentoring entities or organisations of any kind to help them fully understand the opportunity offered by digital innovation in developing sustainable and inclusive growth paths;
- 3** the promotion of a more inclusive labour market, in particular by favouring the entry into the digital labour market also of those categories of people showing various forms of fragility - social, cultural, ethnic, physical, psychological, gender, etc. - in the labour market;
- 4** the growth of people, fostering their wellbeing in both the professional and personal spheres, and seeking to promote diversity and enhance the aptitudes and aspirations of each individual. All this in a working environment characterised by a corporate culture that expresses a positive impact on society and the environment, where remote forms of work are also used to reduce environmental impact.

Business Unit has enabled a major evolution of the business model and services offered to the market. Specifically, the development of assets based on content, technology and data has allowed 'traditional' services to be transformed into innovative services, capable not only of responding to the most advanced market demands, but also of creating a strong differentiation and uniqueness with respect to competitors. The innovation strategy was developed in 3 successive steps described below.

1. The starting point: custom services

We are a Group constantly striving for innovation - both external and internal. This is why we have been able to respond to the challenges of the pandemic with new technological solutions for us and our customers.

The Demand Generation Business Unit, in its initial phase, focused on offering 'customised' services, designed around the specific needs of our clients. These were communication, event organisation and lead generation services, aimed at improving our customers' online positioning and identifying new opportunities. Already at that time, it became clear how content, technology and data could be key assets in the evolution of the model and the services offered, oriented towards matching supply and demand in the field of digital innovation.

2. The matchmaking platform at the heart of outbound services

The matchmaking platform model was first developed to support outbound services, which aim to provide customers with sales opportunities (leads) and online positioning, leveraging DIGITAL360's proprietary portals. The model is based on 3 main assets:

- content; over the years, a network of more than 100 digital assets (including portals, web channels and newsletters) focusing on digital innovation topics has been developed. In addition to portals, content is also delivered through the organisation of numerous events and webinars, both digital and in-person. Content plays a key role in attracting visitors interested in digital innovation topics and, ultimately, in the solutions offered by our custo-

mers;

- the integrated technology platform; a proprietary technology platform has been developed that integrates the Content Management System, the Marketing Automation platform, the CRM, the mailing system, etc. The technology makes it possible to manage navigation paths, to profile visitors to our portals and participants in events and webinars, and to manage all information of interest;
- data; technology allows us to collect a significant amount of data on our users (visitors to our portals, participants in our events and webinars, readers of our white papers), which are analysed on an ongoing basis in order to understand interest in specific digital innovation solutions and future purchase intentions. This information, on the one hand, is particularly useful for offering our users content in line with their needs and, on the other, allows us to make the 'outbound' services offered to our customers more effective.

3. The matchmaking platform at the heart of inbound services

Over the past few years, the matchmaking platform model has evolved significantly, extending its reach also to our clients' websites. In parallel to what we have seen for the platform underlying outbound services, we work with our customers to develop

their proprietary assets at the level of:

- blog linked to the company website, on which content marketing plans are developed in order to attract target visitors;
- Dedicated marketing automation software to manage navigation paths and profiles;
- data collected on visitors, owned by the client company.

Leveraging these assets, a strategy for positioning and generating sales opportunities can be developed through inbound services. These services are often complemented by outbound services in order to enhance their effectiveness.

Advisory&Coaching

The drive for innovation was from the outset and still is the backbone of the Advisory&Coaching Business Unit.

The service innovation strategy was developed in the Advisory&Coaching Business Unit by progressively focusing on and seizing a business opportunity aimed at enabling companies and public administrations to evolve in the new market scenario, characterised, more and more profoundly, by digital transformation. This strategy was developed in three successive steps, described below.

1. The initial intuition: multidisciplinary and research

From the outset, the Advisory&Coaching Business Unit was born with a multidisciplinary vocation, a meeting

of cultures and skills that were traditionally very far apart, even in the concrete context of client organisations, companies and PAs: management engineers, economists, lawyers and lawyers, analysts and technology experts. The decision to be multi-disciplinary was motivated by the conviction that organisations would increasingly come up against the need to deal with complex and composite requirements, which could not be attributed to the traditional breakdown of responsibilities in the company. This initial characterisation was immediately coupled with the awareness that the very complexity of the new needs triggered by the digital transformation would require depth of thought and a propensity for study and research to explore the frontier themes with greater added value, with all the inescapable implications of enhancing individual skills and the diversity of people that study and research entail:

DIGITAL360 was, moreover, born out of the academic world.

2. First level of innovation: knowledge modelling and tool engineering

The ability to innovate and explore frontier topics draws strength from the ability to trace research results back to clear, communicable and easily usable models in the operational contexts of client organisations. Similarly, the effectiveness and efficiency and, therefore, the competitive-

ness of the consultancy service draw strength from the ability to move from the modelling of themes to the engineering of the tools used to transfer knowledge into business processes: effectiveness and efficiency are thus combined with usability and competitiveness. This approach has made it possible, for example, to cope with the explosion of requests that characterised the two-year period 2017-2018 in relation to the entry into force of the GDPR, fully grasping the new season of data protection as an opportunity for growth in quality and expansion of the client base served and, at the same time, as a service to organisations that had to face a radical change on such a crucial issue as data management and protection.

3. Second level of innovation: consult-tech, the combination of advanced knowledge, engineered services and technology platforms

Service engineering is the prerequisite for the adoption of technology platforms as a truly integrated component of the consulting service. The integrated use of technology platforms makes it possible to transform the consultancy contribution into a client asset and to innovate the way consultancy is delivered/used, while at the same time enhancing the expertise of professionals and the ease with which knowledge can be used across the entire client organisation.

This further level of innovation entailed significant investments and a fast but challenging 'learning curve' that enriched the company's skills portfolio and increased efficiency and competitiveness, allowing the target audience to be extended to a wider stratum of SMEs. Overall, a virtuous circle has thus been set in motion that enhances in-house skills, enables the development of cutting-edge technology platforms, and promotes the dissemination of knowledge and advanced consulting services with high added value.

Internal innovation

DIGITAL360 has always leveraged digital innovation to improve the effectiveness and efficiency of its internal processes. As far back as 2014 (2 years after its birth),

DIGITAL360 equipped itself with a latest-generation ERP (Enterprise Resource Planning), i.e. an integrated management information system capable of managing all activities related to the passive and active administrative cycle, external and internal accounting, and monitoring the progress of projects and orders (measuring work done). In 2017, the CRM (Customer Relationship Management) project was launched, with a twofold objective: on the one hand, to have a single repository of all the data of the users who visit our por-

tals, download our white papers and attend our events and, on the other hand, to support all the processes related to managing relationships with existing and potential customers (prospects). In 2018, the Marketing Automation project was launched, which is essential for keeping track of user actions on our digital assets but also for monitoring and targeting customer and prospect needs in the best possible way. Between 2018 and 2019, a first version of the Business Intelligence tool was built to monitor, via reports and KPIs, the management results of the main companies in the DIGITAL360 Group. In 2022, this first version of BI will be revised through the creation of corporate data warehouses in order to make the solution scalable. In 2021, the introduction of two new applications for the management of time tracking and employee expense reports began in the group, which were integrated into the ERP via the latest connection technology in order to automate data transmission. A further impetus for the digitisation of internal processes started in 2021 with the introduction of RPA (Robotic Process Automation) technologies, which allow repetitive manual tasks to be automated through software robots that emulate human behaviour. Even before the pandemic, the DIGITAL360 Group had already invested in Smart Working through the

adoption of collaborative software capable of guaranteeing high levels of effectiveness and quality. This investment has enabled us to face the emergency imposed by Covid-19 without significant operational discontinuity and, on the contrary, achieving an acceleration of innovation in agile working modes that will continue even after the emergency phase is over. Software for booking and managing workstations in our offices was also introduced and abandoned with the end of the pandemic emergency.

Care and valorisation of human resources

2.

2.1 Our people: composition and dynamics in action

The population of the DIGITAL360 Group

2021 was a year of strong growth for us in terms of human resources. As of 31 December, the DIGITAL360 Group had 342 employees, **an increase of 13%** compared to the same date in 2020.

The composition of our organisation shows a substantial gender balance, with women (52%) slightly outnumbering men (48%). The average seniority is 38 years (39 for men and 37 for women).

In 2021, the number of people working with us increased, confirming the equal distribution of gender, professional diversification and the use of all age groups, factors which together contribute to the cultural richness of the Group: a distinctive and decisive asset.

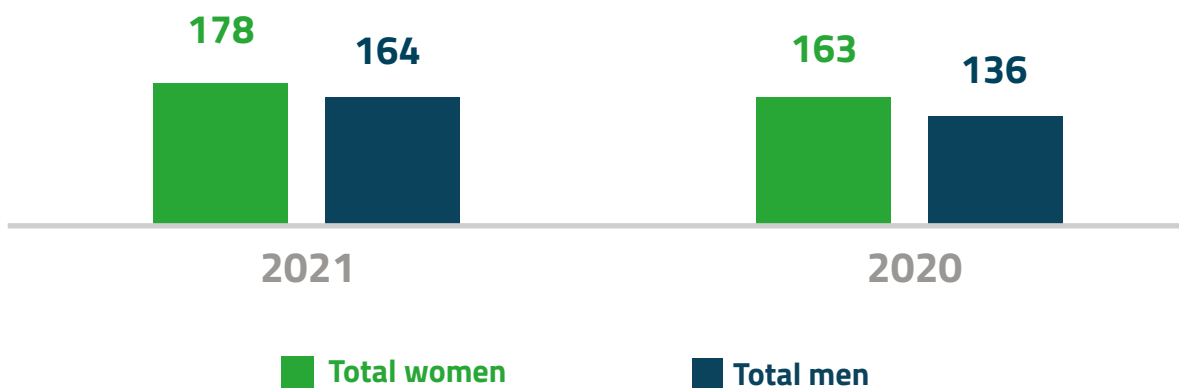


Figure 2.1 – DIGITAL360 Group employees by gender, 2020-2021

¹ The 342 collaborators include fixed-term and permanent employees, VAT contracts, interns and Co.co.s.

The Group has chosen to focus a great deal on collaboration between people at all levels, on mutual contamination, determined by the heterogeneity and professionalism that characterise it, on creativity and on the enhancement of diversity. This translates into a great variety of professional figures that coexist in our Group and make the daily work routine non-repetitive and rich in continuous growth cues, as well as professional and personal enrichment. The services offered to the market structurally provide for different professional and disciplinary contributions - from lawyers to cyber security experts, journalists to computer scientists, organisation experts, or social media and communication experts - in response to a specific need of companies and public administrations called upon to face increasingly articulated and complex challenges.

The professional skills acquired in the field are based on a very high level of education: 82% of our employees have a university degree or higher.

The distribution in terms of disciplines sees a high presence of graduates in STEM disciplines, engineers, lawyers, economists, humanities graduates with profiles from more than 40 different degree courses, providing our Group with invaluable

cultural and professional diversity. Ninety-five per cent of employees are full-time and only five per cent are part-time. Of the total number of employees, 97% have a permanent contract. If we look at the total number of Group employees, people with a permanent contract reach 60%, while 2% have a fixed-term contract; the remaining 38% work with other forms of contract such as collaboration contracts (Co.co.co.) and VAT numbers. This last figure reflects the historical and distinctive presence of activities with a very high professional content that has required, and still requires, professionals registered with registers, with particular reference to lawyers, engineers and journalists.

In any case, employees with VAT numbers have collaboration contracts with the company that regulate and protect their activities, recognising their professional autonomy.

The relatively low number of executives and managers should be read in the light of four characteristics:

- the above-mentioned presence among the collaborators with a high level of professional seniority of VAT-registered professionals who are typically registered with the registers;
- the presence in top management roles of entrepreneurs who in many the flat professional structure with few organisational

levels and strong incentives for autonomy, merit and entrepreneurship;

- the presence of an extensive stock option programme to motivate and retain key people.

The dynamics at work

The year 2021 saw a significant increase in the number of employees amounting to a net increase of 30 permanent employees, 1 fixed-term em-

ployee and 17 employees with VAT.

On the other hand, the number of internships decreased slightly from 25 to 20 in 2021 due to the difficulty in effectively hosting new internships because of the pandemic restrictions. In the new year, the number of internships, which have been very popular in the past and resulted in a large majority of cases in employment, is expected to return to pre-pandemic levels.

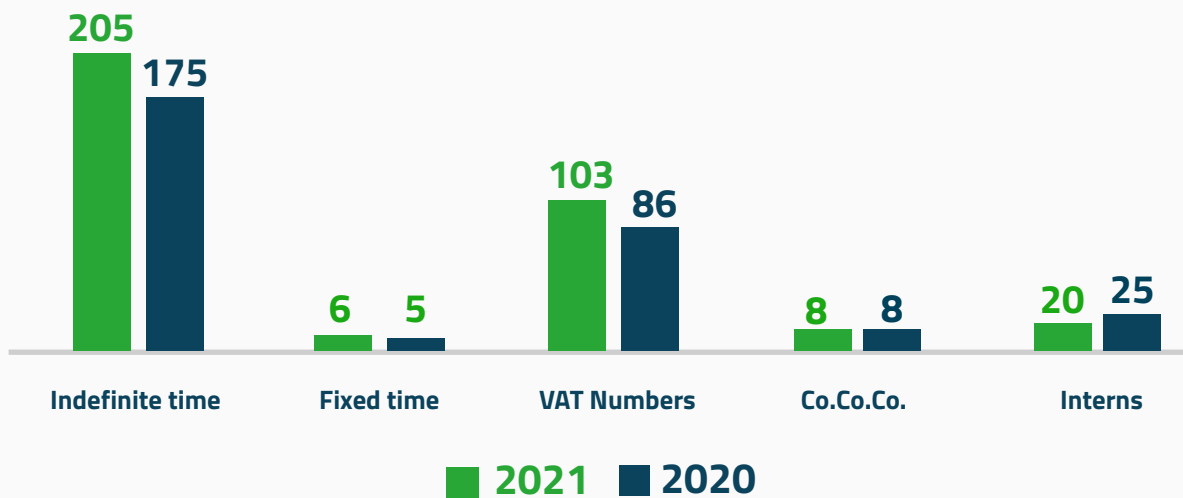


Figure 2.2 - DIGITAL360 Group employees by employment contract in 2021-2020

With regard to the breakdown of the company population by age groups, a general increase is observed for all groups considered (age under 30, age between 30 and 50, age over 50), precisely in connection with the increase in the number of workers in 2021 compared to 2020.

The growth rates were balanced, allowing for substantial stability in the Group: employees under 30 years of age increased by 19%, those between 30 and 50 years of age by 14%, while the over-50s grew by 10%.

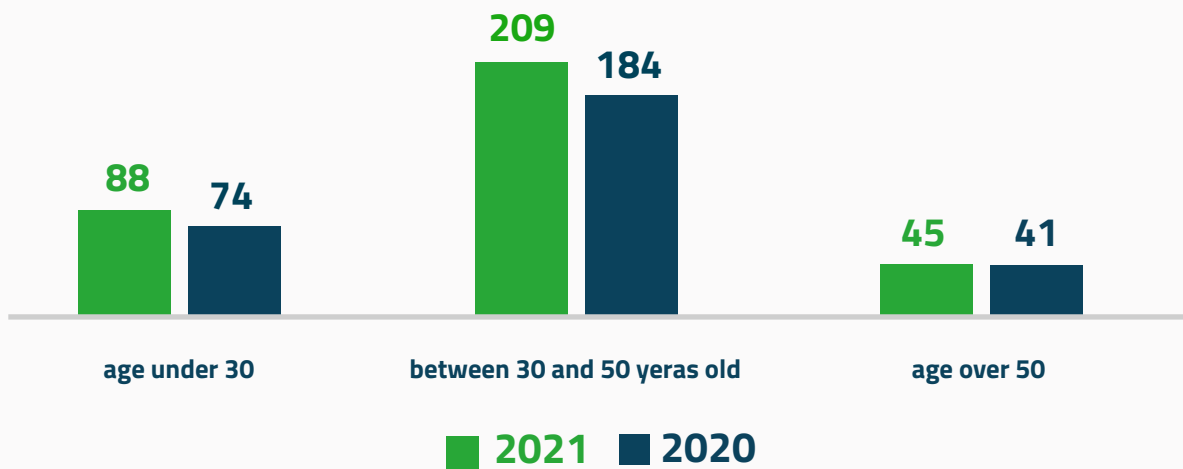


Figure 2.3 - DIGITAL360 Group employees by age group in 2021-2020

The division by contractual categories also remained substantially stable in the comparison between 2021 and 2020.

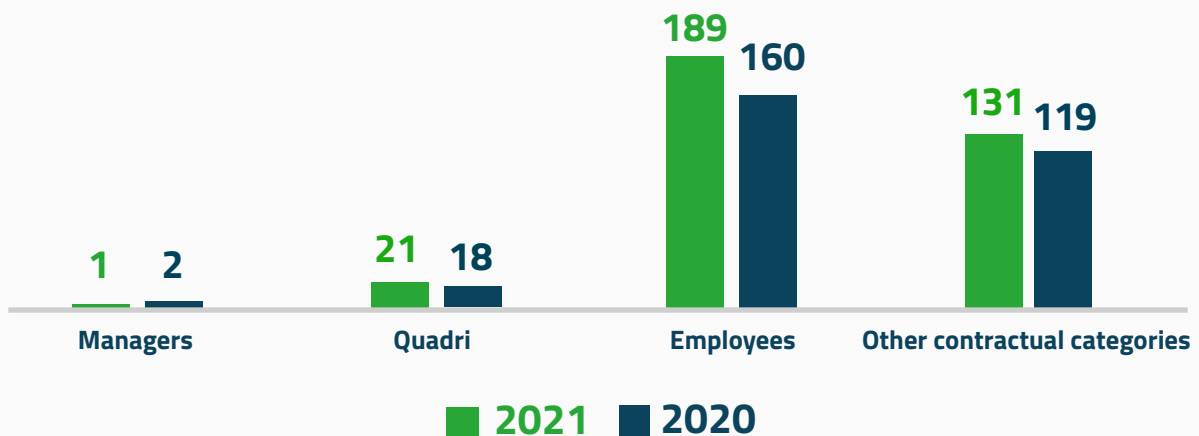


Figure 2.4 - DIGITAL360 Group employees by contractual classification in 2021-2020

Recruitment policies and turnover management

As part of our **talent acquisition** strategy, we offer numerous internship opportunities each year, giving high-potential young people the chance to get to know the company and experience training.

