

A man and a woman are in a kitchen. The man, wearing a blue apron over a tan shirt, is holding a tablet and looking at it with a smile. The woman, wearing a pink apron over a blue and white striped shirt, is leaning on the counter and looking at the tablet. There are green vegetables on the counter in the foreground. The background shows a kitchen with shelves and a window.

nexi

2021

CONSOLIDATED  
NON-FINANCIAL  
STATEMENT

PREPARED PURSUANT TO ITALIAN LEGISLATIVE DECREE NO. 254 OF 30 DECEMBER 2016



## Definitions and terminology used for the companies in perimeter

- **“Nexi SpA”** refers to the Parent Company of the Nexi Group
- **“Nexi”** refers to the following legal entities:
  - Nexi Payments SpA
  - Mercury Payments Services SpA
  - Help Line SpA
- **“Nets”** refers to Nets Topco 3 S.à r.l. and all subsidiaries directly and indirectly controlled with the following categorization.

Geographical area	Company	Country
<b>Nordic Countries</b>	Nets Denmark A/S and its branches Paytrail Oy and its subsidiaries EDIGard AS and its subsidiary and branch Signaturgruppen A/S Poplatek Oy Poplatek Payments Oy Storebox ApS Nets Sweden AB Nets Estonia AS and its branch	Denmark, Sweden, Norway, Finland, Estonia, Latvia, Lithuania and United Kingdom
<b>Poland</b>	P24 Dotcard Sp. z o.o. (or P24) and its subsidiaries, Centrum Rozliczen Elektronicznych Polskie and Platnosci S.A. (or Polskie ePłatności, or PeP) and their subsidiaries	Poland
<b>DACH</b>	Concardis GmbH and its subsidiaries, including Ratepay GmbH	Germany, Austria and Switzerland
<b>CEE</b>	Nets CEE d.o.o. Slovenia (subsidiary of Concardis GmbH) Nets CEE d.o.o. Croatia (subsidiary of Concardis GmbH)	Slovenia and Croatia

- **“Nexi Group”** refers to the companies in the **“Nexi”** and **“Nets”** perimeter

# STRUCTURE OF THE CONSOLIDATED NON-FINANCIAL STATEMENT

The Nexi Group's Consolidated Non-Financial Statement (hereinafter also referred to as the "Statement" or "NFS") is divided into five chapters.

The first chapter includes the Chairperson's and Chief Executive Officer's letter to stakeholders, an Overview of the main Group information for 2021 in terms of achievements, initiatives and commitments, followed by a description of the mitigation actions taken during the year to respond to the impacts generated by the Covid-19 pandemic.

The second chapter illustrates the Nexi Group's mission and business model, with an overview of the main transactions that took place during the year, the main stakeholder engagement initiatives and the 2021 Materiality Matrix.

The third chapter sets out the management methods and policies adopted, responsibilities, specific initiatives and commitments made in relation to each material topic represented in the Materiality Matrix.

The fourth chapter contains the mandatory disclosure according to the EU Taxonomy Regulation for environmentally sustainable economic activities (Reg. (EU) 2020/852).

Quantitative performance indicators are provided for each material topic at the end of the Statement, in the GRI Standards indicators chapter.

## TCFD

The Statement also includes information referring to the requirements of the Task Force on Climate-related Financial Disclosure (TCFD), indicated with a TCFD logo.

Within the individual headings, where applicable and relevant, the information relating to Nexi is provided separately from the information relating to Nets, which became part of the Nexi Group on 1 July 2021, in order to provide a clear picture and ensure a high level of transparency of the practices and processes in force in the various Group companies, which are currently being homogenised and integrated.

This is the English translation of the original Italian document "*Dichiarazione consolidata di carattere non finanziario*". In any case of discrepancy between the English and the Italian versions, the original Italian document is to be given priority of interpretation for legal purposes.

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# 2021 IN BRIEF



# 1

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# 1.1 LETTER TO STAKEHOLDERS

GRI 102-14

Dear Readers,

2021 was a year of great transformation for Nexi, marked in part by the merger with Nets, one of the main European players in the PayTech sector and a leader in the most advanced digital payments markets, such as the Nordic Countries.

The merger became effective on 1 July 2021 and represents a further step on the path to establishing a leading pan-European group in digital payments, with a market space that will expand to four times the size of the one served so far. With offices in 15 countries following the merger with Nets, the new Group has the scale, geographic reach and capabilities to act as a driver of digital change in Europe and make a key contribution to the transition to a cashless economy.

In this evolving context, Nexi's commitment remains unchanged and continues to focus on supporting its partner banks, citizens, businesses and the Public Administration with the aim of changing how payments are made and accepted, offering innovative, secure and reliable solutions and services suitable for serving all markets, including the most digitised ones and those with the greatest potential for growth.

In the pursuit of this commitment, Nexi promotes progress because digitisation plays an essential role in driving Europe towards greater simplification and social inclusion in our lives, in our social and commercial relationships and in our business, projecting it into the future. The challenges we are facing are in line with the expectations - which we continue to monitor - of our stakeholders, and the 2021 results show that we are working in the right direction. In 2021, Nexi entered the CDP Leadership Level with an "A-" rating and was included in the S&P Global Sustainability Yearbook for the second year running.



Nexi has also updated and made more ambitious targets for reducing CO<sub>2</sub> emissions in Italy to zero by 2040, 10 years ahead of the global target set in the Paris Agreement. The Group's target has been endorsed by the Science Based Target initiative, a prestigious international network which arose from the collaboration between WRI, CDP, WWF and the United Nations Global Compact. At the macroeconomic level, 2021 was largely characterised by the correlation between economic and pandemic trends from Covid 19. Also in relation to the latter topic, Nexi has played a key role for the community and the territories it serves, guaranteeing continuity and efficiency in the provision of public utility and collection and payment services to citizens and shopkeepers.

Confirming Nexi's determination to invest in skills and technologies for payment products and services, last December Nexi Digital was created in partnership with Reply: a digital centre of excellence designed to attract talented youth. The company anticipates employing more than 500 employees within four years, 350 of whom will be new recruits, mainly youth, through collaboration with universities and research centres, thus strengthening its proximity to the territories where Nexi operates and contributing to the spread of digital innovation in Italy and Europe as an essential driver of economic development.

More than 6,000 highly skilled people work together at Nexi Group every day. We would like to thank each and every one of them for their contribution to reaching the Group's ambition: thanks to the extraordinary combination of cultures, perspectives and skills - and with them passion and energy - Nexi is able to put customers at the heart of its business every day and shape the future of payments in the countries and areas where it operates.

In January 2022, Nexi was awarded the Top Employers Italia prize by the Top Employers Institute. The Institute has been certifying corporate excellence in human resources management for more than 30 years. This is a valuable recognition for us, being the result of numerous actions implemented during the past year: from the analysis of working conditions to the benefits attributed to our people, from investments dedicated to training and skills development to policies aimed at professional and personal growth, with the aim of constantly improving the well-being of the people working with the company.

Nexi continued its efforts to improve the responsible management of its supply chain, a factor of strategic importance for ensuring the high quality of products and services and the respect and compliance with the Group's principles.

The new positioning enabled the company to record sound economic performance, meeting its 2021 financial guidance and creating value for Nexi's shareholders. Revenues benefited last year from the synergies sought and put into practise, from geographical diversification and from the presence in structurally attractive markets with great growth potential.

These pages recount a challenging year, which saw the Group achieve important results in terms of economic, social, environmental and governance sustainability.

In 2022, we have witnessed the escalation of the conflict in Ukraine. As a European supplier of *mission critical* services and infrastructures, Nexi has activated a series of internal safeguards to guarantee the usual standards of service and safety to citizens, businesses and public administrations in full compliance with the sanctions decided at international level.

Among the various actions implemented to face the crisis, the Nexi Group has decided to support the UN Refugee Agency (UNHCR) with a donation of € 500,000, and to promote a fundraiser amongst employees to support UNICEF (United Nations Children's Fund), who -together with its partners- brings assistance to children and their families in Ukraine and neighboring countries. The amount raised will be doubled by the company, up to a maximum value of € 500,000. These activities were accompanied by the creation of a special channel dedicated to Ukrainian citizens to access job positions in Nets, with the possibility of obtaining support regarding relocation and work visas.

In addition to these central initiatives, numerous local initiatives were developed by the various legal entities in Poland, Italy, Germany, which have activated further fundraising or contributed to local activities.

In the short term, the conflict is expected to have entirely marginal impacts on the Group, but the management will surely follow the evolution of the crisis in order to be able to reliably assess the medium-long term impacts as well.

The new year had begun with the incorporation of SIA and the subsequent extraordinary combination of resources and skills in the field of technology and digital innovation. In 2022 Nexi will give further impetus to the path of digitalisation in Italy and Europe and will define sustainability objectives that consider the evolution of the company's perimeter, with an operational presence in over 25 countries, and that consistently reinforce its role as PayTech leader in Europe.

Enjoy the reading!



CEO  
Paolo Bertoluzzo

A handwritten signature in black ink, consisting of a stylized 'P' followed by a series of loops and a horizontal stroke.



Chairperson  
Michaela Castelli

A handwritten signature in black ink, featuring a large, elegant 'M' followed by several horizontal strokes.

## 1.2 GROUP OVERVIEW



### Purpose

We drive progress by simplifying transactions and by empowering people and businesses to enjoy closer relationships and prosper together.



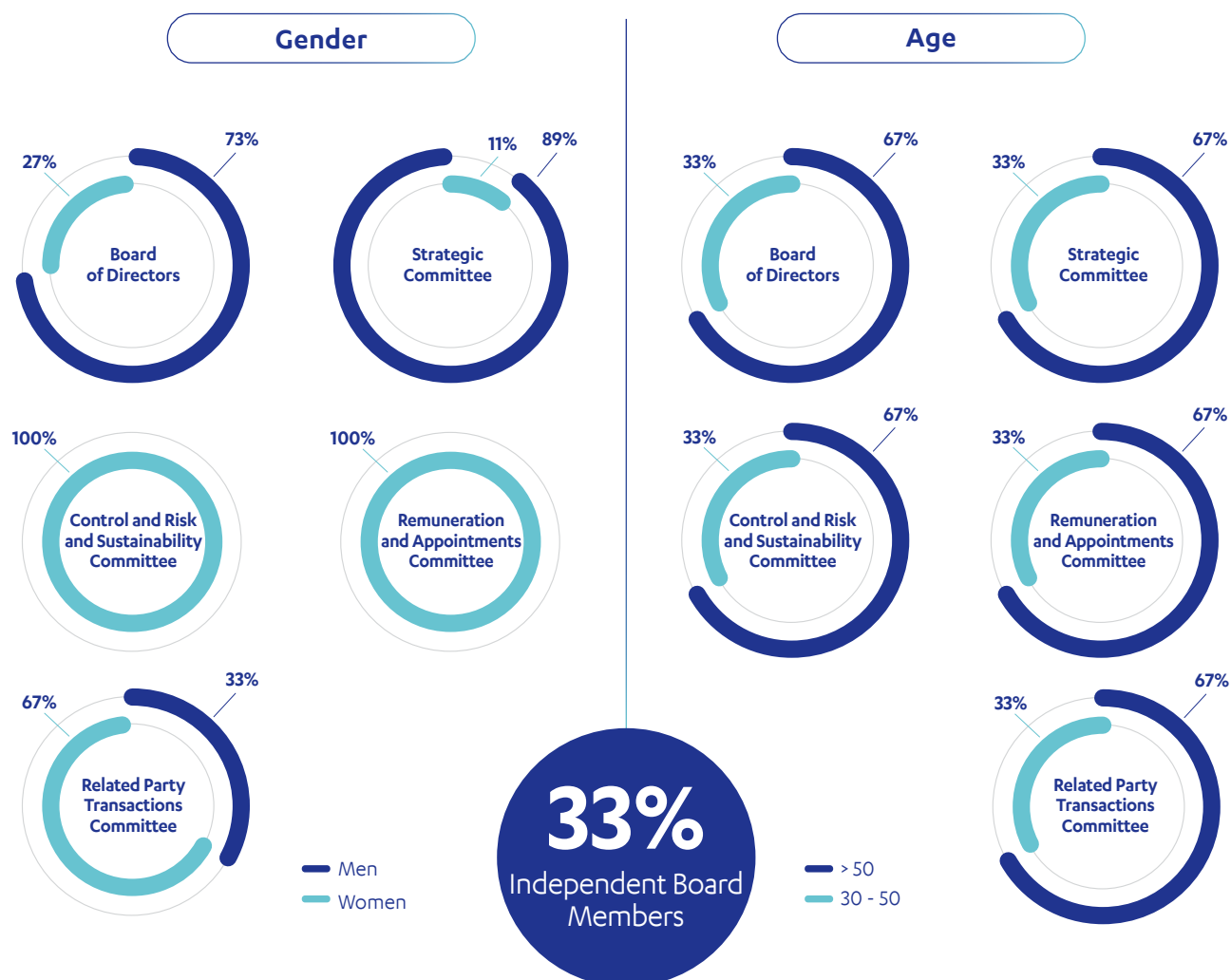
### Ambition

We want to shape the way People pay and Businesses accept payments, by offering to our Customers the most innovative and reliable solutions, thanks to our scale and the competence and energy of our people. We will drive the transition to a cashless Europe by making every payment digital because it is simpler, faster and safer for everyone.



### Governance

Structure of the Board of Directors and Internal Board Committees.





## SUSTAINABILITY AWARDS

- **Inclusion** of Nexi SpA in the 2021 edition of **S&P Global's Sustainability Yearbook**
- **7-point increase** in Nexi SpA's **ESG rating** assigned by S&P Global, **from 61 in 2020** to 68 (out of 100)
- **Award of an A- score** to Nexi SpA by **CDP** and **inclusion in the Leadership Band**
- **The inclusion** of Nexi SpA **in the MIB ESG Index**

**18.6 bn**  
transactions  
managed

**€ 2,269 mln**  
in Revenues

**€ 1,095 mln**  
EBITDA

**€ 167 mln**  
invested  
in technology

**€ 935 bn**  
of transactions  
managed

## Number of employees by geographical area



PERMANENT  
CONTRACTS



TEMPORARY  
CONTRACTS



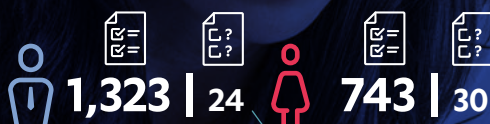
MEN



WOMEN

### NORDIC COUNTRIES

DENMARK, SWEDEN, NORWAY, FINLAND, ESTONIA,  
LATVIA, LITHUANIA AND UNITED KINGDOM



### DACH

GERMANY, AUSTRIA AND SWITZERLAND



### POLAND

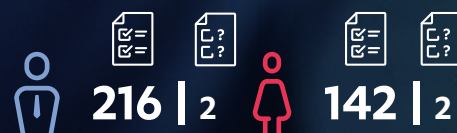


### ITALY



### CENTRAL EASTERN EUROPE

SLOVENIA AND CROATIA



# 6,420

Total number of  
employees by gender.

**42%** women

**58%** men

# 42.3

employees  
average  
age

# 503

new  
hires

# 163

new  
hires

under the age of 30

## TRANSPARENT COMMUNICATION



**54**  
press  
releases



**6,076**  
articles

## PAYSMART EDUCATIONAL CAMPAIGNS



**9 mln customers reached**  
Weekly educational newsletter for a more  
responsible use of payment instruments

## NEXI DIGITAL



European  
hub for  
technological  
innovation



aimed at the  
employment  
of **500 young  
talents** in



**18 roadshow  
days**



and over **1,000  
investors met**



**2**

credit card  
personalisation  
plants

**1** in Italy **1** in CEE

**29.6**

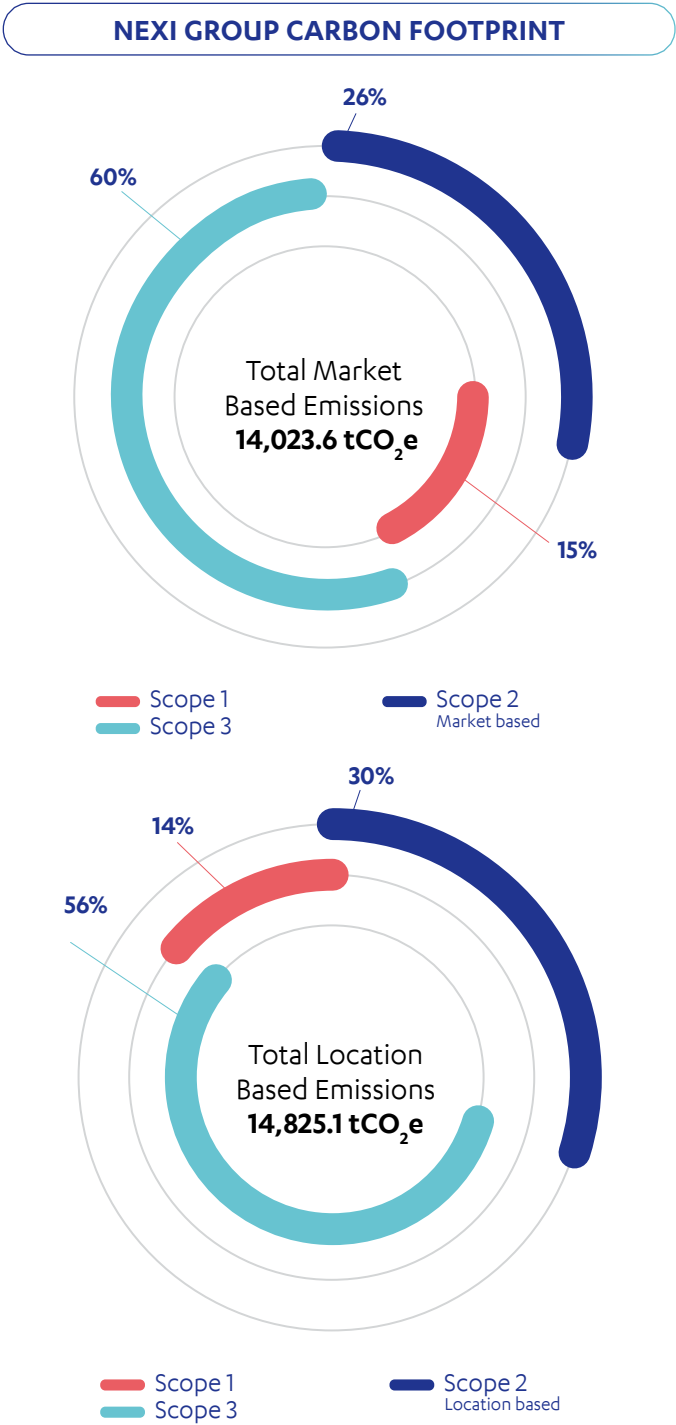
NPS for Nexi  
(+26% vs 2020)

**62,236**

total hours  
of training

**70**

e-commerce  
partnerships  
with merchants



Approval of **Nexi's CO<sub>2</sub> emission reduction targets** by Science Based Targets (SBTi) for the Italian perimeter: **-42% Scope 1 and Scope 2 emissions by 2030**



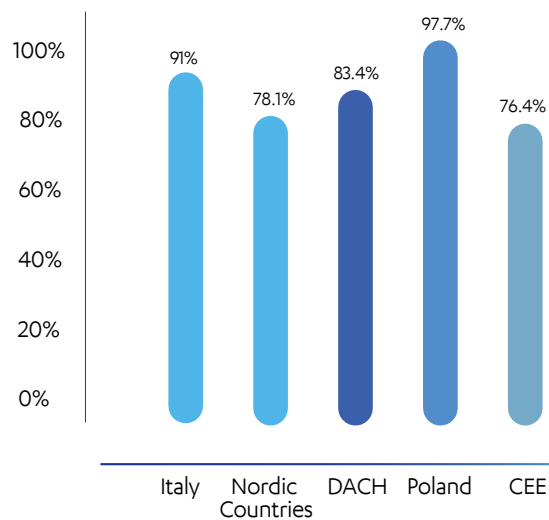
Commitment to working towards **having 78% of capital goods providers in Italy join the SBTi by 2025**



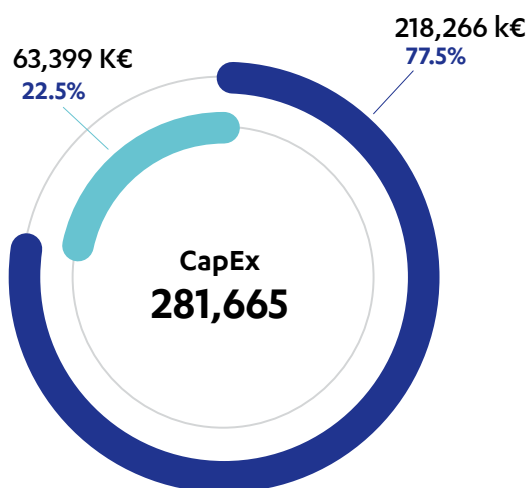
Commitment to reach net zero **emissions for the whole Group by 2040**



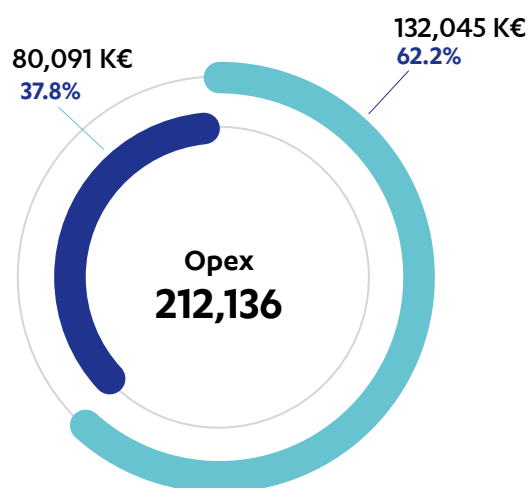
### PROPORTION OF SPENDING ON LOCAL SUPPLIERS



### EUROPEAN TAXONOMY



■ Not eligible activities  
■ Eligible activities



■ Not eligible activities  
■ Eligible activities

# THE RESPONSE TO THE COVID-19 EMERGENCY

## Impacts on business, operations and financial-economic performance

From a strategic and commercial point of view, the Nexi has made every effort to meet the expectations and new behavioural patterns of its customers, starting with a growing habit of using digital payment instruments, including for micro-transactions, and greater use of the e-commerce channel. This as a result of both demand factors (new “web shoppers”, including on the mobile channel) and supply factors (digitalisation of traditional retailers).

The trend in business volumes in 2021 provided further evidence of the shift underway from cash to digital forms of payment, especially on the Italian market where despite the measures taken to limit the health emergency, the acquiring transactions<sup>1</sup> of the last six months of the year consistently recorded double-digit growth compared to the same period in 2019 (the last “pre-Covid” year), despite the continuing weakness of international cards.

In the other areas, in some cases severely affected by waves of contagion, especially in the autumn months, the volumes handled by the Group in the acquiring business were slightly down compared to 2019 but recovering compared to 2020 (around +2% and +7%, respectively, in terms of number and value).

On the other hand, the long-term effects of the pandemic on the catering, transport and hospitality sectors remain to be assessed which, after having suffered more in the past two years, still present a more accentuated charge-back risk profile, which the Group is called upon to carefully monitor and actively manage. It should be noted, however, that these sectors accounted for less than 15% of the acquiring volumes managed during 2021.

Finally, the growing demand in e-commerce for pay later solutions in specific customer segments opens up new opportunities especially, but not only, in the DACH area, even in the face of a changing regulatory environment.

With regard to the Covid-19 emergency, in 2021 there was no operational impact on the continuity and/or quality of services provided by our outsourcers and/or suppliers.

For further information on the impact of the pandemic on long-term economic and financial performance, please refer to the information on Risks, uncertainties and impacts of the Covid-19 Pandemic contained in the Nexi Group's Consolidated Management Report published at [www.nexigroup.com](http://www.nexigroup.com).

## Activities to combat Covid-19 impacts in Nexi

The first half of 2021 was mainly dedicated to carrying out all the activities aimed at returning to the company's offices “in total safety”, starting with the Sempione offices and then including all the other offices in Italy. Starting in the second half of the year, the remote working methods and platforms have been refined to provide “hybrid working” solutions with progressive, partial return to operational offices, always in fully safe conditions.

<sup>1</sup> The payment services on the acquiring side are all the services enabling a merchant to accept payments with cards or other digital instruments belonging to credit and debit circuits.

In particular, more effective devices have been identified to counter the spread of Covid-19, such as the adoption and distribution of certified FFP2 masks with laboratory tests carried out in Italy, temperature detection at entrances, the placement of sanitising gel dispensers at entrances and in various points of the offices, routes indicated by special signs and indications on the ground to maintain social distancing, the placement of self-cleaning stations for sanitising workstations, the strengthening of cleaning, sanitisation and disinfection activities, and lastly the Casa Nexi app was implemented to regulate employee access to offices. This computerised management allows immediate control over the presence of employees in offices while respecting all the safety measures in place.

Among the activities carried out by Nexi to counter the negative effects of the spread of the Covid-19 pandemic, the following deserve mention: the Biological Risk Assessment and the application of a specific health protocol which identifies the danger of infection, assesses the risk of spread and identifies all prevention and protection measures aimed at eliminating the risk of infection in the workplace. The actions necessary to prevent the spread of Covid-19, including the Transition Policy on rules of conduct for accessing company offices and the correct use of protective equipment such as masks, have been communicated to all employees and made available on the company intranet.

Consistent with 2020, the range of services offered to employees has been confirmed and improved with actions dedicated to personal care. These include the provision of free and anonymous psychological support for all employees, organised with the support of professional psychologists, and the establishment of a mailbox answered by the Health and Safety department.

A welfare contribution was made for smart working contract subscribers in 2020 as well. The contribution can be used to purchase goods and services through the dedicated portal, in compliance with the regulations in force.

Lastly, the Covid-19 pandemic had an impact on the provision of training to Nexi staff, leading to a review and reshaping of the training events originally planned in terms of objectives, content, remote provision methods, and placing greater focus on change management courses.

## Activities to combat Covid-19 impacts in Nets

From the outset, Nets has been committed to keeping the level of employee motivation high while at the same time providing constant information on national restrictions and preventive measures in place in the different countries where it operates. A “Nets Covid-19 Crisis Team” was established, which worked with local Country Directors to keep colleagues operational across Europe despite the circumstances created by the pandemic.

Several initiatives have been launched to support employees while working remotely, including:

- possibility of borrowing office and IT equipment to use while working from home;
- online webinars run by external partners to help employees cope with the difficulties of working remotely;
- implementation of specific hybrid working guidelines from June;
- introduction of plans to cover and reimburse staff expenses for remote working tools.

A Pulse Survey was conducted in February and the annual Engagement Survey was conducted in September to monitor employee well-being during the pandemic. The feedback received shows great appreciation for how the emergency was dealt with, and for the close contact maintained with leadership and among various team members during the period of remote working, creating clear expectations and providing useful feedback on performance.



# THE GROUP, STAKEHOLDER ENGAGEMENT AND THE MATERIALITY MATRIX





# 2

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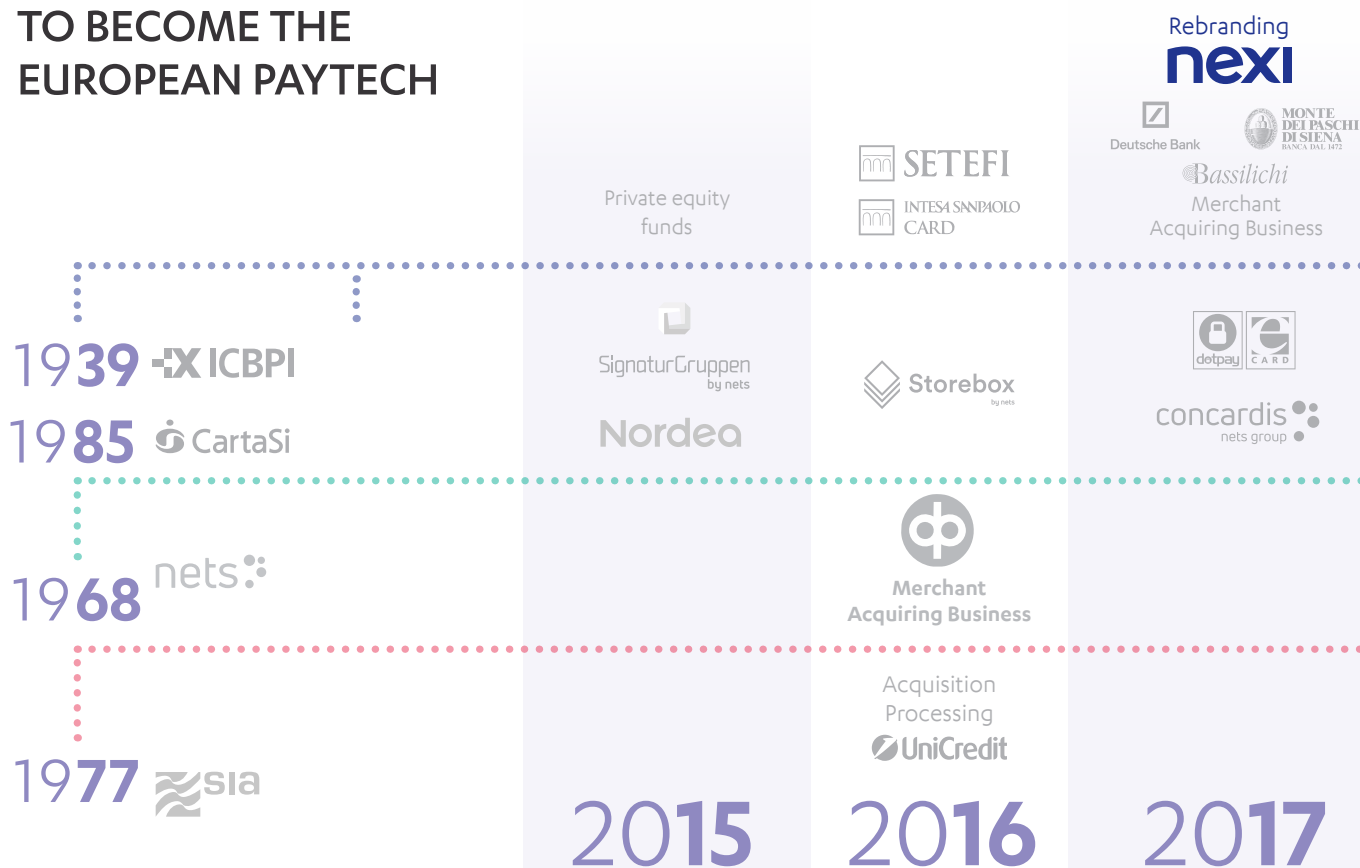
## 2.1 THE MISSION FOR A CASHLESS EUROPE

The Nexi Group is the leading operator in Italy and Europe in the digital payments sector with the scale, capabilities and territorial proximity necessary to provide innovative, simple, fast and secure payment solutions for individuals, businesses, financial institutions and Public Administration.

The Group completed several corporate transactions in 2021 that resulted in significant growth, establishing the Group's role as a European leader in the PayTech market. In particular:

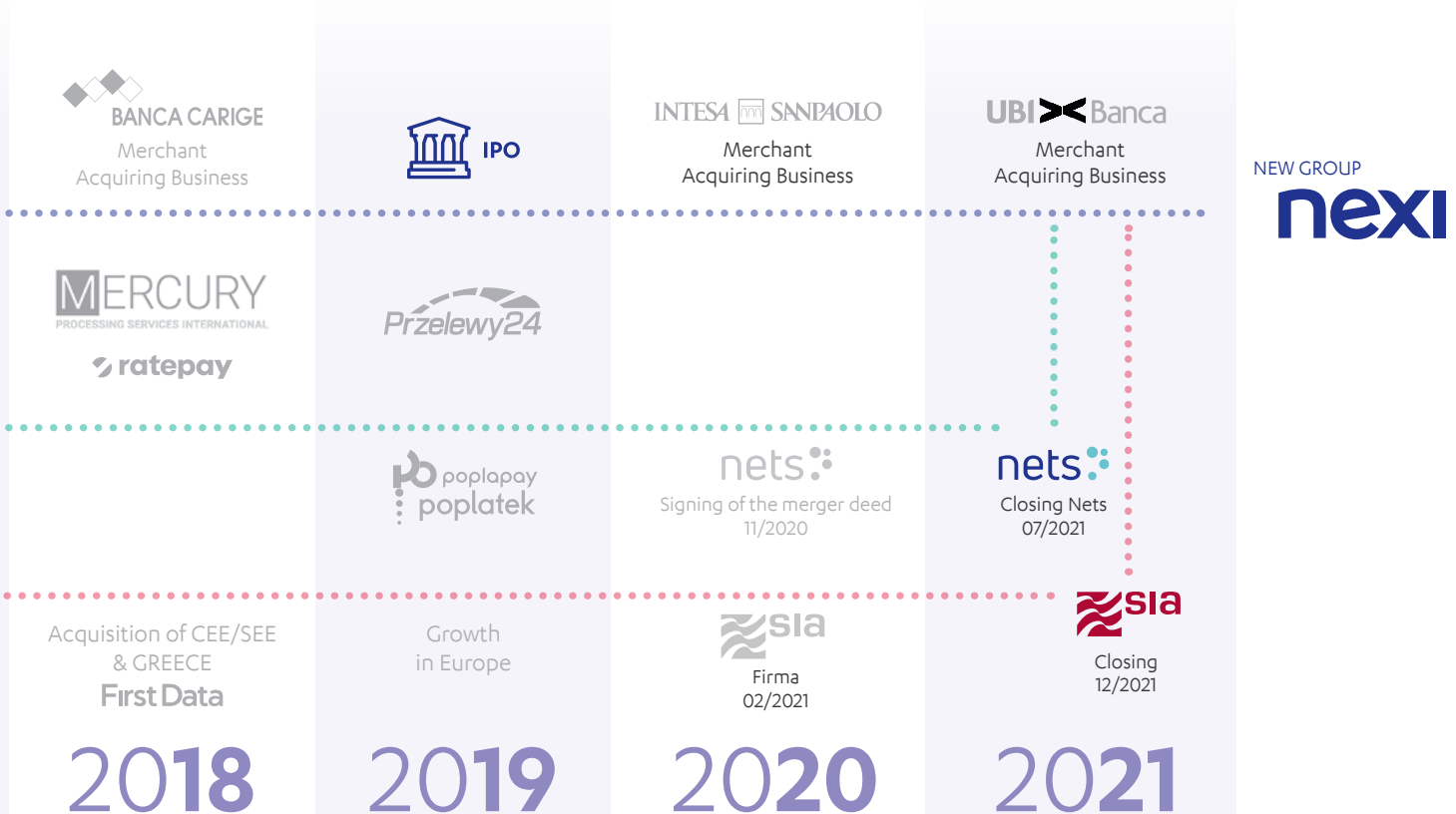
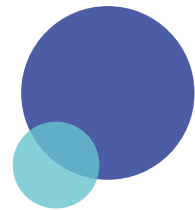
- **March:** merger of Nets into Nexi approved by the extraordinary Shareholders' Meeting, resulting in an increase in the number of directors from 13 to 15. The merger was **effective on 1 July 2021**;
- **21 June:** approval of the merger of SIA into Nexi by the extraordinary Shareholders' Meeting with the adoption of the new Articles of Association;
- **14 October:** obtained authorisation for the merger between Nexi and SIA from the Italian Competition Authority (AGCM).
- **16 December,** signing of the merger deed, with an effective date of **1 January 2022**.

### THE TRANSFORMATION PATH OF NEXI GROUP TO BECOME THE EUROPEAN PAYTECH

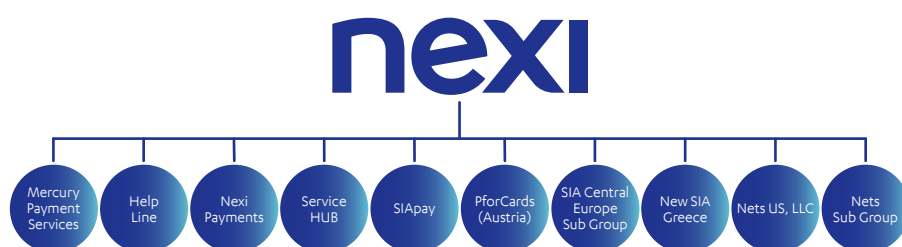


In 2021, the Group also received a number of awards for its commitment to limiting **environmental and social impacts** and ensuring increasing transparency in its sustainability reporting. Major awards received during the year include:

- the **significant improvement in Nexi SpA's ESG rating assigned by S&P Global**, with an improvement in all three ESG dimensions and a 7-point increase in the rating obtained (68/100 in 2021);
- the **inclusion of Nexi SpA in the 2021 edition of S&P Global's Sustainability Yearbook** for the second year running;
- the **significant improvement in Nexi SpA's ESG rating assigned by CDP** (formerly the Carbon Disclosure Project) **with the award of an A- score in the second year of participation and consequent inclusion in the Leadership Band**;
- the **inclusion of Nexi SpA in the MIB ESG Index**, the first ESG index dedicated to Italian blue-chips and designed to identify large Italian listed issuers with the best ESG practices.



With parent company Nexi SpA, the Group listed on the Mercato Telematico Azionario organised and managed by Borsa Italiana SpA since 16 April 2019 is present in 15 countries as a result of the merger with Nets. The Group intends to grow together with its stakeholders by leading the transition to a cashless Europe and making every payment digital because it is more convenient, faster and safer. The mission of driving progress lies therein. In fact, payment digitalisation simplifies citizens' lives, promotes the development of businesses and improves the efficiency of the Public Administration, thus supporting digital inclusion, development and growth in the territories where the Group operates.<sup>2</sup>



The Group contributes to the achievement of the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda<sup>3</sup> through employee training, its commitment to spreading a digital culture and collaborations in technology, investments in technology and the continuous improvement of processes, products and solutions for society and the environment.

GRI 102-5

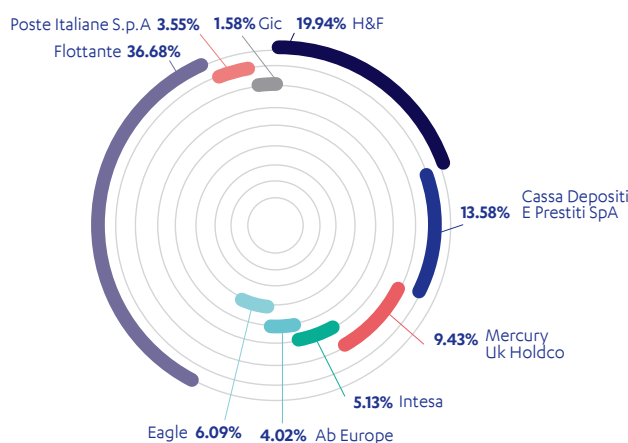
GRI 102-7

<sup>2</sup> Information of a non-financial nature relating to the activities of PforCards Austria, SIA Central Europe Sub Group and New SIA Greece of 2021 is not disclosed in this Statement, considering that the effective date of the merger of the above mentioned SIA companies signed on 16 December 2021 is 1 January 2022. Information regarding Service Hub is not disclosed in this Statement as it was not operational, had no employees and did not generate any impacts in 2021. The company became operational in 2022 following the Group's merger with SIA.

<sup>3</sup> For further details, please refer to the individual paragraphs in Section 3 of the Statement.

<sup>4</sup> It should be noted that the composition of the Nexi Group's shareholders significantly changed in 2021 following the closing of the merger by incorporation of the Nets Group and the SIA Group.

**SHAREHOLDERS' COMPOSITION**  
of Nexi SpA at 31 December 2021<sup>4</sup>



During 2021, the Group showed a solid financial performance, despite the inevitable adverse effects of the pandemic on social and economic dynamics. Revenues stood at € 2,269 million, up 10.0% year on year, EBITDA was € 1,095 million, up 12.1%, and the EBITDA margin exceeded 48%, an improvement of around 1 percentage point.

#### KEY GROUP INDICATORS FOR YEAR 2021

n. 18.6 billion transactions managed (+12.0%)	€2,269 million in Revenues (+10.0%)	€330 million of Capex (+20.8%)
€935 billion of transactions managed (+11.7%)	€1,095 million EBITDA (+12.1%)	Net Financial Position €-5.245 million

Note: the above changes are calculated on an annual basis. Revenues and EBITDA are shown on a pro-forma basis (see also the section "Results of operations" where the reported data are also shown, included in the Nexi Group's Consolidated Management Report published at [www.nexigroup.com](http://www.nexigroup.com)).



## 2.2 THE BUSINESS MODEL

With a portfolio of innovative products, e-commerce expertise and industry-specific solutions, the Nexi Group provides flexible support to the digital economy and the entire global payments ecosystem across a wide range of payment methods and channels. The Group's digital platform and best-in-class professional expertise in the industry allow the company to operate at its best in three market segments: Merchant Services & Solutions, Cards & Digital Payments and Digital Banking & Corporate Solutions.

### Merchant Services & Solutions

The Merchant Services & Solutions Business Unit ("BU") offers solutions and support to every type of counterparty, providing services and products for digital payment acceptance, POS payment terminal management,<sup>6</sup> acquiring flows and customer care activities. Together with the Partner Banks, the BU focuses on merchant needs and supports their activities, supporting all types of business ranging from retail to large distribution chains, for payments in both the physical world and on the online channel.

Thanks to the breadth of services offered, the different payment types accepted, the geographical coverage and the value-added services, following the integration with Nets, the Nexi Group can represent a one-stop-shop model for merchants in several European countries. Also in 2021, Nexi supported merchants in ensuring continuity of service during the different phases of the pandemic, but also in facilitating recovery by presenting important new short- and long-term initiatives<sup>7</sup>.

### Cards & Digital Payments

Through this division and in cooperation with its partner banks, the Group provides a wide range of so-called "issuing" services, i.e., relating to the procurement, issuance and management of payment cards for individuals and companies, using advanced anti-fraud systems to ensure fast, reliable and secure user authentication systems and rapid execution of payment transactions.

Within this BU line, Nets also provides services relating to the products of: (i) Account Management Services; (ii) Core Payment Processing; (iii) Risk Management Services, (iv) Digitisation Services and (v) e-Identity Infrastructure. The business area also includes the operations and processing services provided in relation to the national debit card systems in Denmark ("Dankort") and Norway ("BankAxept").

In 2021, the Cards & Digital Payments BU continued and increased its mission to promote, incentivise and educate customers on the use of digital payments, launching a security awareness campaign that accompanies digital innovation with the aim of creating a cultural background for future generations. Nexi's mission and objective to change the way Italian and European citizens make payments is clearly summarised by the large number of campaigns, events and initiatives that the BU has studied and designed to encourage the transition to digital payments, with constant attention to customers' needs and security.

GRI 102-2

GRI 102-6

<sup>5</sup> Digital economy means an economy based on digital information technologies.

<sup>6</sup> The payment services on the acquiring side are all the services enabling a merchant to accept payments with cards or other digital instruments belonging to credit and debit circuits.

<sup>7</sup> For details of the initiatives of the Merchant Services & Solutions BU, please refer to Section 3 of the Statement, "Modernisation and Progress of European Countries".

## Digital Banking Solutions

The Group provides three types of services through this BU: ATM Management, Clearing Services and Digital Corporate Banking Services. The Digital Banking Solutions business line relies on dedicated professionals to cover this range of services (belonging to different functions, such as marketing, sales, ICT and operations) and three internal Digital Factories dedicated to the development of application solutions.

This BU also includes the installation and management of ATMs on behalf of Partner Banks. On the Italian market, the Group also operates as an automated clearing house (ACH) for domestic and international payments in compliance with standard interbank regimes. The business unit provides e-Security and digitisation services for the Scandinavian market. These services include the provision of e-Security solutions through MitID (Denmark), digitisation services that enable customers to simplify workflows, as well as services to support digital transformation.

## 2.3 STAKEHOLDER ENGAGEMENT

The Nexi Group's stakeholders are the people, groups of people or organisations that influence and/or could be influenced by the organisation's activities, products, services and related performance. With a view to creating shared value, and in line with previous years, in 2021 stakeholder engagement activities were carried out and managed by dedicated corporate functions, opting for remote communication methods when the evolution of the Covid-19 pandemic made it appropriate to ensure consistency and regularity in communications.

The Nexi Group's stakeholder categories are identified through the analysis of internal documents and interviews with management, taking into account the variables laid down in Principle AA1000 Stakeholder Engagement Standard<sup>8</sup>, reviewed and updated periodically with a view to continuous improvement. There were no significant changes in the categories of stakeholders to be considered in 2021, even after the integration of Nets into the Group.

In 2021, the Nexi Group continued to ensure constant dialogue with all categories of stakeholders, as well as the provision of specific training offered to Banks and merchants, the definition of partnerships with the Public Administration, universities and the Innovation community, as well as interventions and sponsorship of numerous events on the evolution of digital technologies.

The following table summarises the main engagement initiatives for the different stakeholder categories, with particular reference to the most significant engagement activities carried out during the year.

GRI 102-40

GRI 102-42

GRI 102-43

GRI 102-44

GRI 102-12

<sup>8</sup> Dependence, responsibility, tension, influence, different perspectives. For more information on the standard, please see <https://www.accountability.org/standards/aa1000-accountability-principles>.

**STAKEHOLDER  
CATEGORY****DESCRIPTION OF  
ENGAGEMENT  
INITIATIVES****MAIN INITIATIVES 2021****CUSTOMERS**

*Partner banks, Private customers,  
Merchants, Public Administration*

Customers express their opinion through customer satisfaction surveys and the Group also identifies their needs by measuring the Net Promoter Score (NPS). Dialogue with Partner Banks is also promoted through several meetings aimed at sharing strategic visions on innovation in digital payment services and supporting their daily activities.

**NEXI**

- Introduction of new surveys and identification of specific improvement actions in the three BUs
- Conducting up-to-date NPS surveys dedicated to Partner Banks with an advanced survey method
- Quarterly Customer Satisfaction surveys through telephone interviews: about 2,000 Nexi owner customers were interviewed as well as about 2,000 customers of competing companies, along with more than 2,500 Nexi merchant customers interviewed and about 2,000 customers of other companies
- Nexi Ready, web portal for the go-to-market: more than 200 banks served, more than 1,000 users
- Creation of a new dedicated portal for Reference Banks
- 7 Thought Leadership events with Banks
- Connexi Digital Week event for Banks
- Connexi Special Event
- 8 Nexi Restart training events
- more than 50 ad hoc campaigns for the Banks commercial network, 26 digital training courses for Banks
- Restart Credit Retail initiative: 157 Banks, 15,000 assets downloaded on Nexi Ready, over 70 customisations
- Debit Premium/Business/consumer international campaign
- Mobile Payment campaigns
- Initiatives to support Key6 adoption: more than 10 million Direct Emailing (DEM), 700,000 SMS, 80,000 Direct Mailing (DM)
- Restart Credit Business initiative: 157 Banks, 44 customisations, 2,500 assets downloaded on Nexi Ready
- Development of e-commerce partnerships with merchants (70 partnerships) and 42 events and webinars held
- RIVISTA "COMMERCIO IN 1° PIANO" ["TRADE AT THE FOREFRONT" MAGAZINE] project (130,000 merchants reached with the print version of the magazine - 143,000 merchants reached with the digital version): project on information and news, relations with merchants and demonstration of interest in order to provide useful information on digital payments
- 1.4 million DEM sent for DEM training campaigns
- 57 positioning events for merchants
- Cashback&Lottery initiatives: 10 training campaigns; 97,000 DM sent
- Nexi For You: an editorial project designed to keep customers up to date with Nexi's products and services and to raise awareness of the legal framework and context of the world of digital payments
- Communication activities (ADV campaigns and CVM initiatives) for consumers on the topic of Cashback: 2.7 million customers involved
- iosi campaigns on services (e.g., ioSpecial, ioVINCO): 168 engagement campaigns, 27 million contacts
- Premium caring and value-added services campaigns: 40,000 customers reached, 60 DEM
- Paysmart educational campaigns: weekly newsletter with the aim of providing information in educational mode about Nexi products and services, for a more responsible use of payment instruments: 9 million customers reached
- Consumer campaigns on value-added services: more than 12 million DEM & SMS
- Communication activities for the Public Administration including Nexi Academy PA: 3 webinars, 664 participants
- Campaigns dedicated to the theme of Public Administration for Banks, including campaign for electronic payment of healthcare fees in Citizen Services pharmacies with the PagoPA system
- 4 events with the Public Administration with over 12,000 participants including "Rinascere l'Italia" [Italy reborn] with the attendance of the President of the Italian Republic, Sergio Mattarella
- More than 20 lead generation events for corporate clients focusing on supply chain finance and tourism (e.g., Mission event)

*continue*

STAKEHOLDER  
CATEGORYDESCRIPTION OF  
ENGAGEMENT  
INITIATIVES

## MAIN INITIATIVES 2021



## CUSTOMERS

Partner banks, Private customers,  
Merchants, Public Administration

Customers express their opinion through customer satisfaction surveys and the Group also identifies their needs by measuring the Net Promoter Score (NPS). Dialogue with Partner Banks is also promoted through several meetings aimed at sharing strategic visions on innovation in digital payment services and supporting their daily activities.

## Nets

- Annual online Customer Satisfaction surveys of private customers and merchants (about 500 respondents)
- Transactional surveys for Merchant Services, feedback from nearly 11,000 Merchants
- Annual Customer Satisfaction survey for E-security services clients, Cards&Digital Payments BU, to support the sustainable reforestation process: for each survey completed by customers, Nets donated to the Global Climate Institute, for a total of 4,770 euros, to plant trees in Tanzania (total trees planted 4,148)
- Closer cooperation with banks by contributing to fraud prevention (e.g., through authentication for e-commerce and contactless -pinless- transactions at the point of sale (POS))
- Executive Club Retail, a meeting place for retail executives. Nets was an event partner
- Retail Awards, industry event. Sponsor of the "Årets Butik" award for retail in Sweden
- Hotel Expo, industry event and congress for hotels and hotel suppliers
- Top Hotel, a meeting place for the best hotels in Germany
- Payments Outlook Webinar, online webinar organised by Nets to share key findings from the Payments Outlook report
- Fraud prevention initiatives focusing on measures to enable customers and end users to make secure payments
- Regular communication via newsletters with our partners on regulatory changes, new developments and relevant internal information
- Webinars and training, online learning video sessions on new products or regulatory requirements.
- Online partner day: with more than 100 participants



## EMPLOYEES

Employees,  
Collaborators

Dialogue with employees is aimed at informing and involving all colleagues in company initiatives, both those related to human resources issues (e.g., welfare, training) and those related to the brand, company strategy, products and services and commercial activities. The dialogue is also aimed at transmitting and reinforcing the company's values.

## Nexi

- Annual People Survey: 94% participation in the survey
- Newsletters and specific communications on company updates (business and strategy)
- corporate events and conventions in totally digital format
- training activities for employees

## Nets

- Yearly Engagement Survey (and additional Pulse Surveys): participation in annual survey 82%
- Online training courses (iLearn, online self-study programme) to expand knowledge and skills on all Group topics

INSTITUTIONS  
AND  
REGULATORS

National and European  
Governance and Audit  
Institutions and Bodies

Relations with regulators are managed on a daily basis through specific functions that work to ensure compliance with laws and respond to all requests for mandatory information or specific requests. Nexi has also joined the main national financial trade associations and actively supports dialogue with institutions on issues relating to the country's digitalisation process

## Nexi

- Institutional dialogues on the digitalisation of payments and support for SMEs
- Working groups and technical tables
- Preparation of One-to-One and group meetings
- Participation in associations

## Nets

- Sharing information on payment data with public authorities and decision makers for carrying out investigations and supporting decisions regarding strengthening or easing restrictions to limit pandemic impacts
- Working groups and technical tables
- Participation in trade associations and organisations



STAKEHOLDER  
CATEGORYDESCRIPTION OF  
ENGAGEMENT  
INITIATIVES

## MAIN INITIATIVES 2021



Shareholders, Investors,  
Rating agencies, ESG  
data providers<sup>9</sup>

- Dialogue with investors and the global financial community through the dedicated Investor Relations Department is constant and aimed at developing the shareholder base in a long-term perspective.
- In 2021, the ESG Function intensified its dialogue with leading ESG providers, investors and investment funds through conference calls and participation in dedicated events.
- At its meeting of 22 December 2021, the Board of Directors of Nexi SpA approved the "Policy for managing dialogue with shareholders and other investors", which sets out the procedures for managing dialogue between the company and its investors

**Nexi**

- Institutional dialogues on the digitalisation of payments and support for SMEs
- 1,119 institutional investors met
- 17 days of participation in international conferences
- 18 days of roadshows
- one-to-one meetings/group meetings/conference calls
- 4 institutional conference calls to present quarterly economic results to the market
- Money 2020 event in Amsterdam: first official presentation of the merger between Nexi and Nets
- New corporate website for the Group, [www.nexigroup.com](http://www.nexigroup.com)



Fintech, Start-ups,  
Developers

The Group continuously cooperates with an international ecosystem of fintech companies, start-up accelerators and incubators, business partners and developers, and start-ups themselves to develop innovative solutions.

**Nexi**

- Digital e-commerce events: e-Commerce hub, Web Marketing Festival, Netcomm Forum Live
- Main Sponsor and interventions at Milan Digital Week
- Nexi Partner Program, a programme in which qualified partners work together to improve the world of digital payments
- Participation in the Salone dei Pagamenti 2021 (ABIServizi initiative on payments and innovation)
- Dissemination activities on the services of the Digital Banking Solutions BU: "Nexi Open" digital magazine developed in collaboration with Repubblica.it, over 110,000 views on [repubblica.it](http://repubblica.it), 12 issues; 10 Nexi Open events; Go to market Instant Payments and PagoinConto
- Participation in Expo Day Fintech Europe of PnP

**Nets**

- Copenhagen Fintech Week 2021, international fintech conference promoting fintech solutions, including green finance topics and the challenge of data in sustainable finance, Nets a speaker at the conference and in panel discussions
- SmartCard21, banking conference in Croatia for the CEE region. Presentation of Nets Climate Action Service, a carbon offsetting service for consumption paid by credit/debit card, to financial institutions in South-east Europe
- Participation in industry-oriented conferences and events in Poland covering topics such as legal changes, new product trends, innovative technical solutions and activities for non-cash payments

*continue*

<sup>9</sup> The "Financial community" category is not a stakeholder for Nets, as it is not listed

STAKEHOLDER CATEGORY	DESCRIPTION OF ENGAGEMENT INITIATIVES	MAIN INITIATIVES 2021
 <p><b>COMMUNITY</b></p> <p>Local and national social fabric, environment, schools and universities</p>	<p>Nexi constantly promotes public debates and supports the dissemination of digital culture through specialised training programmes for members of the judicial authorities and the police in charge of criminal investigations.</p>	<p><b>Nexi</b></p> <ul style="list-style-type: none"> <li>• Collaboration with Feduf to reach students engaged in financial education and cultural change, in collaboration with ABI</li> <li>• Restaurant Week initiative, a project dedicated to highlighting the typical cuisine of Milan's neighbourhoods and offering a variety of tasting menus at special prices. Nexi is a partner in the initiative and provides the booking platform. The initiative is also dedicated to relaunching the HORECA category at a particular time for the industry, with over 200 restaurants involved</li> <li>• Fly to Milano initiative which aims to bring tourists to the city: with a flight to Milan and by booking at least two nights in one of the affiliated facilities, the third night is free. Nexi is a partner in the initiative and provides the booking platform, with over 100 hotels involved</li> <li>• Special Merchant event: first cashless-base shop in Italy, Base Milano</li> <li>• Initiative in association with Ascopier's direct merchant training to boost proximity commerce and support local merchants in Milan: training on digital payments, invitation to accept digital payments with a related donation to partner Plastic Free Onlus</li> </ul> <p><b>Nets</b></p> <ul style="list-style-type: none"> <li>• Fraud prevention initiatives with a focus on measures to enable customers and end users to make secure payments</li> <li>• Nets' Climate Action Service, a carbon offsetting solution designed to provide cardholders with climate-related information on their consumption and to enable them and their issuers to proactively engage with the climate impact related to their personal consumption</li> </ul>
 <p><b>SUPPLIERS</b></p>	<p>The Group's Supply Chain Management Function and those responsible for expenditure are in regular contact with suppliers throughout the duration of the contract. The Supply Chain Function also monitors the relevant level of satisfaction.</p>	<p><b>Nexi</b></p> <ul style="list-style-type: none"> <li>• One-to-one meetings</li> <li>• Purchasing portal</li> <li>• Suppliers with orders greater than 100,000 operating in the ATM, POS and Facility area were targeted for SA8000 and ISO14001 certification by collecting information through a questionnaire on ethical and environmental issues</li> </ul> <p><b>Nets</b></p> <ul style="list-style-type: none"> <li>• One-to-one meetings</li> <li>• Dialogue with suppliers on the Code of Conduct to ensure that they are aware of the internal guidelines and requirements and are committed to promoting responsible sourcing within their supply chains</li> </ul>
 <p><b>MASS MEDIA</b></p>	<p>Relations with the mass media are managed by the External Communication &amp; Media Relations Function, which ensures that all messages transmitted to the main press organisations, including digital media, comply with corporate guidelines and the Group's activities while ensuring an adequate reputation and image for the Group.</p>	<p><b>Nexi Group</b></p> <ul style="list-style-type: none"> <li>• 54 press releases issued</li> <li>• Publication of 6,076 articles</li> </ul> <p><b>Nexi</b></p> <ul style="list-style-type: none"> <li>• Partnership with Adnkronos in terms of interviews and media coverage of events</li> <li>• Social media management: 662 posts on Facebook, Twitter, LinkedIn</li> </ul>

## 2.4 THE MATERIALITY MATRIX

The materiality analysis is an important tool for Nexi in defining the most relevant environmental and social priorities consistent with its business strategy and in accordance with the GRI reporting framework. This to define content with reference to the policies, commitments, risks, objectives and performance on the topics represented in the Matrix that are reported in the Statement.

The analysis is carried out by the ESG Function, with the support of all the corporate functions dedicated to the management and dialogue of the various categories of stakeholders through a process that also involves Nexi Group's management and corporate bodies.

The Nexi Group's Materiality Matrix was updated in 2021 to capture any changes attributable to the acquisition of Nets in relation to the expectations of all of the Group's stakeholders and the impacts that governance, economic, social and environmental aspects might have on their decisions, as well as the impacts that the same aspects might have on business in view of the new areas where the Group operates.

The first step in updating the Materiality Matrix was a timely review of the material topics<sup>10</sup> included in the 2020 Materiality Matrix. In particular, starting from the topics of last year's Matrix, key internal documents were examined such as the business plan, Nexi's and Nets' ESG frameworks, sector and benchmark analyses were carried out examining the material topics identified by peers or comparable companies, as well as reviewing issues addressed by the media, emerging legislation and assessment elements from rating agencies, ESG analysts and institutional investors.