As of 31 December 2021, there were 20 active internships, including curricular and extra-curricular with a view to placement: the conversion rate of extra-curricular internships into employment contracts in 2020 was over 60%.

However, precisely because we consider our organization as "a living organism" open and receptive to external stimuli and "contaminations", we have decided not to focus only on young people: the entry of senior people, in fact, is strongly pursued and experienced as an overall enrichment of the entire Group. Every person who joins DIGITAL360 is called upon to feel that they are the protagonist of their own growth and that of the team they belong to and of the Group itself.

The ambition is that, regardless of their age and background, all people who join DIGITAL360 will feel like 'co-entrepreneurs' of a reality that has the ambition to change the market in which it operates.

In concrete terms, many of the Group's new services stem from the ideas and proposals of employees with different positions and seniority, who are also called upon to give operational substance to their proposals, in a path of personal growth as well as benefit for the entire Group.

A further element in monitoring the effectiveness of placement policies is the conversion rate of extracurricular internships into employment contracts, which was over 60% in 2020.

The recruiting process in 2021 had to cope not only with the need to increase the overall number of employees, but also with a significant increase in turnover due to resignations. Overall, we hired 74 employees in 2021 (compared to 28 in 2020), while 44 people terminated their employment. In 2021, the Group's overall turnover was 56%, compared to 28% in 2020. In detail, the incoming turnover rate for the Group increased from 16% to 35% in 2021. The main change is due to the higher number of employees in the under-30 bracket.

The outgoing turnover is 21%, up from the 2020 figure of 12%.

The increase in outgoing turnover is partly linked to the general upward trend of resignations in the market, also known in Italy as great resignation

² Examples include the microlearning platform 360Digitalskill and the continuous feedback exchange platform feedback4you, both of which originated from proposals by employees and collaborators.

, and partly to the strong attractiveness of our people in market segments that have seen a strong growth in demand in recent months and a consequent increase in competition in the talent market.

This phenomenon particularly affected the Advisory&Coaching business unit from the second half of 2020 as a result of the particular attractiveness of our professional skills in the labour market.

Digital Transformation and Cyber security consultants, for example, have strong opportunities for professional growth and visibility within the company that make them particularly attractive on the market.

To tackle this phenomenon, the company is acting on two fronts:

- strengthening employer branding and enhancing the attractiveness and recruiting of new talent;
- retention of key or high-potential persons.

On the first dimension, firstly, the recruiting process was strengthened with a structured involvement, alongside experienced recruiters, of key people in the company.

Secondly, initiatives were launched to improve attractiveness through partici-

pation in career days, social campaigns and referral programmes aimed at raising awareness of the organisation. The specific objective was to attract candidates more in line with the organisation's culture by highlighting the distinctiveness of our 'Employee Value Proposition', based on factors such as high professional content, flexibility and autonomy in the organisation of work, the richness and diversity of opportunities for growth in skills and the transparency and meritocracy in growth and career paths, which are characterised by the rejection of competitive 'up or out' logics often found in competing organisations.

2.2 Policies of inclusion and valorisation of differences

The promotion of equal opportunities

Our Group has made respect for and appreciation of differences one of its values, and is determined to offer its people equal opportunities for development and growth. This is a commitment that is already manifested in the personnel selection phase, with explicit references, within the job offers published in the various recruitment

³ Analysing the data from the Ministry of Labour and Social Policy on terminations of employment in the second quarter of 2021, a trend growth of 43.7 per cent emerges. In particular, between April and June, there was an increase in terminations, with 2,587,000 closures of employment relationships, a 37% increase compared to the previous quarter and +768,000 compared to the same quarter in 2020. Of these, 484,000 were due to voluntary resignations of workers. Overall, the share of voluntary resignations in total employment exceeded 2% for the first time in years.

We value diversity from all points of view: gender diversity, age diversity, of professional training and background. We promote equal opportunities among our employees through our management culture, remuneration policy and specific rules against the risk of discrimination.

channels, to the policies of social inclusion and protection of diversity. But it is particularly in the performance of day-to-day activities, that we aim to value diversity and promote equal opportunities among our employees and collaborators without discrimination in terms of gender, age and disciplinary background.

Among these measures, equal treatment (including economic) for equal responsibilities, organisation of work by objectives and transparency in the evaluation of results, as well as the consolidation of a widespread culture of respect and inclusion are of parti-

cular importance to us. The gender presence is very high, with a slight prevalence now of women over men. Although without forcing it to give up full meritocracy, there is increasing attention to favouring the presence of women in roles of greater responsibility.

Prevention of the risk of discrimination

More generally, at DIGITAL360 we have decided to seriously address the risk of discrimination among our employees. For this reason, this risk is taken into account within the Group's Code of Ethics, which was adopted by the Parent Company's Board of Directors with its first resolution on 14 September 2016 and subsequently updated on 12 July 2018. It is a single document for the entire Group and, as such, all subsidiaries are required to accept it and comply with its contents. In particular, the Code of Ethics emphasises that the Parent Company and each Group company operate by avoiding discriminatory and opportunistic behaviour. In pursuing this aim, they do not discriminate on the basis of sex, race, language, religion, political opinions, personal and social conditions. For this very reason, the risk of discrimination is monitored by the Group through all the tools provided for compliance with the values of the code of ethics.

2.3 Performance management and remuneration and career policies

Growth opportunities in the Group

In 2021, the Group worked on defining, reviewing and sharing career paths to attract, retain and enhance talent in a changing organisational environment. We strongly believe that a shared reference framework, capable of making explicit the relationships between the current role and opportunities for professional growth, should enable people to identify and visualise, throughout their career, opportunities for growth within the various Business Units, Group companies, professional families, functional areas, etc. To this end, differentiated career paths are promoted to accompany people in

their professional development within the DIGITAL360 group. In the first few years, the effort is to ensure professional growth and continuous learning on all aspects of the business, giving the opportunity to experiment, make mistakes, and test oneself in a healthy environment and supported by the guidance and coaching of mature people. In the subsequent development phases, an attempt is made to give all employees the opportunity to specialise more, following their inclinations and talents in a natural way.

Our rewarding system

The development of talents and their careers within DIGITAL360 is accompanied by a **rewarding system** that is based on principles of meritocracy, non-discrimination and fairness, both internal and external. The aim is to

COMPLIANCE WITH THE VALUES OF THE CODE OF ETHICS SUPERVISORY TOOLS

- Presence of a Supervisory Board, as the body in charge of overseeing the application of the code, which appropriately coordinates with the competent bodies and functions for the proper implementation and control of the principles of the code.
- Dedicated e-mail address: odv@digital360.it
- Reference to a link in case of discrimination incidents to be reported: <https://digitalplatform.unione fiduciaria.it/whistleblowing/>
- Possibility of sending reports in paper format to the postal address: "Supervisory Board, at DIGITAL360 S.p.A., Via Copernico 38, Milan - 20135".

attract, retain and motivate deserving people. The remuneration system consists of a fixed and a variable component. The fixed remuneration is related to the complexity of the role played by the various people.

To this end, the development of a role classification system has been initiated, based on various professionalism factors aimed at ensuring internal fairness and equal opportunities. The alignment with the external labour market is supported by periodic salary benchmarks with companies operating in the various businesses in which the Group is active. The variable component, on the other hand, is based on a management by objectives (MBO) system extended to 59% of DIGITAL360 people, which defines a mix of company and individual objectives and assesses their achievement through a structured process.

The performance management process applied today in the Group's historical companies, P4I and ICT&-Strategy, which will be progressively extended over the next three years to all companies, is designed to apply principles of fairness, meritocracy, equal opportunities and transparency, and is aimed at fostering the boss-employee relationship, clarifying expectations, sharing objectives, receiving and/or giving feedback, analysing achievements and establishing personal development plans.

Career opportunities in the DIGITAL360 Group are oriented towards the idea that we are all 'intrapreneurs' in a company that is determined to change the market in which it operates. Our career paths and well-established rewarding system are the basis for motivating and rewarding deserving people and enabling each of them to build their future to the best of their ability.

The process starts at the beginning of each year with a self-evaluation phase in which people are called upon, in a structured and guided manner, to self-evaluate the achievement of the individual objectives assigned to them, map themselves in terms of the possession and growth of the skills/capacities that characterise their role, define their own areas for improvement by proposing possible initiatives to support their growth path and propose possible changes/improvements in the work organisation. Formal assessment takes place through a structu-

red moment in which the employee receives feedback on the achievement of objectives for the previous year and receives and discusses those for the new year. a project was launched to stimulate the practice of continuous feedback by People Managers through training and the adoption, initially on an experimental basis, of the proprietary Feedback4you platform. This platform was developed by the company P4I for the market, which makes it possible to facilitate, structure and monitor the exchange of continuous feedback and effectively link it to individual performance and growth objectives. In the two-year period 2022-2023, this performance management process will be extended to the newly acquired companies through a gradual process accompanied by coaching and management support actions. Another element characterising the DIGITAL360 Group's rewarding and performance management model is a **stock option plan**, extended to about 40% of the company's population, aimed at retaining and retaining the most important resources for the Group's success. The result of these efforts has been that, despite the aforementioned significant growth in outgoing turnover, the number of resignations among key people has been reduced to very few. The goal for the future is to increase the involvement and loyalty of employees right from the start.

The people who join DIGITAL360 follow an onboarding path which includes a mix of centrally organised initiatives and actions directly managed by the teams in which they are placed.

Among the former are Induction initiatives with Human Resources, a real induction training session in which the Group's values, culture and mission are conveyed; cognitive meetings with Top Management and presentation to the rest of the Group.

2.4 Training, talent development and employability

Training is a decisive activity within the overall strategy for attracting and developing our people. This commitment is certainly favoured by the strong link that unites us with the university world. The group provides its people with a wide-ranging and multidisciplinary training offer, both in-person and online, conceived and designed not only as an opportunity for professional growth and up-skilling, but also as an element of mutual acquaintance, socialisation and above all the creation and sharing of common identities, skills and languages among the various souls of the organisation.

The DIGITAL360 Group's training policy is developed along three lines:

- maintain a high level of know-how in relation to the most cutting-edge digital and business innovation topics;

- develop people's 'technical' and 'vertical' skills in order to improve in terms of efficiency and effectiveness the execution of activities and projects;
- strengthen certain soft skills, also in function of the smart working model.

We want, in particular, to invest in collaboration skills, teamwork and coordination of activities. In order to achieve these goals, we use various teaching methods: face-to-face courses, online courses, international e-learning platforms, proprietary e-learning platforms, certification courses, training-on-the-job, action learning, individual coaching for people managers, participation in national and/or international conferences and events.

As far as the training management process is concerned, the first step involves strategic input from top management, followed by a gathering of needs by People Managers and then the drafting of a detailed plan. The result of this process is the creation of an extensive training catalogue that is constantly updated and enriched from year to year, allowing Group people to access customised training courses. This process, which is now fully operational in the Group's historical companies, will be gradually extended to the acquired companies from 2022 onwards, so as to serve as a tool for integrating and creating Group skills and identity.

From 2022, we also plan to organise periodic webinars, called 'Inspirational Fridays', on a monthly or bi-monthly basis, on non-work-related topics (e.g. in-depth studies on non-European cultures, photography, astrophysics, the national political and social situation, etc.). We believe in the importance of personal as well as professional enrichment. In 2021 we have activated courses on Legislative Decree 231/01, which governs the administrative liability of legal persons, and on the Code of Ethics, through the proprietary e-learning platform, 360DigitalSkills, extended to all Group personnel. On the same platform we have provided digital skills courses. One of the world's largest e-learning platforms has been set up for the companies in the Group's historical perimeter, making it possible to identify courses divided by professional family and increase specific skills. Lastly, several training

We consider training a strategic activity favoured by the strong link that unites us with the university world. The employability and attractiveness of our people in the market measures the innovative capacity of the entire organisation.

courses have been activated with the aim of acquiring professional certifications.

A total of 15,536 hours of training were provided in 2021, a 270% increase over 2020. This growth is associated with the fact that the Group benefited from the New Skills Fund, a measure co-financed by the European Social Fund, set up to support companies and workers in the post-pandemic phase. The decision to make massive use of this extraordinary measure was not tactical or financial, but motivated by the need to accompany people in the development of new skills and behaviours necessary for new ways of working.

The availability of public resources to co-finance people's time dedicated to training, and the availability of valuable internal resources in terms of teachers and content, made this exceptional effort possible in terms of training hours per capita, which must be considered as an extraordinary investment in our people. In terms of content, and also in relation to the aforementioned need to accompany the spread of new ways of working, during 2021 priority was given to training in technical competences and skills specific to the professional role (60%). Alongside this, training was also provided on soft skills (30%), and on occupational safety issues (10%).

Types of training provided by DIGITAL360 Group as at 31.12.2021

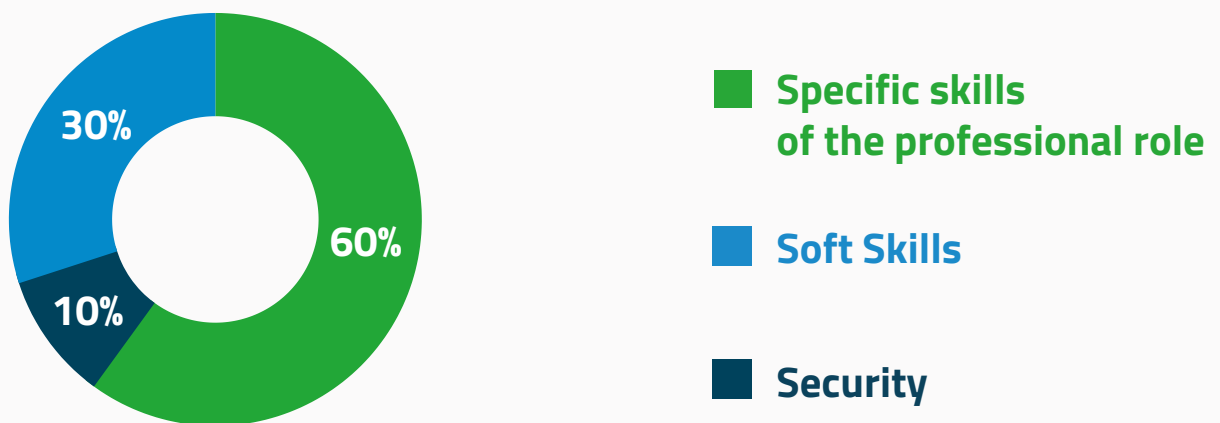


Figure 2.5 - Types of training provided by DIGITAL360 Group as at 31.12.2021

2.5 The value of health and safety at work

Occupational health and safety safeguards

As we have also reaffirmed in our code of ethics, the DIGITAL360 Group places the value of health and safety in the workplace at the centre. That is why we place great emphasis on management systems, policies and shared documents capable of guaranteeing the objectives we have set ourselves.

In particular, we have implemented an OHSAS 18001 management system, currently not certified, in compliance with the measures prescribed by Article 30 of Legislative Decree 231/01, which regulates, in detail, the administrative liability of legal persons. According to this standard, the management system covers all activities, companies and workers (employees and non-employees) of the Group.

In parallel, we put in place internal audit procedures for 20% of the total number of workers covered by this system, as a sample quota for analysis.

We also prepared a **Group Risk Assessment Document (DVR)** that takes into account intra-group activities. In addition to the Group DVR, a specific one was prepared for DIGITAL360 SpA.

The risk assessment is normally updated annually.

Verification of the effectiveness of the policies and all the management methods implemented on health and safety at work issues is entrusted to the **Supervisory Board**, which periodically checks the application of Group policies and procedures. Two companies in the Group, FPA and SericePro, in relation to some of their specificities, have an autonomous body of procedures with respect to the other companies and have an autonomous composition of the guarantee positions on health and safety in the workplace. At FPA, the Group's Prevention and Protection Service and the competent doctor carry out periodic inspections of the workplace while, together with the Supervisory Board, a documental audit is carried out on an annual basis to assess the state of compliance of the company's documental system.

Furthermore, with regard to the communication of any work-related risks or dangerous situations, the DIGITAL360 Group has implemented a **platform for whistleblowing**. Whistleblowing can also include topics concerning health and safety in the workplace, in case wrongdoing occurs. The company has made the document 'Guidelines for the use of the whistleblowing platform' available to everyone - directors, managers, employees and collaborators. A Group QHSE manager has been appointed dedicated to quality, health, safety

SAFETY TRAINING

The DIGITAL360 Group also organises training activities on occupational health and safety issues. These activities are delivered in e-learning mode through the training provider Frareg. The training activities on health and safety in the workplace provide for the involvement of all new recruits and workers called upon for refresher training. Training covered general and specific topics. Additional training was provided for Prevention and Protection Service Managers (RSPP) and for Quality, Health, Safety and Environmental Management (QHSE) employees who took the 40 hours of refresher training to be able to carry out the role of RSPP.

and environment management who also acts as RSPP (Prevention and Protection Service Manager).

As seen above, we invest in health and safety training. The DIGITAL360 Group periodically trains its employees on job-specific risks, in accordance with the law, through the support of training organisations.

Training on these topics is not only dedicated to employees. We provide,

in fact, for freelance contracts, the possibility of access to the training courses offered by the Group pursuant to the State-Regions Agreement of 21/12/11. Freelance professionals are informed about the procedures adopted by the company, and they are also given information on health and safety in the workplace.

Risk assessment at work

Group companies also regularly update their **risk assessment** and, in the event of substantial changes or the introduction of new risks, inform their employees on how to avoid such risks. An example of this is the information and procedures sent to employees and collaborators on how to enter the company, how to enter visitors and how to travel to customers during the SARS-COV-2 pandemic.

During the pandemic period, the Group applied a policy of full remote working, implementing procedures to reduce the risk of contagion. Employees and collaborators started to consult

We consider the protection of health and safety in the workplace to be a corporate value. Our commitment is embodied in a Group Risk Assessment Document (DVR), which in some companies has a specific formulation.

remotely in order to reduce close contact with clients. In this respect, the Group offered its employees and collaborators information on the main risks of remote working.

In their commitment to health and safety, DIGITAL360 Group companies have noted an average risk incidence, compared to objective assessment parameters. Therefore, in accordance with the guidelines offered by the INAIL Guideline 2017, the Group companies did not carry out a subjective survey.