The 16 identified potentially material topics are broadly consistent with those reported in the Materiality Matrix of 2020<sup>11</sup>. The following steps were taken to assess the impact of these topics on stakeholders and the Nexi Group:

- identification of the relevance of material topics for stakeholders through interviews with Nets' business functions responsible for dialogue with each stakeholder category<sup>12</sup>;

GRI 102-46

GRI 102-47

GRI 102-49

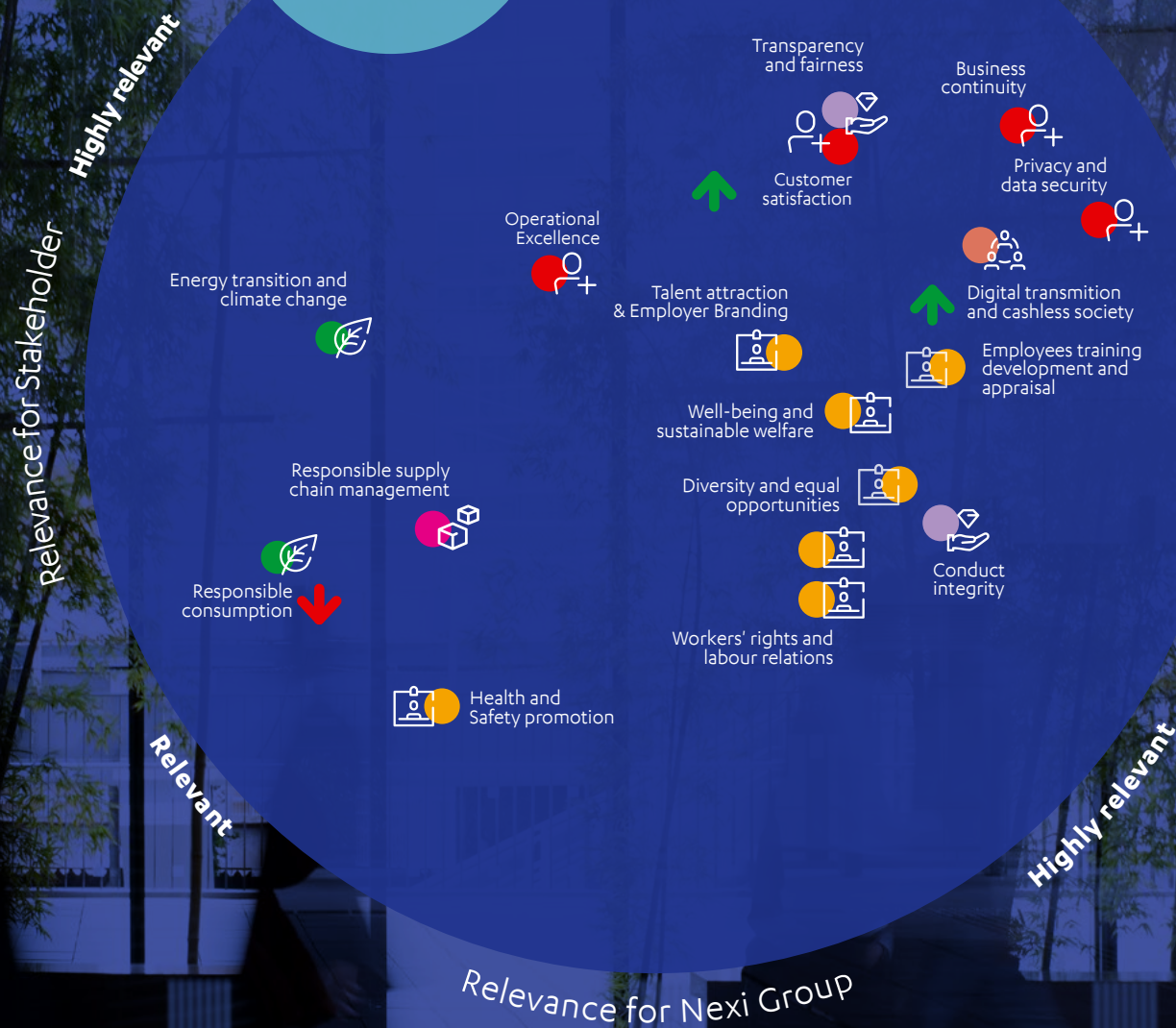
<sup>10</sup> A material topic is an issue that reflects significant economic, environmental or social impacts of the organisation or substantially influences the assessments and decisions of stakeholders

<sup>11</sup> The number of material topics in 2020 was 18. In this Statement, there are 16 topics following a grouping together of certain material topics in order to ensure greater reporting consistency and simplification. More specifically:



- the topics "Digital transition and cashless society" and "Innovation" have been merged into a single topic, "Digital transition and cashless society"
- the topics "Staff assessment and remuneration policies" and "Staff training and development" have been merged into the topic "Employees training, development and appraisal".

<sup>12</sup> As for Nexi's stakeholder categories, a substantial sample had already been directly involved in 2020 in order to track the perceived relevance for different material topics. No changes in Nexi's stakeholder categories are reported in 2021. The materiality analysis carried out in 2021 therefore focused on verifying the expectations of Nets' stakeholders, with the aim of detecting any changes to be made to the Materiality Matrix developed in 2020.

## Nexi Group 2021 Materiality Matrix



- |  |   |  |
|--|---|--|
|  Governance |  Employees |  Environment  |
|  Customers  |  Community |  Supply chain |

The 2021 Materiality Matrix shows a general alignment between Nexi's and Nets' stakeholder expectations with minimal variations in terms of the positioning of material topics ("Customer satisfaction" and "Digital transition and cashless society"  slightly increasing and "Responsible consumption"  slightly decreasing) as depicted within the Matrix itself.



- updating the Nexi Group's expectations through the involvement of Top Management;
- presentation of the draft Materiality Matrix to the Control and Risk and Sustainability Committee for prior opinion on 22 December 2021;
- approval of the Materiality Matrix by the Board of Directors of Nexi SpA on 22 December 2021

List of material topics, definitions and related areas of sustainability:

## GOVERNANCE

- **Conduct integrity:** ongoing commitment to fighting corruption and promoting ethical behaviour and the proper management of tax issues
- **Transparency and fairness:** compliance with the rules and principles of transparency and fairness in relations with customers and the market

## CUSTOMERS

- **Customer satisfaction:** commitment to achieve leadership in the customer experience in digital payments, continually improve at all customer touch points and be an excellence for partner banks.
- **Business continuity:** provision of a reliable and continuous service guaranteed by effective governance and high operational and technological standards.
- **Privacy and data security:** privacy protection and data security monitoring to ensure the proper use of sensitive information and the prevention of cyber-attacks aimed at stealing or compromising company and customer data.
- **Operational excellence:** continuous improvement aimed at progressively increasing the levels of service offered through dedicated initiatives and programmes.

## EMPLOYEES

- **Employees training, development and appraisal:** commitment to fostering the personal and professional growth of employees through a system of differentiated development paths that enhances their skills and aptitudes and ensures fair remuneration, also taking into account the achievement of sustainability objectives.
- **Talent attraction & Employer Branding:** ability to attract and retain talent by ensuring a competent, dynamic and future-proof working environment.
- **Well-being and sustainable welfare:** attention to the well-being of individuals and their families through work-life balance solutions and welfare services tailored to specific needs.
- **Diversity and equal opportunities:** valuing all diversity and promoting the inclusion of all Nexi's people, preventing all forms of discrimination and ensuring fair growth paths.
- **Workers' rights and labour relations:** protection of workers' rights according to current legislation and promotion of dialogue with trade union representatives.
- **Health and safety promotion:** prevention, promotion and training activities relating to health and safety at work.

## COMMUNITY

- **Digital transition and cashless society:** commitment and active participation in the modernisation and progress of countries through expertise and business solutions aimed at spreading digital payments as a safer, simpler and more efficient substitute for cash. Continuous investments to accelerate the development of simple and technologically advanced solutions. Support to enable financial infrastructures to promote the inclusion and access of traditionally excluded groups, also through the dissemination of financial education initiatives.

## SUPPLY CHAIN

- **Responsible supply chain management:** selection of suppliers who act in accordance with social and environmental sustainability criteria and ensure quality service.

## ENVIRONMENT

- **Energy transition and climate change:** use of renewable energy, energy efficiency and



# MANAGEMENT METHODS AND INITIATIVES CONCERNING MATERIAL SUSTAINABILITY ISSUES





# 3

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## 3.1 INSTITUTIONAL RESPONSIBILITY, ETHICS AND INTEGRITY

### UN SUSTAINABLE DEVELOPMENT GOALS



#### MATERIAL TOPIC TRANSPARENCY AND FAIRNESS

- GRI 103-1      GRI 103-2
- GRI 103-3      GRI 206-1
- GRI 417-3

#### MATERIAL TOPIC CONDUCT INTEGRITY

- GRI 103-1      GRI 103-2
- GRI 103-3      GRI 102-18
- GRI 102-25      GRI 102-30
- GRI 102-16      GRI 102-28
- GRI 102-17      GRI 205-3
- GRI 102-19      GRI 207-1
- GRI 102-22      GRI 207-2
- GRI 102-24      GRI 207-3
- GRI 102-26      GRI 207-4
- GRI 102-27

#### MATERIAL TOPIC PRIVACY AND DATA SECURITY

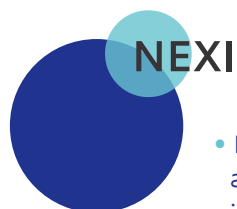
- GRI 103-1      GRI 103-2
- GRI 103-3      GRI 418-1

The Group is committed to transparent and correct management of its business through adequate governance and an articulated control and risk management system. The system is developed not only in compliance with applicable laws and regulations, but also in compliance with the highest international standards

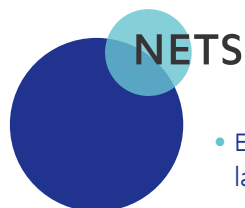
### INITIATIVES AND ACHIEVEMENTS IN 2021



- Sustainability Policy formalising guidelines, roles and responsibilities in sustainability management
- No incidents of corruption and no violations of anti-competitive behaviour
- Centralised governance at Group level for risk management
- Centralised group-wide information security guidelines and policies aligned with ISO standards



- Human Rights Statement, which formalises Nexi's principles and commitments to respect and promote human rights in its operations and supply chain
- Information Security Policy and Information Security Management System in line with ISO standards
- Anti-Money Laundering and Anti-Terrorism Regulations
- Anti-Corruption Policy
- SA8000 certification



- Ethical Policy in compliance with applicable national regulations
- Anti-corruption policy

- GRI 102-11      GRI 102-15      GRI 102-32      GRI 102-31      GRI 201-2

## Corporate Governance

The Corporate Governance model of Nexi SpA, the highest governance body of the Group, is inspired by and complies with the recommendations and principles of the Code of Corporate Governance for Listed Companies 2020 promoted by Borsa Italiana. The body is based on a traditional model that complies with the provisions of the legislation on listed issuers.

### ACTIVITY OF THE BOARD OF DIRECTORS AND INTERNAL BOARD COMMITTEES OF NEXI SPA

<b>Shareholders' Meeting</b>	It expresses its opinion on the company's most important decisions, the appointment of the Board of Directors, the approval of the consolidated financial statements and amendments to the Articles of Association.
<b>Board of Directors (BoD)</b>	It carries out all acts useful for the achievement of the company's objectives, except for those expressly reserved to the Shareholders' Meeting by law or by the Articles of Association. The Board of Directors is also responsible for defining the Group's unitary business plan, with the support of the various Internal Board Committees.
<b>Strategic Committee</b>	It advises on many aspects, including the Nexi Group's strategic plans, business plan guidelines, corporate performance, extraordinary transactions, strategies, financial policies and the organisational structure of the Subsidiaries.
<b>Control and Risk and Sustainability Committee</b>	It assesses the adequacy of periodic, financial and non-financial information. It expresses opinions on specific aspects relating to the identification of the main corporate risks; it monitors the autonomy, adequacy, effectiveness and efficiency of the Audit Function and provides guidance and advice to the Board of Directors in relation to sustainability.
<b>Remuneration and Appointments Committee</b>	It plays an advisory and targeted role for the Board of Directors on the definition of remuneration policies for directors and executives with strategic responsibilities.
<b>Related Party Transactions Committee</b>	It expresses opinions regarding Nexi's Related Party Transactions.

On 13 May 2021, the Board of Directors approved a policy concerning the diversity of corporate bodies, the Diversity Policy. This Diversity Policy refers to specific principles set out in the Group's Sustainability Policy approved on 30 July 2020, and in particular to the principles of diversity and inclusion, training and promotion of a culture of sustainability and transparency and compliance with current legislation.

In particular, the Group intends to promote:

- the enhancement of gender diversity, experience and skills of the Group's resources as a distinctive element in response to the growing challenges of the market in which Nexi operates, including diversity within its administration, management and control bodies, in compliance with the regulatory requirements imposed on a listed company;
- empowerment of the impacts of its daily activities with regard to relevant social, environmental and governance issues through mandatory training plans and awareness-raising initiatives addressed to Group staff, corporate bodies and stakeholders; and
- alignment with the legal provisions for listed companies as well as the relevant regulations, including the Consolidated Finance Act, the Corporate Governance Code.

For further details, please refer to the Report on Corporate Governance and Ownership Structure of Nexi SpA available at [www.nexigroup.com](http://www.nexigroup.com).

**13** At 11:59 p.m. on 31 December 2021, the effective date of the merger with SIA, the resignations of Giuseppe Capponcelli, Maurizio Mussi, Francesco Casiraghi and Simone Cucchetti became effective, and at the same time the appointments by co-optation made on 16 December 2021 of the directors designated by CDPE and FSIA, pursuant to the SIA Shareholders' Agreement, namely Fabio Massoli, Francesco Pettenati, Marina Natale and Maurizio Cereda, became effective.

**14** Two new directors joined the Board of Nexi SpA in 2021, Bo Nilsson and Stefan Goetz, increasing the number of Directors from 13 to 15.

**15** In 2021, two new members joined the Strategic Committee, Bo Nilsson and Stefan Goetz, and the Strategic Committee members Francesco Casiraghi, Giuseppe Capponcelli and Simone Cucchetti left office.

**16** The Remuneration and Appointments Committee and the Control and Risk and Sustainability Committee underwent changes in their composition during the 2021 financial year. Until 11 November 2021, these Committees were composed of a majority of independent members (2/3); however, as of that date, the non-executive and non-independent directors Luca Bassi and Francesco Casiraghi ceased to be members of these Committees. Consequently, they were succeeded in both cases by the Chairperson.

**17** The rate of participation was calculated taking into account the maximum number of meetings each member could have attended since taking office. Therefore, a maximum of seven meetings was considered for the two Board Members who took office on 1 July 2021.

**18** The rate of participation was calculated taking into account the maximum number of meetings each member could have attended since taking office. Therefore, a maximum of four meetings was considered for the two Strategic Committee Members who took office on 1 July 2021.

### COMPOSITION OF THE BOARD OF DIRECTORS AND INTERNAL BOARD COMMITTEES OF NEXI SPA<sup>13</sup>

	Role in the BoD <sup>14</sup>	Strategic Committee <sup>15</sup>	Control and Risk and Sustainability Committee	Remuneration and Appointments Committee <sup>16</sup>	Related Party Transactions Committee	Executive director	Independent director
Michaela Castelli	Chairperson	Member	Member	Member			X
Giuseppe Capponcelli	Director						
Paolo Bertoluzzo	Chief Executive Officer	Chairperson				X	
Luca Bassi	Director	Member		Member			
Francesco Casiraghi	Director		Member	Member			
Elisa Corghi	Director		Chairperson	Chairperson	Chairperson		X
Simone Cucchetti	Director						
Federico Ghizzoni	Director						
Maurizio Mussi	Director						
Jeffrey David Paduch	Director	Member					
Antonio Patuelli	Director				Member		X
Marinella Soldi	Director		Member	Member	Member		X
Luisa Torchia	Director						X
Bo Nilsson	Director	Member					
Stefan Goetz	Director	Member					

### COMPOSITION OF THE BOARD OF DIRECTORS AND INTERNAL BOARD COMMITTEES BY GENDER AND AGE

	Women (no.)	Women (%)	Men (no.)	Men (%)	30-50 (no.)	30-50 (%)	>50 (no.)	>50 (%)	Total (no.)
Board of Directors	4	27%	11	73%	5	33%	10	67%	15
Strategic Committee	1	11%	8	89%	3	33%	6	67%	9
Control and Risk and Sustainability Committee	3	100%	0	0%	1	33%	2	67%	3
Remuneration and Appointments Committee	3	100%	0	0%	1	33%	2	67%	3
Related Party Transactions Committee	2	67%	1	33%	1	33%	2	67%	3

### ATTENDANCE AT MEETINGS OF THE BOARD OF DIRECTORS AND INTERNAL BOARD COMMITTEES

	Number of meetings	Average participation rate
Board of Directors	17 <sup>17</sup>	86%
Strategic Committee	10 <sup>18</sup>	94%
Control and Risk and Sustainability Committee	13	96%
Remuneration and Appointments Committee	10	94%
Related Party Transactions Committee	2	100%



## THE ROLE OF THE CHAIRPERSON

Pursuant to Article 17 of the Articles of Association, the Board of Directors elects the Chairperson from among its members, if not already elected by the Shareholders' Meeting. The Chairperson convenes and chairs the Board of Directors, setting the agenda and ensuring that matters of strategic importance are dealt with as a matter of priority. The Chairperson has no management powers and therefore no operational role.

## THE ROLE OF THE CHIEF EXECUTIVE OFFICER

Nexi is managed by the Chief Executive Officer (CEO), which coincides with the role of General Manager.

In accordance with the guidelines defined by the Board of Directors, the CEO is responsible for directing and coordinating the various corporate components in order to promote the implementation of the business plan of the Group, including Nets. The Chief Executive Officer ensures the coordination and unitary management of the companies within the Group's perimeter.

The directors meet the requirements of good repute and the criteria of competence and fairness, in accordance with the law, and are also subject to so-called interlocking prohibitions<sup>19</sup>.

The *Report on Corporate Governance and Ownership Structure of Nexi SpA*, available on the website [www.nexigroup.com](http://www.nexigroup.com), provides information on its Directors in relation to their *curriculum vitae*, diversity, independence qualifications, participation in meetings of the Board and Internal Board Committees of which they are members, as well as any positions held in other companies.

The remuneration of the members of the Board of Directors is determined at the Shareholders' Meeting. For more information on the remuneration policies and the remuneration of the Board of Directors and the Directors with strategic functions, please refer to the *Remuneration Report* available at [www.nexigroup.com](http://www.nexigroup.com).

## Sustainability governance

The **Board of Directors of Nexi SpA** is the body responsible for the strategic direction and supervision of activities, results and impacts in terms of sustainability. In particular:

- it defines the principles, guidelines, objectives and commitments relating to sustainability issues relevant to the Nexi Group, in line with its strategic objectives and the needs and expectations of internal and external stakeholders;
- it supervises the correct dissemination of the defined principles and guidelines, as well as their application to all Nexi Group companies and their Corporate Bodies, employees, collaborators, suppliers and all other business partners operating in the name and on behalf of the company;
- it periodically assesses the results and impacts as well as the adequacy and effectiveness of the principles and guidelines for planning and managing relevant sustainability issues, in consideration of the evolution of the Group's internal and external context;
- in line with the objective of creating sustainable value over time for all stakeholders and in compliance with the Corporate Governance Code of listed companies, it defines the path of progressive integration of the strategic objectives assigned to top management and Executive Directors with sustainability objectives, known as ESG<sup>20</sup>;
- it prepares and approves the Consolidated Non-Financial Statement in order to ensure adequate reporting of the Nexi Group's activities, results, commitments and impact in relation to relevant sustainability issues;

<sup>19</sup> Prohibition of the highest management, supervisory and control bodies of a company from assuming similar responsibilities in competing organisations.

<sup>20</sup> ESG: environmental, social and governance sustainability.

- it represents the highest governing body for climate-related issues and oversees the definition of the Nexi Group's response to climate change;
- it approves and supervises the Nexi Group's involvement in external initiatives such as the CDP, and formalises reporting obligations and action plans, including decarbonisation plans. In 2021, the Board approved the Nexi Group's direct and indirect emission reduction targets, which were subsequently also approved by the *Science Based Target* initiative. The Group has committed to becoming net-zero by 2040 as part of its Climate Strategy;
- in all matters relating to sustainability, it is assisted by the Control and Risk and Sustainability Committee, which also supports the Board in promoting activities related to climate impacts on the Group, including the process of risks and opportunities arising from change.

### **The Boards of Directors of the other Nexi Group companies:**

- are responsible for the full and correct implementation of the principles and guidelines included in the Sustainability Policy;
- promptly inform the Board of Directors of Nexi SpA of any developments in the field of sustainability considered significant within the scope of their competence.

The **Control and Risk and Sustainability Committee** carries out propositional and consultative functions vis-à-vis the Parent Company's Board of Directors regarding sustainability. In particular:

- it examines and evaluates the sustainability issues related to the performance of business activities and the interaction dynamics with stakeholders, with the aim of continuously improving Nexi Group's sustainability profile;
- it monitors Nexi SpA's position on sustainability issues with the aim of constantly aligning with current and emerging regulations and best market practices;
- at the request of the Board of Directors, it expresses opinions on any further sustainability issues;
- it examines and evaluates the Consolidated Non-Financial Statement.

**Top Management** formulates sustainability plans and related objectives and is responsible for their operational implementation in line with the strategies, principles, guidelines and objectives defined by the Board of Directors. In particular:

- it helps to identify relevant sustainability issues;
- it proposes initiatives and objectives, also taking into account business-related risks and sustainability issues;
- it implements the initiatives, reports on the results achieved and the progress made in relation to the objectives defined by the Board of Directors;
- it carries out advocacy activities internally and externally, involving internal and external stakeholders;
- it promptly reports any developments deemed significant in relation to relevant sustainability issues to the ESG Function, including the issue of climate change. Top Management regularly reports on climate-related issues to the Board of Directors in detail and in a timely manner. In particular:
- Chief Risks Officer: questo ruolo è svolto dal Responsabile del Group Risk Management, che riferisce direttamente all'Amministratore Delegato. Il Group Risk Management implementa il risk management Framework a livello aziendale, compresa la valutazione e il monitoraggio dei rischi ESG, e riferisce trimestralmente al Comitato Controllo e Rischi e Sostenibilità;
- Chief Risks Officer: this role is performed by the Head of Group Risk Management, who reports directly to the Chief Executive Officer. Group Risk Management implements the

company-wide Risk Management Framework, including the assessment and monitoring of ESG risks, and reports quarterly to the Control and Risk and Sustainability Committee;

- Chief Information Officer: reports directly to the Chief Executive Officer and ensures business continuity, including with regard to responding to acute physical risks and improving the energy efficiency of Nexi's data centres;
- Facility manager: this role is performed by the Head of Real Estate Facility & General Services, who regularly reports to the Chief Administrative Officer (CAO), who in turn reports to the CEO. The Facility Manager is responsible for creating a more environmentally friendly and energy-efficient working environment and for its impacts on emissions;
- Chief Procurement Officer: this role is carried out by Group Procurement, responsible for managing procurement-related activities including climate-related aspects, such as assessing suppliers from an environmental and climate perspective.

The function **responsible for sustainability issues** within the Group Corporate & External Affairs Function is the **ESG Function**. It sees to the following:

- coordinates and monitors the overall process of preparing the Consolidated Non-Financial Statement;
- coordinates the development of Nexi SpA's sustainability strategy and ESG positioning through dialogue with and the involvement of Top Management;
- reports to the Control and Risk and Sustainability Committee on the Consolidated Non-Financial Statement, the development of sustainability strategies, the results and progress achieved, as well as the principles and guidelines defined by the Nexi SpA Board of Directors.

The results of the Self-Assessment of the Board of Directors 2021 confirm that the Board of Directors is aware of the importance of issues related to sustainability, safety and the environment. Ad hoc in-depth sessions were held on ESG issues and the level of commitment and sharing of the path undertaken by the Group is good.

The details of the Self-Assessment process and the findings were presented and discussed at the Board meeting on 10 March 2022 (and previously by the Remuneration and Nomination Committee at its meeting on 8 March 2021) and summarised in the Corporate Governance and Ownership Structures Report available at [www.nexigroup.com](http://www.nexigroup.com).

A number of initiatives were carried out in 2021 that testify to the Group's commitment to the sustainable management of its activities, and important awards have been received in this regard, testifying that the challenges the Group is facing are in line with the expectations of the stakeholders. In particular:

- **inclusion of Nexi SpA in the 2021 edition of the S&P Global's Sustainability Yearbook**, for the second consecutive year participating in the *Corporate Sustainability Assessment*, an annual assessment of corporate sustainability practices covering more than 10,000 organisations globally. This year more than 2,100 companies, representing over 45% of global market capitalisation, participated in the *Corporate Sustainability Assessment*;
- **significant improvement in Nexi SpA's ESG rating assigned by S&P Global with an increase of 7 points, from 61 in 2020 to 68 (out of 100) this year**, showing an improvement in the company's rating in all three ESG dimensions;
- **significant improvement in Nexi SpA's ESG rating assigned by CDP** (formerly the Carbon Disclosure Project) **with the score A- in the second year of participation and consequent inclusion in the Leadership Band**. CDP The CDP initiative produces annual reports aimed at informing analysts and investors on the level reached by companies with respect to the guidelines for reporting on risks and opportunities arising from climate change

defined by the Financial Stability Board's TCFD recommendations<sup>21</sup>. More than 13,000 companies with over 64% of the global market capitalisation reported environmental data through CDP in 2021;

- **inclusion of Nexi SpA in the MIB ESG Index**, the first ESG index dedicated to Italian blue-chips and designed to identify large Italian listed issuers with the best ESG practices;
- **approval of Nexi's CO<sub>2</sub> emission reduction targets by Science Based Targets (SBTi)**, a prestigious international network created by WRI, CDP, WWF and the United Nations Global Compact. In line with global climate change targets, to help limit global warming to 1.5°C above pre-industrial levels. **Nexi is committed to reducing absolute Scope 1 and 2 greenhouse gas emissions in Italy by 42% by 2030, from a 2020 baseline. In addition, Nexi is committed to working towards having 78% of capital goods providers in Italy join the SBTi by 2025<sup>22</sup>**;
- **commitment to zero net Group emissions by 2040**, years ahead of the Paris Agreement target.
- **approval of the Diversity Policy by the Board of Directors on 13 May 2021**. This *Diversity Policy* refers to specific principles set out in the Group's Sustainability Policy, approved on 30 July 2020, and in particular to the principles of diversity and inclusion, formation and promotion of a culture of sustainability and transparency and compliance with current legislation. For further details, please refer to the Nexi SpA Corporate Governance Report published at [www.nexigroup.com](http://www.nexigroup.com);
- **definition and publication of the Nexi SpA Human Rights Statement**. The Statement declares Nexi's commitment to respecting and protecting these rights in all the countries in which the Group operates with reference to the supply chain (in the process of selection, evaluation and mitigation of supplier risk) and to the Group's employees (relations with trade unions, employee selection and assessment processes and health and safety management);
- **obtaining ISO 14001 environmental certification for Nexi Payments**, issued by the certification body DNV-GL, in relation to the activities of "Digital payment solutions: supply of POS terminals with related software and services through the design, development, delivery and service stages"<sup>23</sup>;
- **obtaining SA8000 Social Accountability certification** from the certification body DNV-GL for Nexi Payments in accordance with the international standard<sup>24</sup>;
- **Nexi was awarded Top Employer Italia 2022 by the Top Employers Institute**, the certification body for corporate excellence in the HR field present in Italy for over 30 years. The award was given following actions implemented in 2021, and is based on an analysis of working conditions, company benefits, investments dedicated to training and skills development, HR policies aimed at the professional and personal growth of human resources, and the overall well-being of people working in the company;
- **participation for Nexi Payments in the sustainability rating of EcoVadis**, an entity specialized in corporate sustainability assessments, with a global network of over 90,000 companies assessed, and **achievement of the "bronze medal" award** in the first year of participation;
- **establishment of the Diversity and Inclusion Board in Nets**, assigned to lead the diversity and inclusion agenda, defining priorities and activities to be implemented;
- **Participation in the SDG Tech Awards 2021 initiative for Nets** in November 2021, in the area of digital solutions. The initiative is the leading sustainability award in the Nordic Countries. The SDG Tech Awards is a multi-stage programme aimed at creating a permanent community of like-minded companies that can share their green technologies, support each other and collaborate to help accelerate the green transition;
- **Nets launch of the Climate Action Service**, the solution allows customers to offset their carbon footprint by automatically donating a sum to a project to offset the emissions generated.

<sup>21</sup> The TCFD was established in December 2015 by the Financial Stability Board, which is the international body responsible for monitoring and promoting financial market stability, chaired by the Governor of the British Central Bank, Mark Carney. For details, see <https://www.fsb-tcf.org/>.

<sup>22</sup> For more details on the initiatives defined to achieve the objectives approved by SBTi, please refer to Section 3 of the Statement, under the heading "Environmental Protection".

<sup>23</sup> The certification process was established in 2020 and certification was granted in 2021.

<sup>24</sup> The certification process was established in 2020 and certification was granted in 2021.

## The Group Internal Control and Risk Management System - ICRMS

Nexi's Board of Directors has implemented a Group Internal Controls and Risk Management System (ICRMS) compliant with the provisions of the Corporate Governance Code and suited to the nature and size of the company based on the following four pillars:

- the Management and Coordination Regulations governing relations between Nexi SpA and its direct or indirect subsidiaries;
- the *Group Regulatory System Guidelines*, consisting of all the Nexi Group's Codes, Regulations, Guidelines, Policies, Procedures and Operating Instructions;
- the Enterprise Risk Management (ERM) process and the identification of the Group Enterprise Risk Management Function, with the task of coordinating, mitigating and consolidating the main risks for the Group;
- the Audit Function, responsible for the overall assessment of the suitability and adequacy of the Group's internal controls and risk management system.

The ICRMS consists of a set of rules, procedures and organisational structures aimed at effectively identifying, measuring, managing and monitoring the main risks that may affect the organisation, in order to contribute to the Group's sustainable success.

The Subsidiaries are independently responsible for the definition and operation of their own internal control systems, in accordance with Nexi Group guidelines, with particular reference to the companies subject to supervision by a public authority, in compliance with the management and coordination activities of Nexi SpA.

This system takes into account the recommendations of the Corporate Governance Code and is inspired by national and international best practices.

The internal control systems adopted by the companies of the Nexi Group are consistent with the models of the CoSO framework<sup>25</sup> - Internal Controls and CoSO - ERM issued by the Committee of Sponsoring Organizations of the Treadway Commission.

Without prejudice to the autonomous responsibility of companies in relation to the structure of internal controls, Nexi SpA and its subsidiaries implement organisational solutions that:

- ensure compliance with the law and consistency with the general framework. The internal control systems are defined in compliance with current regulations, the Corporate Governance Code of Italian listed companies and in line with the general reference framework, by way of example consisting of: the Articles of Association, Code of Ethics, Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/01, the general regulations on management and coordination, the Group's regulatory system, the system of powers and delegations, as well as national and international best practices;
- ensure the necessary separation between operational and control functions and avoid situations of conflict of interest in the allocation of responsibilities;
- allow all risks assumed or conceivable in the various operational segments to be identified, measured and adequately monitored;
- are inspired by process-based logic, regardless of the positioning of the relevant activities in the organisational and corporate structure;
- define control activities at all operational levels and allow the unambiguous and formalised identification of tasks and responsibilities, in particular with regard to the analysis and correction of any inconsistencies found;

<sup>25</sup> Committee of Sponsoring Organizations



- ensure reliable information and IT systems and reporting procedures suited to the various management levels to which the control functions are assigned;
- activate the information flows useful to allow the fulfilment of the responsibilities concerning the internal control systems and thus to pursue the related objectives. Each body / structure is provided with the necessary information to fulfil its responsibilities, including those relating to the internal controls systems;
- empower management to ensure the adequacy of the internal controls systems within the activities for which they are responsible, through active participation. To this end, also based on the risks being managed, management establishes specific control activities and monitoring processes to ensure the effectiveness and efficiency of the internal controls systems over time and to prevent and identify irregularities and/or fraudulent actions;
- ensure that anomalies detected by the operating units, the Audit Function or other staff involved in control activities are promptly brought to the attention of the appropriate levels of the company (the Board of Directors and the Board of Statutory Auditors, if significant) and promptly addressed;
- allow the traceability of activities and relevant documentation, ensuring their identification, reconstruction from sources and supporting information over time.

### Board of Statutory Auditors

The Nexi SpA Board of Statutory Auditors is composed of three statutory auditors and two alternate auditors elected at the Shareholders' Meeting of Nexi SpA on 13 February 2019. The Board verifies the correct exercise of strategic and management control by the Parent Company over the Group companies and works in close cooperation with the corresponding bodies of the subsidiaries.

MEMBERS OF THE BOARD OF STATUTORY AUDITORS <sup>26</sup>	ROLE
Piero Alonzo	Chairperson
Mariella Tagliabue	Statutory Auditor
Marco Giuseppe Zanobio	Statutory Auditor
Tommaso Ghelfi	Alternative Auditor
Andrea Carlo Zonca	Alternate Auditor

In relation to the composition of the Board of Statutory Auditors, the *Diversity Policy*:

- recommends that the shareholders consider candidates of different age groups for the role of Statutory Auditor in order to ensure a proper balance between continuity and change in the composition of the Board of Statutory Auditors;
- establishes that at least one third of the Statutory Auditors shall belong to the least represented gender, in accordance with the provisions of Article 147-ter, paragraph 1-ter, of the Italian Consolidated Law on Financial Intermediation (TUF), by Italian Law No. 160/2019, and recommends that the balance between genders is also respected within the lists for both the standing and alternate members where the number of candidates is greater than three;
- establishes that the Statutory Auditors must have appropriate skills and professional requirements in accordance with the regulations applicable to Nexi; and
- in line with the provisions of the applicable legislation, establishes that the Statutory Auditors must meet the requirements of independence.

On 31 December 2021, at least one third of the members belongs to the least represented gender.

<sup>26</sup> As a result of the merger with SIA, as of 31 December 2021, at 11:59 p.m., the resignations of the standing auditor Marco Giuseppe Zanobio and the alternate auditors Tommaso Ghelfi and Andrea Carlo Zonca became effective and, at the same time, Eugenio Pinto, Serena Gatteschi and Emiliano Ribacchi were appointed as new members of the Nexi Board of Statutory Auditors

The Nexi SpA Board of Statutory Auditors also acts as the Parent Company's Supervisory Body pursuant to Italian Legislative Decree 231/2001 and identifies itself as the "Internal Control and Audit Committee" pursuant to Article 19 of Italian Legislative Decree No. 39/2010.

The Board of Statutory Auditors also monitors compliance with the "Related Party Transaction Procedure" with the general principles set out in the Regulation on Related Party Transactions, adopted by Consob with resolution no. 17221 of 12 March 2010 and subsequent amendments and additions, and reports to the Shareholders' Meeting pursuant to Article 2429, second paragraph, of the Italian Civil Code or Article 153 of the Italian Consolidated Law on Financial Intermediation (TUF). Available on the website [www.nexi-group.com](http://www.nexi-group.com), the procedure identifies the rules governing the approval and execution of related-party transactions carried out by Nexi, directly or through subsidiaries, to ensure the transparency and substantive and procedural fairness of such transactions. For detailed information on the related party transactions concluded in 2021, please refer to the Consolidated Financial Statements published at [www.nexigroup.com](http://www.nexigroup.com).

The outcomes of the self-assessment process of Nexi's Board of Statutory Auditors for the financial year 2021, presented and discussed at the Board meeting on 10 March 2022, show a positive overall picture of the functioning of the board of statutory auditors, from which it emerges that this body has been able to adopt effective and efficient operating methods that are aligned with the reference regulatory framework"

## The 231 Organisation, Management and Control Model and the Code of Ethics

The Nexi companies make use of an **Organisation, Management and Control Model** pursuant to **Italian Legislative Decree 231/2001** (hereinafter also "231 Model") approved by the Board of Directors after a positive opinion of the Supervisory Body. The Model is constantly monitored to ensure its effectiveness over time and to ensure that it is updated. All organisational activities and structures are subject to controls relating to the implementation of the 231 Model and compliance with the Code of Ethics by each company's Supervisory Body, which reports on the matter to the Corporate Bodies, prepares and implements the annual plan of relevant supervisory activities, also through the Group's Audit functions.

The Code of Ethics is an integral part of the 231 Model. The Code of Ethics has been adopted to clearly and transparently define the set of values that guide employees in their decision-making in all company activities.

A Code of Ethics has been drawn up for each legal entity, approved by the Board of Directors in June 2021 and revised in December 2021.

The most important values promoted by Nexi include the principles of honesty, fairness, transparency and impartiality. The recipients of the Models must avoid being involved in situations where there is a conflict of interest, must keep personal data and privileged information confidential and must comply with applicable laws and regulations (including applicable anti-corruption legislation). In addition, Nexi promotes the creation of safe and healthy workplaces and respectful working conditions, also ensuring quality, security, confidentiality, reliability and continuity of services through the constant alignment of relevant technological developments.

The Code of Ethics contains references and guiding principles complementary to legal obligations and self-regulation; they guide conduct in continuity and consistency with Nexi's mission and its core values. The Code of Ethics is the basis on which the preventive control

system is implemented, entrusted to a special Supervisory Body with autonomous powers of initiative and control. The Code and any updates thereto are defined and approved by the Board of Directors of each Nexi company.

The project to revise and align the various Models in Nexi that had been launched in 2020 continued in 2021 with the aim of integrating the contents into the mission and aligning them with the requirements contained in the new version of the Model. In order to constantly review the content, all Nexi companies have also scheduled an update with the aim of incorporating the latest legislative and organisational developments.

The 231 Model of Nexi, Nexi Payments, Help Line and Mercury Payment Services, including their respective Codes of Ethics, are available at [www.nexigroup.com](http://www.nexigroup.com)

All employees are invited to take note of updates to the 231 Models through specific communications.

### Reporting unlawful conduct

Nexi provides dedicated information channels aimed at facilitating the flow of information and any report of unlawful conduct, both by employees and external parties, in relation to the violation of internal rules, regulations and procedures, including violations of the Code of Ethics and 231 Model. Any flow of information can be addressed:

- to an email address for the Supervisory Body. Each Group company has a dedicated email address indicated in the respective Codes of Ethics;
- to the address of the registered office of any Group company by post, to the attention of the Supervisory Body (in the case of anonymous reports);
- to the email address of the Head of the internal whistleblowing system identified as the Head of the Group Compliance Function, or the Audit Function if the report is addressed to the same, who informs the Supervisory Body

Anyone making a report in good faith is protected from any form of retaliation, discrimination or penalisation and the anonymity of the whistleblower is regardless guaranteed.

**No reports were received through the whistleblowing channel in 2021, nor were any reports received by the Audit Function**, also with reference to what was reported to the Head of the Function in the role of Secretary of the Supervisory Body for Nexi, Nexi Payments and Help Line.

**During 2021, no reports of discrimination were received for any of the Group companies.**

### Anti-Corruption Policy

In 2021, Nexi established an Anti-Corruption Policy, which was approved by the Board of Directors on 11 March 2021 and revised and updated in December 2021 to reflect changes in the Group's perimeter. The Anti-Corruption Policy has been adopted to:

- define and distribute a set of principles aimed at identifying and deterring potential acts of corruption among all stakeholders, both inside and outside Nexi, in order to protect its integrity and reputation;
- outline roles and responsibilities within Nexi for combating corruption;
- identify the main risk areas where corruption could occur, the strategic and coordination efforts to be implemented in terms of the company's activities, and the tasks assigned to each department or office.

The adoption of the Anti-Corruption Policy demonstrates Nexi's commitment both in terms of fighting corruption and in terms of compliance with applicable law. In accordance with the rules set out in the Code of Ethics, Nexi does not tolerate corruption in all its forms, whether in the public or private sector, and takes all necessary measures to avoid such wrongdoing.

Bribes, collusive behaviour, solicitation (directly or through a third party) to obtain a personal advantage for oneself or another person in any form is strictly prohibited. In addition, any offer, promise, request (request for corruption), or acceptance (acceptance of bribes) of any money, goods or other benefits (regardless of form, including tips or corporate donations) is strictly prohibited.

All Nexi companies must abide by the Policy, along with their governing bodies, employees, associates, suppliers and any other business partners acting in the name of or on behalf of Nexi, wherever they do business. Nexi is committed to providing periodic training on the Anti-Corruption Policy. All business operations relating to usual business activities must comply with the principles specified in the Anti-Corruption Policy. These controls are identified in the Organisation, Management and Control Model, as well as in more specific internal rules and regulations.

The Nexi departments responsible for overseeing the policy on the prevention of corruption are Internal Audit and Compliance & AML.

**In 2021, no sanctions were recorded for non-compliance with regulations or laws relating to corruption and money laundering, in line with 2020.**

### **Nets integrity in conduct**

Both the **Nets Ethics Policy** and **Anti-Corruption Policy** regulate the aspects of conflicts of interest within Nets. Nets Compliance is responsible for carrying out an annual monitoring of compliance in the Nets perimeter companies, including on the issue of conflicts of interest. Both policies were updated in December 2021. In the Ethics Policy, Nets expresses its fundamental commitment to act in compliance with all applicable laws and regulations, thus demonstrating its commitment to the relationship between Nets and its stakeholders. In this regard, Nets undertakes to cooperate in a legal and ethical manner with official investigations into potentially illegal activities involving Nets. The Anti-Corruption Policy is based on these principles, defining the minimum requirements to be applied by all companies within Nets. The Policy prohibits all forms of corruption, which it defines as including facilitating payments, as well as both public and private bribes. It also sets out measures to be taken to prevent and detect such events, defines a number of high-risk areas and provides guidelines, thresholds and absolute prohibitions applicable to the receipt and offering of gifts. Training on this Policy is provided at least once a year to all Nets employees.

Nets also recently implemented a new Whistleblowing Policy replacing the previous one and launched a new whistleblowing tool, replacing several locally applicable tools and thus creating a uniform reporting channel for Nets companies. This tool allows to anonymously report conflicts of interest by a wider range of actors and provides a secure two-way forum for communication with a whistleblower. It can be used by anyone who wants to make a report under the new EU Whistleblower Directive (2019/1937/EU).

### Evolution of the Group's Internal Control System

During 2021, an internal project was managed to extend the audit assessment of Nexi's Internal Control System to the new Nets companies that joined the Nexi Group.

In particular, an enhanced IT tool, Internal Control System - ICS, has been adopted to manage and collect evidence related to the existing Group Internal Control System (ICS) assessment process based on the COSO Framework, already in use since 2019, also in order to enable more effective and automated communication for the Control and Risk and Sustainability Committee and the Board of Directors.

In addition, a quarterly management report is shared with Top Management to provide them with a complete and up-to-date view of the audits carried out during the period and the main points of attention that emerged from the results of the audits in relation to each area of responsibility.

The Group's most recent ICS assessment was conducted in the first quarter of 2022 and resulted in an overall positive result.

### The role of the Audit Function

The Audit Function of each Group company is responsible for the independent verification of the operation, adequacy and consistency of the ICRMS with the guidelines defined by the Board of Directors. The Function is responsible for periodically assessing the completeness, functionality and adequacy of the Internal Control System, including the information system.

In particular, the Audit Function:

- defines and implements an audit plan, approved by the Board of Directors following the prior opinion of the Control and Risk and Sustainability Committee, to review and assess the adequacy and effectiveness of the Internal Control System;
- verifies, both on an ongoing basis and in relation to specific needs and in compliance with international standards, the operation and suitability of the risk management and internal control system through an annual and multi-annual audit plan approved by the Board of Directors, based on a structured process of analysis and prioritisation of the main risks;
- draws up periodic reports containing adequate information on its activities, on how it manages risks and on compliance with the plans defined for limiting them. The periodic reports contain an assessment of the suitability and adequacy of the risk management and internal control system; in addition, at the request of the control body, it prepares timely reports on events of particular importance;
- sends the reports mentioned in the previous points to the Chairpersons of the control body, the Control and Risk and Sustainability Committee and the management body, as well as to the CEO;
- checks, as part of the audit plan, the reliability of the information systems, including the accounting systems.

**During 2021, in line with previous years, no reports were received by the Audit Function regarding ascertained corruption, also with reference to what was reported to the Head of the Function in the role of Secretary of the Supervisory Body for Nexi Payments, Mercury Payments Services and Help Line.**



## Nexi's audit plan on sustainability issues

The 2021 audit plan envisaged audit activities on sustainability issues, with reference to the material topics represented in the 2020 Materiality Matrix relating to compliance with laws and regulations, together with those relating to the operational area of corporate services for customers, but also issues relating to employee and supplier management.

The main audit activities carried out in 2021 are listed below:

### Nexi Spa

- Controls related to Italian Law 262/05
- Market abuse audits
- Audits on Related Party Transactions
- Environmental, Social and Governance Audits

### Nexi Payments

- Audit for SA 8000 Certification (social responsibility standard)
- ISO14001 Environmental Management System
- ISO 9001 Quality Management System
- Audit of the anti-money laundering process
- Transparency and customer information
- Award system

### Mercury Payment Services

- Contact Unit

### Help Line

- ISO 9001 and UNI EN 15838 Certification
- Verification of the merchant support process

### Nets' audit plan on sustainability issues

Some of the main audit activities in the field of sustainability are listed below:

- Anti-money laundering audit for Nets, Concardis, Nets Denmark A/S
- GDPR Governance, Nets
- MS, Nets complaint management
- Quality management governance, Nets Norway
- HR Concardis
- PSD2 compliance and secure customer authentication (SCA), Nets

## The role of the Compliance & AML Function

### Non-compliance risks

The Compliance & AML Function is responsible for ensuring that Nexi's activities comply with applicable laws and regulations, ex ante and on an ongoing basis, using a risk-based approach. The Function carries out assessments of compliance with contractual clauses in communications with customers and Supervisory Authorities and provides assistance and advice in relation to specific requests made by corporate bodies and supervised Nexi companies. The Function also aims to disseminate a corporate culture based on the principles of honesty, fairness and compliance through the provision of specific training.

During 2021, the Function perfected the methods of reporting and providing guidance to Nexi Payments Management through a clear and timely snapshot of non-compliance risks, the progress of corrective actions underway, as well as regulatory changes and related compliance actions. It also carried out fine-tuning activities aimed at increasing the performance of the information tools supporting the Function in all areas managed by the same, but with particular reference to the management of regulatory risk assessments.

The Function also worked to ensure compliance with the e-commerce payment system, analysing the proposed solutions and subsequently directing them towards choices that comply with current regulations. During the year, attention was also paid to information system compliance, improving the management of logical access and corporate IT assets, in collaboration with the CISO Area and the Risk Management Function.

### Anti-Money laundering

In order to prevent and combat money laundering and terrorist financing, the Function has adopted the AML Policy in addition to the AML Internal Regulation<sup>27</sup>. The Head of the Compliance & AML Function in Nexi Payments is also the MLRO<sup>28</sup> and the Delegated Officer for reporting suspicious transactions under Art. 35 of Italian Legislative Decree 231/2007. With regard to anti-money laundering regulations, during the second half of 2021, the Policy and the Manual were updated in order to incorporate the latest regulatory changes, the introduction of certain efficiencies to the enhanced due diligence processes, and the regulation of anti-money laundering profiles related to the new Payment Initiation Services (PIS). For further information on the activities carried out in 2021 also with reference to the activities carried out to control the risk of money laundering and terrorist financing, please refer to the Management Report published on the website [www.nexigroup.com](http://www.nexigroup.com).

### Protection of personal data

Nexi's Data Protection Officer - DPO - is responsible for monitoring compliance with EU Regulation 2016/679 on data protection (the so-called GDPR) and any other applicable provisions relating to the protection of individuals with regard to the processing of personal data at Italian and European level. In particular, the DPO is involved in all matters relating to the protection of personal data, advises on obligations and compliance with existing legislation, issues opinions on data protection impact assessments, informs and advises the Board of Directors and, finally, acts as a point of reference for the Data Protection Authority and stakeholders. Privacy complaints are handled according to specific internal regulations, in particular the privacy regulation entitled "Protection and processing of personal data", and the procedure relating to the "Management of data subjects' rights".

In 2021 in reference to Nexi SpA, the Function created a community between the Data Protection Officers of the various Group companies with the aim of sharing best practices on the subject of personal data protection, ensuring consistency on the subject within the Group.

As part of the consolidation activities aimed at data protection, a specific *Privacy Readiness* activity was carried out during the course of the year with the aim of developing a consistent level of maturity of the Nexi companies with respect to data protection legislation through:

- strengthening internal awareness of data protection issues and of Nexi's core organisational and regulatory principles (privacy organisational model, legal basis, etc.);
- training on how to manage audits.

<sup>27</sup> Legislation currently being revised to incorporate the provisions set out in the Fifth Anti-Money Laundering Directive.

<sup>28</sup> Responsible for reporting money laundering.

Two important initiatives were also carried out in 2021:

- the Data Retention project was launched with the aim of identifying and deleting personal data stored on electronic or paper media that exceeded the retention periods established by law;
- an assessment of the third-party providers designated as data controllers was carried out in order to identify the providers processing data in non-European countries as required by the European Court of Justice's ruling of 16 July 2020, the so-called "Schrems II ruling".

Finally, in order to strengthen all employees' awareness on the importance of proper management and protection of personal data, in compliance with current regulations, specific training courses were held remotely in 2021.

#### **Reports of alleged Privacy Code violations**

In 2021, Nexi received 363 requests from data subjects (+ 111% compared to 2020) pursuant to Articles 15 et seq. of the GDPR, all of which were processed. Of these requests, 346 were received from natural persons, 17 from legal persons. No request was received directly from the Privacy Authority.

It should be noted that during 2021, Nexi recorded four minor events for which a report to the Privacy Authority was not necessary, as they were not classified as high risk for the rights of the data subjects.

## **The role of Compliance in Nets**

### **Risks of non-compliance, anti-money laundering and personal data protection**

**The Nets Compliance & Regulatory Function**, oversees legal and compliance risks, defining minimum requirements through policies<sup>29</sup> and supporting their implementation and monitoring through frameworks, tools, processes and control activities, facilitating risk and compliance management and assessing the compliance of the activities of individual Nets entities with the approved Group-wide strategy. Its areas of focus include financial crime prevention, anti-corruption and bribery, GDPR data protection and PSD2 compliance.

During 2021, compliance governance maturity was a significant area of focus as the establishment of three Lines of Defence (LoD) matured among the Nets perimeter entities. In addition, emphasis was placed on the continuous development of the compliance framework through the implementation of group policies, the division of responsibilities between 1LoD and 2LoD, the development of independent monitoring in the 2LoD compliance domains and continuous 2LoD reporting. In particular, the group policies subject to annual review were updated during the year to reflect legislative changes, the results identified during the AML/CTF risk assessment and the level of maturity of the compliance setup across the Networks perimeter, as well as Nexi's input at Group level to ensure maximum alignment.

GDPR governance has a hybrid approach, with certain activities carried out and supported centrally and the rest decentralised, thus falling under the responsibility of the respective business and corporate units. This model is also based on three lines of defence.

The first line of defence is corporate entities that have designated GDPR employees. Several cross-cutting procedures and tools have been put in place to support the business units working on GDPR issues, including the archiving tool for data mapping, the Data Subjects Rights portal, the Retention portal, and the platform for Data Breach procedures.

<sup>29</sup> Nets' Anti-Money Laundering ("AML") and Counter-Terrorist Financing ("CTF") policies set out the principles and standards for managing financial crime risks, including the prevention of money laundering ("ML") and terrorist financing ("TF"), applicable to Nets.

The second line of defence is responsible for monitoring compliance with the GDPR through the Nets DPOs.

The Nets DPO office is responsible for monitoring, advising and enforcing compliance with the GDPR and local data protection regulations in all countries in which Nets operates. For legal entities operating on a "stand alone" basis<sup>30</sup>, are designated local DPOs, who interact with the Nets DPO office via a dotted-line contact.

The third line of defence is responsible for carrying out internal audits regarding compliance with the GDPR.

Nel corso del 2021 sono state intraprese diverse attività per rafforzare ulteriormente la compliance al GDPR:

- extension of the Nets Privacy Policy to all entities;
- extension of the scope of second line of defence monitoring to all newly acquired regulated entities<sup>31</sup>;
- updating specific training for new employees;
- work streams initiated on the "Schrems II ruling".

During the second half of 2021, there was also a focus on increasing the level of PSD2 compliance maturity by updating group policies and developing monitoring activities, which were successfully launched in Q4 2021 in the Nordic Countries. Central Europe will follow in 2022.

**There were no cases of corruption in Nets during the reporting period.**

## Enterprise Risk Management

During 2021, following the announcement of the merger with Nets, Nexi's Risk Management Function was involved in integration activities, and in particular in defining the governance, operational processes and aspects for the establishment of a Group Risk Management Function in order to strengthen the supervision and monitoring of the main risks to which the Group is exposed.

In line with the recommendations of the Corporate Governance Code for listed companies, the Nexi Group's Enterprise Risk Management focuses on managing relevant risks in relation to the creation and protection of value through the integration of Risk Management culture and practices into the strategy definition and performance management processes. The Enterprise Risk Management Policy of the Nexi Group was updated and approved by the Board of Directors of Nexi SpA in June 2021; this updated version takes into account the new structure of the Group and represents the "Group Policy" with which all legal entities belonging to the Nexi Group must comply.

The Policy outlines:

- The principles that characterise the ERM model adopted by the Nexi Group.
- The roles and responsibilities of the corporate bodies and functions involved in the implementation of the ERM model.
- The risk management framework in terms of activities, actors involved and methodologies representing the minimum and standard requirements for risk analysis, assessment and monitoring at Group level.

<sup>30</sup> Ratepay and the Legal Entities based in Poland.

<sup>31</sup> These entities belong to Polskie ePłatności: as the acquisition took place in autumn 2020, the companies were included in the monitoring from Q1 2021.

Therefore, the mission of the ERM model is to promote informed decision-making based not only on expected returns, but also on the underlying risk profile, ensuring adequate management consistent with the corporate risk appetite.

Following the identification and assessment of risks, the Risk Management Function periodically monitors the exposure to risks and the progress of the related mitigation plans defined with the risk owners involved. This evidence is reported quarterly to the Control and Risk and Sustainability Committee and periodically to the Nexi SpA Board of Directors.

#### RISK CATEGORIES POTENTIALLY APPLICABLE TO NEXI

Risk categories	Description	Risk Management objectives
<b>Strategic risks</b>	Typical business risks capable of influencing the Group's performance and in particular its strategic decisions and/or significantly influencing the Group's business model and its practical applicability	The objective of Risk Management is to create awareness, including by quantifying the impact on business objectives, where relevant and feasible, to facilitate risk-informed decisions
<b>Operational risks</b>	Risks related to the inefficient and/or ineffective execution of business processes, including security, legal and contractual risks and/or related to ICT systems, with negative consequences on the Group's activities and/or performance	The objective is to mitigate their impact and/or likelihood from a cost/benefit perspective in line with the defined risk appetite, according to the Operational and Security Risk Framework adopted to comply with EBA guidelines
<b>Non-compliance risks</b>	Risk of incurring judicial or administrative sanctions, significant financial losses or reputational damage as a result of violations of mandatory (laws, regulations) or self-regulatory rules (e.g., Articles of Association, Codes of Conduct, Corporate Governance Codes)	Given the nature of these risks, the related compliance actions are aimed at minimising their occurrence, taking into account the time needed to comply with what may require particularly complex new regulations, as well as the alignment of new products and services to the regulatory environment in a rapidly evolving international marketplace
<b>Financial risks</b>	Risks related to the availability of capital, credit and liquidity management and/or to the volatility of the main market variables (interest rates, exchange rates, etc.)	The risk management activities are aimed at measuring and monitoring risk in line with risk appetite and defined risk limits

The mission, principles, roles and responsibilities of the ERM model can be found at [www.nexigroup.com](http://www.nexigroup.com).

For further details on the main strategic, financial, operational and reputational risks to which the Nexi Group is exposed, which have emerged in the context of Enterprise Risk Management, broken down into different aspects and outlined in the context of the current macroeconomic, political and regulatory context, please refer to the 2021 Consolidated Financial Statements at [www.nexigroup.com](http://www.nexigroup.com).



## Main activities carried out by the Risk Management Function in 2021

In order to improve the tools for identifying and monitoring the risks to which the Nexi Group is exposed, in 2021 the Risk Management Function carried out the following activities, among others:

- In 2021, the Function took steps to i) update the Enterprise Risk Management policy, defining a common methodology applicable to the entire Group, II) establish information flows from the various legal entities to the Parent Company, III) launch projects to standardise or integrate risk management methodologies at Group level (e.g., for credit risk, the development of a Framework for the definition of risk appetite).
- The Function analysed the risks associated with integration, with particular reference to the IT transformation work stream and with a focus on the risks of delay in achieving the expected synergies.
- The Risk Management Function developed a methodology to map potential risks related to the supply chain at individual supplier and contract level, also taking into account regulatory requirements and market best practices. In the first quarter of 2021, this analysis was applied to a panel of about 100 suppliers, including outsourcers. In addition, the Function collected and analysed the results of a self-assessment questionnaire sent to selected categories of suppliers (e.g., POS suppliers to ATM) to assess potential critical ESG areas. Furthermore, given the increasing need for the company to ensure greater monitoring of supply chain risks and in line with the provisions of the EBA guidelines on outsourcing, in the second half of 2021 the Risk Management Function, in collaboration with the Compliance, Organisation, Supply Chain and CISO Functions, launched a new project focused on improving governance, processes and activities for managing supply chain risks, with particular reference to outsourcers.
- The Risk Function has further strengthened the measurement and assessment of credit risk for issuing and acquiring activities. It also defined and implemented a dashboard of second-level indicators for Nexi Payments with the aim of evolving and enhancing the credit risk monitoring systems, as well as producing specific reports for top management.
- The monitoring of reputational risk is a fundamental pillar of the Risk Management Framework, in line with regulatory provisions, as well as a tool for monitoring phenomena that may have an impact on Nexi's reputation with its various stakeholders. In this direction, the Risk Management Function continued to refine a reputation dashboard in 2021, with the aim of providing a concise representation of the status of Nexi's reputation with reference to the main stakeholders (customers, Supervisory Authorities, general public). The representation is based on a list of indicators collected in a structured and continuous manner by various functions and allows Risk Management to capture a possible worsening trend in reputation.
- In 2021, the Nexi Group began implementing a dedicated risk analysis of climate-related risks and opportunities, integrated into the broader Enterprise Risk Management process and led by the ERM Function, in line with the TCFD reporting recommendations. As part of this process, the Nexi Group has included the assessment of climate-related risks and opportunities considering long-term horizons (10-30 years) that go beyond the strategic plan, applying scenario analysis where possible for both physical and transitional risks to quantify exposure.

TCFD

## Identification and assessment of ESG risks within the risk assessment activities

Given the aim of creating and at the same time protecting value for all its stakeholders, the Nexi Group considers risk management activities to be an integral part of its sustainability strategies. The structured and proactive management of corporate risks helps to reduce the volatility of results over time and protects tangible and intangible assets, which are key elements of the Group's sustainability in the medium to long term.

The Risk Management Function cooperates with the ESG Function in a structured way to manage specific ESG issues in order to ensure better risk control. Both Functions periodically report the results of their activities to the Control and Risk and Sustainability Committee. ESG risks, including climate-related risks, are also included in the Enterprise Risk Management model for assessing the Group's risks, in order to facilitate their identification and assessment during interviews with people involved in the annual process.

## Emerging risks and medium to long-term trends

Emerging risks and medium to long-term trends that could have a significant impact on the Nexi Group in the coming years include the following

- Evolution of Covid-19, or risk of other pandemics: it is impossible to exclude the persistence of the epidemiological emergency caused by Covid-19 (so-called Coronavirus) or the occurrence of other pandemics, as well as the prolongation, reintroduction and/or possible tightening of prevention measures and restrictions - relating, in particular, to the conduct of commercial and industrial activities and the movement of goods and persons - that could be implemented in Italy, Europe and worldwide. These events could have negative effects on national and international macroeconomic indicators and unfavourable repercussions on the Nexi Group's relevant markets. Nexi has developed and implemented contingency plans in the context of crisis management, monitored the evolution of the pandemic through extraordinary board meetings and meetings with top management, and has constantly monitored the evolution of the emergency in order to protect the health and safety of workers, business continuity and business results;
- Combination Execution: the complexity of executing the transformation projects with Nets and SIA will require significant efforts and continuous monitoring to help achieve the expected synergies, consolidate the IT infrastructure, adequately monitor local regulatory requirements and preserve the Group's staff and know-how. In this regard, the Company has developed a comprehensive cross-functional plan, also subject to constant monitoring by the Risk Management Function, in order to highlight potential risks or delays in achieving the expected synergies.
- Alternative payment channels: risk of start-ups / fintechs / other players entering the digital payments market, also due to the PSD2 Regulation on the European market, resulting in the development of alternative payment channels (e.g., account-to-account, ledger-to-ledger) aimed at providing less expensive payment solutions to customers. Nexi will continue to monitor and analyse the evolution of the digital payments industry in order to identify emerging trends in relation to new payment solutions and methods (e.g., QR code payments, A2A, L2L, etc.).
- Development of value-added services: Trends seem to indicate a shift away from basic payment services towards value-added services and front-end software. Nexi is developing expertise in the VAS sector through partnerships, acquisitions and the internal development of key value to drive VAS opportunities.
- Supply chain disruptions and microchip shortages: the international geopolitical scenario and the Covid-19 pandemic could cause major disruptions or delays in the supply of cards and/or POSs. In order to mitigate this risk, Nexi has increased its stock and negotiated contracts with suppliers with a guarantee of early delivery.

## TCFD

**Focus on climate-related risks and opportunities**

In line with the recommendations expressed by the Task Force for Climate-related Financial Disclosures (TCFD) and the European Commission's *Non-Binding Guidelines on Climate Information Reporting*, the Nexi Group has conducted an analysis to identify and assess the risks and opportunities related to climate change in Nexi, although a risk area related to environmental aspects was not identified. The identified risks did not exceed the materiality threshold that would have determined their inclusion in ERM assessment activities. However, climate change risks are important to the Group, given the potentially high strategic and reputational impacts that such risks could have on the company and the speed with which such changes could occur. Furthermore, understanding and considering all the potential implications of climate change, and not only from a financial perspective, is crucial for defining a pathway for climate change mitigation and adaptation, thus meeting the growing pressures and expectations of governments, consumers, employees, investors and financiers.

Climate-related risks are integrated into the company-wide risk management process and evaluated regularly through analyses covering multiple time horizons: short, medium and long term.

**Relationship between materiality analysis and business risk assessment**

Risk Management activities are an integral part of Nexi's sustainability strategies, and therefore the Group's annual ERM assessment process also includes the identification, assessment and monitoring of ESG risks. The table below shows the relationship between the relevant ESG areas and topics and the ESG risks identified within the Enterprise Risk Management process.