In the DIGITAL360 Group, the main risks are those of a service company and concern work spaces, commuting and travelling accidents, video terminal work and work-related stress. For workers exposed to VDTs, a specific risk assessment was carried out in accordance with Annex XXXIV of Legislative Decree 81/08 (also known as the Safety Consolidation Act, i.e., the standard that regulates the protection of workers' health and safety in the workplace), while for work-related stress, the specific risk assessment was carried out according to the 2017 INAIL guidelines and the assessment of objective parameters was low..

The prevention of accidents at work

The risk assessment is clearly aimed at **preventing accidents, which, as at 31.12.2021, have never occurred in the Group.** In any case, we have

a procedure for managing accident non-compliance and corrective and **preventive actions**, which describes how accidents are dealt with.

DIGITAL360 also implements preventive measures. In order to reduce exposure to VDTs, we have prescribed a 15-minute break every 2 hours for our workers. For prolonged use of laptops, we prescribe that the workstation be equipped with an external screen at least 19 inches in size. The Group also has a competent doctor and a coordinating competent doctor. The arrangements for access to medical examinations are those laid down in Article 41 of Legislative Decree 81/2008.

Medical examinations are organised through the collaboration of the Human Resources office and Frareg, the company that provides us with the occupational medicine service. Our offices and Frareg have a shared registry, where the deadlines for the examinations to be carried out are indicated, which is modified by our Human Resources department, based on people joining and leaving the company. In this regard, we must point out that the IQC company, as it has no workers, is obviously not subject to the constraints of occupational medicine.

2.6 Flexibility and new ways of working

At DIGITAL360 we strongly believe in

work flexibility and are proactive in spreading the culture of autonomy and **empowerment**.

Even before the Pandemic, DIGITAL360 was already promoting a very thorough **Smart Working** model, with the absence of constraints on timetables and time-stamping systems, and the possibility of working in places other than the office without limitations, provided that this is within the framework of an organisation shared with the team and with full responsibility for the results and quality of the service rendered to the customer. The use of Smart Working is on a voluntary basis and can be accessed by permanent and fixed-term employees, both full-time and part-time, including apprentices, subject of course to the assessment of individual teams as to whether the necessary conditions for using this modality exist.

All workers are equipped with tools to work remotely and company applications are designed to allow remote access. This organisation made it possible during the health emergency to cope with the pandemic by closing offices without direct impact on productivity. Following an analysis carried out through surveys and focus groups, a series of needs were identified to make work that had to be carried out entirely remotely for many months more sustainable and effective. Particular attention was given to enhancing and disseminating the use of the Unified Communication and Col-

laboration environment (the Group in particular adopts the entire Microsoft Office 365 suite). Numerous socialisation and online communication initiatives have been introduced and training on behaviour and leadership styles in virtual or hybrid contexts has been enhanced. The Group, moreover, has always been a forerunner in the adoption of Smart Working models, the promotion of which, both in the private and public world, constitutes an important and distinctive business area. The adoption of advanced Smart Working models has therefore been enabled by the in-house skills present, and has at the same time allowed for the refinement and development of models and practices that were then proposed on the market.

Also in terms of space, our locations in Milan, Rome and Catania are in line with our Smart Working-oriented spirit and working style, and are based on open and innovative **coworking spaces**, located in central areas easily accessible by public transport.

There are no a priori limitations at Group level on the number and distribution of days when our people can work remotely.

These limitations may be defined by managers in relation to the characteristics of the task, the employee's level of autonomy, and the need for coordination within the organisation. Even before the pandemic, there were cases of employees working permanently or for

certain periods from locations far from the company premises; this practice, which was always subject to an assessment by the managers, has been further strengthened since the beginning of the pandemic. Furthermore, in order to ensure a better organisation of work and for effective contact and coordination with colleagues, we request that during the course of work and within normal working hours, the person makes himself or herself available by means of the digital tools in his or her possession (e.g. e-mail, Teams, etc.). Of course, the normal breaks governed by health and safety at work regulations remain valid.

2.7 Communication, welfare, engagement

Communication with co-workers

The DIGITAL360 Group strongly believes that listening to the needs of its employees and enabling them to work effectively and calmly is one of the critical success factors for overcoming current and future challenges.

In 2021, also with a view to meeting the new socialisation needs that have emerged in the face of the increased use of remote work, we activated a corporate social network on the **Facebook Workplace** platform, which has helped to enrich and transform the way we communicate and socialise at DIGITAL360, with the aim of developing a sense of belonging to the Group and helping pe-

ople feel closer and more 'connected', despite working remotely.

This tool allows everyone to get in touch with colleagues from different business units and companies, post initiatives, content or projects, and get information on company life. It also allows our people to keep their finger on the pulse of what is happening on a daily basis at DIGITAL360, while offering everyone the opportunity to grow and maintain their network of contacts.

We organise monthly **update webinars** to which all people in the Group are invited.

During the webinars, top management shares business developments and communicates key news, projects and initiatives affecting the Group.

On this occasion, we also give space to newcomers, offering them the opportunity to introduce themselves to their colleagues. Training initiatives such as *inspirational Fridays* and training weeks also contribute to increasing opportunities for exchange and discussion between people.

We promote better organisation of work through flexibility and a pro-active commitment to spreading a work-life balance culture.

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Attention to people's well-being

In our commitment to always value the contribution of our people, we believe that initiatives aimed at improving people's well-being are a strategic lever that is perfectly in line with our corporate values, and that, together with the agile organisation of work, are an important tool for improving the attractiveness and well-being of the entire corporate population. Against this, it is important to note that the DIGITAL360 Group is a conglomerate of small companies, some of them micro, whose workforce composition is highly heterogeneous. The rapid growth

We listen to the needs of our employees, develop and adopt technological solutions to make communication between and with our people effective and foster continuous improvement in a collaborative climate.

of recent years, the various acquisitions, and the strong dynamism of the Group are all factors that have slowed down the development and implementation of a structured and unified welfare plan. For this reason, **a relaunch of corporate welfare is being studied and will be implemented over the next two years** to better meet the needs of employees, while taking into account the Group's new organisational structure.

Improving engagement with our people

The DIGITAL360 Group monitors people engagement through periodic structured surveys in order to improve it.

For 2022, in particular, an in-depth People Engagement survey is planned, which will be used to accurately detect levels of well-being and engagement and to design a coherent framework of improvement initiatives.

Stakeholder relations

3.

3.1 Our approach to customers: communication and satisfaction

As described in the Group presentation in the first chapter, **DIGITAL360 is divided into two Business Units that address two different categories of customers:**

- the Demand Generation Business Unit, which specifically targets technology companies and digital innovation providers to help them in their marketing and business opportunity generation activities;
- the Advisory & Coaching Business Unit, on the other hand, which works alongside companies of all sectors and sizes and public administrations to support them in their digital transformation process.

The Demand Generation Business Unit had 285 active customers in 2021, while the Advisory & Coaching Business Unit offered services to just over 300 customers.

We establish long-term relationships with customers, based on trust, quality and the effectiveness of our services, with the concrete aim of to contribute to the achievement of their objectives

The principles underlying customer relations

Customer focus is based on a number of underlying principles shared by the entire Group, which permeate the organisation's operating practices and ensure fairness and transparency in customer relations.

Here are the main ones.

1. Quality, reliability and precision. The human and personal component is a very important element of our services in all their phases: from the establishment of the relationship, the definition of the business proposal to the delivery of the service and the building of a long-term relationship.

The constant striving for quality, the seriousness in taking on customers' needs and the precision in the design and planning of solutions and then in their implementation are therefore a fundamental aspect of the professional and human background of the Group's people. To fully and concretely implement these principles, the Group is constantly committed to providing innovative tools to support and build a favourable and rewarding business environment. In concrete terms, these principles are implemented through a significant training effort not limited to technical skills but extended to the soft skills that contribute to the quality of professional performance (see Chapter 2) and through basic offering models for the various service classes, which are constantly reviewed and improved, to ensure the quality of the business proposition across all business units. Finally, the consulting services for some business areas are ISO 9001 certified..

2. Transparency and fairness in the drafting of offers and contractualisation. The aim of these principles is to

ensure that the commercial proposal and the ensuing contract contain a clear, complete and unambiguous presentation of the services proposed, to allow for a correct assessment by the customer.

The achievement of this objective is ensured by pursuing a close relationship with the customer, right from the early stages of the business relationship. This practice is monitored and supported by constant internal discussions within the operational teams.

Furthermore, in order to ensure that contractual commitments are complete and in line with the company's operational practice and formal obligations, the customer-specific business proposal is drawn up from standard offer templates per class of service, which include, for example: terms of payment, responsibilities of the parties, compliance with the Code of Ethics, and protection of personal data and intellectual property of both.

3. Punctuality and compliance with obligations undertaken. LThe first focus in the provision of the Group's services is the constant effort to meet the commitments undertaken within the agreed timeframe, detecting and sharing any deviation and any risk of deviation with the client in a timely manner. The organisation into operating units that share the same objectives and daily activities to-

gether with the consolidated practice of working in multidisciplinary teams allow for the constant monitoring of the progress of projects, the timely detection of potential criticalities and the correct management of the relationship with the client.

4. Flexibility. The projects and services of both Business Units address client organisations that are constantly evolving, and the same client need that motivated the start of a project may undergo profound changes in the course of the project itself. It is company practice to privilege the fulfilment of the client's real needs over a rigidly formal interpretation of contractual commitments, within a framework of mutual cooperation and trust. This delicate goal of flexibility is ensured by pursuing a commercial and professional relationship that balances the need for profitability with a vision of long-term partnership.

5. Checking the level of customer satisfaction. Establishing and maintaining long-term relationships with customers requires continuous attention to the level of customer satisfaction as a constant element of the business relationship. This is pursued through continuous monitoring by the heads of the operational teams of the effectiveness of the relationship and services. As of 2022,

it is also pursued by means of systematic, independent surveying of the level of customer satisfaction, to ensure an objective basis for monitoring and managing the quality of the customer relationship.

Go-to-market channels

The Group's go-to-market strategy is based on a series of communication and interaction channels with the market, regularly used by both Business Units.

Specifically, the main channels are:

- the Digital360hub and Advisory360hub portals, dedicated respectively to the Business Unit Demand Generation and Advisory&Coaching, within which, in addition to the presentation of the main services offered, clients and prospects can find in-depth content (such as articles, white papers, videos, infographics, etc.) on topics related to these services;
- all the portals and newsletters of the DIGITAL360 Network, which represent a significant asset for the market positioning of the two Business Units. Within the network, in-depth content related to the activities carried out by DIGITAL360 is constantly published and digital marketing plans are developed for the launch of specific services/initiatives;
- continuous meetings with pro-

spects - both individually and within dedicated workshops - for the presentation of the Group and its services;

- continuous accounting activity on active customers carried out by dedicated persons throughout the project life cycle;
- collective events specifically aimed at customers and prospects (e.g. Demand Generation Lab, DIGITAL360 Awards, Tech Company Lab);
- the monthly newsletter for ThinkTankDIGITAL360 customers, featuring editorials written by the Group's key people on particularly relevant and topical issues.

Pro bono activities in favour of professional associations and academic institutions also contribute to nurture the relationship with the market in all its business and professional articulations.

These opportunities intrinsic to the Group's unique business model not only contribute to the creation of a widespread culture, but also enable the professional profile of individual consultants to be enhanced in addition to their corporate skills.

The indirect impact on customers

The services provided by the DIGITAL360 Group generate in client organisations, in the market

and consequently in society a certain, though difficult to measure, indirect positive impact in several areas, such as:

- increased resilience and security of companies and, consequently, of the economic system as a whole, thanks to services aimed at improving cyber security and compliance, with particular reference to data protection. The positive impact extends to reducing the risk of damage or penalties and operational blockages;
- Increased business productivity and reduced operational risks, thanks to services supporting the digitisation of processes (e.g. in operations) and Smart Working;
- increased rate of innovation, thanks to services supporting the innovation process both internally and externally (open innovation);
- increased efficiency and effectiveness in the management of information systems and the use of digital technologies, thanks to services supporting technology and data governance;
- better matching of demand and supply of digital innovation (with a focus on SMEs) and consequent improvement of market effectiveness and efficiency, thanks to the network of portals and the match-making platform;
- contribution to reducing emis-

sions, e.g. through services supporting the introduction of Smart Working (which also affects staff mobility and helps to reduce and optimise travel with a benefit on emissions and traffic as well, as we report in detail in Chapter 4 of this report);

- Greater dissemination of the culture of digital and innovation, also as a lever of sustainability and inclusiveness, through the Group's publications, events and webinars.

3.2 Digital culture at the service of the community

As already emphasised in the first chapter, all our activities foster the digital innovation of companies and public administrations, aiming to generate a positive impact on the sustainable and inclusive growth of the entire economic system. This is the contribution that the DIGITAL360 Group offers to the community in which it operates. The impact generated by our activities, in fact, is not only reflected on the clients who decide to purchase our services, but affects the entire professional population who benefit from the content produced and disseminated by the Group through the various communication channels. In the following paragraphs we will briefly describe the main activities with a positive cultural impact on the community.

Our publishing assets: the Digital360 Network

The DIGITAL360 Group manages more than 100 digital editorial assets (portals, web channels, news letters) focused on the themes of digital transformation and innovation, contributing to culture, education and information on these issues thanks to a group of

27 specialised journalists and a team of hundreds of contributors who produced more than 18,000 articles in 2021, accessible free of charge and available to all readers. Among these editorial assets is a portal - ESG360 - which is specifically designed for ESG (Environmental, Social and Governance) issues.

Events and Webinars

During 2021, more than 800 events and webinars were held (with 160,000 registered participants), touching on all the main aspects of digital innovation, also highlighting its importance for the development of the economic system as a whole.

Below are some examples of events that are particularly significant from the

To make innovation a lever of sustainable and inclusive development, an appropriate culture must be promoted. This is DIGITAL360's commitment to the community in which it operates.

The numbers of the DIGITAL360 Network

- 26 portals focused on digital innovation
- 36 web channels
- 41 newsletters
- 2,419 white papers published
- 2.5 million unique users per month (on average)

point of view of promoting digital culture in our country:

- **Demand Generation Lab**; a free training event dedicated, in particular, to customers of the Demand Generation Business Unit. The event included 3 tracks aimed respectively at marketing managers, sales managers and entrepreneurs with about 20 training sessions on the different topics of digital marketing, digital technologies to support marketing and sales, innovative digital events, lead generation techniques, opportunities from content marketing and marketing automation. The event reached over 1,600 registered participants and a thousand attendees among current and potential customers;;
- DIGITAL360 Awards**; è it is a three-day in-person meeting, organised annually at a tourist location. We invite the CIOs of client companies, together with external and internal speakers, for an open discussion on

the main topics of digital innovation. The event is attended by hundreds of client companies from all sectors of the economy and public administration. The event's mission is to promote the culture of digitalisation in Italy, generating a virtuous mechanism for sharing the best experiences among companies, suppliers, start-ups, research centres and institutions. Now in its seventh edition, the DIGITAL360 Awards involved 170 CIOs as members of the Jury and awarded 73 digital innovation projects;

- **Forum PA**; it is the largest national event on the modernisation of the public sector. For 30 years, this event has been the place where operators from public administrations, private companies, the academic world, civil society organisations and organised citizenship have met and compared notes. Forum PA is also a point of reference for all communities of innovators, both public and private, engaged in the organisational and technologi-

The numbers of our events

- 800 events and webinars organised in 2021
- 160,000 registered for events and webinars
- 700 speakers at the PA Forum 2021 events
- 170 CIOs on jury in DIGITAL360 Awards
- 1,600 enrolled in the Demand Generation Lab

cal transformation of PA and territorial systems. The 2021 edition of Forum PA was held online due to the pandemic and saw the participation of over 700 speakers including representatives from the institutional, political, business and academic worlds and 122 public and private partners, who gave rise to almost 200 events.

The e-learning offer

In order to foster greater development of digital culture in companies, we have set up two e-learning platforms:

- **360DigitalSkill**, a multimedia content platform for developing and updating digital skills and attitudes. This platform stems from the experience, professionalism and innovation capacity of the DIGITAL360 Group: the aim is to accompany Italian companies in spreading digital culture and awareness among their employees, helping them to become aware of the opportunities and challenges and thus facilitating transformation processes. We also want to help people discover and reinforce their digital skills and aptitudes, through innovative tools and constantly updated, high quality content, in order to grow the organisation's digital culture;
- **FPA Digital School**, the platform for training and empowerment of human capital, is the result of the experience and skills developed in recent years in projects accompanying digital

innovation, carried out for businesses and public administrations. The FPA Digital School combines various multimedia tools (video clips and video tutorials, webinars, a platform for community building, articles and in-depth studies) with the experience of professionals who have been pioneering "digital frontier" issues for years. Within the paths offered by FPA Digital School there are, for example, those for improving organisational and managerial skills, for the digital or ecological transition, but also ad hoc paths for companies in the health sector and for all those companies that are interested in customised support and accompaniment for the transition to digital.

The Relationship with Public Administrations

Among the companies of the DIGITAL360 Group, FPA, by history and

The numbers of the 360DigitalSkill e-learning platform

- 30 courses in the catalogue
- 300+ learning objects
- 20+ video interviews
- 7,000+ users

The numbers of the FPA Digital School e-learning platform

- 120 courses in the catalogue
- 1,179 learning objects
- 85,880 users
- 977,479 open badges being issued

vocation, constitutes the pivot of relations with the Public Administration, with which it ensures a constant relationship. In addition to the ForumPA event and the training of the Digital School, there are many activities aimed at national and local institutions based mainly on the communication of best practices and the organisation of meeting and comparison tables between the various public actors. These include, for example:

- **Reportage PA:** Italy that starts again. Stories and projects of a country that works developed in collaboration with the Ministry of Health, PON Aree Metropolitane;
- **PA Rubrics.** Video columns that help disseminate successful PA experiences and encourage replication of experiences.

Thanks to this activity, FPA can boast of a reference community of around 60,000 public actors. Public Administrations are also one of the recipients of all the Group's information assets. As far as the Advisory&Coaching Business Unit is concerned, the account management team represents the focal point of relations with the PA, ensuring long-term relationships centred on the evolution of the context and the needs of the various Public Administration actors.