**Materiality matrix topics and Enterprise Risk Management****Material Topics 2021**

- Customer satisfaction
- Business continuity
- Privacy and data security
- Operational excellence
- Digital transition and cashless society
- Responsible supply chain management

**CLIENTS****COMMUNITY****SUPPLY CHAIN****ERM 2022 - 2024**

- Cyber risk
- GDPR compliance
- Business interruption
- Trade-off between business as usual, transformation projects and innovation
- Vendor risks

The following climate-related risks could potentially affect the Nexi Group:

- Emerging regulations and the consequent introduction of a carbon tax;
- Rising average temperatures and consequently higher cooling energy requirements for data centres;
- Increased severity and frequency of flooding with consequent direct and indirect costs for the activities of the credit card personalisation plant

The Nexi Group has identified the following climate-related opportunities:

- Use of hybrid and electric vehicles for the company fleet;
- Cost reduction as a result of the POS reconditioning initiative;
- Installation of a thermo-cooling system for the Milan Sempione headquarters.

Nexi defines “short-term” as the time horizon covering the next three years, “medium-term” as the period between three-ten years and “long-term” as between 10-30 years.

In 2022, a similar analysis is planned for the integration of Nets using the same scenarios to estimate the impacts for the entire Group.

For further discussion of climate-related risks and opportunities identified by Nexi, please refer to the CDP 2021 questionnaire available at [www.cdp.net](http://www.cdp.net).



## MITIGATION PLANS IN RELATION TO THE MAIN RISKS RELATED TO MATERIAL TOPICS

Material topics	ERM risks	Risk description	Mitigation plans and protections in place
Business continuity  Privacy and data security	Cyber risk, GDPR compliance	Risk of theft or compromise of personal data managed by the Group, as a result of external cyber-attacks and/or internal data disclosure and consequent reputational impacts or sanctions in relation to the GDPR.	<ul style="list-style-type: none"> <li>Development and continuous improvement of the IT security initiatives and controls in place to protect data from external and internal access</li> <li>Reviewing and updating policies and procedures on IT security and data protection</li> <li>Regular cybersecurity awareness and training campaigns to avoid phishing viruses and malware</li> <li>Renewal of Cyber Insurance coverage</li> <li>Renewal of ISO 27001 and PCI-DSS certifications</li> </ul>
	Interruption of services	Risk of disruption of systemic processes or critical systems owned by the Group or an outsourcer/supplier due to malfunctions, errors or natural events, potentially caused by climate change, resulting in an inability to adequately serve customers (banks, merchants and private customers) in terms of timing and service.	<ul style="list-style-type: none"> <li>Gap analysis to verify the Group's IT structure (hardware, processes and expertise)</li> <li>Definition of a continuity plan for ICT services and disaster recovery procedures</li> <li>Data centre consolidation</li> </ul>
Responsible supply chain management	Supply risk	Risk of untimely identification and inadequate management of potential supply chain risks, with particular reference to outsourced services.	<ul style="list-style-type: none"> <li>Implementation of the governance model for third-party supervision, in line with EBA guidelines</li> <li>Definition of risk assessment checklists (including ESG risks) for outsourcers, to be implemented at Group level</li> <li>Developing appropriate contractual clauses to mitigate potential risks (e.g., insurance)</li> </ul>
Conduct integrity Transparency and fairness	Alignment of the joint entity's governance and internal control system with the Group standard	Risk that the internal control system and governance structure of subsidiaries are not yet fully aligned and/or implemented throughout the Group, causing potential gaps in compliance with Group policies and procedures, operational problems and/or poor coordination in implementing strategy and achieving corporate objectives.	<ul style="list-style-type: none"> <li>Alignment with the Group Risk Management framework, with a focus on IT risk assessment</li> <li>Improving periodic reporting and information flows on risks arising from subsidiaries</li> <li>Improving the effectiveness of local governance</li> </ul>



## Ethics, transparency and fairness in the conduct of business

### Management of privileged information

The *"Regulations for processing Relevant/Privileged Information, the establishment and maintenance of the Relevant Information List, the Insider List and Internal Dealing"* are in force in Nexi. The purpose of the document is to regulate, in addition to confidentiality and reporting obligations, the process of managing documents and information concerning Nexi, with particular reference to confidential and privileged information, as well as the establishment, preservation and updating of registers of persons who have access to the aforementioned information and internal dealing obligations. The regulation aims to ensure compliance and guarantee Nexi's proper disclosure to the market of its privileged information while ensuring maximum confidentiality until the information is published.

### Taxation management

The integration in 2021 with Nets has brought the Nexi Group, which until 2020 was present with operating offices only in Italy, to a completely international dimension, with a presence in 25 countries, fully in line with the strategic objective of being a PayTech leader in Europe.

Although it is engaged in a complex, cross-cutting redesign of its processes, the objective of the correct application of tax law remains a priority for the Group, even if a tax strategy is not explicitly formalised, as demonstrated by the creation of a dedicated Function within the Group Chief Financial Officer.

Tax management is functional to the Group's business and its sustainable development, including a high level of attention to tax compliance which, consequently, mitigates the risk of unethical or illegal behaviour, in line with the code of ethics and the prevention of tax crimes covered by the 231 Model.

In particular, in accordance with the system of internal controls, in order to correctly identify potential risks of a fiscal nature, the Group monitors the risk of non-compliance with tax legislation through the specific supervision of Subject Matter Experts in the CFO Function. Similarly, as part of its Sustainability Policy, Nexi reaffirms its commitment to complying with tax regulations and reducing the level of tax-related risks.

Reflecting the growing importance given to the issue of taxation for the Group's stakeholders, in 2021 Nexi updated its main material topic "Conduct Integrity" by adding the area of taxation to its description<sup>32</sup>.

Bearing in mind the objective of reducing the risk of disputes as much as possible, the management of tax obligations is controlled by a specific organisational procedure and the correct interpretation of tax legislation is pursued through participation in working groups, taking into account the specialist opinions provided by professionals of primary standing and the guidelines of the Tax Authority.

<sup>32</sup> Ongoing commitment to combating corruption and the promotion of misconduct and appropriate management of tax matters

The above will also be extended to Nets as the integration process currently underway evolves. Disclosure relating to the Group's activities will be provided in detail through the Country by Country Report (Italian Law No. 208 of 28 December 2015).<sup>33</sup>

## The Antitrust Programme

In 2021, Nexi continued to pursue its antitrust awareness efforts. In detail:

- workshops for Nexi's upper management aimed at clarifying the most significant rules for writing and managing documents for the correct application and management of the antitrust issue;
- an online training course on *Unfair Commercial Practices (UCP)* for employees working in the company areas most affected by this legislation, such as Customer Value Management, Brand and Communication, Marketing, E-commerce and Complaints. The course focused on the management of the main illegal behaviours in the field of unfair, deceptive and aggressive commercial practices in order to ensure that the information contained in advertisements to customers is true, correct and complete and that all initiatives are clear and transparent.

In addition, *Practical Guidelines* were published in 2021 outlining the best practices for UCPs to ensure that Nexi's advertising and marketing initiatives are fair and transparent to customers.

In 2021, Nets proposed training activities for key staff to ensure compliance with competition regulations. The Legal Function monitors the application of competition law with respect to major contracts stipulated with customers, suppliers and partners. In addition, colleagues are trained to identify contractual terms and conditions that may be suspicious from a competition law perspective and in such cases are asked to report directly to the Legal Function. The same Function continuously updates Nets' compliance programme, where the most relevant rules are included.

Finally, the Legal Function is involved in all M&A transactions in order to ensure compliance with specific regulations.

**No legal actions were reported or concluded in relation to anti-competitive behaviour and antitrust violations in 2021, nor in relation to monopolistic practices for the entire Group.**

<sup>33</sup> The Country by Country Report (CbCr) will be published at the end of the year (2022) in accordance with regulatory requirements and sent to the competent authority (Italian Revenue Agency)

## Conflicts of interest

Nexi Spa has adopted a Policy for managing conflict situations of a material nature applicable to the entire Nexi Group. The Policy is supported by the Code of Ethics and 231 Model. The Policy identifies the different types of conflicts of interest and lists the organisational, procedural and administrative measures aimed at identifying and managing actual or potential conflicts of interest. The members of the Internal Committees of Nexi's Board of Directors have an obligation to notify the Chairperson of any potential conflict of interest, and in the event of a conflict of interest, the Chairperson of Nexi's Board of Directors is required to take appropriate steps to resolve it.

## Transparency obligations

Nexi Payments has the "Regulatory text for the correct fulfilment of transparency obligations" in place, approved by the CEO, which regulates the roles and responsibilities useful for ensuring compliance with transparency provisions in accordance with the Bank of Italy's provision on the transparency of banking and financial transactions and services of 9 February 2011 and subsequent amendments.

In view of the business model with which Nexi provides services and products through its Partner Banks, first, second and third level safeguards have been defined to verify that the activities carried out comply with the transparency provisions.

Fair and transparent customer information is also ensured by the publication of pre-contractual information documents on [www.nexigroup.com](http://www.nexigroup.com).

## Transparency and fairness in marketing campaigns

In all its activities, the Nexi Group is guided by principles and guidelines on transparency and fairness, supported by self-regulatory obligations on transparency, managed by the Compliance Function.

Nexi's commercial communications are carried out by Nexi Payments and the marketing areas of the Cards & Digital Payments: Brand & Communication, Digital product and Commercial Business Units. Within these Business Units, the Customer Value Management (CVM) Function, in cooperation with the Brand & Communication area, acts responsibly in the management of commercial campaigns dedicated to private and corporate customers and merchant customers.

The CVM Function has defined and formalised specific rules and a contact policy for any campaign targeting respective clients. Communications are organised in a predefined shared hierarchy (service, regulation, information, training, product and service information, marketing). Each type of communication has a specific priority level, contact rules and a contact policy which is applied through marketing. Specific indicators have been created together with a contact management dashboard to check adherence to targets and to anticipate any distortions to be corrected in a timely manner.

The CVM Function sends campaigns to private and business customers, respecting the preferences expressed by customers in terms of data processing and privacy, regarding the possibility of being contacted and receiving communications. In addition, it monitors all campaigns on a daily basis to verify and ensure that their information is adequate and fully complies with customers' data processing and privacy preferences::

- number of contacts made per channel and per specific time interval (day, week, month, quarter, year);
- history of customer contacts on both the inbound and outbound channels to improve the level of service and facilitate customer management;
- percentage of unsubscribe requests from Nexi's commercial communications, both to implement them immediately and to verify that they do not exceed the predefined threshold;
- monthly and transactional (following certain events) survey of the Net Promoter Score with analysis of all customer records with specific reference to commercial communications in order to identify any problems from customers and implement actions to improve the quantity and manner of communication. Particular attention is paid to detractors and verbatims, used anonymously, to identify areas for possible improvement.
- weekly monitoring of contact centre activities, of the reasons prompting the customer to contact the company, with particular reference to commercial communications, in order to promptly detect any problems or reports from customers;
- detailed analysis of all complaints and prompt action to resolve them.

In addition, time intervals have been defined during which no commercial communications are carried out (e.g., weekends, after 6.30 p.m.) and limits have been set on the number of contacts per channel and timing, as long as the necessary authorisations are in place.

In addition, commercial and non-commercial communications are scheduled monthly and reviewed weekly to optimise the contact plan in the interest of customers.

Finally, a *"Reach dashboard"* is in place to check the daily status of privacy consents and contact details in order to have total control over its trends and immediately identify any kind of problem.

In 2021, there were no instances of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, and sponsorship.

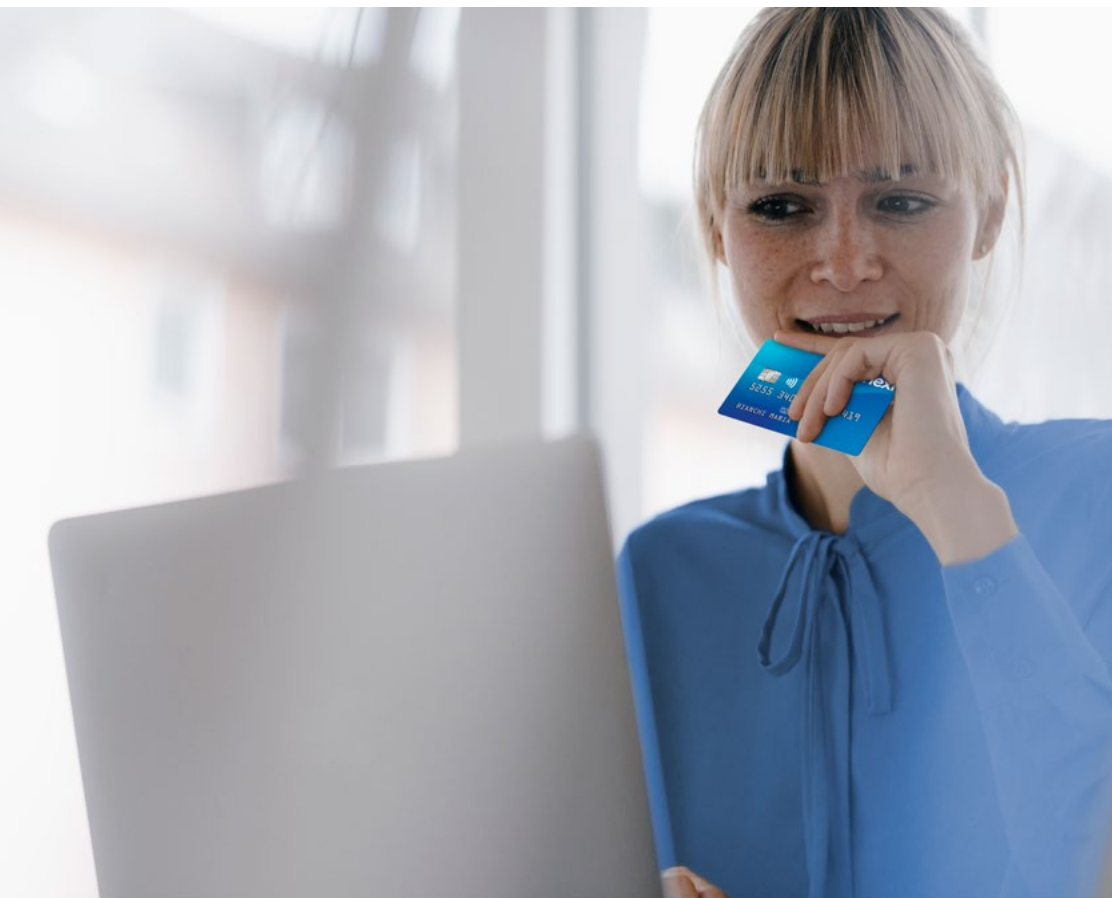
## Transparency in Nets' commercial campaigns

At Nets, sales and marketing communication campaigns are managed according to the national rules and standards in force in the countries where the Group operates.

For large key accounts (LAKA), the LAKA Marketing Function communicates with existing LAKA merchants as follows:

- In Nets Sweden, Finland, Denmark and Norway, the e-mail communication tool always offers customers the option of cancellation if they do not wish to receive communication, in accordance with the applicable national rules.
- In Germany, an e-mail communication tool called Clever Reach always offers customers the option of cancellation if they do not wish to receive communication, according to local rules and regulations in Germany.

In its marketing and communication activities on its e-commerce channels, Nets acts in compliance with all applicable data protection laws, due to the need to collect and process data. Nets' main data storage and processing system is the HubSpot CRM system, which also operates in compliance with all the data protection laws. Nets has also signed a Data Protection Agreement which implies that all communications must be based on explicit consent from the user and the option to unsubscribe is automatically included in the e-mail design. The configuration described above covers all Nets locations - Sweden, Denmark, Norway, Germany and Austria.





## Certified Management Systems

### Nexi

#### Quality Management System certifications

In 2021, the following Italian companies maintained their 2020 Quality Management System certifications according to ISO 9001: 2015, certified by the Certification Institute DNV-GL:

- Nexi Payments (100% coverage) ISO 9001 in "Creation, development and management of digital payment solutions dedicated to individual customers, merchants, SMEs and banks, alongside Partner Banks. Design, development and management of s/w solutions, technology and application outsourcing, information services and related customer services, with a focus on payment systems used for banking and financial institutions, public administration and corporations, e.g., e-banking applications, services and solutions (web and mobile), Interbank Corporate Banking and e-invoicing solutions and services. Services for the payment of pensions and collection of taxes".
- Help Line SpA ISO 9001 (100% coverage), related to "Provision of customer support in payment products/systems and banking/financial markets".
- Help Line UNI EN ISO 18295 (100% coverage) on requirements for the "customer contact centre" and aims to provide customer-focused "best practices" to meet customer expectations.
- Mercury Payment Services ISO 9001 certification (100% coverage), related to "Provision of customer support services within payment products/systems and banking/financial markets. Card Issuing Operations".
- Orbital Cultura Srl ISO 9001 (100% coverage), related to "Management of high-tech systems for art, culture and leisure".

#### Safety certifications

- ISO27001 - Information Security
- ISO22301 - Business Continuity
- PCI-DSS - Cardholder data security
- PCI-3DS - ACS Security
- PCI-PIN - Payment cards PIN security
- PCI-CPP - Card Production physical requirements
- PCI-CPL - Card Production logical requirements

#### Environmental Management Systems certifications

Nexi Payments achieved ISO 14001 certification in 2021. The certification relates to "Digital payment solutions: provision of POS terminals and related software and services".

#### Social Responsibility - certifications

Nexi Payments has obtained SA8000:2014 Social Accountability certification for compliance with ethical and legislative requirements that guarantee the protection of health and safety at work, as well as workers' rights.

#### Other certifications

Since July 2020, Mercury Payment Services has been Mastercard Card Quality Management (CQM) certified (50% coverage); the CQM programme is part of Mastercard's supplier approval process for companies involved in the management and personalisation of payment cards. The approval is based on the company's Quality Management System,

certified according to UNI EN ISO 9001: 2015, and is issued by the international MasterCard circuit only to providers who successfully complete the procedures defined in the CQM programme as part of the payment card personalisation and issuance process.

### **Data Centre Management systems**

The Pero and Settimo Milanese sites are home to the Nexi Payments Data Centres and are ISO 9001 certified. The Settimo Milanese site is also ISO 14001 certified.

## **Nets**

### **Safety certifications**

- ISO27001 - Information Security
- ISO22301 - Business Continuity
- PCI-DSS - Cardholder data security
- PCI-3DS - ACS Security
- PCI-PIN - Payment cards PIN security
- PCI-CPP – Card Production physical requirements
- PCI-CPL – Card Production logical requirements

### **Quality and Safety Management Systems certifications**

Nets in Norway is ISO 9001 and ISO 27001 certified in relation to the services defined in the “context of the organisation”:

### **Trust Services**

- E-Ident
- Electronic signature (E-Signing)
- Electronic consent (E-Consent)
- Electronic Archive (E-Archive)
- Rights ID
- Finnish Trust Network (FTN)
- Passport Reader
- Mobile Enterprise ID

### **Domestic card scheme**

- BankAxept
- BaxBis
- Nets Online

### **Other certifications**

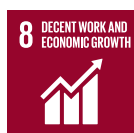
The conformity assessment body (CAB) BSI Group Netherlands certified that Nets' Passport Reader service meets the requirements for issuing qualified EU certificates.

Nets is certified by the Finnish Supervisory Authority, Traficom, as an Identity Broker in the Finnish Trust Network.

The Regulation applies to the provision and conformity assessment of electronic means of identification and intermediary services for identification that have been notified to the Finnish Transport and Communications Agency (Traficom).

## 3.2 MODERNISATION AND PROGRESS OF EUROPEAN COUNTRIES

### UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



### MATERIAL TOPIC "DIGITAL TRANSITION AND CASHLESS SOCIETY":

GRI 103-1

GRI 103-2

GRI 103-3

*At Nexi Group, we are committed to investing in the economies of all the regions in which we operate and to supporting local businesses in the best possible manner in order to facilitate and spread the digitalisation of payments across Europe.*

### INITIATIVES AND ACHIEVEMENTS IN 2021

#### THE NEXI GROUP

- 167 million euros invested in technology
- "Nexi Digital", a talent pool for young graduates with a focus on engineering and digital skills

#### NEXI

- Partnerships with world-leading fintech companies through the Nexi Open digital financial services ecosystem
- "Micropayments" initiative to reduce POS transaction fees
- "Nexi Welcome" campaign to support small businesses in the experience of receiving payments via mobile phone

#### NETS

- Launch of SoftPOS enabling merchants to use Android devices to accept contactless card payments
- Merchant Financing solution to provide financing to merchants.

## Innovation in business

Innovation and technological progress are at the heart of the path taken by the Nexi Group, aimed at achieving its strategic objective of becoming a driver of innovative and technologically advanced solutions in the payments markets. The Group constantly invests in technology and expertise, with a constant focus on the excellence and safety of its products and services. In 2021, the Nexi Group's technology investments totalled 167 million euros and mainly relate to POS and ATM products and services, as well as software development and other technological developments.

As far as business innovation is concerned, the medium-long term strategic developments and initiatives to be developed on an annual basis are defined by the Group's Business Strategy Function. Through its activities, the Function supports Top Management and the Board of Directors in defining, monitoring and reviewing the guidelines of the Group's strategic plan. The Function constantly collaborates with an international digital innovation ecosystem consisting of international fintech communities, start-up accelerators and incubators, developers, investors, commercial banks and business partners. The ecosystem has been further enriched in 2021 with the creation of "Nexi Digital", a talent pool for young graduates with a focus on engineering and digital, which will be based in Italy and Poland with the aim of internalising strategic skills.

## Open Banking

In recent years, a great deal of investments have been made in Open Banking with the aim of seizing the opportunities arising from the second European Payments Directive, PSD2. The development of cutting-edge technological solutions in the field of Open Banking continued in 2021. Nexi offers the following solutions in this area:

- **CBI Globe (Global Open Banking Ecosystem):** platform developed for the CBI Consortium and launched at Nexi in 2020. This is the technology infrastructure gateway that enables banks and financial institutions to comply with PSD2 regulatory requirements by providing access to account data to authorised third parties;
- **CBI Globe Active:** feature that allows customers of third-party providers to reach, through a single connection, many financial institutions operating in the Italian banking market, as well as in the international financial scene;
- **PagoInConto (PISP):** a solution developed by Nexi and launched in 2021 which enables Partner Banks and large companies to provide an innovative payment service. It enables merchants to handle receiving payments more efficiently and offers private customers a simple digital experience;
- **Check IBAN:** service available in partnership and co-investment with Experian. This service allows companies and public bodies to verify, with certainty and in real time, the correctness and existence of their debtor's IBAN and its match with the tax code/VAT number of the account holder before making a monetary transaction.

Nexi Open is the open ecosystem that aims to turn Open Banking into a concrete business opportunity. It continued its operations in 2021, offering Partner Banks a wide range of turnkey services and ideas. Nexi Open currently includes around 30 partnerships for the integration of various highly innovative solutions.

The partnership with Plug and Play, a leader in the field of start-up accelerators and one of the most active Venture Capitals in the world, continued in 2021. This collaboration represents an important bridge between Europe and Silicon Valley and gave rise to a "Fintech

Hub" in 2021, with Nexi as funding partner. Two main areas of interest have been identified within the perimeter of the "Fintech Hub": Transaction Risk Analysis (TRA) and Strong Customer Authentication (SCA).

Nexi also signed important new partnerships with Salesforce and SAP in 2021, two of the most important ERP/back-end platforms used by large companies to manage e-commerce and omnichannel services. With these joint offerings, Nexi can provide digital payment services to both Salesforce and SAP customers.

## Merchant Services & Solutions

In 2021, the Group renewed its focus on investing in new payment solutions to ensure continued support for merchants, both in terms of business continuity and results and revenue growth despite the ongoing Covid-19 pandemic. New industry-focused solutions have been designed and offered to address different business specificities. The rise of in-store digital payments has been reinforced by new solutions more related to e-commerce solutions for both small and medium-sized enterprises. Technology upgrades have strengthened e-commerce platforms, especially for large customers, with a focus on omnichannel and cross-border aspects. Innovation and support for customer activities were the main focus of 2021, which led to the creation of value in the merchant services offering through new launches and successful initiatives:

- *"Worry-Free Collection for Restaurants"*: new solutions for bookkeeping and payment management, designed specifically for restaurants;
- *"Micropayments"*: promotion dedicated to small merchants, reducing POS transaction fees on payments up to €10;
- *"Nexi Welcome"*: campaign to support small businesses in the experience of receiving payments via mobile, with a zero monthly fee policy and a single percentage commission on major credit and debit cards;
- *"POS Extra zero-fee"*: solution to ensure business continuity in the event of faults and/or increase in flow volumes in the point of sale.
- SoftPOS (Nets): solution to enable merchants to use Android devices (mobile or tablets supporting Android Pay) to accept contactless card payments, which is more efficient for merchants and improves the consumer experience by allowing them to browse, order and pay via a single device, while avoiding the traditional POS check-out;
- Merchant Financing (Nets): solution aimed at providing financing to merchants using data on transaction volumes and revenues to calculate financing options and repayment schedules, strongly assisting SME merchants in managing their operating capital and cash flow needs;
- Data Analytics (Nets): solution developed for SME & LAKA retailers and partners that enables them to create customisable dashboards with in-depth analyses of performance, consumer behaviour and industry benchmarking.

In 2021, the Group's digital channel offering was further strengthened and enriched:

- new information structure: Nexi Business and its functions have been consolidated and rationalised through the creation of a more transparent structure which in turn enables merchants to have a first-class experience, both in terms of easy browsing and availability of information;
- up-selling capacity: together with a more flexible structure, Nexi Business has enriched its portfolio of products and services with the introduction of new capabilities (e.g., vertical packages) and proposals (e.g., Amex, meal vouchers, etc.);
- new LAKA portal: to better meet the specific needs of large companies, Nexi has de-



veloped a new business portal called Nexi Enterprise. By adding advanced integrative functionalities to Nexi Business, Nexi Enterprise enables high-volume customers to monitor and manage results in a simple and intuitive way.

In 2021, the Nexi Group's e-commerce offer was enhanced with the following innovations and initiatives:

- new e-commerce onboarding: XPay360's onboarding has been completely revamped, simplifying and reducing the steps needed to complete the process. In addition, to better serve its customers, Nexi has expanded its range of e-commerce products, launching two new solutions designed specifically for MCCs in hotels and restaurants (e.g., XPay Hotel and Pay-by-link Plus Ristorazione);
- service improvement on XPay: combination of several features that improve the customer's payment experience and increase the acceptance rate for merchants (e.g., TRA service, advanced tokenisation, automatic update of expired cards for recurring payments, etc.);
- XPay promo with zero monthly fee for banks to support them in their e-commerce sales proposition;
- XPay promo with zero monthly rate for the entire hotel industry, to support hotels during the Covid-19 pandemic (together with the "Incasso senza pensieri" service);
- creation of new packages with vertical partners in specific product categories to support merchants in launching their e-commerce websites easily, quickly and on advantageous terms;
- enrichment of XPay with new payment services, such as Bancomat Pay and Oney, and with new plugins (e.g., BigCommerce);
- "P24now" (Nets): a universal and unique purchasing wallet integrating account-to-account and PSD2 payments with the possibility to use BNPL and/or a revolving credit line among all merchants supplied by P24;
- "Shop-in-Shop" (Nets): innovative account-to-account market solution from the Paytrail sector. It enables Finnish merchants to empower sellers on their e-commerce platforms with one brand, one integration and with flexible payment, reconciliation and checkout options.

## Cards & Digital Payments

Support to Partner Banks for the renewal of their offerings continued in 2021. In particular:

- Xiaomi Pay and Swatch Pay!: further expansion towards a widespread adoption of digital payment solutions, being the first issuer in Italy to enable the use of Xiaomi Pay for Mastercard with dedicated Go-to-Market activities, as well as to enable Swatch Pay! solutions on both International Schemes;
- YAP development: YAP - the Money app for Gen Z and Millennial products - has been supplemented with new features (e.g., P2P transaction summary and new "My YAP" section with parental control) and improvements (app ratings and NPS);
- Nexi Debit Premium: enhancement of the go-to-market of the advanced international debit card designed for the most demanding customers, frequent travellers, those who want exclusive and fully digital services;
- "Commercial" cards: increased go-to-market efforts for Commercial Corporate Pay and Travel account products aimed at medium and large-sized companies to optimise working capital (Corporate Pay) and for greater efficiency in the management of travelling staff (Travel account);
- MitID (Nets): the new third-generation eID platform was successfully launched in Denmark in October 2021. The eID platform is designed for scalability and internationalisation. It runs on state-of-the-art infrastructure and can be easily deployed to new customers, both banks and public institutions;
- Consumer Financing (Nets): a solution enabling banks and merchants to offer consumers versatile financing options at different touch points. Through products such as buy-now-pay-later, versatile instalments and the conversion of transactions into loans, issuers can offer the right financing option for their consumer customers;
- Secure Virtual Payment application (SVPA - Nets): a virtual terminal solution that allows a smartphone or tablet to function as a payment terminal, enabling consumer devices to be used to receive payments.

## Digital Banking & Corporate Solutions

The innovation roadmap for Corporate Banking, Instant Payments and ATM services continued in 2021. The following initiatives were implemented to further enrich the VAS Open Banking offer and improve the ATM experience:

- Open Banking: Next Generation IBAN Check - a service integrated in partnership and co-investment with Experian that allows banks to easily certify the IBAN used for payments and refunds;
- A2A Rails: PagoInConto - an A2A IBAN-based service specially developed for handling large tickets;
- ATM: DCC (Dynamic Currency Conversion) - a service that provides transparent exchange rates for multi-currency withdrawals.

## Digital culture

In 2021, Nexi continuously campaigned to drive the company's transformation into a cashless society through digital innovation and payment development. To achieve this goal, Nexi implemented several projects in 2021 supporting private customers and merchants in their daily activities.

Nexi also actively participated in Italian Government initiatives such as the State Cashback programme and renewed the promotions launched in 2020 with the solidarity programme to support small merchants, with solutions such as: Mobile POS, Pay-by-link and Digital Showcase, to support business continuity.

The Nexi Group has also organised a large number of physical and online events in Italy and Europe to significantly contribute to the public debate on digital development with different areas of interest: among others, transformation of commerce, evolution of retail, security, smart cities and open banking.