Cooperation with Universities and Associations

The DIGITAL360 Group maintains

constant relations with important sectors of the academic world and with important professional associations operating in the Group's fields of interest. As far as collaborations with the academic world are concerned, of particular relevance is the one with the Digital Innovation Observatories of the Politecnico di Milano, which some of DIGITAL360's key people founded at the end of the 1990s (in particular, Andrea Rangone, Raffello Balocco and Mariano Corso, respectively President, CEO and Scientific Advisor of DIGITAL360). Many DIGITAL360 managers and professionals actively participate in the Observatories, contributing to the research and presentation of results. The DIGITAL360 Group participates, through its subsidiary P4I, in the consortium EHT S.c.p.a. (Etna High Tech), to which approximately 40 companies belong. Membership in the consortium may allow participation in public tenders in the region and the pursuit of new opportunities for the development of the company's business in Sicily. With regard to collaborations with professional associations, we would like to mention in particular the one with Aused (Association of Users of Information Systems and Technologies) and the one with Clusit (Italian Association for Information Security). Again, many of our professionals participate in association activities and research and training initiatives.

THE DIGITAL INNOVATION OBSERVATORIES OF THE POLYTECHNIC OF MILAN

The Digital Innovation Observatories of the School of Management of the Politecnico di Milano were established in 1999 with the aim of creating culture in all the main areas of Digital Innovation. Today they are a qualified point of reference on Digital Innovation in Italy, integrating Research, Communication and Continuous Update activities.

The Vision that guides the Observatories is that Digital Innovation is an essential factor for the country's development. The Mission is to produce and disseminate knowledge on the opportunities and impacts that digital technologies have on enterprises, public administrations and citizens, through interpretative models based on solid empirical evidence and independent, pre-competitive and long-lasting comparison spaces that aggregate the demand and supply of Digital Innovation in Italy.

Research: Research activities are carried out by a team of almost 100 Professors, Researchers and Analysts working on more than 40 different Observatories addressing all the key issues of Digital Innovation in Enterprises (also SMEs) and Public Administration.

Update: Osservatori.net is the point of reference for professional updates on digital innovation. The portal is a unique source of information and data based on Publications, Webinars and Workshops by analysts and experts with unique and distinctive know-how. Everything is delivered via a multimedia and interactive platform for distance learning.

Communication: through Conferences, Media and Publications, the Observatories disseminate good practices, experiences and culture related to digital innovation, producing more than 6000 press releases and 300 public events each year.

Networking: the Observatories bring together the broadest community of decision-makers from demand, supply and institutions, who collaborate and develop concrete relationships in the numerous opportunities for interaction to contribute to the diffusion of Digital Innovation in Italy.

Social Impact Projects

The numbers of the At Work 4.0 project

- 14 young people aged between 18 and 25 involved
- 400 hours of theoretical and practical training on digitisation and Industry 4.0
- 300 hours of internships in companies in the manufacturing sector

As far as social impact projects are concerned, we have developed some important partnerships with third sector organisations, the main ones being: **Caritas Ambrosiana** and **Fondazione S. Carlo** (part of the Caritas system that offers services and activities to support the social and labour integration of young people and adults in difficulty), **Sesta Opera San Fedele** (Prison Volunteer Association), **Banco Alimentare** (a foundation that fights waste and recovers food that is still good), **Pensiero Solido** (an association that promotes comparisons and reflections on the transformations taking place to put sustainability at the centre); **The Good in Town** (a start-up Benefit focused on providing services that help companies include sustainable development in their strategies). In this context, it was decided to focus attention, in line with the objectives in-

cluded in the Benefit Society statute, on projects explicitly oriented towards the inclusion in the world of work of the most fragile, weak or marginalised people. The training path launched together with Caritas Ambrosiana and Fondazione S. Carlo called '**Al lavoro 4.0' (At work 4.0)**', aimed at training young NEETs, i.e. young people who do not work and do not study, falls into this category. The project started in May 2021 and ended in the first quarter of 2022. It involved 14 young people between the ages of 18 and 25 in a theoretical and practical training course of around 400 hours on digitisation and Industry 4.0, supplemented with 300 hours of internships in companies in the manufacturing sector. The training was delivered thanks to the contribution of university professors as well as many Group professionals and managers who supported the S. Carlo Foundation tutors.

A new edition of the 'At Work 4.0' course is planned to be launched in 2022 to train professional profiles related to Industry 4.0 and digital marketing.

During 2021, the foundations were also laid for initiatives that will be fully developed during 2022. In particular:

- "**Diversity360 - stories of an inclusive digital world**"; is a communication and networking initiative aimed at promoting the entry of people with physical and/or mental disabilities into the digital world of work.

The project intends to highlight the stories of professional growth of people with disabilities who, thanks to digital technology, have found a context in which they can best express their skills. High-tech companies and voluntary associations were involved. The monographic stories are meant to be an inspiration for people with disabilities looking for a job, so that they may look at digital as an opportunity, but also for companies looking for new professional profiles so that they may be truly inclusive in their selection and hiring processes; DIGITAL360 Group will use its communication network to share the contents produced in order to inspire new inclusion policies;

- **'Prison, Work, Freedom'**; is a project on the inclusion of prisoners and ex-prisoners in the world of work. The project, initiated in cooperation with Sesta Opera San Fedele, has a twofold objective: on the one hand to raise awareness among companies in the technological world in which DIGITAL360 operates to offer concrete job opportunities to inmates or former inmates; on the other hand to offer some inmates support and coaching to create digital-related professionalism useful to companies or to set up new businesses (start-ups);
- **Regeneration and distribution of digital devices**; thanks to the

support of its network DIGITAL360 is also able to respond to requests from associations and voluntary organisations seeking digital tools for the beneficiaries of their activities. Specifically, computers have been donated to enable prisoners to carry out activities of public utility (such as the digitisation of materials from our cultural heritage to be preserved) and computers to support organisations carrying out training and active job search;

- **Banco Alimentare digital**; professionals from DIGITAL360 are supporting Banco Alimentare in digitising its processes and designing an evolution map of its various information systems, thus contributing to the increasingly effective pursuit of its high social impact objectives.

Finally, our commitment to the community also extends to sport: in 2021, we sponsored the participation of two Italian athletes in the world championship of the martial art Muhai Thai, in Bangkok.

We work with companies and professionals to ensure quality services. We aim to share with them the principles of our Code of Ethics and our Benefit Society Charter, in order to build together a socially, economically and environmentally sustainable environment.

3.3 Relations with our suppliers

Our daily work to support digital innovation as a lever of sustainable and inclusive growth for the economy and society could not take place without

the contribution of the DIGITAL360 Group's suppliers. In the course of 2021, the companies belonging to the Group had relations with **around 900 suppliers (between companies and professionals)** for a **total purchase volume of around EUR 9 million**.

The procedure for selecting the suppliers we work with involves comparing several offers for each purchase through an evaluation process involving all suppliers deemed suitable.

The supplier is chosen by the head of the function or business unit on the basis of high standards of quality, reliability and integrity and on the basis of qualitative and economic criteria (e.g. price, technical competence, timing of intervention, proven experience, etc.).

SUPPLIERS OF THE DIGITAL360 GROUP

The main suppliers of the DIGITAL360 Group are leading companies and professionals in the tech and digital world. We can divide them into several categories.

■ **Suppliers of integrated services for the Group's operating sites.** These supplies include, in addition to the rental of space, all related services that enable their operational use (facility management): electricity and water utilities, air conditioning and heating, connection, security, access, cleaning and waste disposal. These are overall contracts that do not provide for the visibility of individual cost components and, consequently, greatly limit the possibility of influencing the choice of supplier for services rendered to the Group. (See box 'Copernicus 38' in Chapter 4 of this Annual Report).

■ **Suppliers for the organisation of in-person events for the Group's customers (e.g. venue managers, technical support, catering providers, etc.).**

These events, although limited by the pandemic, are gradually resuming. The choice of supplier is determined by a number of factors: customer requirements, accessibility and ease of access and use of equipment, cost-effectiveness and payment terms.

■ **Providers of editorial, technical and professional consulting services.**

These are mainly professionals (often registered), who are chosen on the basis of their proven professional experience and their ability to analyse and delve into the issues dealt with by the Group to supplement the internal structure.

■ **Suppliers of technology devices and IT services in the cloud for the availability of IT resources needed for operations.** The suppliers in this case are large international operators and the services are present within their standard offer. These operators declare an active sustainability policy to which reference must be made and which we indicate in more detail in Chapter 4. We feel it is important to emphasise that, in this field, the possibility of DIGITAL360 to influence supplier policies is absolutely marginal, whichever supplier is chosen.

■ **Providers of insurance services to cover the main risk categories.** These concern: civil liability, damage to technical equipment, D&O (Directors and Officers) liability of directors, auditors and senior Group figures, professional insurance policies as well as for cyber security in some Group companies. In this type of activity, the Group uses an insurance broker to help choose the best company in terms of cost, quality and scope of coverage.

■ **Mobility services for the movement of personnel in the execution of their activities.** The company car fleet is very small, as the use of public transport is favoured - also for sustainability reasons. In such cases, the suppliers are the main rail or air transport operators, i.e. urban mobility services (including sharing services), including taxis.

■ **Providers of consultancy services of various kinds:** administrative and financial, public relations and finally services related to listed company status.

If we look at the purchase volumes, among the Group's main suppliers, we have those of services directly related to 'production'; in particular, these are services related to venues and supplies for the organisation of events; technical, commercial and professional consulting, together with other professionals from various fields. Next, at a good distance, we have the costs related to Information Technology, within which are the costs related to licences for software platforms, their development and maintenance.

Almost all of the DIGITAL360 Group's purchases come from within the country, while purchases from abroad (EU and non-EU) account for about 8% of the total.

Compared to 2020, we saw an important increase in both the number of suppliers and their purchasing volume. This is a significant figure, albeit one determined by a not entirely homogeneous comparison, given that the pandemic and its acute repercussions in the year 2020 caused the suspension of all events in attendance.

EVENT SUPPORT SERVICE PROVIDERS

The organisation of events involves the use of external suppliers for many essential services, such as guarding, reception, catering, cleaning, etc. .

There are two types of suppliers:

■ Main contractor

The first is when you turn to a "main contractor": they are managers of exhibition spaces or facilities of various kinds who organise the various ancillary services under their responsibility. In this case, the possibility of influencing the subcontractors is marginal and is limited to the control of certain environmental parameters and, in particular, the biodegradability of all materials in use and the reduction of the use of plastic.

■ Direct selection

The second scenario occurs when we can proceed independently with supplier selection and direct contracting: in these cases, the use of biodegradable, recycled or recyclable materials, reduction in the use of plastics and the use of LED lamps for lighting are directly controlled.

These events, involving numerous actors and service providers, will be resumed in the course of 2021.

Having sketched out an overview of supplies, we feel it is important to reaffirm that, on the whole, the DIGITAL360 Group's ability to adopt operational policies and practices capable of affecting the sustainability profile of suppliers is low. Yet, as pointed out in Chapter 5, the Group's Code of Ethics is not only known by all employees, but is also widely disseminated among stakeholders. We are considering also asking suppliers, partners and distributors to share the principles of our Code, involving them in the construction of a socially, economically and environmentally sustainable context. In the next three years, the DIGITAL360 Group is committed to reviewing the standard methods of selecting and contracting suppliers in order to ensure that the sustainability requirements applicable from time to time are always adequately considered, also in relation to the common benefit objectives connected to the status of Benefit Corporation.

Among the criteria of a general and technical nature that we apply in our relations with suppliers, we emphasise those relating to the requirements of honour and reliability, compliance with Community regulations and other regulations on the origin and quality of products. For this reason, in ac-

cordance with the Code of Ethics of DIGITAL360, the supplier will be obliged not to adopt acts or conduct that could lead to the commission of the offences envisaged by the Code itself, even in the form of an attempt, and to adopt and implement, where necessary, appropriate procedures to prevent such violations.

3.4 Investor Communication

Another stakeholder category is represented by investors, given DIGITAL360's listing on the regulated market of Borsa Italiana - Euronext Growth. As of June 2017, DIGITAL360 has appointed the Investor Relator, a corporate figure dedicated to the relationship with the financial community, including shareholders and investors. In order to ensure maximum transparency in communications and information towards third parties and the market, on the website

<https://www.digital360.it/investor-relations/corporate-governance-e-assembly/> are available a number of

procedures, which detail how the Group meets the disclosure requirements for listed companies for the benefit of current and potential investors.

3.5 Our focus on cyber security and data protection: a value for all our stakeholders

Data, with particular focus on personal data, are at the heart of the digi-

COMMUNICATION AND DIALOGUE INITIATIVES WITH THE FINANCIAL COMMUNITY

DIGITAL360 SpA manages the relationship with the financial community in a structured and continuous manner. The main channels it used during 2021 are:

- regular meetings with investors - current and potential (42 during 2021, of which 31 one-to-one);
- two webinars per year with shareholders and the financial community, for the presentation and commentary of financial statement data (annual and half-yearly) and management performance (a total of 658 people registered in 2021);
- a specific IR newsletter reporting all major events with relevance to the financial community, sent to a database of 985 subscribers (11 issues in 2021);
- timely sending of press releases at all corporate events of financial significance (61 SDIR - regulated information dissemination system - releases sent in 2021).

tal transformation and thus also of DIGITAL360's activities, which has always paid great attention to the issues of cyber security and personal data protection. In these areas, in particular, we have developed an extensive range of services that we offer to our customers and have developed a sophisticated cyber security and privacy management system to protect the data that our stakeholders entrust to us.

In this chapter, we therefore discuss the services we offer clients on these issues through the Advisory & Coaching Business Unit and describe the internal architecture to protect the data of all stakeholders. The pandemic, with the violent acceleration of online processes and Smart Working that it has induced and, thus, the increased dependence on digital technologies for the conduct of business, has further strengthened the reasons, content and value of these issues.

Offering services to customers

Offering the best services to our customers in an increasingly digitised world means putting data protection at the centre.

If the topic of security is relevant for individuals - just think of the protection of one's privacy and virtual identity on social networks - cyber security is becoming a key aspect in securing day-to-day activities in all areas affected by

Our expertise in digital innovation allows us to offer our customers and, more generally, the business community, advanced skills in IT security and data protection. These same skills enable us to protect and safeguard the data that all stakeholders entrust to us. This has also been a key factor in the pandemic's acceleration of remote working.

the digitisation process. In this area, companies active in digital innovation such as DIGITAL360 are not alone, but are part of a market that is also receiving increasing attention from a policy and regulatory perspective. In fact, the Ministry for Technological Innovation and Digital Transition has launched a new strategy to strengthen cyber security, called Italia Digitale 2026. In parallel, an intervention on

the Public Administration is planned thanks to the National Recovery and Resilience Plan (PNRR). These are major public commitments that promise to grow the entire national digital innovation sector.

To complete the regulatory and market framework in which the DIGITAL360 Group operates, three years after its entry into force, the European Privacy Regulation (General Data Protection Regulation or GDPR) remains very important.

For those active in the field of innovation like DIGITAL360, this is a commitment not only to comply with rules and regulations, but also to promote a culture of security and digital identity (see in detail section 3.2 Digital Culture at the Service of the Community, in Chapter 3).

We would now like to illustrate how DIGITAL360 fits into this process of digital transformation of the Italian economy and society by offering its clients its experience in the fields of cyber security and data protection.

In our daily work, we help companies protect the digitisation of their business processes, implementing the best strategies to prevent and deal with information security threats and enhancing their capabilities to manage cyber risks.

We also support clients with specific advice on data protection, aimed at facilitating the adaptation and mana-

gement of data protection compliance. We also provide services for cyber risk assessment and management, proposing and supporting the implementation of a corrective or improvement action plan. Finally, we help organisations to establish what their approach to security (security posture) should be and to maintain it over time, even in the face of a scenario that forces them to deal with increasingly frequent threats of great potential impact.

DIGITAL360's constant focus on data management and data protection is

fundamental to our relationship with our customers. This commitment, however, is also directed within the Group: on the one hand to protect the data of employees, collaborators, clients, suppliers and in general our interlocutors (investors, financiers, partners, etc.) with whom

DIGITAL360 has contractual relations; on the other hand to protect the personal data of visitors to the platforms, and participants in webinars and events of the DIGITAL360 network, acquired through online registration formats.

MODELLO OPERATIVO DATA PROTECTION

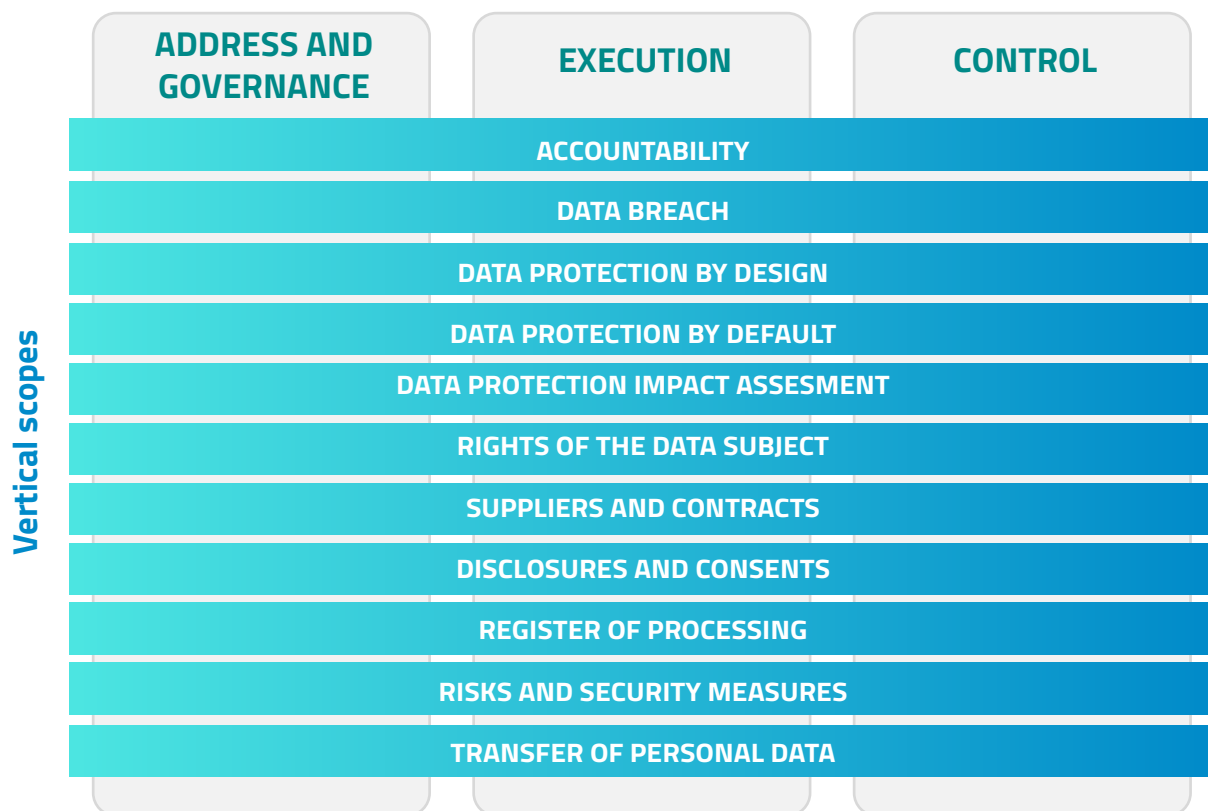


Figure 3.1 - Data Protection Operating Model

Our internal data protection and security model

The focus on data protection is an example of the virtuous circle of innovation that is created at DIGITAL360 where market-tested products, services and models help internal development, also thanks to feedback from stakeholders. On this basis, and in accordance with the provisions of the GDPR, the Group has defined its own **Model for the protection of personal data**, which includes highly articulated measures from an organisational, operational, architectural and control point of view.