## Nexi innovation awards

Nexi's continued commitment to innovation was demonstrated in 2021 by the following awards:

- Netcomm Award - category winner  
PAYMENTS with Mobile POS - Pay-by-Link - Social Commerce
- Paytech Awards  
Covid-19 Response - Corporate cards Initiative - winner
- Aite Group's Digital Wallet Impact Innovation Awards - Winner in the multi-channel solutions for merchants category
- ADI Design Index 2020  
Virtual cards Corporate Pay and Travel account - published selection
- ADI Design Index 2021  
Mobile POS - Pay-by-Link - Social Commerce - published selection
- Nexi Digital Showcase - Monza Brianza Chamber of Commerce
- ADI Design Index 2021- Nexi-Pay-by-Link service selected for the XXVII Compasso d'Oro 2022
- Business excellence promoted by Borsa Italiana - special mention to NEXI in the innovation and technology category
- Nexi Case study 2021 Impact Innovation Award in Digital Wallets: Published by Aite Novarica Group

## 3.3 CUSTOMER SATISFACTION

### UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



#### MATERIAL TOPIC CUSTOMER SATISFACTION

GRI 103-1 GRI 103-2

GRI 103-3

#### MATERIAL TOPIC PRIVACY AND DATA SECURITY

GRI 103-1 GRI 103-2

GRI 103-3

#### MATERIAL TOPIC OPERATIONAL EXCELLENCE

GRI 103-1 GRI 103-2

GRI 103-3

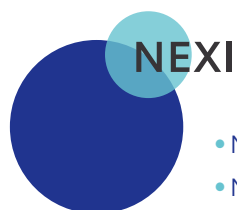
#### MATERIAL TOPIC BUSINESS CONTINUITY

GRI 103-1 GRI 103-2

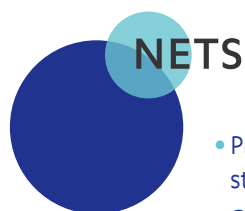
GRI 103-3

*Customers are central to the Nexi Group. We are committed to dialogue with customers and listening to customers' feedback to serve them in the best possible way and to develop and improve the products and services offered.*

### INITIATIVES AND ACHIEVEMENTS IN 2021



- Net Promoter Score equals to 29,66
- NexToCustomers" initiative to raise employee awareness of customer experiences
- "Be the 1st Customer" programme to simplify the steps a customer must complete to apply for a card
- Introduction of the "Customer Week" for recent graduates participating in Nexi's Graduate Program, with the aim of promoting a culture attentive to customer needs
- New Customer Relationship Management (CRM) programme to ensure faster customer relations and more effective problem solving in call centre contacts



- Provision of customer satisfaction surveys to merchant customers and IeS services customers (issuing, e-Security, digitisation)
- Adoption of the Nets Business Continuity and Crisis Management Policy in order to ensure business continuity in the infrastructure

The customer is central to the Nexi Group. Its daily activities, new products, innovation and investments are always calibrated by putting the customer at the centre. For this reason, Nexi constantly monitors and detects the needs of its customers through both customer satisfaction surveys and through the constant detection and analysis of the Net Promoter Score (NPS) and related feedback, as well as through the management of complaints and the analysis of feedback on digital application stores.

Nexi's constant aim is to spread the culture of customer satisfaction among all its people, with the aim of improving service levels and customer relations in order to achieve excellence. To this end, the change management initiatives launched in previous years have been further strengthened in 2021:

- periodic listening to a selection of customer calls by Upper management, in compliance with privacy regulations, to identify possible specific improvement initiatives;
- sharing the results of the most recent surveys aimed at gathering private customers' perceptions of Nexi and its services in corporate staff meetings;
- creation of the "NexToCustomers" digital channel to engage and raise awareness among employees about customer experiences and update them on current initiatives;
- launch of "digital coffees" focused on presenting the customer satisfaction programme and sharing it among employees;
- presence of specific NPS targets for the Business Units.

## Customer Satisfaction

Several improvements were made to the process of measuring customer satisfaction in 2021.

For surveys of both private customers and merchants, the process and analysis of the verbatims was improved in order to understand the elements of the different services that were most appreciated, both of Nexi and its competitors, and to gather ideas for improvement.

- For merchant customers, the survey showed a tangible improvement in Nexi's NPS indicator, especially in the second and final quarter, across all business models. Trend driven mainly by merchants using SmartPOS or the new Mobile POS devices (NPS: +11 for Mobile, +8 for SmartPos).
- For private customers, there has been a gradual decline in Nexi's appreciation mainly due to customers using Nexi's digital properties, driven by the introduction of Strong Customer Authentication (SCA), a requirement to make online payments more secure in accordance with the European PSD2 regulation (Directive 2015/2366/EU).

## Customer Satisfaction in Nets

At Nets, the vast majority of customer interactions are monitored through surveys of merchant customers and IeS (issuing, e-Security, digitisation) service customers of the Cards & Digital Payments Business Unit to identify areas for improvement and the areas of Nets' services and products that are most appreciated. Based on the results, Nets is continuously working to improve accessibility to services, reducing waiting times and improving agent skills to ensure more effective contact resolution, in order to improve overall satisfaction.

Nets works by applying a logic of continuous improvements focused on improving interactions with merchant customers, such as through written communication and simplifying processes.



## Net Promoter Score

Consistent with previous years, in 2021 Nexi invested in listening to customers in order to continually improve its solutions and further explore customer needs in light of radical changes in post-pandemic consumption habits. This process has been further strengthened in 2021 with the use of surveys and ongoing analysis of the Net Promoter Score indicator, as well as feedback from the overall perceived experience of customers and their contact with Nexi.

In 2021:

- new surveys were introduced and specific improvement actions were identified in the three BUs;
- Consistent with previous years, a new NPS survey dedicated to Partner Banks was carried out;
- the detection method has evolved, with increased frequency and automation of some aspects of NPS detection.

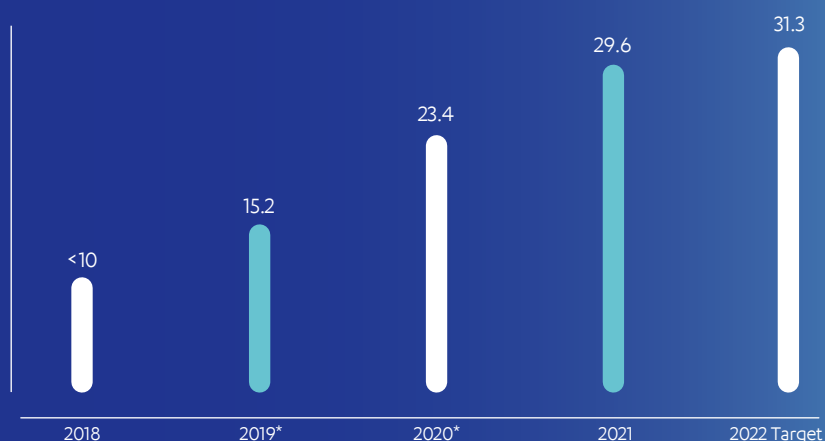
## LISTENING TO THE CUSTOMER'S VOICE: OUR NPS

The path of continuous improvement is confirmed in 2021 by both the NPS value achieved (+26% vs 2020 and +18% vs target 2021) and the target set for 2022. Despite the pandemic context generated by Covid-19, the initiatives launched by Nexi in 2020 and continued in 2021 in response to the needs and expectations of its customers have been recognised and appreciated by owners, merchants and Partner Banks.

During the course of the year, NPS values exceeding 40 were reached for some customer categories. In 2021, Nexi included in the measurement also the NPS of Intesa Sanpaolo merchants and the Bank itself among the Partner Banks category.

In 2022, Nexi will extend the NPS recognition methodology to the Nets perimeter.

In continuity with previous years, the NPS indicators reported have been indicated among the specific management objectives and included in the metrics underlying their remuneration, as reported in the Remuneration Policy and Remuneration Report.



\*The NPS value published in the 2020 NFS, for the NPS 2019= 15 for the NPS 2020= 23

NPS calculated as the arithmetic average of the NPSs detected for all categories of Nexi customers (owners, merchants and Partner Banks)

## Brand reputation and Brand awareness

In 2021, Nexi strengthened its position in the market by providing innovative products and services to its customers, helping and supporting merchants in their daily activities, and launching new projects with Public Administrations.

According to research by Nextplora, Reputation Institute, the Reputation and Notoriety of the Nexi brand continue to grow in terms of brand recognition, association with the world of digital payments and above all in terms of reputation, now fully in the area of strength.

## Complaints management

Inspired by the principles of transparency, service and quality, complaints management is an important tool for managing and monitoring customer satisfaction.

In this regard, Nexi has internal regulations that define the roles, responsibilities and operating methods useful for identifying critical areas and areas for improvement, for strengthening the relationship of trust with customers and reducing operational risks and damage to reputation.

Customers can submit a complaint in writing in the manner indicated on the website [www.nexigroup.com](http://www.nexigroup.com) and [www.mercurypayments.it](http://www.mercurypayments.it) in the dedicated sections. Nexi Payments, Mercury Payment Services and the dedicated functions are responsible for responding to each complaint in writing within 15 working days, in accordance with the rules established by self-regulatory initiatives or supervisory regulations on complaints relating to payment systems. In the course of 2021, in order to increase the efficiency of the complaints management process, the complaints management of Mercury Payment Services was brought under the control of Nexi Payment.

The Complaints Management Function also processes requests for clarification from the Supervisory Bodies in the field of banking and financial transactions and services, as well as periodically ensuring the required information flows to the Group's corporate bodies.

## Complaints management in Nets

In Nets, complaints management is considered a fundamental part of the customer experience for its merchant customers. The complaints received provide an important input for improvement and at the same time an opportunity to provide a better experience at a later stage. In all countries, customers have the possibility to send a written complaint which will be handled by the Complaints Manager in the country. In some countries it is also possible to issue a verbal complaint. Nets aims to handle complaints on a day-to-day basis, but this is not possible for more complicated cases. For this type of complaint Nets follows the guidelines prescribed by PSD2 and the requirements of local authorities.

## Privacy and data security

Because information is one of the Nexi Group's most valuable assets, its security is essential to protect the company, gain customer trust, competitive advantage, profitability and growth, and ensure compliance with regulatory obligations. The Nexi Group promotes an ethical and controlled information processing environment aimed at protecting information systems from security threats that may adversely affect the Nexi Group and its stakeholders.

As well as being one of the fundamental pillars of the company's strategy, data security has been implemented over the years thanks to a significant investment plan in line with the Group's corporate evolution and aimed at strengthening both technical and organisational security requirements in all entities.

The Group's commitment to guarantee security of information and of its Information Security Management System (ISMS) is enshrined in the "Group Information Security Policy" approved by Nexi's Board of Directors in December 2021. In addition to the Policy, the ISMS includes organisational structures, regulations, operating instructions, procedures and technical documentation governing planning, design and implementation activities, roles and responsibilities, processes and resources, staff behaviour and controls relating to automated information processing to maintain:

- confidentiality: the data are only accessible through defined processes to those who are expressly authorised;
- integrity: data may only be modified through defined processes by those expressly authorised; the requirement implies completeness, accuracy and conformity of data during the acquisition, storage, processing and presentation phases;
- availability: the information is only accessible and usable through defined processes to authorised processes and users and only when a real need arises.

The ISMS is integrated with the IT risk analysis process (so-called IT Risk Assessment) which, carried out in cooperation with the Risk Management Function, represents the residual IT risks considering the maturity of the processes and the efficiency of the implemented controls.

## Business Continuity

Service reliability is a key factor for the Nexi Group, which has developed a Business Continuity Management System (BCMS) whose objective is to guarantee the ability to provide critical services, as required by current regulations, at a minimum acceptable level of service and in line with the operational risk appetite defined in the Enterprise Risk Management framework.

The Group's policies have been defined with the aim of ensuring a uniform approach for all its member companies and guaranteeing the consistency of the year's results. For this reason, an updated Group Business Continuity Policy was approved by the Board of Directors of Nexi SpA in December 2021. A dedicated team constantly updates and verifies Business Continuity strategies and solutions for all scenarios required by applicable regulations, including CODISE, PSD2, Privacy, through testing activities planned and executed regularly throughout the year.

This has required significant investments in recent years, aimed at increasing the resilience of services with appropriate technological and organisational measures.

## Operational Excellence

Nexi's focus on operational excellence, which also aims to increase the level of services offered, continued in 2021. The main projects launched during the year are listed below:

- new Customer Relationship Management (CRM) programme to ensure call centre operators manage customer relationships more quickly and resolve customer issues more effectively;

- dispute management, the first project within a broader transformation roadmap, which focused on simplifying the dispute opening process, standardising the model, categorising disputes and automating the resolution process;
- Complaint management, replacement of the CRM system used with the aim of ensuring greater integration with the front-line system used for information on customer situations and contact history, continuity for dispute management and resolution and more detailed reports;
- Selfcare Projects, implementation of new self-care features (such as card delivery tracking, change of correspondence address, card blocking due to theft or loss) on Nexi Digital's contact points (IVR, Nexi Pay and website) to make customers more independent in the simplest tasks and promote the use of the app and portal for issue resolution;
- KPI Reporting Project, implementation of several operational and management reports for better monitoring of operational processes.

## Operational excellence at Nets

Nets has developed several processes and indicators that help to ensure a focus on continuous improvement and provide Top Management with an accurate overview of company performance. Some examples of processes aimed at achieving operational excellence are:

- Collection of customer feedback through annual Customer Satisfaction Surveys;
- Fulfilment of the service objective which is formalised in a report on the service level of the specific business unit;
- Monitoring of suppliers (carried out by the Vendor Relations area);
- Financial performance or policy compliance by Risk Management.

In 2021, security reporting and the implementation of related KPIs was an area of improvement and focus. Nets has consolidated its security reporting to cover all entities and subsidiaries in Poland, Germany and Finland.

Nets has also implemented unified incident management to centrally manage escalation points and the IT service area. In addition, Nets' crisis management process now covers the entire perimeter and is aligned with the crisis management process for the Nexi Group as a whole. Finally, work began on simplifying IT processes and support tools in the Nexi Group.

Examples of initiatives developed and implemented in business and technology areas during 2021 include:

- MitID: in October 2021, Nets' new third-generation eID platform went live in Denmark for the Danish Digitisation Agency. The MitID service is a fully compliant eID solution (PSD2, eIDAS, GDPR, etc.) with digitised onboarding, authentication and signature.
- the Nets Passport Reader service launched in 2020 was officially certified during 2021 as compliant with the latest European regulations - eIDAS - by the leading global standards body, the British Standards Institute (BSI).
- the new UNI platform for clearing services introduced in Norway in 2020 started onboarding Finnish issuers in 2021 and prepared for the takeover of Danish issuers in 2022.
- simplified reporting for LAKA customers who deal with both Nexi and Nets.
- nPay is Nets' new pan-European payment terminal solution.
- SAFe framework implemented as an agile way of working in Nets' Technology.

## 3.4 RESPONSIBILITY TO OUR PEOPLE

### UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



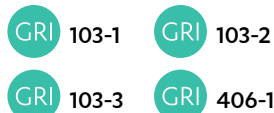
#### MATERIAL TOPIC EMPLOYEES TRAINING, DEVELOPMENT AND APPRAISAL



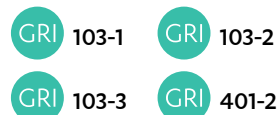
#### MATERIAL TOPIC TALENT ATTRACTION & EMPLOYER BRANDING



#### MATERIAL TOPIC DIVERSITY AND EQUAL OPPORTUNITIES



#### MATERIAL TOPIC WELL-BEING AND SUSTAINABLE WELFARE

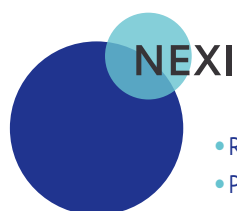


We are committed to creating a dynamic culture based on people's involvement and merit with the Nexi Group. We welcome the diversity of cultures, perspectives and skills. Every single person in the Group plays a key role in achieving our ambition to shape the future of digital payments across Europe.

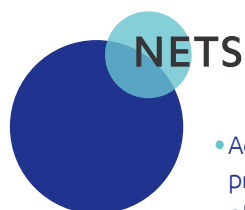
### INITIATIVES AND ACHIEVEMENTS IN 2021



- 62,236 hours of training for employees
- 0 confirmed cases of discrimination in the Group



- Regular performance evaluation for over 90% of employees
- Partnerships with associations and universities to increase competences
- Anonymous channels for reporting regulatory violations and episodes of corruption
- Improved parenting support
- Diversified training and Skill-UP project to map and improve people's skills
- Collaboration with Auticon for the inclusion of autistic people in specific projects
- Collaboration with Valore D to support female leadership



- Adoption and implementation of the People Plan, which aims to promote a stimulating work culture, focusing on the development of people
- Implementation of initiatives to promote women in management
- Specific training on diversity and inclusion
- Launch of the Diversity and Inclusion Board, which will be responsible for driving the diversity and inclusion agenda, defining priorities and activities to be implemented



The Nexi Group has become a very diverse organisation in terms of professional and cultural background, including diversity of skills, gender and age. The commitment to achieving an appropriate transformation process was driven primarily by the organic growth of new managers, professionals and specialists, and by the acquisition of new skills and the strengthening of those already present within the Group.

The Group's People Strategy aims to enhance the skills, passions, abilities and background of each employee, so as to:

- create value for all the Group's stakeholders;
- pursue and ensure the sustainability of the organisation's growth in the medium and long term;
- establish a culture based on performance and merit;
- strengthen leadership in the management and development of our people.

The number of employees of the Nexi Group as of 31 December 2021 is 6,420.

## Diversity management

### Gender diversity

In 2021, in line with 2020, the share of women in Nexi was 47%. During the year, Nexi focused its efforts on:

- strengthening the presence of female managers;
- providing female managers with the tools and skills to enable them to access career paths and professional development based on merit.

In 2021, 15% of managerial positions were held by female managers (15 women out of a total of 97 managers).

### Initiatives and Collaborations

**Women's empowerment:** partnerships with associations and universities were strengthened and the training offer was diversified in 2021. In particular:

- the partnership with Valore D, an association that supports female leadership in companies, was renewed, and managerial courses dedicated to C-level, senior and middle managers were launched;
- a collaboration was initiated with Luiss Business School for the participation of young Nexi managers in the MBA, including two women;
- the partnership with **Women&Tech - Associazione Donne e Tecnologie** was renewed, thanks to which specific mentoring courses were promoted as part of the Women Empowerment programme, an intercompany programme dedicated to senior and junior female managers;

**Parental support:** specific rules have been incorporated into the MBO and LTI regulations that envisage the payment of MBO/LTI shares even in the case of absence for compulsory maternity/paternity leave. Details are also available in the Remuneration Report published at [www.nexigroup.com](http://www.nexigroup.com)).

### Generational diversity

Several generations work in Nexi with different levels of seniority and different levels of experience. Attention to their specific needs and expectations is one of the key elements of the People Strategy in terms of offering integration paths, engagement actions, targeted training and specific welfare initiatives.

#### MATERIAL TOPIC WORKERS' RIGHTS AND LABOUR RELATIONS

- GRI 103-1
- GRI 103-2
- GRI 103-3
- GRI 102-41
- GRI 402-1

#### MATERIAL TOPIC HEALTH AND SAFETY PROMOTION

- GRI 403-1
- GRI 403-2
- GRI 403-3
- GRI 403-4
- GRI 403-5
- GRI 403-6
- GRI 403-7

### Skills diversity

Nexi's strength rests on two distinctive pillars: cutting-edge technology and its people.

The Skill-UP project continued during 2021 within the operational area; it helps to identify strategic actions from a short-, medium- and long-term perspective to overcome the challenges of the future. In particular:

- identify internal resources in terms of "key skills" and identify the skills to be researched on the market to support the Group's growth;
- define both technical and "soft" training plans to be implemented over the next two years in order to update internal skills at an overall level and fill any gaps, anticipating the possible future need for specific professional profiles;
- identify subject matter experts as trainers.

Thanks to the Skill-UP project, Nexi has entered the AICA European Best Practices list for the best human capital development project.

### Disability

In 2021, Nexi began a partnership with **Auticon**, a national company providing professional services related to information technology that exclusively hires people with autism. Auticon employees were included in a Nexi business intelligence project, making an important contribution both in terms of technical knowledge and the implementation of new ways of interacting.

## Diversity management in Nets

It is essential to create a dynamic, diverse and inclusive workplace at Nets as well, where everyone feels welcome and able to reach their full potential by offering opportunities to top talent regardless of their nationality, ethnicity, disability, age, gender, sexual orientation, religion or belief.

In early 2021, the *People Plan* was adopted to promote a stimulating work culture, with a focus on people development initiatives, up-skilling selected staff and diversity and inclusion.

Also in 2021, the *Diversity and Inclusion Board* was established, a cross-border and cross-company team chaired by the Nets' CEO to drive the strategic plan for diversity and inclusion management, setting priorities and initiatives year by year. The primary goal for 2021 was gender equality.

### Gender diversity

For Nets, it is important that executives have appropriate skills, regardless of gender. Nets is committed to widening the field of candidates for management positions in order to offer equal opportunities to men and women. In addition, the requirements for external recruitment agencies include gender diversity measures to promote a healthy distribution in terms of diversity.

In 2021, Nets launched:

- the project to promote female talent, with the aim of having 40% female candidates in recruitment processes by 2024;
- initiated a review of equal pay for some of the companies in its perimeter. The results are currently being analysed, after which a specific plan will be developed to address the results obtained.

## Staff assessment and the Reward system

### Performance Management

Performance Management is the process adopted to improve the contribution of each individual employee to the company's results according to a merit-based approach. Performance evaluations are transparently communicated to shareholders, employees and external persons and, as in previous years, are based on the following criteria:

- WHAT, clear and measurable qualitative and quantitative individual and company objectives;
- HOW, behaviours in line with company values.

All fixed-term and permanent Nexi employees with at least three months' seniority are subject to the Performance Management process.

**During 2021, 1,997 Nexi employees (98% of the company workforce) were involved in the Performance Management system<sup>35</sup>.**

### Performance Management in Nets

Nets has a performance management review system, ImpACT, which is based on frequent dialogue between employee and manager and is designed for a rapidly changing environment, allowing priorities to be changed quickly. It is based on a simple and flexible configuration which ensures that Nets is always focused on what creates value - for employees, customers and the company as a whole. ImpACT reinforces Nets' values and behaviours, as well as the company's leadership model, highlighting the importance of driving results, role modelling values and development teams.

ImpACT focuses on promoting employee performance, on real-time feedback to help employees grow and feel engaged. The heart of ImpACT is based on frequent, quality dialogue between employees and leaders<sup>36</sup>.

Employees and leaders are encouraged to carry out development check-ins at least twice a year.

In 2021, Nets revamped ImpACT to incorporate additional tools to the process to set priorities and manage feedback and development.

### Reward system

In continuity with previous years, Nexi's Reward system is based on the following principles:

- **alignment with business values and strategy**
- **performance**
- **competitiveness and fairness**
- **transparency and communication**

Consistent with the objective of **creating sustainable value over time** for all stakeholders and in accordance with the provisions of the Corporate Governance Code for Listed Companies, a path has been defined for the **progressive integration of the strategic objectives** of Upper management and for the Executive Directors with **sustainability objectives**, also known as ESG (Environmental, Social and Governance).

<sup>35</sup> In calculating the indicator, all employees in force at 31/12/2021 present during the dialogue and development (March 2021) and mid-year review (July-September 2021) phases were taken into account. All fixed-term and permanent employees with at least three months' service in the Group are subject to assessment through the Performance Management system. Nets data is not included since a formalised performance review process has not yet been established. The six employees of Orbital Cultura srl are also not included.

<sup>36</sup> Leaders are employees who are responsible for managing other resources

In line with this commitment and included in the Sustainability Policy, the **MBO of the CEO and Managers with strategic responsibilities includes the following two objectives:**

- **People Value**, level of employee satisfaction as measured by the engagement index of the people survey;
- **Customer Satisfaction**, perceived customer experience as measured by the Net Promoter Score (NPS).

For further information on remuneration, please refer to section i of the “Report on remuneration policy and compensation paid” available at [www.nexigroup.com](http://www.nexigroup.com).

## Reward system in Nets

The principles underlying remuneration at Nets are designed to be simple and transparent, in line with the requirements of the People Strategy. Nets operates by seeking standardisation and simplicity as the foundations for the experience of its employees and for its business activities and strategy.

The incentive system is closely linked to the financial performance achieved by Nets and determined according to the specific responsibilities for each professional position. In order to remain competitive in the markets of different countries, the target of the incentive system varies according to the geographical area.

## Training

In 2021, Nexi created and defined an integrated approach to assess how employees’ experiences, attitudes and diversity can be integrated into all training and development initiatives. Nexi uses various training tools and content inspired by market best practices and employee experiences.

To ensure excellence in training, Nexi has chosen the best partners on the market specialised in specific areas of expertise, such as the Polytechnic Institute of Milan MIP, ABI formazione, Oxford, Palo Alto University.

Training initiatives carried out in 2021:

- **corporate training:** designed for employees so that they can always be prepared and updated on Nexi’s activities, relative trends, positioning, strategy, products and services. The course “Pay UP: Payments Today and tomorrow” continued in 2021. It was created by the people of the Nexi Group for the people of the Nexi Group;
- **One Nexi training:** intended for all employees, in order to follow a common and shared direction. Training aims to build a company with a unique identity, to enhance and include the diversity of experiences, skills, attitudes and passions, and to improve everyone’s soft skills. Nexi Pillar One includes three different training programmes designed to support people in pursuing shared leadership. These include leadership academy, managerial academy and the training catalogue;
- **Specialised training:** includes activities aimed at acquiring, maintaining and developing specialised knowledge about the individual employee’s business area. Notable training in 2021 included *sales empowerment journey*, the *customer care excellence path*, and the *graduate programme*. The Data Academy was also held for the second year;
- **technical training:** carried out through participation in external courses, events and conferences aimed at enriching skills and encouraging the sharing of ideas. Training includes tools and methodologies aimed at operational improvement, technological

upgrading and constant regulatory updating. In 2021, the technical training mainly focused on technology certification (such as AWS, Adobe, Salesforce, Oracle, PMP), but also on topics such as accessibility and inclusion, time management and productivity, project management, management accounting and numerous other career paths in digital payments, compliance, risks and auditing;

- **language training:** to facilitate the transformation of the Group which operates in an international context and to help people collaborate and communicate with new colleagues, a digital language training programme was launched with dedicated courses and unlimited access to a digital business English platform available to all employees;
- **mandatory training** is provided in constant compliance with applicable regulations and includes courses on privacy, money laundering, occupational health and safety, aiming to provide adequate knowledge for compliance with legal and industry regulations. In 2021, Nexi conducted the following compliance training courses:
  - IT Security Awareness, including phishing webinars and online security awareness courses;
  - GDPR updates with "Privacy video clips" on activities required for processing personal data in compliance with internal regulations;
  - online courses and specific focus on the Social Responsibility and Environmental Management System for the maintenance of SA8000 and ISO14001 certifications have been foreseen;
  - anti-money laundering, with an online course focusing on transparency and AML-Issuing;
  - antitrust, with an online course dedicated to unfair commercial practices, market abuse and Related Party Transactions;
  - Italian Legislative Decree 231/2001;
  - special online training to accompany the gradual return to the office after the period of remote working.

## Training in Nets

Nets believes in experience-based learning and offers a variety of learning opportunities through a digital learning platform, *CrossKnowledge*. Through this platform, Nets provides a mix of structured and guided learning paths within specific areas. The learning channels focus on different topics where employees and leaders can choose and select the courses of interest relevant to their individual development and growth at any given time, as well as a huge library where they can search for different training opportunities.

The platform is currently available to all employees and leaders of Nets in the Nordic Countries (Nets Denmark A/S, including national branches), Concardis and Nets CEE, and drives most of the training/learning courses. The platform is also accessible to some other subsidiaries (EDIGard, Poplatek, Poplapay)<sup>37</sup>.

Other training platforms are also available:

- **technical upskilling**, Nets currently has 200 licences for **Pluralsight**<sup>38</sup>. For technical upskilling, Nets has also signed an agreement with **Microsoft** for the free training of a number of employees;
- **language upskilling**, Nets provides access to a digital language training platform for the entire corporate population.

<sup>37</sup> The excluded companies are Raptapay, Polskie ePłatności, P24 and Paytrail.

<sup>38</sup> Licences are used to provide employees with technical training (e.g., on cloud issues)

Training initiatives carried out in 2021:

- **Compulsory training**

- In addition to the mandatory annual IT security training, all new Nets employees in the Nordic Countries and in the CEE area are required to complete a **security course** when they join Nets;
- training on GDPR. Mandatory GDPR awareness training for Nets in the Nordic Countries was launched in late 2020. For the business area in the DACH area, a data protection course was launched in August 2021 for Concardis. In addition, the **Nets GDPR onboarding course** for new Nets employees in the Nordic Countries continues;
- anti-money laundering training. At the end of 2020, the last mandatory programme on **Anti-Money Laundering and Counter Terrorist Financing** was launched for Nets in the Nordic Countries. For the business area in the DACH region, an ad-hoc course on the prevention of money laundering was launched for Concardis in July 2021;
- anti-corruption training. The latest **Anti-Bribery and Anti-Corruption (ABC)** training course for Nets in the Nordic Countries was launched at the end of 2020;
- MAR/RTP training. Following the integration of Nets into Nexi, the entire Nets leadership team participated in specific training. A training course on the subject was also provided to the remaining company population.

- **Other compulsory training courses**

- training on workplace safety;
- Introduction to Diversity & Inclusion.

- **Onboarding for new employees.** Training courses to be carried out as soon as they are hired.

- Security awareness<sup>39</sup>;
- GDPR onboarding<sup>40</sup>;
- Data protection<sup>41</sup>;
- Training on key elements in Nets related to performance management and development of people, our values, the payment industry.

- **Security Academy**, specialised upskilling on security specifications for constant security awareness;

- **Product Academy**, - updating product organisation in terms of product management, SAFe and Agile (from summer 2021, access to **priority membership with Mind the Product** has been enabled for additional training on product management roles and responsibilities, OKR, customer mindset and product usage) - and training for all employees on Nets product and service knowledge;

- **Agile Learning Hub**, to strengthen the general understanding of the principles and ways of working in Agile;

- **Leadership programmes:**

- **Learn2LEAD** - new leaders, strong connection to ImpACT, strengthening the concept of performance and development;
- **LEAD4Change** - developing the leader's capacity to lead and promote change within the organisation;
- **LEAD4TheFuture** - developing the leader's ability to lead other resources in a hybrid model/world.

<sup>39</sup> Targeted at Nets employees located in the Nordic Countries and CEE area

<sup>40</sup> Targeted at Nets employees located in the Nordic Countries

<sup>41</sup> Targeted at Nets employees located in the Nordic Countries and DACH area



## Sustainable welfare

Nexi sees welfare as an important supplementary element to the remuneration package, part of a broader reward strategy focused on the needs, motivations and real values of individuals.