The correct application of this Model is central to our Group's activities, not only to comply with the relevant legislation, but also to minimise the risks of penal, civil and administrative sanctions, which can lead to possible significant financial losses or reputational damage.

Our Data Protection Model consists of 3 parts:

1. Organisational Model for the Protection of Personal Data;
2. Operational Model for the Protection of Personal Data;
3. Data Protection Control Model.

DATA PROTECTION CONTROL MODEL

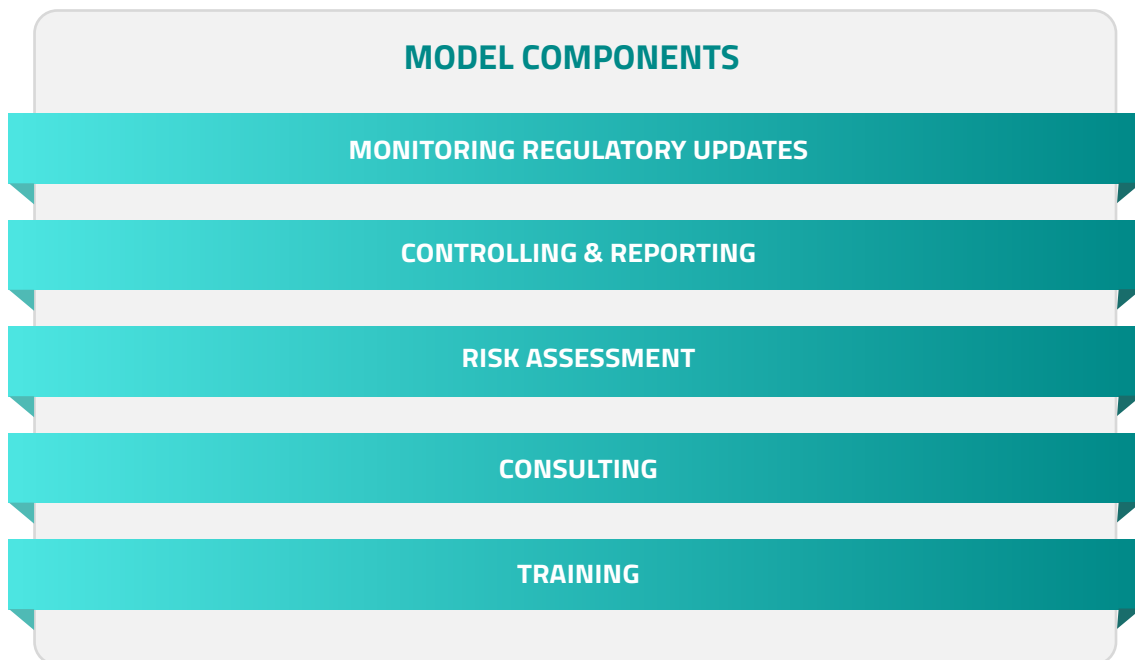


Figure 3.2 - Data Protection Control Model

The **Organisational Model** aims to ensure the definition of structures, roles and organisational approaches that guarantee the direction and governance, execution and control of the Model.

The **Operating Model** contains the internal provisions and self-regulation rules (procedures) described in Figure 3.1 'Data Protection Operating Model'. The Control Model aims to ensure the identification of non-compliance with the Data Protection Model, both of a preventive and corrective nature, in compliance with the business context, the resources available and the operational constraints existing within our reality.

The **Control Model** adopted by the Group includes the components schematically summarised in Figure 3.2 'Data Protection Control Model'.

Regulatory compliance efforts in our Group are accompanied by an ongoing commitment to technological innovation. For this reason, in the course of 2021 we started the project of adopting the proprietary software platform GRC360/Data Protection, in order to fulfil accountability obligations and to equip the data protection model with an IT support, capable of guaranteeing the quality and consistency of information as well as efficient compliance management. The procedures adopted and the control of data protection cannot be considered

fully operational without monitoring their effectiveness. This is why, as of 2018, **the Group has had a Data Protection Officer (DPO)** who is required to report directly to the Legal Representative and/or the Board of Directors of the Companies, on a periodic basis, on the issues covered by his office. On the other hand, he may report at any time to the corporate bodies on issues that he deems relevant and urgent.

DIGITAL360's commitment to data protection and to monitoring the effectiveness of the measures taken has meant that in the two-year period 2020-2021, the Group has not recorded any objections or complaints from third parties or sanctioning measures by the Data Protection Authority. We also did not have to notify the Authority of any personal data breaches.

We can only report that in 2021 there were only low-impact incidents - the loss of two smartphones and the theft of a PC - which, thanks to the security measures taken by the Group, did not lead to any loss of information.

Reduced travel, brought about by the pandemic, and structural changes in the management of remote work have reduced the frequency of these events.

Environmental impact

4.

4.1 Our sustainable and responsible working model

At DIGITAL360 we see innovative technologies as a tool not only for renewing businesses and public administration, but also for protecting the environment (by reducing waste, resource consumption and pollution) and increasing the social and labour inclusion of the most fragile and marginalised people. These commitments are also included in our new articles of association as a Benefit Society and are also present in the principles set out in our Code of Ethics, as well as in our daily activities. The focus on these issues is embodied both in a

clear internal policy and in a specific offer of services on the market.

Domestic policy

Considering that DIGITAL360 operates in the service sector and has no production processes, with respect to the environmental sphere, the Group's activity does not present specific areas of risk. This does not prevent us from promoting virtuous behaviour in our daily activities with regard to the rational use of resources and the reduction of consumption. As already emphasised in Chapter 2, dedicated to our Human Resources, **DIGITAL360 has leveraged the critical issues presented by the pandemic to further develop Smart Working, creating innovative solutions aimed at guaranteeing remote work in an effective manner.** This made it possible to protect the health of employees and co-workers while at the same time ensuring a reduction in the emissions caused by the mobility of our people. This is a choice that, due to its flexibility and effectiveness, was already in our DNA before the pandemic and is destined to remain part of

We work in an innovative, flexible, distributed and meritocratic way, convinced that technology can be an engine for sustainable and inclusive development.

our corporate culture, regardless of the health restrictions imposed by the authorities.

DIGITAL360 decided to monitor the movements of its people by offering quantitative data to support its mobility policies. In doing so, both emissions from company-owned or company-controlled sources and, in the specific case of DIGITAL360, those related to the company car fleet (Scope 1)

pe 1) were considered, as well as emissions related to the company's activity that do not fall directly within the company perimeter, but may occur externally in upstream or downstream processes, such as business trips made by employees by plane, train and in company-owned vehicles (Scope 3).

The results are summarised in Tables 1 and 2 below:

SCOPE 1 - DIRECT EMISSIONS

Type	u.m.	2021	2020	Δ %
From petrol fleet	tCO ₂ e	1,61	0,91	77,69%
From Diesel car fleet	tCO ₂ e	12,48	7,05	76,89%
Total Scope 1⁴	tCO₂e	14,09	7,96	76,98%

Table 4.1 - Scope 1, direct emissions

SCOPE 3 - BUSINESS TRAVEL EMISSIONS

Type	u.m.	2021	2020	Δ %
By aeroplane	tCO ₂ e	13,87	9,13	51,89%
By train	tCO ₂ e	0,33	0,44	-24,61%
From car	tCO ₂ e	12,73	7,24	75,82%
Total Scope 3⁵	tCO₂e	26,93	16,81	60,21%

Table 4.2 – Scope 3, business travel emissions

⁴ To calculate the Scope 1 tonnes of CO₂ equivalent for the years 2021 and 2020, values reported by the UK government's Department for Environment, Food and Rural Affairs (DEFRA) were used. Specifically, to calculate the 2021 and 2020 tonnes of CO₂, DIGITAL360 decided to start from the count of litres of fuel - for petrol and diesel cars respectively - consumed in the reporting year. This makes the reported figure accurate and reliable.

⁵ To calculate the Scope 3 tonnes of CO₂ equivalent for the years 2021 and 2020, the values reported by the UK government's Department for Environment, Food and Rural Affairs (DEFRA) were used. Specifically, to calculate the 2021 and 2020 tonnes of CO₂, DIGITAL360 decided to start with the km travelled by the different means of transport in the reporting year and use the respective transformation coefficient.

In general, there is an increase in CO2 emissions in 2021 compared to 2020, a year that was strongly influenced by the situation caused by the spread of the Coronavirus in Italy and the rest of the world. DIGITAL360 is committed to monitoring Scope 3 emissions and evaluating appropriate actions to contain them.

The supply of services in the market

Beyond our internal policy, DIGITAL360 has for years offered services on the market that help organisations innovate the way they work with a significant impact on sustainability. Our work supports the innovation of client companies with an indirect impact on their consumption and on the efficiency of their organisations. For example, helping companies to adopt organisational models based on Smart Working induces benefits in terms of emissions but also in terms of flexibility and the reconciliation of people's lifestyles, which are difficult to estimate but similar to those detectable in our organisation.

RESEARCH BY THE POLYTECHNIC OBSERVATORIES ON SMART WORKING

Smart Working and the adoption of new work organisation models can improve not only the competitiveness of companies, but also their impact in terms of social and environmental sustainability. In fact, the Smart Working Observatory of the Milan Polytechnic has estimated that if a worker carried out his or her work from home for an average of 2.5 days a week, everyone could save 123 hours a year on home-office commuting, with economic savings, for those who commute to work by car, of around EUR 1,450 a year. At the country system level, the possibility of working from home for 2.5 days a week translates into savings in terms of CO2 emissions of around 1.8 million tonnes per year, calculated on those who are expected to work remotely at the end of the emergency and who commute to the office by motor vehicle. ⁶

⁶ Source: Conference 'Smart Working Revolution: a future to build now', Osservatorio Smart Working.
Link: <https://statics.teams.cdn.office.net/evergreen-assets/safelinks/1/atp-safelinks.html>

With particular reference to Smart Working, DIGITAL360 has been a pioneer on a national level, developing over the last 10 years distinctive experiences and methodologies capable of supporting private organisations and public administrations in all phases of the introduction of advanced models of agile working. We develop activities ranging from vision definition to assessments and flexibility policy design, from support in discussions with trade unions to management coaching on new leadership models and results orientation. In addition, we devote ourselves to employee training, up to the redefinition of work spaces and the design of internal and external communication campaigns. Over the course of 2021, DIGITAL360 supported 20 organisations by involving more than 12,000 people in listening to and collecting needs for the evolution of working models through surveys and in training activities aimed at managers and employees to encourage the diffusion and correct adoption of Smart Working.

4.2 Sharing and flexibility of work spaces

Together with the possibilities offered by sustainable mobility, technological tools and collaborative platforms for Smart Working that the Group has developed, another strong point in

We focus on efficient use of workplaces and resources. Our offices share common spaces with other innovative companies, promoting the circulation of ideas.

our environmental management concerns our headquarters in via Copernico 38, Milan. Our offices are part of a **coworking context** managed by the company Copernico, belonging to the American giant IWG, which offers innovative companies workspaces and shared services in several Italian cities. This solution not only has the advantage of collaborating with a leading company in the sector - which has the redevelopment and energy efficiency of buildings at the core of its business - but is also based on two cardinal principles of sustainability in the corporate environment: **sharing** and **flexibility**. Sharing multifunctional spaces (meeting rooms, training rooms, lounges, library, garden, terrace, gym and bar) is an advantage for the efficient use of resources, as is evident from the paradigm of the sharing economy; it also encourages the circulation of innovati-

ve ideas between different people and companies.

In fact, a workspace such as the one chosen by our Group is capable of offering insights and visions on the changes taking place, stimulating creativity and helping to define the right strategies for the future.

All in the service of digital innovation, which, as already emphasised, is for us a clear lever for the sustainable transformation of the economy.

Workspace flexibility also allows companies, in a scenario that continues to change, to have assets and tools that adapt to their actual needs: another point in the direction of efficiency and, therefore, economic and environmental sustainability. This flexibility, during the height of the pandemic crisis, enabled us to facilitate the safe return of our employees to their workplaces, also thanks to the adoption of Workera, an app for booking individual workstations.

COPERNICUS 38: AN INNOVATIVE AND ENVIRONMENTALLY FRIENDLY LOCATION

For Copernico, the company that manages the building in Milan, where the headquarters of the DIGITAL360 Group, sustainability is a concrete commitment: in its various buildings it is pursuing a policy based on renewable energy supplies, emission offsetting and LEED (Leadership in Energy and Environmental Design) certificates, a voluntary certification programme that covers the entire life cycle of the building itself, from design to construction. In addition, Copernicus is committed to the planting and maintenance of hundreds of plants in its building, with the aim of improving working wellbeing. The one in via Copernico 38 (known as Copernico Centrale) was the first coworking space realised by the company, which takes its name from the street and remains its 'main hub' to this day. It is a redevelopment project on a 15,000 square metre office building, completed in 2015 and recently acquired by the international group IWG. It is located in a strategic area of the city, next to Milan's Central Station, served by many urban and suburban railway and public transport lines.



4.3 Energy consumption and emission reduction

DIGITAL360 is a leading group in technological innovation. While we firmly believe that this is a lever for sustainable development, we cannot ignore the fact that technological solutions also need attention when it comes to energy consumption. For us, this means being able to carefully choose suppliers who can guarantee us not only economic but also environmental sustainability.

Emissions in the DIGITAL360 Group are mainly in three areas:

- **the technological infrastructure used;** the delivery of digital services (e.g. content on online portals, webinars, streaming events, online advisory services, etc.), which are becoming increasingly important in DIGITAL360's offering, are based on a cloud infrastructure. Among

the providers of this infrastructure, we chose Cloud AWS (Amazon Web Services). As the provider itself explains, AWS is committed to efficiency and continuous innovation of its infrastructure, with the goal of powering its operations with 100 per cent renewable energy by 2025. AWS also cites a study by 451 Research, a technology research firm in the S&P Global Market Intelligence group, which found that the company's servers are **3.6 times more energy efficient** than the average US corporate data centre analysed;

- **the mobility of personnel to perform their duties;** with regard to this point, the Group is carrying out monitoring to obtain quantitative data to support its sustainable mobility policies (see in detail section 4.1 Internal Policy, in Chapter 4);
- **office locations;** as already emphasised in section 4.2, the Group's main offices, starting with the headquarters in via Copernico 38, are located in service facilities that provide not only the space but also all related activities: concierge, security, cleaning, electricity and air conditioning. While the DIGITAL360 Group has little opportunity to influence or condition the supplier's policies, the shared space and flexibility guarantee a commitment to sustainability. In order

We work with sustainability-oriented suppliers to reduce our environmental impact without sacrificing performance and service efficiency.

to make an indirect contribution to offsetting those emissions that cannot be eliminated or are not under the direct control of DIGITAL360,

we have decided to offset in 2022 the emissions of the year 2021, by financing specific and certified planting or reforestation measures.



MAISA REDD Project

Group governance and economic performance

5.

5.1 Business ethics, our compass

The instruments and bodies for the dissemination of business ethics

At DIGITAL360 we look at the concept of ethics as a real *modus vivendi* of the Group, aimed at guiding the behaviour of corporate bodies, management, internal and external personnel.

For us, ethics is the ability to integrate activities with respect for and protection of the interests of all individuals with whom Group companies relate, as well as with the safeguarding of environmental resources and their conservation. In order to achieve this objective, our commitment is to ensure that the Group's core values are clearly defined and that they constitute a constant reference point for everyone in the performance of their activities, enabling the creation of a shared vision and culture among all stakeholders, both internal (management, employees, collaborators) and external (customers and suppliers,

At DIGITAL360, ethics is of absolute importance in guiding the behaviour of all stakeholders. The Code of Ethics is the main instrument to guarantee respect for our principles.

investors, public institutions and the community). We believe that sharing this set of values is the driving force behind the Group and the main source of its success and image. Precisely for this reason, DIGITAL360 has decided to adopt a Code of Ethics, which was adopted by the Parent Company's Board of Directors (BoD) with its first resolution on 14 September 2016 and subsequently updated on 12 July 2018.

The Code of Ethics is a single document for the entire Group, and as such all subsidiaries are obliged to accept and respect its contents. Its purpose is to define, formalise and share the set of our ethical values, the observance of which constitutes the fundamental element for the good functioning, reliability and reputation of the Group itself. Moreover, the prepara-

tion of a Code of Ethics guarantees an effective prevention, detection and contrast of violations of laws and regulations. In particular, the Code is an integral part of the Organisation, Management and Control Model defined to prevent the offences provided for by Legislative Decree 231/01, concerning the administrative liability of legal persons and related regulations.

The principles and values of the DIGITAL360 Group

Our Code of Ethics outlines the principles that each DIGITAL360 Group company, as an active and responsible member of the community in which it operates, recognises and places at the heart of its activities. The text, in its entirety, can be consulted on our website: https://media.digital.it/wp-content/uploads/2021/07/05192041/DIGITAL360_CodiceEtico_2018-1.pdf

■ **Legality**

The Parent Company and each Group Company respects and enforces, internally, the laws in force in the countries in which it carries out its activities, as well as the ethical principles of common acceptance according to international standards in the conduct of business. In pursuing this aim, all internal and external personnel of the Companies must be aware of the ethical value of their actions and must not pursue personal or corporate profit, to the detriment of compliance with the laws in force and the principles of the Code itself.

■ **Transparency, fairness and loyalty**

La Capogruppo e ciascuna Società del Gruppo rifugge il ricorso a comportamenti illegittimi, o comunque scorretti, per raggiungere i propri obiettivi economici, da perseguirsi esclusivamente con l'eccellenza della performance in termini di qualità dei prodotti e dei servizi offerti, fondata sull'esperienza e sull'attenzione al cliente. La Capogruppo e ciascuna Società del Gruppo, inoltre, adotta strumenti organizzativi atti a prevenire la violazione di disposizioni di legge e dei principi di trasparenza, correttezza e lealtà da parte del personale interno ed esterno, vigilando sulla loro osservanza e concreta implementazione. Nello svolgimento della propria attività per la Capogruppo e ciascuna Società del Gruppo, i destinatari del Codice sono tenuti a fornire informazioni chiare, complete, trasparenti ed accurate, ma comunque nei limiti previsti dalle norme sulle obbligazioni di confidenzialità contenute nel Codice stesso.

■ **Good faith**

All internal and external personnel of the Parent Company and of each Group Company shall act by inspiring their actions with the principle of good faith, in the genuine conviction that they are acting correctly and with substantial respect for the rules and for others.

■ **Equity**

The Parent Company and each Group Company operates by avoiding discriminatory and opportunistic behaviour. In pursuing this aim, it does not discriminate on grounds of sex, race, language, religion, political opinion, personal and social conditions.

■ **Diligence**

The Parent Company and each Group Company undertakes to operate with the utmost commitment and professionalism in the performance of the tasks and duties entrusted to it within the limits of its own powers and competences.

The Group is committed to progressively introducing, over the next three years, special clauses in signed contracts declaring the commitment to apply, in conducting its own business and managing relations with third parties, the values indicated in its own Code of Ethics, requiring the counterparty to read and share its principles. Through specific clauses, DIGITAL360, in the conduct of its business and in the management of relations with third parties, declares that it applies the values indicated in its Code of Ethics, requiring the counterparty to read and share its principles.

The Board of Directors

The Group's objective is to place ethical values as a point of reference and comparison on a daily basis with respect to every decision and behaviour taken by those operating within the company, at whatever hierarchical level they may be. This, in our opinion, is fundamental to establish and maintain a relationship of trust between the Group's companies and their respective stakeholders. The

corporate body which, due to its relevance in company management, has the main responsibility for promoting and ensuring respect for the values contained in the Code of Ethics is the Board of Directors (BoD) of the parent company DIGITAL360 SpA. The structure of corporate governance (governance) in the Group is articulated starting from DIGITAL360 SpA, which holds 100% of the capital of all the companies within the scope of the Sustainability Report.

We feel it is important to emphasise how the work of centralising staff functions at the Parent Company is strongly linked to the objective of increasing the levels of efficiency and effectiveness of these activities at Group level. Governance is also ensured by the multi-personal Boards of Directors of each of the companies included in the scope of the financial statements. The Parent Company's Board of Directors consists of the Group's Chairman, the two Managing Directors, four directors, one of whom is independent, as illustrated in Table 5.1.

BOARD OF DIRECTORS

President	Andrea Rangone
Managing Director	Raffaello Balocco
Managing Director	Gabriele Faggioli
Independent director	Giovanni Crostarosa Guicciardi
Director and Honorary President	Umberto Bertelè
Councillor	Carlo Mochi Sismondi
Councillor	Pierluigi Negro

Table 5.1 – Composition of the DIGITAL360 Group Board of Directors as at 31.12.2021

The Board of Directors assesses the adequacy of the organisational, administrative and accounting structure of the companies, prepares the Group's strategic and financial plans and evaluates, on the basis of the report of the Executive Bodies, the general management performance.

The Board of Auditors

The Board of Statutory Auditors is the

body that monitors the application of all principles of corporate governance and ensures compliance with regulations and the law.

It also enforces the principles of the Articles of Association and ensures compliance with the principles of proper administration, with specific reference to the functioning of the organisational, administrative and accounting structure.

BOARD OF AUDITORS

President	Marco Giuseppe Zanolio
Mayor	Vincenzo Maria Marzuillo
Mayor	Carlo Pagliughi
Alternate Auditor	Carlo Rigamonti
Alternate Auditor	Adriano Albani

Table 5.2 – Composition of the DIGITAL360 Group Board of Statutory Auditors as at 31.12.2021

The governance of sustainability

As of 2021, the topic of sustainability has really become central for us. Both through the path to becoming a Benefit Corporation and through the drafting of our first Sustainability Report, we are trying to give ESG issues an increasingly relevant and structured role in the company.

To this end, we are committed from 2022 onwards to formalising sustainability governance, which takes into

account the issues that are most relevant to us in strategic terms, and which helps us to have a clear idea of the direction to pursue. In doing so, we want to improve the controls available to the Group, progressively creating new ones, formalising policies and committing ourselves to finding new projects and tools that make sustainability a theme that accompanies and enriches our development and growth.

We are sensitive to the need to ensure fair and transparent conditions in the conduct of business activities and therefore adopt risk management that is as integrated as possible.

5.2 Risk Management and Prevention

Safeguards for the containment of business risks

At DIGITAL360, we are convinced that in order to manage risks effectively, the most integrated management possible is required. This is why we have adopted a structured approach, involving the coordination of various company bodies and functions, which guarantee the highest level of professionalism and competence for the management of specific risks, assigning them tasks and responsibilities and integrating their respective areas of operation. As of the end of 2021, the companies IQC and ServicePro are not yet included

in the risk management procedure, in view of the fact that the process of integration into the Group was completed in 2021.

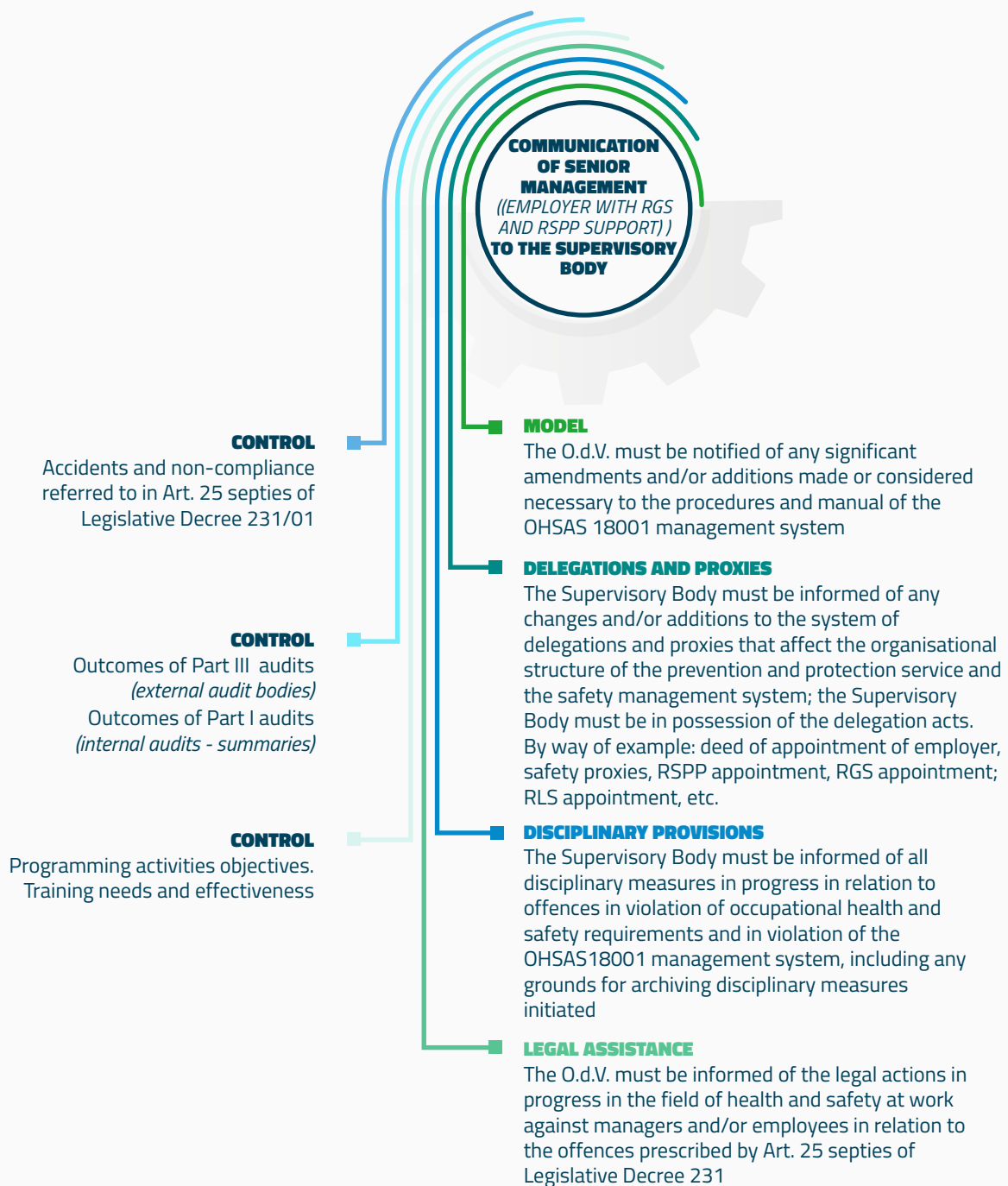
Among the bodies involved in risk management, of particular importance is the **Group Compliance&Audit function**, which has the task of assessing the effectiveness of the risk management system adopted by Group companies in respect of their spheres of operation, highlighting any shortcomings in the compliance safeguards and suggesting ways in which they can be resolved. This function is also involved in the definition and implementation of a strategy for the digitalisation of compliance processes (i.e. compliance with laws and regulations) capable of guaranteeing a timely approach to possible changes in risk.

Since 2016 DIGITAL360 has adopted its own **Organisation, Management and Control Model**. In this way, we wished to reaffirm the centrality of a business culture based on legality, condemning all behaviour that does not comply with the law or with internal provisions, and striving to spread a culture of control and risk management.

Model 231 presents, along with the general protocols, the special part protocols, i.e. a set of rules and organisational principles that must be put in place to prevent specific risks; they are defined by company processes and allow timely monitoring of any changes

in the risk associated with the Group's various activities. At the same time as adopting Model 231, DIGITAL360 appointed its own **Supervisory Board (SB)**, with the task of monitoring the suitability of Model 231 and thus the

adherence of the risk analysis (risk assessment) to operational risks. The body works in constant synergy with the Group Compliance&Audit function. Below is an example of information flows in the DIGITAL360 Group:



Furthermore, in the year 2018, the **Data Protection Organisation and Management Model** and the related set of procedures were adopted (see in detail section 3.2 Digital Culture at the Service of the Community, within Chapter 3), and the Group **Data Protection Officer (DPO)** was appointed to enable the integrated management of the risks associated with the processing of personal data.

The DPO operates with the support of the same Group Compliance&Audit function. With reference to the responsible management of IT risk, DIGITAL360 has appointed its own **Chief Information Security Officer**, who has a strategic role of informing, advising and warning the general management on IT security risks.

This figure has been assigned the task of managing information security and violations of industry standards and regulations, in order to increase the Group's security level in view of the company's business strategies. In addition to all this, aware of the importance that social media are assuming in the corporate context, and of the inevitable risks associated with their use, we have adopted and disseminated policies and rules of conduct for the correct use of social media in the Group. Finally, we would like to point out that with the drafting of the Sustainability Report 2021, DIGITAL360 has decided to start **reflecting on ESG**

risks, a topic that had already been addressed previously, even if not in a formalised manner.

The certifications of our companies

In addition to what has already been outlined about the Group's and the parent company's commitments, let us now look at some specific cases of how risk management at DIGITAL360 has led to quality certifications.

FPA obtained the ISO9001 certification which, in its 2015 re-edition, entailed as its most relevant novelty the introduction of risk analysis, i.e. the identification of areas of risk for each business activity/process, and their management with a view to the continuous improvement of the Management System. This was done through integration with the risk management standards contained in the UNI ISO 31000:2010 standard.

The field of application covers the dissemination of innovation in the public and private sector through the conception, promotion, organisation and management of events; the design and provision of consultancy services and the implementation of communication, information, public relations and institutional products, including through digital solutions; publishing and publishing activities; training and research activities; and the design, creation and management of databases.

P4I also obtained ISO9001 certification with the following scope: design and delivery of development, professional and management consulting services; consulting services for information systems.

After analysing the tools that the DIGITAL360 Group has put in place for risk management, the main types of risk and the measures we have taken to counter them are set out below.

The risks associated with corruption

Thanks to Model 231, to which the monitoring activities of the Supervisory Bodies and the Group Compliance&Audit function are linked, we map corrupt offences that could potentially impact the Group's sensitive activities. In addition, we detail the operation of our control system for the prevention of these types of offences. In our Code of Ethics, we explicitly condemn any behaviour, by anyone, consisting in promising or offering, directly or indirectly, gifts and benefits to public officials and/or public service appointees and/or private individuals, whether Italian or foreign, from which an undue or illegal interest or advantage may be gained. At the end of 2021, we launched a project to revise the Code of Ethics and draw up a Group anti-corruption policy.

In addition, the Group uses a digital solution for managing reports of Model violations and misconduct: our whistleblowing platform.

However, in our view, combating corruption is also a cultural issue.

For this reason, the entire Group is constantly engaged in the work of

E Areas subject to corruption risk

The mapping of activities subject to the potential risk of corruption is carried out in both the public and private sectors. The protocols of the special part of Model 231 have been defined by company processes, so as to make it easier to identify risks, and apply in their entirety to all of the companies' activities, with the exclusion of IQC and ServicePro in view of the fact that the path of integration into the Group was completed in 2021.

In order to prevent and counter the occurrence of corrupt practices, the following risk areas have been identified

- personnel selection, management and administration
- management of relations with co-workers
- management of fulfilments and relations with the Public Administration
- management of disputes and settlements
- procurement of goods and services and management of appointments with external professionals
- management of accounts and preparation of financial statements
- management of extraordinary transactions on assets and capital

consolidating an ethical and legal culture: all our people (employees, collaborators and consultants) have been asked to consult the internal e-learning platform ('360Digitalskill'), which contains training courses dedicated not only to the subject of the administrative liability of entities, but also to the verticalisation of the individual crime families that make up the catalogue of offences under 231, including corruption offences.

The total number of proven corruption incidents in 2021 is 0, but as in other fields,

DIGITAL360 is committed to constant improvement with future projects and goals.

Fiscal risks

Another aspect of our business that we monitor closely is related to tax risks through the functions of the Administration, Finance and Control (AFC) department.

The Group's objectives in this area are to ensure that:

- income and value added declarations are prepared in accordance with the applicable tax regulations;
- the calculation of taxes is carried out in accordance with the tax principles set out in the applicable regulations and the circulars issued by the various offices of the tax authorities;
- VAT offsetting transactions and tax

refund claims are related to tax credits that actually exist, are certain and verifiable;

- value-added declarations originating from cross-border relationships are filed in accordance with the timeframe and tax regulations.

The companies Digital360. P4I, ICT&-Strategy, and FPA have also provided in their 231 organisational models for the exposure to tax risks (Art. 25 quindiesdecies, Legislative Decree 231/01), acknowledging their own control system adopted for the mitigation of crime risks.

5.3 Compliance with Laws and Regulations

In our commitment to business ethics, a key step is to ensure compliance with the rules of law applicable to our activities. In the corporate world, we use the term compliance to refer to business compliance with laws and regulations, as well as other ethical principles and objectives that a company sets itself. With regard to verifying the effectiveness of policies/procedures to ensure socio-economic compliance, the DIGITAL360 Group aims to ensure maximum compliance with all the regulations to which it is subjected through the activation and monitoring of specific control measures.

To do this, we rely on audits by qualified internal organisational units

(Compliance&Audit, Investor Relator, General Counsel, Administration Finance and Control, Prevention and Protection Service, Human Resources, etc.). Where this is not sufficient, we resort to bodies in charge of supervising specific regulations (such as the Data Protection Officer) or specialised external professionals (such as the Nominated Adviser - Nomad who accompanies the listing of companies on alternative capital markets).

We monitor compliance through internal organisational units, supervisory bodies and external specialised professionals



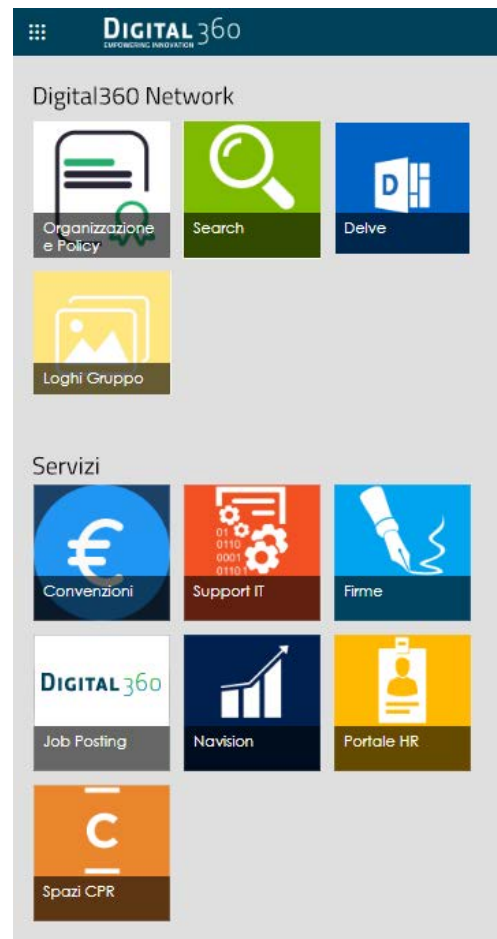
Control bodies

In DIGITAL360, compliance with social and economic laws and regulations is corroborated by the various control bodies, internal or external to the Group:

- The Board of Auditors
- The Investor Relator
- The Nomad - (Nominated Adviser)
- Management Control
- Auditing Companies
- The Data Protection Officer
- The Supervisory Board
- The Chief Information Security Officer
- The Workplace Prevention and Protection Manager

Obviously, the management of the individual areas covered by the monitoring of the control bodies makes use of specific procedures and policies. We would like to point out that, as previously mentioned, two Group companies (FPA and P41) are subject to ISO9001 Quality Certification, thanks also to the measures taken in the area of compliance.

In addition, a common space in the DIGITAL360 Workspace cloud platform is used, in which all procedures and documents are uploaded to ensure proper management of activities and timely information, and the aforementioned digital platform for handling reports of unlawful conduct or violations of its models (whistleblowing). Finally, we would like to emphasise that during 2021, no fines or non-monetary penalties were registered in the DIGITAL360 Group.



5.4 Our economic performance

The history of DIGITAL360 is one of constant progress over the years. We have collected in a table the economic value (in thousands of euros) directly generated by the Group and distributed to internal and external stakeholders

We continue our growth path with improved financial results which results in an increase in the economic value distributed to our stakeholders.