The main benefits offered to employees are:

- supplementary pension scheme with a supplement for the company;
- healthcare for all members of the employee's family;
- paid leave for medical examinations, plus additional leave for family members with certified disabilities;
- annual allowance for each family member with a disability, plus an additional annual allowance for training needs and the purchase of equipment to support the children of workers with learning disabilities (DSA);
- insurance consultancy for the preparation of estimates, also on-site, with specific discounts for home and auto policies;
- discounts on the purchase of annual public transport passes;
- possibility of converting part or all of the production bonus into a pension fund and/or non-cash services.

All Nexi employees, regardless of their professional category and type of contract, are entitled to the following insurance coverage:

- life insurance policy;
- occupational and non-occupational accident policy;
- permanent disability insurance;
- healthcare.

In accordance with current legislation, pension contributions are regularly paid and absence is managed in accordance with the law or the contract.

All Nexi employees (100%) are located in Italy and hired in compliance with the provisions of the National Collective Bargaining Agreements (CCNL).

All Nexi Payments and Help Line employees benefit from the provisions of a Corporate Integrative Agreement (CIA) - Supplementary Agreement - signed in 2019 and valid until the end of 2022, which among other provisions introduced or improved elements aimed at increasing work-life balance, such as:

- flexibility of working hours;
- paid leave for medical examinations and clinical tests, also for similar needs related to family members;
- paid leave hours and benefits available during the year for employees with disabled family members.

All Mercury Payment Services employees benefit from the provisions of the union agreements signed in 2019, which include supplementary health coverage for the employees' family members and subsidised banking conditions. All the provisions of the Supplementary Agreement signed in 2017 continue to apply, including those favouring work-life balance. A new Supplementary Agreement was signed for Mercury Payment Services in October 2021 which, in addition to incorporating the provisions of the previously signed agreements on healthcare coverage and subsidised banking conditions, supplemented and further enriched the chapter on work-life balance.

Work-life balance was strengthened at Nexi in 2020 with the issuance of the Smart Working Regulations, a new flexible way of organising work applicable to almost all employees. The regulations were replaced in December 2021 by the agreement reached with the trade unions on Smart Working.

In line with Nexi's regulations, the Smart Working agreement which was already in place at Mercury Payment Services for certain areas of the company has been extended to all employees, with the exception of those whose duties cannot be performed remotely. Until the end of the state of national emergency, the simplified Smart Working rules which have allowed almost all employees to work from home will remain in force.

For Nexi Payments and Help Line, in the event of significant restructuring and reorganisation, the national collective credit agreement requires the company to inform the trade unions; the consultation procedure lasts a maximum of 45 days<sup>42</sup>.

## Sustainable Welfare in Nets

Nets continued to provide support to employees during the Covid-19 pandemic in 2021 to enable them to work from home, including guidelines and tools to deal with the situation, as well as office and IT equipment. In 2021, Nets partnered with an external provider to provide online webinars to help employees cope with "remote working fatigue" and health in Smart Working. Guidelines for hybrid working were made permanent during the year to allow employees to work more flexibly, and allowances for employees were introduced to support the purchase of permanent office equipment for use at home.

To monitor employee well-being during the pandemic, specific questions were added to the *Pulse Survey* conducted in February and the annual Engagement Survey conducted in September. Employee feedback shows that they feel supported in working remotely and are in close contact with their managers, are able to stay in touch with their team members while working remotely, know what is expected of them and receive feedback on their performance. The survey results for the Covid-19 questions reached a score of around 85 out of 100.

All full-time and part-time employees of Nets receive benefits according to national legislation, collective agreement and company contract, such as pension, insurance (health, sickness and accident), lunch breaks and flexible working hours, as well as parental/maternity leave. Employees also receive benefits according to the policies adopted, such as welfare support, working arrangements, support for useful equipment for working from home. The 39% of Nets employees population is hired in compliance with Collective Bargaining Agreements<sup>43</sup>.

Based on experiences from the pandemic period, *Hybrid Ways of working have been implemented*. Nets carries out frequent consultations and negotiations with the National Labour Council on the basis of national law, the collective agreement and the applicable company agreement. Whenever changes are made, employees are informed in accordance with the regulations on the notice period established in national legislation, the collective agreement or the company agreement.

## People Survey

The People Survey is Nexi's main tool for listening to people and is an opportunity to give employees the chance to express and share their opinions and provide useful feedback to

<sup>42</sup> For Mercury Payment Services, the national collective agreement for commerce has no specific provisions on this matter, the legal provisions apply

<sup>43</sup> The countries where Nets operates, which are covered by collective bargaining agreements, are Denmark, Norway, Sweden and Finland.

measure the progress and effectiveness of actions taken, helping to constantly identify new initiatives to improve the company.

This is an annual questionnaire with anonymous and confidential answers, managed by a major international survey company.

94% of the company's population participated in the *People Survey 2020*<sup>44</sup>. The results showed a further improvement in the Engagement Index compared to the previous year (+2.7 points) and an overall satisfaction index of 73.6%, noting that the actions taken were effective. As always, the results are communicated to all employees both through videos of the CEO and in dedicated area meetings for the different functions.

Strengths:

- clear strategic direction recognised by the Nexi population;
- clear construction of corporate identity;
- strong adherence to extraordinary operations with a medium to long-term vision;
- great appreciation for the way the company dealt with Covid-19;
- "Living for the customer" continues to be the highest rated value.

Areas for improvement include "collaboration" and "people development".

The need to simplify processes, organisational structures and measurement metrics that generate complexity and operational fatigue remains unchanged from the previous year.

In 2021, Nexi confirmed the continuation of the action plan identified in 2020 through the following initiatives:

- Smart Collaboration: adoption of collaboration tools (Microsoft Teams, One Drive) for all employees, which received a strong boost due to Covid-19;
- Gate & Passive Cycle 2.0: adoption of mechanisms to simplify the budget process and the engagement of corporate projects, simplification of the automated passive cycle process;
- Smart Contracting Active Cycle: optimisation of processes, procedures and contract archiving;
- Paperless Operations: digitalisation of operational processes;
- Ticketing: process review and simplification;
- Calendar: revision and simplification of the activity scheduling process in the tools available to employees.

Actions are monitored monthly and brought to the attention of Top Management on a quarterly basis; the monitoring of actions is communicated to all employees through the Group's various communication tools (intranet videos, staff meetings, etc.).

In response to the necessity for improvement in the area of "people development", the "Growing in Nexi" program was launched in 2021. The program includes a series of training and development initiatives for the two-year period 2021-2022 addressed to the entire corporate population.

The 2021 People Survey was launched in November and the initial results confirm the high engagement rate (73.5%) and effectiveness of the actions taken after the 2020 survey: the area of simplicity improved (+1.8 points compared to 2020), the area of collaboration showed marked improvement (+ 2.5 points), as did that of people development (+5.8 points).

<sup>44</sup> The People Survey 2021 was conducted in November and the results are being analysed at the time of this Statement. The first results available in aggregate form are shown on the next page.

## Engagement Survey in Nets

The primary channel for collectively listening to employees is the Nets *Employee Engagement Survey*. Through the Survey launched in September, Nets assessed the overall level of engagement in the company and received suggestions and feedback on current issues, increasing its awareness of the employee experience and well-being.

The survey conducted in 2021 also included specific feedback for leaders.

Each leader has access to a dashboard with their team's results and is asked to discuss the results with their team, as well as to jointly set up actions to further strengthen involvement.

The overall results of the September survey showed a positive development in engagement with a two-point increase in the overall score to 70 out of 100, compared to the figure collected in February 2021. 82% of Nets employees responded to the survey.

The highest scores concern questions relating to: our surroundings, immediate leader, team collaboration and clarity of individual focus. The results were also significantly higher than the external benchmark on some of the specific issues related to our culture, particularly those related to empowering people, challenging the status quo and taking action.

Areas in which Nets scored low include customer mindset<sup>45</sup> and resources in teams<sup>46</sup>.

The employee experience is also monitored through life cycle surveys to receive feedback from staff entering or leaving the organisation and to gather input to improve internal processes.

## Health and Safety

In 2021, Nexi continued with health surveillance in response to Covid-19 and introduced free and confidential access to psychological support for all employees, organised with the support of professional psychologists. Nexi employees were consulted, through the involvement of their representatives (RLS), with meetings aimed at updating and sharing the actions taken to mitigate risks at company level.

The RLS from the Health and Safety service were involved in the inspections of all workplaces, also during the pandemic period, favouring a process of timely monitoring of the various situations concerning the workplaces, with consequent improvement actions to be verified and developed over time.

Activities are being developed to help create the conditions necessary to obtain ISO 45001 certification, including the provision of specific training courses for Health and Safety functions.

As part of the monitoring and control of compliance with health and safety regulations, greater attention was paid to verifying the technical and professional requirements of Nexi's suppliers in 2021, as well as the Interference Risk Assessment (DUVRI) which could potentially occur in the workplace.

<sup>45</sup> "Customer mindset" refers to the ability to integrate feedback received from customers to improve the offer provided

<sup>46</sup> "Resources in teams" means the presence of appropriate resources to do the job

To address health risks, Nexi adopts a dedicated assessment document on the spread of the SARS-COV-2 virus. The document mitigates the danger of contagion, the risk of spread and helps to identify all the prevention and protection measures to eliminate the risk of contagion in the workplace<sup>47</sup>.

Also during 2021, Nexi offered its employees free access to the flu vaccine for all companies in the perimeter.

**Nexi recorded two injuries in 2021, both of which occurred to employees on their private property while working in Smart Working mode.**

**However, there were no injuries for non-employees for the year 2021.**

## Health and Safety at Nets

Nets is an employer responsible for workplace health and safety and follows the national rules and regulations in force in the countries where the Company operates. Currently, Nets does not have a single management system for health, safety and environment (HSE); however, the elements covered by national regulations are based on collaboration and dialogue between employer and employee representatives, with a focus on creating a safe working environment. In 2021 Nets complied with national regulations and local agreements on HSE.

Nets initiated the following health, safety and environment activities in 2021:

- compulsory meetings for Working Environment Committees;
- compulsory health, safety and environment training;
- continuous dialogue on the pandemic emergency between the Crisis Management Team (CTM) and the National Committees;
- implementation of hybrid working and supporting employees with home office equipment;
- provision of flu vaccine, part of the Occupational Health Care Agreement and follow-up on the use of overtime and sick leave, as part of the obligations.

Nets has set up the Working Environment Committee in most countries; the committee's objective is to work for a totally healthy working environment within the company. All the committees participate in planning workplace safety and environment in the company and monitor its development. The composition of the committees varies according to national legislation but includes worker and employer representatives and the health professional of the country in question. It is compulsory to participate in training courses and obtain appropriate certificates in all countries.

The work of the committees in all geographical areas is documented and may be subject to controls by national authorities or others (e.g., National Labour Inspectorate or clients).

**Nets recorded one injury during the second half of 2021.**

<sup>47</sup> The methodology adopted for risk assessment focuses on the specific guidance provided by INAIL (Italian National Institute for Insurance against Accidents at Work).

<sup>48</sup> Norway, Sweden, Finland, Denmark, Poland, Germany, Switzerland, Croatia and Slovenia

## 3.5 SUPPLY CHAIN

### UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



### MATERIAL TOPIC RESPONSIBLE SUPPLY CHAIN MANAGEMENT

GRI 103-1

GRI 103-2

GRI 103-3

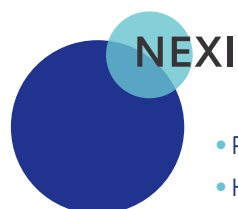
GRI 102-9

GRI 102-10

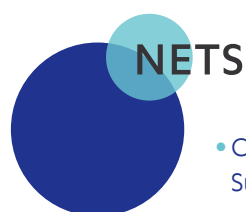
GRI 204-1

*The Nexi Group is committed to developing active control of its supply chain by adopting specific procedures to assess and improve sustainability, involving suppliers, collaborators and business partners in its initiatives.*

### INITIATIVES AND ACHIEVEMENTS IN 2021



- Requirement for all suppliers to read the Sustainability Policy
- Human Rights Statement for the respect of human rights in the supply chain
- First ESG risk self assessment on the supply chain
- Procurement Policy and activities of Expenditure Managers aimed at improving supply quality according to the principles of equity, cost-effectiveness, quality, innovation, continuity and ethics



- Continuing obligation for all suppliers to comply with the Supplier Code of Conduct
- Ongoing obligation to complete a Sustainability Self-Assessment for new suppliers or contract renewals



For the Nexi Group, responsible supply chain management is of strategic importance to ensure the high quality of products and services. In choosing suppliers, the Group adopts the utmost transparency and efficiency to ensure impartiality at every stage of the purchasing process. The Group intends to ensure equal conditions for all suppliers participating in the selection process, which is based on objective evaluations according to the principles of fairness, economy, quality, innovation, continuity and ethics in line with the provisions of the Group Purchasing Policy and in full respect of the Codes of Ethics or Supplier Codes of Conduct of all Group companies.

In order to follow up on what has already been defined in the Sustainability Policy in which the Group acknowledges its responsibility to respect human rights also with reference to its supply chain, a Human Rights Statements was defined<sup>49</sup> in 2021 which describes the implementation of this commitment in the process of selection, evaluation and mitigation of supplier risk in more detail.

All Nexi's suppliers involved in the selection process, which is governed by a specific procedure, must be qualified for inclusion in the supplier register<sup>50</sup>. The procedure is subject to checks by the Audit Function.

The identification of suppliers potentially exposed to risk is carried out on the basis of the information recorded during the qualification phase and refers to the country in which the supplier operates, the product category and the presence of specific activities that may have an environmental or social impact. Suppliers at risk are then subjected to an in-depth analysis, including the completion of a self-assessment questionnaire, with the aim of obtaining more information on their exposure to environmental, social and governance risks. To mitigate any possible risk, any use of subcontractors must be subject to explicit approval and verification by Nexi. Suppliers based outside Italy qualify by entering the signed contract and the privacy-by-design questionnaire into the portal<sup>51</sup>.

All existing supplies are monitored by Expenditure Managers who assess the quality of the service or product provided and compliance with contractual commitments (SLA). Following this assessment, the Supply Chain Management Function records the degree of satisfaction with the existing relationship. The evaluation process is carried out at least once a year and allows to identify possible improvement actions and to rethink the relationship with the supplier from a strategic point of view.

The Nexi Group's main suppliers include:

- processors for payment processing;
- suppliers of smart cards complying with the EMV (Europay Mastercard Visa) technical standard and related card personalisation services;
- Poynt, SmartPOS supplier for advanced terminals featuring an advanced and flexible Android-based operating system;
- traditional POS terminal providers (such as Ingenico Italy);
- ATM providers.

<sup>49</sup> The Nexi Group Human Rights Statement is publicly available at [www.nexigroup.com](http://www.nexigroup.com).

<sup>50</sup> Suppliers who provide goods or services to Nexi are required to qualify, with the exception of institutional suppliers, who cannot be replaced or whose order from Nexi is less than 30,000 euros per year. This limit does not apply to Mercury Payment Services suppliers.

<sup>51</sup> With the exception of suppliers with orders totalling less than 30,000 euros and institutional or non-substitutable suppliers.

Finally, the Nexi Group also depends on external service providers to connect its own platforms with those of third parties, including those of the Visa and Mastercard payment circuits. The outsourcer management process is regulated by the “Outsourcing of business functions” Policy, which defines a system of reference rules so that the supplier selection processes, and the control and mitigation of the risks associated with the activity carried out by the suppliers themselves are completed in full compliance with specific control and responsibility principles.

To date, there are no significant critical problems in the management of activities outsourced to these suppliers. For further details on risks related to supplier dependency, please refer to the Group’s Consolidated Financial Statements published at [www.nexigroup.com](http://www.nexigroup.com).

The management of potential supply chain risks is described in the Enterprise Risk Management heading of the Statement, to which reference should be made for details.

On 31 December 2021, the percentage of expenditure made by Nexi towards Italian suppliers is 91% of the total expenditure (-3% compared to 2020).

## Nets Supply Chain

Nets has a Supplier Code of Conduct which is based on the ten principles of the UN Global Compact and outlines Nets’ commitments to human and labour rights, environmental and ethical standards, including anti-corruption. The Supplier Code of Conduct applies to all suppliers providing goods or services. In order to assess suppliers’ compliance with the Code of Conduct, Nets carries out audits on an ongoing basis.

In 2021, Nets continued to develop the Supplier Sustainability Self-Assessment form for all new suppliers and existing contract renewals. The Supplier Sustainability Self-Assessment provides a preliminary screening of suppliers’ approach to sustainability management and is a reinforcing tool in the supplier due diligence process. This process is also strengthened by internal guidelines for the evaluation of suppliers’ Codes of Conduct and by constant dialogue with suppliers aimed at increasing their awareness of Nets’ requirements and engaging them in promoting responsible sourcing.

On 31 December 2021, the percentage of expenditure made by Nets towards local suppliers is 78.1% in the Nordic Countries, 83.4% in the DACH area, 97.7% in Poland and 76.4% in the CEE area.



## 3.6 ENVIRONMENTAL PROTECTION

### UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



#### MATERIAL TOPIC ENERGY TRANSITION AND CLIMATE CHANGE

GRI 103-1 GRI 103-2

GRI 103-3

#### MATERIAL TOPIC RESPONSIBLE CONSUMPTION

GRI 103-1 GRI 103-2

GRI 103-3 GRI 306-1

GRI 306-2

### INITIATIVES AND ACHIEVEMENTS IN 2021

#### NEXI GROUP

- Disclosure in accordance with the TCFD Recommendations
- Commitment to extend the emission reduction targets to the entire Group perimeter by 2022
- Commitment to eliminate net CO<sub>2</sub> emissions by 2040

#### NEXI

- Approval of GHG emission reduction targets, Scope 1, 2 and 3, from SBTi
- Achievement of the 'A-' Leadership Level rating in the CDP Climate Change questionnaire
- Introduction of a Mobility Manager with the aim of making home-work commutes more efficient and limiting commuting emissions
- 100% certified renewable energy for powering our offices and data centres of property

#### NETS

- Launch of the Nets Climate Action Service to make private payment card customers aware of their carbon footprint and promote offsetting of emissions produced by transactions
- Continued support for the UN Global Compact and subscription to the principles enshrined in the initiative

*Having a positive impact on the environment is a priority for the Nexi Group. This is why we are constantly working to reduce the Group's impact on the environment through careful management of our daily activities and IT infrastructure, involving our supply chain and business partners in achieving our medium- and long-term goals.*

## Combating climate change

As part of the Climate Strategy, the Nexi Group continued to work hard on several fronts in 2021. In particular:

- **accurate and more complete** quantification of its **impacts according to the GHG protocol standards**: in 2021, new Scope 3 categories were included for Nexi<sup>52</sup> and Scope 1, 2 and 3 indicators were calculated for Nets;
- definition of **targets to reduce direct and indirect CO<sub>2</sub> emissions in line with best practices**, to help limit global warming to 1.5°C above pre-industrial levels and in alignment with the Science Based Target (SBTi) initiative<sup>53</sup> for the Italian perimeter. The objectives defined and **approved by SBTi** concern:
  - the reduction of absolute greenhouse gas (GHG) emissions of Scope 1 and 2 in Italy by 42% by 2030, starting from the 2020 baseline;
  - a commitment that 78% of capital goods suppliers in Italy will join SBTi by 2025.

To achieve these objectives, Nexi will implement the following targeted actions on the target perimeter:

- switch from natural gas to alternative, low-carbon heating solutions in its offices;
- renegotiation of **electricity** supply contracts to power all of Nexi's offices, selecting the same single supplier as the previous year, which guarantees **100% energy from renewable sources covered by guarantees of origin**;
- renewal of the company fleet with the introduction of hybrid cars;
- direct involvement of key POS and ATM providers to align them with SBTi's target setting framework.

In 2022, the Group's commitment to limiting its environmental impacts will be reinforced by an in-depth review of the SBTi targets in order to include the impacts of the Nets acquisition in the emission reduction targets. The Group will also continue its efforts to align its disclosure with the TCFD recommendations and to implement structures and processes to mitigate, manage and govern the risks and opportunities related to climate change, extending processes already in place in Nexi to the Nets' perimeter companies.

Among the commitments and initiatives carried out in 2021 are worth mentioning:

- **Net-zero commitment for the Group** with the aim of achieving net-zero emissions **by 2040**, ten years ahead of 2050, which is the target set by the European Union in the European Green Deal in response to the Paris Agreement;
- **analysis of risks and opportunities arising from climate change** according to the recommendations of the *Task Force on Climate-related Financial Disclosures* - TCFD<sup>54</sup>; for 2021, the analysis is limited to Nexi, but an extension of the analysis has been planned for 2022 with the aim of mapping climate change-related risks and opportunities for Nets as well;
- **transparency** on governance, strategy and the risks and opportunities arising from climate change **through the gradual adoption of the TCFD recommendations and Nexi SpA's participation** for the second year running in the **CDP Climate Change questionnaire<sup>55</sup> with the score A-, which includes Nexi SpA in the Leadership Level**;
- obtaining **ISO 14001 environmental certification for Nexi Payments** and maintaining ISO 14001 certification for the data centre in Settimo, Milan;
- the launch in Nets of the **Nets Climate Action Service**, a **carbon offsetting solution** designed to provide **credit card holders** with climate-related information on their consumption, and to enable them and their issuers to proactively engage in combating the impacts of their personal consumption on climate change;
- **Nets' commitment**, as a signatory to the **UN Global Compact**, to implement the ten principles of the Global Compact, including the goal of reducing its impact on the environment<sup>56</sup>.

<sup>52</sup> Specifically, in addition to what Nexi already reported in 2020 and in line with its commitment to progressively improve the mapping of its impacts, in 2021, the Scope 3 categories generated by the following were measured: "Commuting", "Use of products sold", "End-of-life disposal of products sold", "Consumption of leased products". Total Scope 1, Scope 2 and Scope 3 emissions and Scope 3 single-category emissions are presented in the following pages and in the Section 5 "GRI Standards Indicators".

<sup>53</sup> SBTi is a collaborative initiative between CDP, the UN Global Compact, the World Resources Institute and WWF, in line with the Paris Conference climate agreements that aim to keep global warming within 1.5°C of pre-industrial levels. Upon writing this Statement, more than 2,000 companies and financial institutions are working with the Science Based Targets Initiative (SBTi) to reduce their emissions in line with climate science, of which nearly 1,200 have adopted targets aligned with the demands of science. For more information, see <https://sciencebasedtargets.org/>.

<sup>54</sup> The framework developed by the Financial Stability Board's G20 Task Force on Climate-Related Financial Disclosures (TCFD) helps companies more effectively measure, manage and report climate-related risks and opportunities. The European Commission's "Guidelines on reporting climate-related information" published in 2019 recognise the importance of TCFD in supporting European organisations in reporting climate-related information.

<sup>55</sup> The questionnaire is available at [www.cdp.net](http://www.cdp.net).

<sup>56</sup> Nets provides an annual *Communication on Progress Report* to the UN.

## Nexi Properties

In 2021, Nexi has initiated a number of activities aimed at reorganising its workspaces, with the guiding principle of ensuring a safe, comfortable and environmentally friendly workplace. In particular, the activities focused on:

- **energy savings** through plant modernisation, including the gradual introduction of LED technology for all lighting systems and partial revamping of air conditioning systems. Due to the emergency situation caused by the Covid-19 pandemic, the re-lamping project only affected the fourth floor of the Corso Sempione Headquarters building in 2021, and will be implemented in 2022;
- **reduction in paper consumption** by reducing the copy areas in the buildings of the Corso Sempione Headquarters, as part of the “paperless” initiative, and raising the awareness of all employees to reduce their use of paper as part of the project to reorganise and streamline all our paper archives;
- **Greater attention to proper waste sorting** by providing employees with more clearly identifiable and usable waste collection areas;
- **reducing the use of plastics** by introducing new water fountains in the new spaces on the fourth floor of the building in Corso Sempione in Milan. The project will be extended to all floors of the building during 2022.

In its energy impact efficiency activities, Nexi is supported by an external Energy Management service that aims to:

- monitor consumption and identify actions, interventions, procedures and everything necessary to promote a rational use of energy;
- draft energy statements;
- support Nexi in providing public authorities with the energy data required by the relevant laws.

During 2021, Nexi expanded the scope of the Energy Manager’s activities in order to integrate energy saving policies with environmental and corporate policies in an increasingly consistent, efficient manner and in line with industry best practices.

During the reporting period, Nexi completed a number of projects launched in previous years to reduce energy consumption and the resulting greenhouse gas (GHG) emissions in the buildings of its Milan headquarters, amounting to approximately 41,540 m<sup>2</sup>, or about 58% of Nexi’s office space. In particular, the following actions have been completed:

- **revamping of the air-conditioning system of the Corso Sempione 55 and part of Corso Sempione 57 headquarters buildings** with the replacement of the thermo-cooling plant, implementing new-generation heat pump technology using geothermal wells that optimise yield and reduce energy consumption, resulting in the disposal of gas boilers and a reduction in CO<sub>2</sub> emissions;
- **renovation of all the headquarters’ WCs**, a project that included the installation of photocell taps to reduce water consumption, and the installation of LED lamps;



A number of one-off measures to modernise and increase the efficiency of the systems in the various buildings were also completed in 2021, in particular:

- **partial re-lamping of our sites** (in addition to the WCs and the fourth floor of our headquarters, the technical rooms in Cividale del Friuli and the emergency lamps in Florence were re-lamped);
- **decommissioning of redundant and no longer needed uninterruptible power systems;**
- **efficiency improvement of the air conditioning system** in the Florence data processing centre with partial revamping;
- revamping of the air conditioning system serving an office portion of the Florence building.

With regard to the peripheral offices, Nexi also continued with the process of making space more efficient by merging the two Bologna offices, in particular by closing the Granarolo dell'Emilia office in December. The office consolidation process will continue in 2022, involving buildings in Rome. In addition, a consumption efficiency system will be tested at the Florence headquarters in 2022 by installing sensors and actuators that adjust the air conditioning system according to external weather conditions.

## Nets Properties

**All the Nets buildings are rented, totalling more than 50 in different European countries.** As a tenant, Nets is rarely involved in building renovations, which are usually carried out by the owners of the buildings. An exception to this, however, is the Oslo offices, where the specific lease agreement stipulates that Nets shall bear the necessary investments for the maintenance of the building and in accordance with Norwegian requirements and standards for building operations.

## Employee mobility

With the aim of mapping and making the use of consumption linked to home-work commutes efficient, and in line with the commitment made in 2020, **Nexi introduced the role of Mobility Manager in 2021.** The Mobility Manager is responsible for mapping the travel needs of all employees. This was done by launching a survey in 2021 in order to measure the environmental impact of travel and define appropriate reduction actions. The identification of strategic actions to reduce impacts and related areas of intervention will be carried out in 2022. The installation of charging columns for electric and hybrid cars in the Corso Sempione headquarters was also completed in 2021 and will become operational in 2022.

## Responsible waste management

The recovery and recycling of materials used in the company's activities are basic principles of Nexi's approach to waste management, which is governed by an organisational procedure that assigns roles and responsibilities for the management of all types of waste, either through direct management or through an external supplier, in order to ensure full compliance with the relevant regulatory provisions in force.

Nexi's workplace waste is collected in special containers for separate collection, in accordance with the regulations in force regarding disposal and carried out by a specialised company responsible for environmental sanitation activities. This also includes non-hazardous waste produced in the payment card personalisation plant. Special waste is disposed of through specialised companies, selected and controlled by the Real Estate and Facility Management Function in conjunction with the Supply Chain Management area, with prior classification of the waste and control of the authorisations and forms provided each time. During 2021, Nexi carried out a census and reorganisation of the paper archives in all its offices. In addition, renovations carried out in the building in Corso Sempione 55, Milan, resulted in the removal and disposal of furniture no longer in use. Therefore, despite there being no significant changes in the total amount of waste, the incidence of the different types of waste on the total has changed: against an increase in the production of waste in offices, there has been a total reduction in waste relating to the Data Centers owned by Nexi, equal to zero in 2021.

## Disposal of POS and ATM products

Also in 2021, the management of POS terminals provided as rentals that reach the end of their life cycle was governed by specific agreements with the suppliers of the POSs themselves, to which obsolete terminals are resold in place of the new POS terminals according to a buyback scheme.

In addition to the POS rental service model, Nexi also offers a POS sales service model through resellers or directly. Nexi also takes care of the collection of obsolete POSs in this service, in accordance with industry regulations and environmental best practices. Registration activities at the National Register of Environmental Managers are ongoing in order to offer this service, as required by current regulations.

For ATM equipment<sup>57</sup>, as well as its components and accessories, an analysis is carried out to determine their state and degree of obsolescence before they are decommissioned. These analyses are useful to determine whether the equipment can be reconditioned and then reassigned to the Partner Bank's branch, or if considered obsolete, disposed of by certified and qualified suppliers in accordance with the relevant regulations.

<sup>57</sup> In addition to ATM terminals, this category also includes so-called "Base B" equipment used mainly for the payment of healthcare fees and TCRs (Teller Cash Recyclers)

## Responsible waste management in Nets

In cooperation with the owners of the leased offices, the Nets Facility Management Function is responsible for the management of waste, which is collected, recycled or disposed of in accordance with national regulations in the countries where Nets operates.

Nets is also responsible for the management of waste produced in the payment card personalisation plant and POS waste. Nets' objective is to ensure responsible end-of-life management of terminals together with external partners, including both hazardous and non-hazardous waste management, in accordance with national guidelines in the countries where the waste is treated.

At the end of their life cycle, all rented terminals are returned to Nets or partners for registration and subsequent destruction (according to the PCI DSS standard for information security). The terminals are sent to specialised suppliers to ensure that the disposal and recycling of the terminals is carried out according to specific national regulations. The same disposal and recycling process is also used for terminal equipment that is out of use, which, however, is not recorded when it is returned.

## The best solutions for Data Centres

During 2021, in line with Nexi's IT strategy of insourcing and consolidating data centres, the total dismantling of two of the three data centres that provided services for Mercury Payments Services (located in Milan and Sesto San Giovanni) was completed, through the insourcing of IT equipment and application workloads; and the sale of the two data centres in Vicenza and Pont St. Martin that provided the services of the acquired companies Basilichi and Consorzio Triveneto was finalised.

Despite the increase in services offered by Nexi, the renewal of IT infrastructures with new-generation equipment has led to a reduction in the physical space occupied (-64% compared to 2020) and an increase in the services provided at the same size, with a consequent improvement in the energy consumption needed to cool the equipment (-20% compared to 2020).