	2021	2020	Δ% 2021 over 2020
Directly generated economic value	33.183.436	27.466.115	20,8%
Revenues from sales and services	31.175.300	26.098.668	19,5%
Increases in fixed assets for internal work	1.429.622	1.305.942	9,5%
Other revenues and income, net	572.285	-140.442	507,5%
Financial income	13.080	213.192	-93,9%
Value adjustments to financial assets	-6.851	-11.246	-39,1%
Distributed economic value	28.213.379	23.313.872	21,0%
Operating costs (for raw materials, consumables and goods, services, use of third party assets) and operating expenses	16.001.446	13.832.953	15,7%
Staff Remuneration	10.607.980	8.299.126	27,8%
Remuneration of lenders	323.049	294.762	9,6%
Shareholder remuneration and distributed profits	-	-	-
Taxes and Charges to the Public Administration	1.232.403	877.557	40,4%
Donations and gifts to the community	48.500	9.475	411,9%
Economic value retained	4.970.057	4.152.242	19,7%
Depreciation and Provisions	3.019.085	2.584.104	16,8%
Undistributed profits	1.950.972	1.568.139	24,4%

Table 5.3 - Economic value (in thousands of euros) directly generated, distributed and retained by the DIGITAL360 Group in the two-year period 2021-2020.

THE NUMBERS OF THE DIGITAL360 GROUP

- **33.18 million** the economic value generated in 2021, up 20.8%.
- **28.21 million euro** the economic value distributed in 2021, up 21%.
- **4.97 million retained** economic value in 2021, up 19.7%.
- **over EUR 31 million** in Group revenues in 2021, up 19.5%.
- **EUR 6.5 million EBITDA** in 2021, up 27.4 per cent

In 2021, the DIGITAL360 Group generated an economic value of **EUR 33.2 million, an increase of 20.8% compared to the previous year**. The following table does not include the companies acquired during 2021, which it was decided to exclude from the scope of the Sustainability Report 2021 (see Methodological Note).

Of the economic value directly generated by the DIGITAL360 Group in 2021, 85% was distributed to the relevant stakeholders. Specifically, suppliers received 48.22%; personnel

31.97%; public administration 3.71%; lenders 0.97% and the community (in the form of donations and gifts) 0.15%. The remaining 14.98% was retained within the Group to support future growth.

With regard to **taxes and tax charges paid to the Public Administration**, it should be noted that the DIGITAL360 Group's tax policy respects and applies current Italian tax regulations and practices, considering that in both 2021 and 2020 all Group Companies operated in Italy. In the area of compliance with accounting regulations, the companies DIGITAL360 SpA, ICT&, FPA and P4I are obliged to have their accounts audited, while the small size of IQC has little impact on the Group's numbers and is below the threshold of the audit obligation. Service Pro, on the other hand, will be subject to statutory audit from 2022 as it has exceeded the size limits triggering the audit obligation two years in a row. In any case, both IQC and Service Pro are included in the audit (limited review) with a view to the Group's consolidated financial statements (see section 5.2 Risk management and risk prevention, in particular the section "Tax risks" in Chapter 5).

⁷ The following were considered for the calculation of EBITDA: Production value - Costs for raw materials, ancillary materials, consumables and goods - Costs for services - Costs for use of third party assets - Personnel costs - Sundry operating expenses. Please note that for the calculation of the following value, the companies acquired during 2021 were not considered, which it was decided to exclude from the reporting scope of the Sustainability Report 2021 (see Methodological Note).

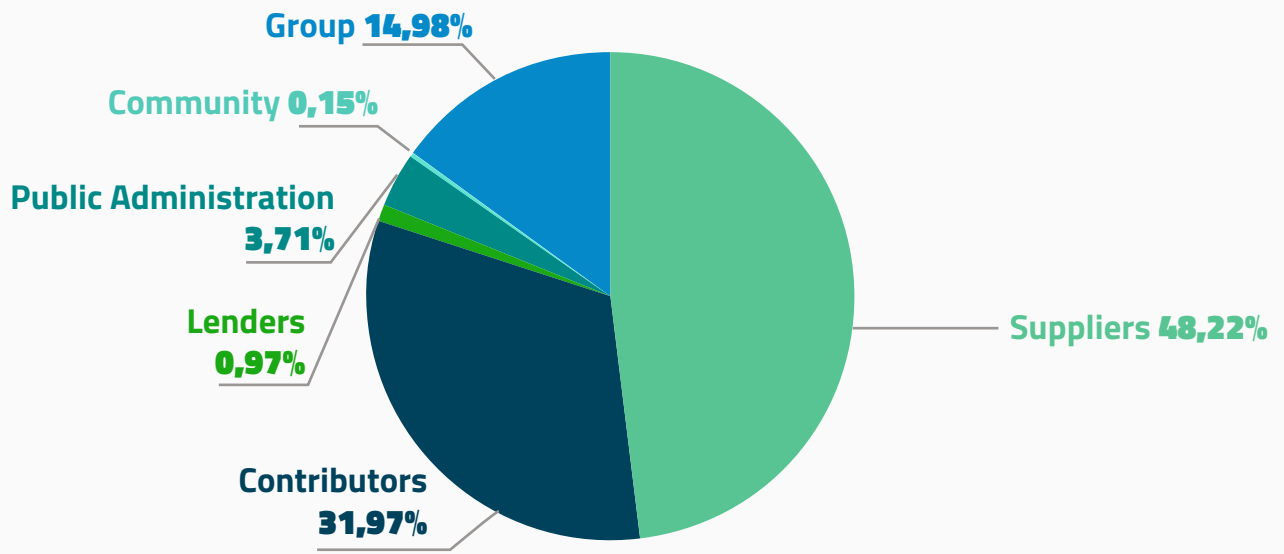


Figure 5.1 – Breakdown of economic value generated to DIGITAL360 Group stakeholders as at 31.12.2021

The correct fulfilment of tax obligations is ensured by an administrative function with the necessary expertise and supported by external consultants. In addition, all tax disclosures in the Sustainability Report and the

statutory financial statements comply with the requirements of our Group Code of Ethics, accounting standards and are audited by an external consultancy firm.

Methodological Note

6.

6.1 Scope, purpose and content of the Sustainability Report 2021

Every corporate organisation has an impact on the socio-economic context and the territories in which it operates that is much broader than the mere economic dimension. This is because, in carrying out its activities, a company constantly interacts with a large number of stakeholders (hence the term stakeholders), ranging from employees and collaborators to the entire world outside the company perimeter, which includes customers, local communities, institutions, suppliers, partner companies, etc.

Directive 2014/95/EU, transposed in Italy through Legislative Decree No. 254 of 30 December 2016 (hereinafter "D.Lgs. 254/2016"), introduced the obligation for large public interest entities to declare, as of 1 January 2017, certain non-financial information concerning, in particular, aspects relating to personnel, respect for the environment and human rights, social impact, and the fight against active and passive corruption, also establi-

shing some general criteria on the structure and content of the relevant document, known as the Consolidated Statement of Non-Financial Nature (DNF). The DIGITAL360 Group is not among the entities covered by this Decree, so this Sustainability Report can be classified as a voluntary Sustainability Report, covering the year 2021 (1 January - 31 December 2021).

We felt that the Sustainability Report was the most suitable tool to present to stakeholders the activities, projects and results achieved during the financial year 2021 in the economic, social and environmental spheres, as well as the initiatives implemented and the commitments made to the main stakeholders.

The data was reported with the aim of presenting a clear picture of the Group's actions and characteristics. The process of collecting information and quantitative data has been structured in such a way as to guarantee comparability over time between different financial years, in order to allow a correct reading of the informa-

tion and a complete vision to all the stakeholders concerned of the evolution of the performance and growth of the DIGITAL360 Group.

The reporting boundary is represented by the Group's fully consolidated companies as of 1 January 2021, namely: DIGITAL360 SpA (Parent Company), ICT&Strategy Srl, Partners4Innovation (P4I) Srl, IQC Srl, FPA Srl and ServicePro Srl. It was decided, for this first sustainability report, not to include the companies in the reporting scope:

- ICT Mobi
- Imageware Srl
- ICTLAB PA Srl
- Corecube Srl

acquired in the latter part of 2021, although these are part of the consolidated budget for the year 2021.

This choice was motivated by the difficulty of including the most recent additions to the Group in the reporting activities, as they all occurred in the last quarter of the year.

In futuro, il perimetro di rendicontazione del Bilancio di Sostenibilità tenderà ad uniformarsi a quello del bilancio consolidato di Gruppo per l'esercizio corrispondente, salvo eventuali eccezioni che saranno adeguatamente motivate.

In the future, the reporting scope of the Sustainability Report will tend to be aligned with that of the Group's consolidated financial statements for the corresponding financial year, subject to any exceptions that will be duly justified.

This document was approved by the Board of Directors on 22 November 2022.

This Sustainability Report has been prepared in accordance with the GRI Standards, 'core' option.

The document can be downloaded at <https://www.digital360.it/sostenibilita-societa-benefit/>

This document is the Group's first sustainability report: any comments will help us improve future editions. For any comments or clarifications, stakeholders can write to us at sustainability@digital360.it

6.2 Materiality analysis and management involvement

The list of aspects to be assessed in this Report has been defined in accordance with the contents defined in Article 3 paragraph 2 of Legislative Decree 254/2016 and on the basis of all aspects envisaged by the Global Reporting Initiative (GRI) Standards.

⁸ The ICT&Strategy figures also include those for the company Innovation Post acquired in the course of 2021 and merged into ICT&Strategy.

In accordance with the GRI Sustainability Reporting Standards defined in 2016 and continuously updated, we chose to consider as material those aspects that emerged as relevant from internal management involvement.

For the publication of the first edition of the Sustainability Report, the internal stakeholder engagement process took place in autumn 2021 and was carried out through several meetings and the sending of written questionnaires. All the GRI economic, environmental and social issues (200, 300 and 400 series) were included in the questionnaires submitted to management for assessment, as well as some specific topics created to describe and highlight the innovation and digitalisation issues typical of the sector in which DIGITAL360 operates, which were not considered sufficiently covered by the GRI Standards. The managers of the various company functions expressed a precise evaluation of the relevance and impact of the themes for DIGITAL360, determining as relevant themes those which reported a value above the materiality threshold, set at the average of the individual evaluations. The selected topics were then approved by the Group Top Management (Chairman and Managing Directors).

The themes that emerged as materials

can be divided into:

1. social issues: service quality and customer satisfaction, customer privacy, transparency, community involvement and activation of partnerships, compliance with laws and regulations (in the socio-economic sphere);
2. personnel-related topics: health and safety at work, valuing people, training and skills development, protection of diversity and equal opportunities, non-discrimination;
3. economic and governance issues: economic performance, indirect economic impacts, taxation and anti-corruption, corporate governance mechanisms;
4. innovation-related topics: digital innovation of processes and services, seen as a powerful lever for sustainable and inclusive economic growth;
5. environmental issues pertaining to the Group, although of little relevance considering DIGITAL360's activities: mainly related to the reduction of emissions related to travel and commuting.

Materiality analysis and management involvement

The results of the process did not lead to the definition of a materiality matrix, due to the fact that, for the first year of reporting, the DIGITAL360 Group did not engage external stakeholders.

Below, Table 6.1 summarises the GRI material themes for the DIGITAL360 Group and the specific themes specifically created, not included in the GRI Standards:

GRI CODE	ASPECT
201	ECONOMIC PERFORMANCE
203	INDIRECT ECONOMIC IMPACTS
205	FIGHTING CORRUPTION
207	RISK MANAGEMENT IN TAX MATTERS
305	REDUCING ENVIRONMENTAL IMPACTS (EMISSIONS)
401	HUMAN RESOURCES MANAGEMENT POLICIES
403	OCCUPATIONAL HEALTH AND SAFETY PROTECTION
404	STAFF TRAINING AND EDUCATION
405	PROTECTION OF DIVERSITY AND EQUAL OPPORTUNITIES
406	NON-DISCRIMINATION POLICIES
417	FOCUS ON PRODUCT COMMUNICATION
418	CUSTOMER PRIVACY PROTECTION AND DATA SECURITY
419	SOCIO-ECONOMIC COMPLIANCE
-	INNOVATION AND DIGITISATION OF PROCESSES
-	CONTRIBUTION TO SOCIAL INCLUSION THROUGH DIGITISATION
-	SERVICE QUALITY AND CUSTOMER SATISFACTION

Table 6.1 - Relevant GRI and specific aspects that emerged from the management involvement process within the DIGITAL360 Group

6.3 Collaboration with external stakeholders

The Group's long-term strategies and action programmes are also defined with the aim of responding to the expectations of the various stakeholders, with whom various initiatives for discussion and dialogue have been initiated in 2021.

Table 7 below shows:

- the main categories of stakeholders;
- issues felt to be priorities;
- listening, dialogue and consultation activities carried out during the year.

Despite the fact that there is no formal process for selecting or prioritising stakeholders, the DIGITAL360 Group has established a fruitful dialogue and solid collaborative relations with a large category of external stakeholders; all relations in which no particular critical issues are to be found. The table below summarises, for the main stakeholders, the most important dialogue initiatives, referring to the relevant chapters of the Sustainability Report for an analytical description of the main modes of interaction and collaboration.

KEY STAKEHOLDERS

DIALOGUE INITIATIVES

Employees and collaborators



We maintain continuous communication channels both through applications and social media dedicated to the Group's employees and collaborators, and through periodic meetings and webinars aimed at the entire company population. In addition, topical moments in relations with employees and collaborators are monitored with specific interventions and tools aimed at enhancing the value of people, skills and diversity. Please refer to **Chapter 2** for an analytical description.

Azionisti e comunità finanziaria



Gestiamo in modo strutturato e continuativo la relazione con la comunità finanziaria, anche grazie alla presenza dell'Investor Relator. Con azionisti e investitori sono organizzati incontri periodici e webinar. Si rimanda al **capitolo 3** per una descrizione approfondita.

Customers



We regularly communicate with customers through various channels, including one2one meetings to present business offers and group events. There is also a newsletter and constant communication on social networks, Group publications for all relevant company facts. Please refer to **Chapter 3** and, in particular, **Section 3.1** for a more in-depth overview of our approach to customers.

Society and the local community



The Group's entire activity is aimed at promoting digital culture in our country, fostering its sustainable and inclusive development. In addition, as a benefit corporation, we are planning many community benefit initiatives aimed at disadvantaged or fragile people, in collaboration with various third sector operators, including Caritas Ambrosiana, Sesta Opera San Fedele and Fondazione S. Carlo. Please refer to **chapter 3** for all the initiatives carried out with the community and with social impact.

Schools and universities



We were born from a group of professors at the Politecnico di Milano and the relationship with the academic world is in our genetic heritage. The relationship with universities runs along several directions: lectures and testimonials in many university courses, research in collaboration with various universities, accompanying students in their curricular internships and dissertations. Please refer to **chapter 3** for more information.

Public Administration



We have always been concerned with innovation and the digital transformation of PA. The most important moment of confrontation and exchange at national level is the ForumPA, organised for over 20 years by FPA, but the constant confrontation with the various PA articulations at different times and through different channels, accompanies and supports the Group's activities: from specific initiatives for sharing contents and experiences, to events, information assets and consultancy activities. Please refer to **chapter 3** for details.

Suppliers



We constantly address a variety of suppliers, companies and professionals, with whom we establish a non-standardised relationship of communication and dialogue. Please refer to **chapter 3** for an in-depth description.

Table 6.2 - List of DIGITAL360 Group's main external stakeholder dialogue initiatives

Annex

Chapter 2

GENERAL INFORMATION

GRI 102-8 Total employees by employment contract and gender

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Total staff	342	299	14%
Total women	178	163	9%
Total men	164	136	21%
Total employees	211	180	17%
Women	118	104	13%
Men	93	76	22%
Open-ended	205	175	17%
Women	115	100	15%
Men	90	75	20%
Fixed-term	6	5	20%
Women	3	4	-25%
Men	3	1	200%
Other Collaborators	131	119	10%
Women	60	59	2%
Men	71	60	18%
VAT No.	103	86	20%
Women	45	37	22%
Men	58	49	18%
Internship	20	25	-20%
Women	8	15	-47%
Men	12	10	20%
Co.Co.Co	8	8	0%
Women	7	7	0%
Men	1	1	0%

GRI 102-8 Fixed-term and permanent employees by type of employment and gender

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Full time	200	171	17%
Women	109	96	14%
Men	91	75	21%
Part time	11	9	22%
Women	9	8	13%
Men	2	1	100%
Total employees	211	180	17%

EMPLOYMENT

GRI 401-1 Total number of new hires for fixed-term and permanent contracts by age group and gender

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Total new employees	74	28	164%
Total women	40	11	264%
Total men	34	17	100%
Under 30	36	14	157%
Women	18	6	200%
Men	18	8	125%
Between 30 and 50 years old	36	12	200%
Women	21	4	425%
Men	15	8	88%
Over 50 years	2	2	0%
Women	1	1	0%
Men	1	1	0%

GRI 401-1 Total number of fixed-term and permanent employees terminated or interrupted by age group and gender

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Total terminated employment relationships	44	22	100%
Total women	24	7	243%
Total men	20	15	33%
Under 30	16	10	60%
Women	6	1	500%
Men	10	9	11%
Between 30 and 50 years old	24	12	100%
Women	17	6	183%
Men	7	6	17%
Over 50 years	4	0	-
Women	1	0	-
Men	3	0	-

GRI 401-1 Turnover rates (overall, incoming and outgoing) compared to the number of fixed-term and permanent employees by age group and gender

DIGITAL360 GROUP

	2021	2020
Overall turnover rate	56%	28%
Incoming turnover rate	35%	16%
Women	34%	11%
Men	37%	22%
Under 30	63%	31%
Women	69%	29%
Men	58%	33%
Between 30 and 50 years old	26%	10%
Women	25%	5%
Men	28%	18%
Over 50 years	13%	12%
Women	13%	11%
Men	13%	13%
Exit turnover rate	21%	12%
Women	20%	7%
Men	22%	19%
Under 30	28%	22%
Women	23%	5%
Men	32%	38%
Between 30 and 50 years old	17%	10%
Women	20%	8%
Men	13%	13%
Over 50 years	25%	0%
Women	13%	0%
Men	38%	0%

HEALTH AND SAFETY AT WORK

GRI 403-9 Number of occupational injuries related to the total number of DIGITAL360 Group employees and other external workers

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Number of recordable occupational accidents	0	0	0%
Number of accidents with serious consequences	0	0	0%
Number of deaths at work	0	0	0%

GRI 403-9 Number of occupational injuries related to the total number of DIGITAL360 Group employees and other external workers

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Number of recordable occupational accidents	0	0	0%
Number of accidents with serious consequences	0	0	0%
Number of deaths at work	0	0	0%

TRAINING AND EDUCATION

GRI 404-1 Average annual hours of training provided to the DIGITAL360 Group's total workforce by contractual category and gender

DIGITAL360 GROUP

	2021	2020	Δ 2021-2020
Total average training hours per year	45	14	224%
Women	42	12	261%
Men	49	17	194%
Managers	-	-	-
Women	-	-	-
Men	-	-	-
Managers & employees *	55	16	246%
Women	52	12	354%
Men	59	23	157%
Categories of NON-employees (VAT numbers, internships, Co.Co.)	39	14	183%
Women	35	13	163%
Men	43	-	-

There is a significant increase in average hours for some contractual categories during 2021 compared to 2020, because the DIGITAL360

Group benefited from the New Skills Fund to support companies and workers in the post-pandemic phase.

* For the two-year period 2021-2020, it was not possible to distinguish the training hours provided to middle managers from those provided to DIGITAL360

Group employees. It is the Group's concern to make reporting more transparent and detailed from the next editions of the Sustainability Report.

GRI 404-2 Scope of training programmes delivered by DIGITAL360
Group training plan to employees

DIGITAL360 GROUP

	2021
Security	10%
Soft skills	30%
Role-specific skills	60%

GRI 404-3 Percentage of DIGITAL360 Group fixed-term and permanent employees who received periodic (at least annual) performance and professional development appraisals, broken down by category, by gender and by company

DIGITAL360 GROUP

	2021	2020
Managers	100%	100%
Women	-	-
Men	100%	100%
Quadri	100%	100%
Women	100%	100%
Men	100%	100%
Employees	93%	93%
Women	90%	90%
Men	96%	97%
Categories of NON-employees (VAT numbers, internships, Co. Co.)	91%	96%
Women	95%	98%
Men	87%	93%
Total	92%	94%

DIVERSITY AND EQUAL OPPORTUNITIES

GRI 405-1 Total employees by contractual category, gender and age group

DIGITAL360 GROUP

	2021			2020			Δ 2021- 2020
	Women	Men	Total	Women	Men	Total	
Managers	0	1	1	0	2	2	-50%
age under 30	0	0	0	0	0	0	-
between 30 and 50 years old	0	0	0	0	0	0	-
age over 50	0	1	1	0	2	2	-50%
Quadri	6	15	21	5	13	18	17%
age under 30	0	0	0	0	0	0	-
between 30 and 50 years old	6	12	18	5	10	15	20%
age over 50	0	3	3	0	3	3	0%
Employees	112	77	189	99	61	160	18%
age under 30	26	31	57	22	23	45	27%
between 30 and 50 years old	78	42	120	68	35	103	17%
age over 50	8	4	12	9	3	12	0%
Categories of NON-employees (VAT numbers, internships, Co. Co.)	70	61	131	58	61	119	10%
age under 30	17	14	31	16	13	29	7%
between 30 and 50 years old	38	33	71	35	31	66	8%
age over 50	15	14	29	7	17	24	21%
Total	188	154	342	162	137	299	14%

GRI 405-1 Composition of the DIGITAL360 Group Board of Directors by age group and gender

DIGITAL360 GROUP	
	2021
Total Board Members	7
Total women	0
Total men	7
under 30	0
Women	0
Men	0
Between 30 and 50 years old	1
Women	0
Men	1
Over 50 years	6
Women	0
Men	6

GRI Content Index

GRI Standard	INDICATORS	Reference in the text	General comments / Omissions
GRI 101 - REPORTING PRINCIPLES 2016			
GRI 102 - GENERAL INFORMATION 2016			
ORGANISATION PROFILE			
102-1	Name of organisation	Chapter 1, paragraph 1.1 One innovative SME, two business cores, multiple co-entrepreneurs Methodological Note, paragraph 6.1 Boundary, scope and contents of the Sustainability Report 2021	
102-2	Main activities, brands, products and services	Chapter 1, section 1.1 An innovative SME, two business cores, multiple co-entrepreneurs, section 1.3 Innovating and knowing how to innovate Chapter 3, section 3.2 Digital culture at the service of the community	
102-3	Location of head office	Chapter 1, section 1.1 One innovative SME, two business cores, multiple co-entrepreneurs	
102-4	Location of activities	Chapter 1, section 1.1 One innovative SME, two business cores, multiple co-entrepreneurs	
102-5	Ownership and legal form	Chapter 1, section 1.1 DIGITAL360: one innovative SME, two business cores, multiple co-entrepreneurs	
102-6	Markets served	Chapter 1, section 1.1 One innovative SME, two business cores, multiple co-entrepreneurs	

102-7	Size of the organisation	Chapter 1, paragraph 1.1 An innovative SME, two business cores, multiple co-entrepreneurs Chapter 2, paragraph 2.1 Our people: composition and dynamics in action Chapter 3, paragraph 3.1 Our approach to customers: communication and satisfaction Annex Chapter 2
102-8	Information on employees and other workers	Chapter 2, Section 2.1 Our People: Composition and Dynamics Annex Chapter 2
102-9	Supply Chain Description	Chapter 3, Section 3.3 Relations with our Suppliers
102-10	Significant changes to the organisation and its supply chain	Chapter 1, section 1.1 One innovative SME, two business cores, multiple co-entrepreneurs Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021
102-11	Precautionary Principle	Chapter 5, Section 5.2 Risk Management and Prevention
102-12	External Initiatives	Chapter 5, Section 5.1 Business Ethics, Our Compass
102-13	Membership of associations	Chapter 3, Section 3.2 Digital culture at the service of the community
STRATEGY		
102-14	Statement by a senior manager	Letter from the President
ETHICS AND INTEGRITY		
102-16	Values, principles, standards and norms of behaviour	Chapter 5, Section 5.1 Business Ethics, Our Compass
GOVERNANCE		
102-18	Governance Structure	Chapter 5, Section 5.1 Business Ethics, Our Compass
STAKEHOLDER INVOLVEMENT		
102-40	List of stakeholder groups	Methodological note, section 6.3 Collaboration with external stakeholders

102-41	Collective Bargaining Agreements	GRI Content Index	All employees are covered by the respective applicable national contract. There are no second-level agreements with employees.
102-42	Identification and selection of stakeholders	Methodological note, section 6.3 Collaboration with external stakeholders	
102-43	Ways of involving stakeholders	Chapter 2, section 2.7 Communication, welfare, engagement Chapter 3, section 3.1 Our approach to customers: communication and satisfaction Chapter 3, Section 3.2 Digital Culture at the Service of the Community Chapter 3, section 3.3 The relationship with our suppliers Chapter 3, Section 3.4 Investor Disclosure Methodological note, section 6.3 Collaboration with external stakeholders	
102-44	Key issues and criticalities raised	Chapter 2, section 2.7 Communication, welfare, engagement Chapter 3, section 3.1 Our approach to customers: communication and satisfaction Chapter 3, Section 3.2 Digital Culture at the Service of the Community Chapter 3, section 3.3 The relationship with our suppliers Chapter 3, Section 3.4 Investor Disclosure Methodological note, section 6.3 Collaboration with external stakeholders	In the relationship with stakeholders, there are no particular critical issues.

REPORTING PRACTICES				
102-45	Persons included in the consolidated financial statements	Chapter 1, paragraph 1.1 One innovative SME, two business cores, multiple co-entrepreneurs Methodological Note, paragraph 6.1 Boundary, scope and contents of the Sustainability Report 2021		
102-46	Definition of report content and topic perimeters	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021		
102-47	List of material topics	Methodological note, section 6.2 Materiality analysis and management involvement		
102-48	Review of information	-	This document is the DIGITAL360 Group's first Sustainability Report and, therefore, does not require revisions of past years	
102-49	Changes in Reporting	GRI Content Index	This document is the DIGITAL360 Group's first Sustainability Report and, therefore, does not include any changes to past information	
102-50	Reporting Period	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021	1 January - 31 December 2021	
102-51	Date of publication of the most recent balance sheet	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021	This document is the DIGITAL360 Group's first Sustainability Report	
102-52	Reporting Periodicity	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021	Annual	
102-53	Contact for enquiries regarding the report	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021		
102-54	Statement on reporting in accordance with GRI Standards	Methodological Note, Section 6.1 Boundary, Scope and Content of the Sustainability Report 2021	This Sustainability Report has been prepared in accordance with the GRI Standards: core option	
102-55	GRI Table of Contents	GRI Content Index		

102-56	External Assurance	-	The DIGITAL360 Group Sustainability Report 2021 is voluntary in nature and, for this reason, does not require external auditing
GRI 201 - ECONOMIC PERFORMANCE 2016			
GRI 103: Management mode disclosures 2016			
103-1	Explanation of the material theme and its perimeter	Chapter 5, Section 5.4 Our Economic Performance	
103-2	The management mode and its components	Chapter 5, Section 5.4 Our Economic Performance	
103-3	Assessment of management modes	Chapter 5, Section 5.4 Our Economic Performance	
GRI 201: Specific disclosures 2016			
201-1	Directly generated and distributed economic value	Chapter 5, Section 5.4 Our Economic Performance	
GRI 203 – INDIRECT ECONOMIC IMPACTS 2016			
GRI 103: Management mode disclosures 2016			
103-1	Explanation of the material theme and its perimeter	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction	
103-2	The management mode and its components	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction	
103-3	Assessment of management modes	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction	
GRI 203: Specific disclosures 2016			
203-2	Significant indirect economic impacts	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction	
GRI 205 - ANTI-CORRUPTION 2016			
GRI 103: Management mode disclosures 2016			
103-1	Explanation of the material theme and its perimeter	Chapter 5, Section 5.2 Risk Management and Prevention	
103-2	The management mode and its components	Chapter 5, Section 5.2 Risk Management and Prevention	
103-3	Assessment of management modes	Chapter 5, Section 5.2 Risk Management and Prevention	
GRI 204: Specific disclosures 2016			
205-1	Operations assessed for corruption risks	Chapter 5, Section 5.2 Risk Management and Prevention	

205-3	Established incidents of corruption and actions taken	Chapter 5, Section 5.2 Risk Management and Prevention	In 2021, the DIGITAL360 Group did not ascertain any incidents of corruption.
GRI 207 - TAXES 2019			
GRI 103: Management mode disclosures 2019			
103-1	Explanation of the material theme and its perimeter	Chapter 5, Section 5.2 Risk Management and Prevention Chapter 5, Section 5.4 Our Economic Performance	
103-2	The management mode and its components	Chapter 5, Section 5.2 Risk Management and Prevention Chapter 5, Section 5.4 Our Economic Performance	
103-3	Assessment of management modes	Chapter 5, Section 5.2 Risk Management and Prevention Chapter 5, Section 5.4 Our Economic Performance	
GRI 204: Specific disclosures 2019			
207-1	Approach to taxation	Chapter 5, Section 5.2 Risk Management and Prevention Chapter 5, Section 5.4 Our Economic Performance	
207-2	Fiscal governance, control and risk management	Chapter 5, Section 5.2 Risk Management and Prevention	
207-4	Country-by-Country Reporting	Chapter 5, Section 5.4 Our Economic Performance	
GRI 305 - EMISSIONS 2016			
GRI 103: Management mode disclosures 2016			
103-1	Explanation of the material theme and its perimeter	Chapter 4, Section 4.1 Our Sustainable and Responsible Business Model Chapter 4, section 4.3 Energy consumption and emission reduction	
103-2	The management mode and its components	Chapter 4, Section 4.1 Our Sustainable and Responsible Business Model Chapter 4, section 4.3 Energy consumption and emission reduction	
103-3	Assessment of management modes	Chapter 4, Section 4.1 Our Sustainable and Responsible Business Model Chapter 4, section 4.3 Energy consumption and emission reduction	

GRI 303: Specific disclosures 2016		
305-1	Direct greenhouse gas emissions (Scope 1)	Chapter 4, Section 4.1 Our Sustainable and Responsible Business Model
305-3	Other indirect GHG emissions (Scope 3)	Chapter 4, Section 4.1 Our Sustainable and Responsible Business Model
GRI 401 - EMPLOYMENT 2016		
GRI 103: Management mode disclosures 2016		
103-1	Explanation of the material theme and its perimeter	Chapter 2, section 2.1 Our people: composition and dynamics in action Chapter 2, Section 2.3 Performance management and remuneration and career policies
103-2	The management mode and its components	Chapter 2, section 2.1 Our people: composition and dynamics in action Chapter 2, Section 2.3 Performance management and remuneration and career policies
103-3	Assessment of management modes	Chapter 2, section 2.1 Our people: composition and dynamics in action Chapter 2, Section 2.3 Performance management and remuneration and career policies
GRI 401: Specific disclosures 2016		
401-1	New recruitments and turnover	Chapter 2, Section 2.1 Our People: Composition and Dynamics Annex Chapter 2
401-2	Benefits provided for full-time employees, but not for part-time or fixed-term employees	Chapter 2, section 2.1 Our people: composition and dynamics in action Chapter 2, Section 2.3 Performance management and remuneration and career policies Chapter 2, section 2.6 Flexibility and new ways of working Chapter 2, section 2.7 Communication, welfare, engagement
GRI 403 - HEALTH AND SAFETY AT WORK 2018		
GRI 103: Management mode disclosures 2018		

103-1	Explanation of the material theme and its perimeter	Chapter 2, Section 2.5 The Value of Health and Safety at Work
103-2	The management mode and its components	Chapter 2, Section 2.5 The Value of Health and Safety at Work
103-3	Assessment of management modes	Chapter 2, Section 2.5 The Value of Health and Safety at Work
GRI 403: Management mode disclosures 2018		
403-1	Occupational Health and Safety Management System	Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-2	Hazard identification, risk assessment and accident investigation	Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-3	Occupational health services	Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-4	Worker participation and consultation and communication on health and safety at work	Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-5	Worker training in occupational health and safety	Chapter 2, Section 2.4 Training, Talent Development and Employability Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-6	Workers' health promotion	Chapter 2, Section 2.5 The Value of Health and Safety at Work
403-7	Prevention and mitigation of occupational health and safety impacts within business relationships	Chapter 2, Section 2.5 The Value of Health and Safety at Work
GRI 403: Specific disclosures 2018		
403-8	Workers covered by an occupational health and safety management system	Chapter 2, Section 2.5 The Value of Health and Safety at Work 100% of employees and non-employees of the DIGITAL360 Group are covered by an occupational health and safety management system and 20% of them are internally audited
403-9	Accidents at work	Chapter 2, Section 2.5 The Value of Health and Safety at Work Annex Chapter 2
GRI 404 - TRAINING AND EDUCATION 2016		
GRI 103: Management mode disclosures 2016		
103-1	Explanation of the material theme and its perimeter	Chapter 2, Section 2.4 Training, Talent Development and Employability

103-2	The management mode and its components	Chapter 2, Section 2.4 Training, Talent Development and Employability
103-3	Assessment of management modes	Chapter 2, Section 2.4 Training, Talent Development and Employability
GRI 404: Specific disclosures 2016		
404-1	Average annual training hours per employee	Chapter 2, Section 2.4 Training, Talent Development and Employability Annex Chapter 2
404-2	Employee skills upgrading and transition assistance programmes	Chapter 2, Section 2.3 Performance management and remuneration and career policies Chapter 2, Section 2.4 Training, Talent Development and Employability Annex Chapter 2
404-3	Percentage of employees receiving regular performance and professional development appraisals	Annex Chapter 2
GRI 405 – DIVERSITY AND EQUAL OPPORTUNITIES 2016		
GRI 103: Management mode disclosures 2016		
103-1	Explanation of the material theme and its perimeter	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences
103-2	The management mode and its components	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences
103-3	Assessment of management modes	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences
GRI 405: Specific disclosures 2016		
405-1	Diversity in governing bodies and among employees	Chapter 2, section 2.2 Inclusion policies and valuing differences Annex Chapter 2
GRI 406 – NON-DISCRIMINATION 2016		
GRI 103: Management mode disclosures 2016		
103-1	Explanation of the material theme and its perimeter	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences
103-2	The management mode and its components	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences

103-3	Assessment of management modes	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences	
GRI 406: Specific disclosures 2016			
406-1	Incidents of non-discrimination and corrective measures taken	Chapter 2, section 2.2 Policies for inclusion and valorisation of differences	In 2021, the DIGITAL360 Group did not record any incidents of discrimination
GRI 417 - MARKETING AND LABELLING 2016			
GRI 103: Management mode disclosures 2016			
103-1	Explanation of the material theme and its perimeter	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders	
103-2	The management mode and its components	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders	
103-3	Assessment of management modes	Chapter 3, section 3.1 Our approach to customers: communication and satisfaction Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders	
GRI 417: Specific disclosures 2016			
417-3	Cases of non-compliance concerning marketing communications	Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders	In 2021, the DIGITAL360 Group did not record any incidents of non-compliance with respect to these issues
GRI 418 - CUSTOMER PRIVACY 2016			

GRI 103: Management mode disclosures 2016

103-1	Explanation of the material theme and its perimeter	Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders
103-2	The management mode and its components	Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders
103-3	Assessment of management modes	Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders

GRI 418: Specific disclosures 2016

418-1	Proven complaints regarding breaches of customer privacy and loss of customer data	Chapter 3, section 3.5 Our focus on cyber security and data protection: a value for all our stakeholders	In 2021, the DIGITAL360 Group did not register any complaints about breaches of its customers' privacy
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GRI 419 – SOCIO-ECONOMIC COMPLIANCE 2016**GRI 103: Management mode disclosures 2016**

103-1	Explanation of the material theme and its perimeter	Chapter 5, Section 5.3 Compliance with Laws and Regulations
103-2	The management mode and its components	Chapter 5, Section 5.3 Compliance with Laws and Regulations
103-3	Assessment of management modes	Chapter 5, Section 5.3 Compliance with Laws and Regulations

GRI 419: Specific disclosures 2016

419-1	Non-compliance with social and economic laws and regulations	Chapter 5, Section 5.3 Compliance with Laws and Regulations	In 2021, the DIGITAL360 Group did not record any incidents of non-compliance of a material nature with respect to these issues
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DIGITAL 360
EMPOWERING INNOVATION