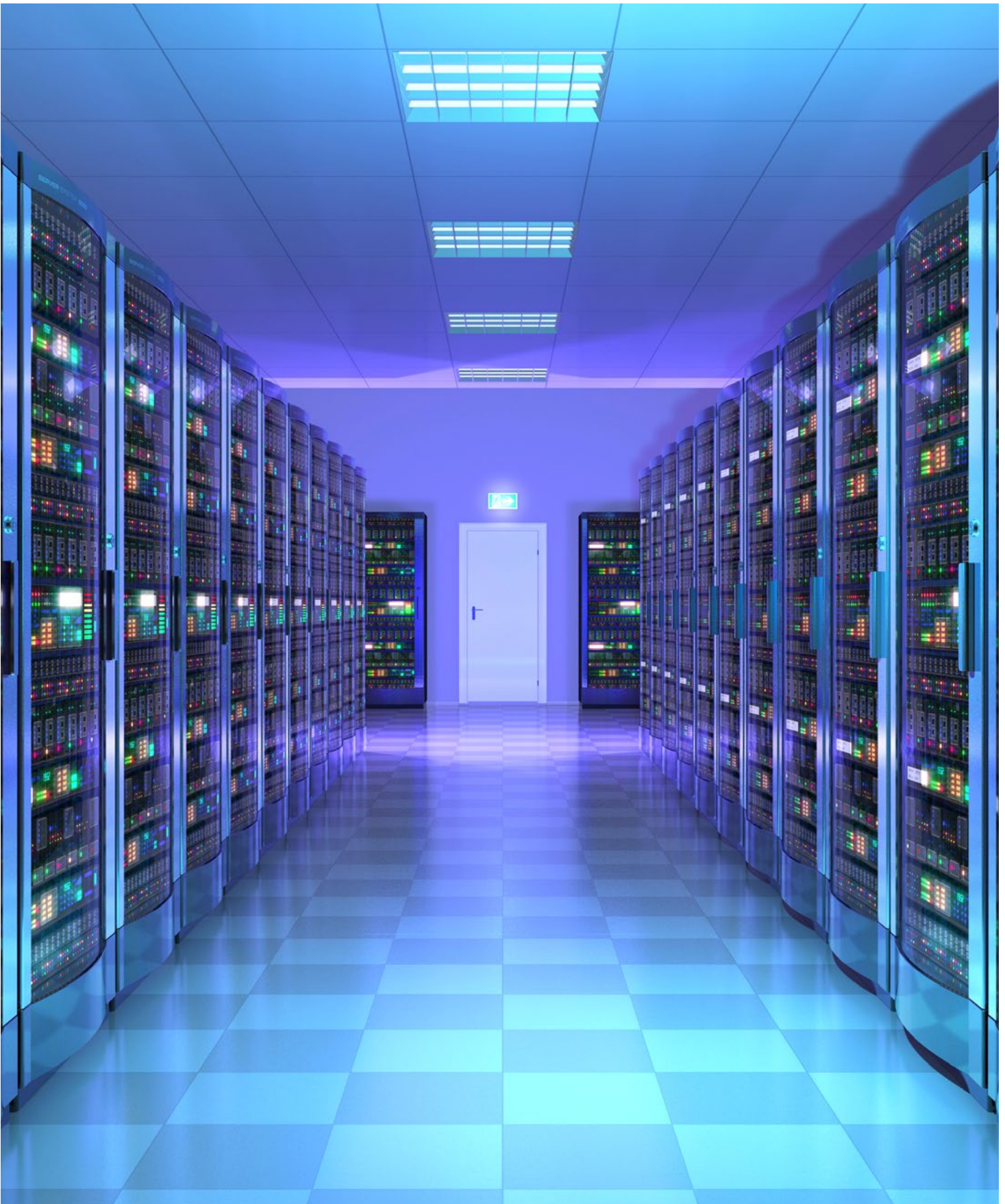
**During 2021, the use of these measures allowed us to reduce the PUE (Power Usage Effectiveness) of the Pero Data Centre from 1.58 to 1.56 and to maintain that of Settimo DC at 1.55.** Both sites are also certified ISO 9001, Settimo also ISO 14001

Throughout 2022, Nexi will continue to improve and optimise its IT resources, also in view of the new companies in its perimeter, and also using cloud technology in order to simultaneously offer personalised products to customers and with a lower environmental impact.

## Nets Data Centres

In recent years, Nets has also launched projects to improve the energy and space efficiency of more than thirty data centres in various countries, including Germany, Switzerland, Poland, Croatia, Finland, Norway and Denmark. Following the completion of the “TierIII” project concluded in 2020 with the aim of making the data centres in Slovenia and Croatia more efficient and migrating services to a more reliable and efficient environment, projects in Norway continued in 2021, including the “Exodus” data centre migration project following the closure of the data centre in Rommen, Norway used for the Norwegian branch of Nets Denmark’s operations, and the transfer of all services to the data centre in Fetsund, Norway, built in 2018 with a TierIII efficiency certificate. Work on the complete migration of the data centres is expected to be completed in early 2022. The new data centre in Fetsund has a PUE of 1.40 and has resulted in a space reduction of 20-25%.

Nets has also embarked on a journey to consolidate solutions and platforms and manage systems in the cloud, enabling a more universal and scalable configuration. During 2020, the first year of the project’s implementation, an overhaul of 80% of Nets’ 600 or so applications was carried out. By the end of 2021, around 60% of Nets’ technology landscape was undergoing modernisation and around 20% of our external services are now on the cloud.





# EUROPEAN TAXONOMY



# 4

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# EUROPEAN TAXONOMY

In June 2020, the European Council and the European Parliament adopted Regulation (EU) 2020/852 (so-called Taxonomy Regulation), aimed at defining a framework for redirecting capital flows towards sustainable investments. The Regulation aims to gradually develop a taxonomy to be incorporated into European legislation, which can be the basis for classifying “environmentally sustainable activities” in the various sectors of activity.

As of 2021, as part of the scope of application of the Non-financial Reporting Directive (NFRD), the Nexi Group is subject to disclosure obligations related to reporting its economic activities falling within those considered environmentally sustainable under the classification of the Taxonomy, in accordance with the provisions of Taxonomy Regulation and Delegated Regulation (EU) 2021/2178 (Disclosure Delegated Regulation) on the content of information and how it is presented.

The objective of the EU Taxonomy is to promote comparability for companies and investors, and to help market operators establish a common language for identifying sustainable activities and thus mitigate the risk of “greenwashing”. To qualify as environmentally sustainable, an economic activity must substantially contribute to one or more of the six environmental objectives set out in article 9 of the Taxonomy Regulation: climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; and protection and restoration of biodiversity and ecosystems. Delegated Regulation (EU) 2021/2139 was adopted on 4 June 2021, specifying the technical screening criteria that specific economic activities must meet for the first two environmental, climate-related objectives.

A delegated act concerning the other four environmental objectives has not yet been adopted. Therefore, for the reference year 2021, the Nexi Group’s EU taxonomy disclosure only covers eligibility for the first two objectives, namely climate change mitigation and climate change adaptation, giving an indication of the percentage of eligible economic activities with reference to turnover, CapEx and OpEx.

## 4.1 Taxonomy - eligibility

An economic activity is defined as eligible for the EU Taxonomy when it is reported among those for which technical screening criteria are available, regardless of whether that economic activity meets one or all of the technical screening criteria included in the Delegated Acts.

Therefore, eligibility for the Taxonomy is expressed with three KPIs that are calculated as the share of turnover, CapEx and OpEx consistent with the provisions of the Delegated Acts, related to the total turnover of the Group, CapEx and OpEx. Descriptions of the three KPIs are given below.

## 4.2 Alignment with Taxonomy - Evaluation of technical screening criteria

Alignment with the EU Taxonomy is expressed by the proportion of economic activities in terms of total turnover, CapEx and OpEx that successfully pass all the following steps:

1. test to assess whether the activity meets the screening criteria for substantial contribution to at least one of the six environmental objectives of the Regulation;
2. test to assess whether the activity meets the criteria of Do No Significant Harm (DNSH), i.e., whether the activity generates negative impacts on the other environmental objectives of the Regulation;
3. test to assess whether the activity meets the minimum safeguard criteria (MS), i.e., whether the activity covers the social requirements predefined by the Regulation.

## 4.3 Approach and reporting process

Nexi has carried out an assessment of its activities and business model, analysing the way in which revenue is achieved, as well as the expenses related to the acquisition, maintenance and improvement of its assets and the current structure of its operating expenses, in order to understand the level of sustainability integration as defined by the EU Taxonomy. The assessment led to the quantification of the economic activities according to the various KPIs as indicated below.

## Eligible economic activities - Turnover

The Nexi Group is one of the main players operating in Europe which offers digital payment solutions to Partner Banks, companies, citizens and Public Administration\*. Such solutions are not explicitly included in the EU Taxonomy scope, which currently focuses mainly on economic activities with high carbon impacts such as manufacturing, electricity production, construction, and transport. The Nexi Group has therefore assessed its business model with respect to the economic activity “8.1. Data processing, hosting and related activities”, as relevant to the first two environmental objectives - climate change mitigation and adaptation. However, the legal entities of the Nexi Group do not generate revenues directly attributable to the aforementioned economic activity, as it represents a single component of a complete range of services, thus making it inaccurate and potentially misleading to evaluate the economic activity as a source of revenue in its own right. In conclusion, in 2021 the Nexi Group does not have any turnover share eligible under the EU Taxonomy.

\* For further details on Nexi Group's business model, please refer to Paragraph 2.2 “The business model” of this Statement.

## Eligible economic activities - CapEx

The CapEx KPI refers to the increase in tangible and intangible assets during 2021 before depreciation, amortisation, write-downs and revaluations, including those resulting from impairment or the application of the fair value method. The KPI covers costs recognised for property, plants and equipment (IAS 16), intangible assets (IAS 38) and investment property (IAS 40).

For the purposes of this disclosure, the Nexi Group has taken into account the increases in the Group's tangible and intangible assets disclosed in the Group Consolidated Financial Report, €281.7M.

The share of eligible CapEx under the EU Taxonomy is represented by the part of capital expenditure, as defined above, that relates to activities, processes or the purchase of assets associated with the following economic activities:



### ACTIVITY 5.5

**Collection and transport of non-hazardous waste:** Nexi incurred capital expenditure on equipment to support the "paperless" project.



### ACTIVITY 6.5

**Transport by motorbikes, passenger cars and light commercial vehicles:** Nexi incurred capitalised car rental expenses (including VAT) as fringe benefits for executives and other key figures.



### ACTIVITY 7.2

**Renovation of existing buildings:** During the year, the Nexi Group renovated its headquarters buildings in Milan, Italy and Norway to accommodate the "New working methods" project.



### ACTIVITY 7.3

**Installation, maintenance and repair of equipment for energy efficiency:** Nexi incurred maintenance and refurbishment costs related to new lighting equipment at its Milan headquarters.



### ACTIVITY 7.4

**Installation, maintenance and repair of charging stations for electric vehicles in buildings (and car parks attached to buildings):** Nexi incurred capitalised costs related to the installation of charging stations for its electric/hybrid car fleet.



### ACTIVITY 7.5

**Installation of building efficiency measurement devices:** the Nexi Group incurred capitalised costs related to efficiency performance measurement devices, mostly related to buildings in Norway.



### ACTIVITY 7.7

**Purchase and ownership of buildings:** In 2021 Nexi invested in the purchase of part of the real estate of the Milan office. In particular, Nexi purchased a property that had previously been rented. This new building unit forms a single block with the premises already owned by Nexi.



### ACTIVITY 8.1

**Data processing, hosting and related activities:** Nexi incurred expenses during the year related to project costs for full processing platforms (issuance, acquisition, payments) and purchases of hardware and data centre implementations.

In accordance with the objectives of reducing direct and indirect CO<sub>2</sub> emissions for Italy, approved by SBTi, the ambitious commitment to achieve net zero emissions for the Group by 2040 and other initiatives to combat climate change, the Nexi Group is working on various fronts with targeted initiatives as detailed in paragraph 3.6 "Environmental protection".

The following table shows the values of CapEx relating to the activities of the Nexi Group in 2021, including the values of Nets, which was acquired on 1 July 2021, as presented in the Consolidated Financial Statements.

(Values in thousands of Euros)

ECONOMIC ACTIVITIES	31 December 2021	
	CapEx values	CapEx %
<b>A. ECONOMIC ACTIVITIES ELIGIBLE UNDER THE EU TAXONOMY</b>		
 5.5 - Collection and transport of non-hazardous waste	74	0.03 %
 6.5 - Transportation by motorbikes, passenger cars and light commercial vehicles	942	0.33 %
 7.2 - Renovation of existing buildings	2,524	0.90 %
 7.3 - Installation, maintenance and repair of equipment for energy efficiency	1,002	0.36 %
 7.4 - Installation, maintenance and repair of charging stations for electric vehicles in buildings (and car parks attached to buildings)	63	0.02 %
 7.5 - Installation of devices for measuring the efficiency of buildings	73	0.03 %
 7.7 - Purchase and ownership of buildings	40,000	14.20 %
 8.1 Data processing, hosting and related activities	18,721	6.64 %
	<b>63,399</b>	<b>22.51 %</b>
<b>B. ECONOMIC ACTIVITIES NOT ELIGIBLE UNDER THE EU TAXONOMY</b>		
	<b>218,266</b>	<b>77.49 %</b>
<b>TOTAL CAPEX (A+B)</b>	<b>281,665</b>	<b>100.00 %</b>

## Eligible economic activities - OpEx

The OpEx KPI refers to costs related to data centre management and other ICT management operations, configuration, repair and management of POS and ATM terminals, car rental and maintenance, as well as real estate and other facility management expenses. As per the income statement, all operating expenses considered fall under the heading "Other administrative expenses".

The share of OpEx eligible for the EU Taxonomy is represented by the part of operational expenditure, as defined above, associated with the economic activities listed below:



### ACTIVITY 5.5

**Collection and transport of non-hazardous waste:** the Nexi Group incurred non-capitalised non-hazardous waste management costs (mainly paper and printer toner, in addition to ordinary waste management).



### ACTIVITY 6.5

**Transport by motorbikes, passenger cars and light commercial vehicles:** Nexi incurred car rental costs (including VAT) as fringe benefits for managers and other key figures.



### ACTIVITY 6.6

**Road freight services:** the Nexi Group incurred transport costs for the distribution of terminals.



### ACTIVITY 7.2

**Renovation of existing buildings:** the Nexi Group incurred renovation costs for Nets Norway.



### ACTIVITY 7.3

**Installation, maintenance and repair of equipment for energy efficiency:** Nexi bore the costs of routine maintenance of its premises, mostly relating to lighting infrastructure and related equipment.



### ACTIVITY 7.5

**Installation of devices for measuring the efficiency of buildings:** The Nexi Group incurred non-capitalised costs related to energy management services for buildings and data centres.



### ACTIVITY 7.7

**Purchase and ownership of buildings:** This includes the portion of OpEx related to the ordinary maintenance costs of Nexi's buildings.



### ACTIVITY 8.1

**Data processing, hosting and related activities:** OpEx's share of the operating expenses related to processing the accounting flows received and sent to the National and International Circuits, with the related accounting settlement, terminal management including all the maintenance activities necessary to ensure the efficiency of the equipment for the electronic acceptance of payment cards (POS equipment and EFT SERVER equipment installed in large-scale retail trade and hotels), Nets data centre activities outsourced to third-party suppliers and other expenses.

The Nexi Group's efforts to improve and make its energy consumption more efficient and reduce its environmental impact could generate higher OpEx shares in the coming years.

The following table shows the OpEx values relating to the Nexi Group's activities in 2021, including the values of Nets, which was acquired on 1 July 2021, as presented in the Consolidated Financial Statements

(Values in thousands of Euros)

ECONOMIC ACTIVITIES		31 December 2021	
		CapEx values	CapEx %
<b>A. ECONOMIC ACTIVITIES ELIGIBLE UNDER THE EU TAXONOMY</b>			
	5.5 - Collection and transport of non-hazardous waste	78	0.04 %
	6.5 - Transportation by motorbikes, passenger cars and light commercial vehicles	80	0.04 %
	6.6 - Road freight services	926	0.44 %
	7.2 - Renovation of existing buildings	85	0.04 %
	7.3 - Installation, maintenance and repair of equipment for energy efficiency	195	0.09 %
	7.5 - Installation of devices for measuring the efficiency of buildings	62	0.03 %
	7.7 - Purchase and ownership of buildings	936	0.44 %
	8.1 - Data processing, hosting and related activities	129,682	61.13 %
		<b>132,044</b>	<b>62.25 %</b>
<b>B. ECONOMIC ACTIVITIES NOT ELIGIBLE UNDER THE EU TAXONOMY</b>		<b>80,092</b>	<b>37.75 %</b>
<b>TOTAL CAPEX (A+B)</b>		<b>212,136</b>	<b>100.00 %</b>





# 5

GRI STANDARDS INDICATORS

# GRI STANDARDS INDICATORS

GRI 102-55

## THE GROUP, STAKEHOLDER ENGAGEMENT AND THE MATERIALITY MATRIX

GRI 102-1 **“Name of the organisation”**  
Nexi SpA, Parent Company, Italy

GRI 102-3 **“Location of headquarters”**  
Milan, Corso Sempione 55 and 57, Italy

GRI 102-4 **GRI 102-4 “Location of activities”**  
**Countries in which the Group carries out significant activities:**

- Italy
- Denmark
- Austria
- Croatia
- Estonia
- Finland
- Germany
- Latvia
- Lithuania
- Norway
- Poland
- Sweden
- Switzerland
- United Kingdom
- Slovenia

## INSTITUTIONAL RESPONSIBILITY, ETHICS AND INTEGRITY



### COMPOSITION OF THE HIGHEST GOVERNANCE BODY AND ITS COMMITTEES

Composition of the BoD And Internal Board Committees of Nexi SpA		Strategic Committee <sup>(2)</sup>	Control and Risk and Sustainability Committee	Remuneration and Appointments Committee <sup>(3)</sup>	Related Party Transactions Committee	Executive director	Independent director
	Role in the BoD <sup>(1)</sup>						
Michaela Castelli	Chairperson	Member	Member	Member			X
Giuseppe Capponcelli	Director						
Paolo Bertoluzzo	Chief Executive Officer	Chairperson				X	
Luca Bassi	Director	Member		Member			
Francesco Casiraghi	Director		Member	Member			
Elisa Corghi	Director		Chairperson	Chairperson	Chairperson		X
Simone Cucchetti	Director						
Federico Ghizzoni	Director						
Maurizio Mussi	Director						
Jeffrey David Paduch	Director	Member					
Antonio Patuelli	Director				Member		X
Marinella Soldi	Director		Member	Member	Member		X
Luisa Torchia	Director						X
Bo Nilsson	Director	Member					
Stefan Goetz	Director	Member					

(1) Two new directors joined the Board of Nexi SpA in 2021, Bo Nilsson and Stefan Goetz, increasing the number of Directors from 13 to 15.

(2) In 2021, two new members joined the Strategic Committee, Bo Nilsson and Stefan Goetz, and the Strategic Committee members Francesco Casiraghi, Giuseppe Capponcelli and Simone Cucchetti left office.

(3) The Remuneration and Appointments Committee and the Control and Risk and Sustainability Committee underwent changes in their composition during the 2021 financial year. Until 11 November 2021, these Committees were composed of a majority of independent members (2/3); however, as of that date, the non-executive and non-independent directors Luca Bassi and Francesco Casiraghi ceased to be members of these Committees. Consequently, they were succeeded in both cases by the Chairperson.



## COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES

Nexi <sup>(1)</sup>																		
Employees trained on anti-corruption procedures by professional category	2021							2020						2019				
	Executives		Middle managers		Remaining employees			Executives		Middle managers		Remaining employees		Executives		Middle managers		Remaining employees
	No.; %	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]
Italy	57	89	671	97	1,118	98	35	37	489	70	864	72	28	29.5	327	51.3	740	61.9

Nexi Group <sup>(1)(2)(3)</sup>																		
2021																		
No.; %	Executives				Middle managers				Remaining employees									
	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]
Italy	57	89	671	97	35	-	489	70	864	72	28	29.5	327	51.3	740	61.9		
Nordic Countries	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DACH	5	-	-	-	26	-	-	-	187	-	-	-	-	-	-	-	-	-
Poland	-	-	-	-	2	-	-	-	7	-	-	-	-	-	-	-	-	-
CEE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>71</b>		<b>699</b>		<b>1</b>		<b>1,347</b>											

(1) The total employees per category used to calculate the percentages included in the tables of "GRI R" for Nexi is retrieved from the Register, while for GRI indicators 401-1, 404-1, 404-3, 405-1 and 405-2, the totals are calculated considering the time the employee held the specific role (specific role held for 50% or more of the time during the year).

(2) Nexi launched the course on anti-bribery and anti-corruption in December 2020. Employees completed the course before the reporting period of the Statement and are therefore not included in the table above (the course was completed by 1,928 employees before the second half of 2021).

(3) The geographical breakdown given in the table has changed from the geographical breakdown given in the 2020 Statement. The approach adopted in 2021 reflects the significant changes in the geographical areas in which the Group operates following the merger between Nexi and Nets according to the Methodological Note.

Nexi																		
Employees to whom anti-corruption policies and procedures have been communicated	2021						2020						2019					
	Executives		Middle managers		Remaining employees		Executives		Middle managers		Remaining employees		Executives		Middle managers		Remaining employees	
	No.;	%	No.;	%	No.;	%	No.;	%	No.;	%	No.;	%	No.;	%	No.;	%	No.;	%
Italy	52	81.3	489	70.1	792	69.3	25	26.3	343	49.1	563	47	28	29.5	327	51.3	740	61.9

Nexi Group <sup>(1)</sup>																		
2021																		
No.; %	Executives				Middle managers				Remaining employees									
	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]
Italy	52	81.3	489	70.1	792	69.3	25	26.3	343	49.1	563	47	28	29.5	327	51.3	740	61.9
Nordic Countries	1	-	-	-	9	-	-	-	0	-	-	-	-	-	-	-	-	-
DACH	7	-	-	-	38	-	-	-	264	-	-	-	-	-	-	-	-	-
Poland	-	-	-	-	2	-	-	-	7	-	-	-	-	-	-	-	-	-
CEE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>60</b>		<b>538</b>		<b>1,063</b>													

(1) The geographical breakdown given in the table has changed from the geographical breakdown given in the 2020 Statement. The approach adopted in 2021 reflects the significant changes in the geographical areas in which the Group operates following the merger between Nexi and Nets according to the Methodological Note.

## GRI 205-3

## INCIDENTS OF CORRUPTION DETECTED AND ACTION TAKEN

Incidents of corruption	Nexi Group		Nexi		
No.	2021	2021	2020	2019	
<b>Total</b>	-	-	-	-	-

## GRI 206-1

## LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOUR, ANTITRUST AND MONOPOLY PRACTICES

Ongoing or concluded legal actions	Nexi Group		Nexi		
No.	2021	2021	2020	2019	
Legal actions accepted	-	-	-	-	-
Unaccepted legal actions	-	-	-	-	-
<b>Total</b>	-	-	-	-	-

## GRI 405-1

## DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

Composition of the Board and Internal Board Committees by gender and age group	Nexi								
	2021								
	No.; %	Women (no.)	Women (%)	Men (no.)	Men (%)	Age 30-50 (no.)	Age 30-50 (%)	Age >50 (no.)	Age >50 (%)
Board of Directors		4	26.7	11	73.3	5	33.3	10	66.7
Strategic Committee		1	11.1	8	88.9	3	33.3	6	66.7
Control and Risk and Sustainability Committee		3	100.0	-	-	1	33.3	2	66.7
Remuneration and Appointments Committee		3	100.0	-	-	1	33.3	2	66.7
Related Party Transactions Committee		2	66.7	1	33.3	1	33.3	2	66.7

Composition of the Board and Internal Board Committees by gender and age group	Nexi								
	2020								
	No.; %	Women (no.)	Women (%)	Men (no.)	Men (%)	Age 30-50 (no.)	Age 30-50 (%)	Age >50 (no.)	Age >50 (%)
Board of Directors		4	31.0	9	69.0	7	53.8	6	66.7
Strategic Committee		1	14.0	6	86.0	5	71.4	2	66.7
Control and Risk and Sustainability Committee		2	67.0	1	33.0	2	66.7	1	66.7
Remuneration and Appointments Committee		2	67.0	1	33.0	2	66.7	1	66.7
Related Party Transactions Committee		2	67.0	1	33.0	1	33.3	2	66.7

Composition of the Board and Internal Board Committees by gender and age group	Nexi								
	2019								
	No.; %	Women (no.)	Women (%)	Men (no.)	Men (%)	Age 30-50 (no.)	Age 30-50 (%)	Age >50 (no.)	Age >50 (%)
Board of Directors		4	30.8	9	69.2	7	53.8	6	46.2
Strategic Committee		1	14.3	6	85.7	5	71.4	2	28.6
Control and Risk and Sustainability Committee		2	66.7	1	33.3	2	66.7	1	33.3
Remuneration and Appointments Committee		2	66.7	1	33.3	1	66.7	2	66.7
Related Party Transactions Committee		2	66.7	1	33.3	0	33.3	3	100.0



Employees by professional category and gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Wom-en	Total	Men	Wom-en	Total
Executives	216	64	280	82	15	97	76	19	95	76	19	95
Middle managers	735	414	1,149	468	277	745	451	247	698	416	222	638
Remaining employees	2,774	2,217	4,991	528	668	1,196	526	671	1,197	541	655	1,196
<b>Total</b>	<b>3,725</b>	<b>2,695</b>	<b>6,420</b>	<b>1,078</b>	<b>960</b>	<b>2,038</b>	<b>1,053</b>	<b>937</b>	<b>1,990</b>	<b>1,033</b>	<b>896</b>	<b>1,929</b>

Employees by professional category and age	Nexi Group <sup>(1)</sup>								Nexi							
	2021				2021				2020				2019			
No.	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Executives	1	171	107	279	-	50	47	97	-	59	36	95	-	58	37	95
Middle managers	28	746	350	1,124	6	456	283	745	7	448	243	698	11	421	206	638
Remaining employees	637	3,081	1,041	4,759	36	758	402	1,196	29	834	334	1,197	37	894	265	1,196
<b>Total</b>	<b>666</b>	<b>3,998</b>	<b>1,498</b>	<b>6,162</b>	<b>42</b>	<b>1,264</b>	<b>732</b>	<b>2,038</b>	<b>36</b>	<b>1,341</b>	<b>613</b>	<b>1,990</b>	<b>48</b>	<b>1,373</b>	<b>508</b>	<b>1,929</b>

(1) The age composition of Nets employees does not include 258 employees of the company Polskie ePłatności, as this figure was not available at the date of this Statement.

Average age of employees by gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Wom-en	Total	Men	Wom-en	Total
Average age of employees	42.7	42.0	42.3	48.1	46.9	47.5	45.2	45.7	45.5	45.4	46.5	46.0

Employees belonging to protected categories by gender	Nexi <sup>(1)</sup>								
	2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees with disabilities	41	47	88	39	38	77	38	37	75
Other types of employees	1	4	5	2	7	9	2	7	9
<b>classified as protected categories</b>	<b>42</b>	<b>51</b>	<b>93</b>	<b>41</b>	<b>45</b>	<b>86</b>	<b>40</b>	<b>44</b>	<b>84</b>

(1) The indicator does not include data from Nets as information on disability or membership of protected categories cannot be collected in accordance with the regulations of the countries in which Nets operates.

## GRI 417-3

### INCIDENTS OF NON-COMPLIANCE CONCERNING MARKETING COMMUNICATIONS

Incidents of non-compliance (e.g., transparency, marketing communication)	Nexi Group			Nexi		
	2021		2021	2020		2019
Incidents of non-compliance with regulations leading to a fine or penalty	-	-	-	-	-	-
Incidents of non-compliance with regulations leading to a warning	-	-	-	-	-	-
Incidents of notice of non-compliance with self-regulatory codes	-	-	-	-	-	-



## GRI 418-1

## SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA

Complaints	Nexi Group		Nexi	
no.	2021	2021	2020	2019
Accepted complaints	368	363	177	129
Unaccepted complaints	-	-	-	-
<b>Total</b>	<b>368</b>	<b>363</b>	<b>177</b>	<b>129</b>
Requests received from natural persons	346	346	155	-
Requests received from non-natural persons	22	17	17	-
- of which referred by the Privacy Authority	5	-	2	-

Complaints	Nexi Group		Nexi	
no.	2021	2021	2020	2019
Accepted complaints	100.0	100.0	100.0	100.0
Unaccepted complaints	-	-	-	-

## GRI 419-1

## NON-COMPLIANCE WITH LAWS AND REGULATIONS IN THE SOCIAL AND ECONOMIC AREA

Incidents of non-compliance	Nexi Group <sup>(1)</sup>		Nexi	
no.	2021	2021	2020	2019
Total	1	-	-	-
Monetary value (euros)	400	-	-	-

(1) The incident of non-compliance was detected in Nets CEE d.o.o. Croatia. Following that case, related to the collection of personal sensitive data, the company paid a penalty equal to the monetary value shown in the GRI 419-1 table (400 euros).  
Regarding the lawsuits brought by Nexi employees, in 2021, 3 individual disputes and 3 positions within a collective dispute were closed with conciliation. In addition, 9 individual disputes were closed with a sentence.

## Responsibility to our People

GRI 102-8

### INFORMATION ON EMPLOYEES AND OTHER WORKERS

Total workforce by gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees	3,725	2,695	6,420	1,078	960	2,038	1,053	937	1,990	1,033	896	1,929
Other col-labora-tors <sup>(1)</sup>	24	12	36	24	12	36	25	25	50	28	20	48
- of which internships	15	7	22	15	7	22	17	17	34	6	4	10
- of which temporary	5	4	9	5	4	9	4	6	10	17	16	33
- of which collaboration contracts	4	1	5	4	1	5	4	2	6	5	-	5
<b>Total</b>	<b>3,749</b>	<b>2,707</b>	<b>6,456</b>	<b>1,102</b>	<b>972</b>	<b>2,074</b>	<b>1,078</b>	<b>962</b>	<b>2,040</b>	<b>1,061</b>	<b>916</b>	<b>1,977</b>

(1) The category "Other employees" does not constitute a significant share of the Nets' workforce, for this reason data related to this category are not included in the indicator.

Employees by type of employment	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,611	2,181	5,792	1,049	642	1,691	1,027	609	1,636	1,010	575	1,585
Part-time	114	514	628	29	318	347	26	328	354	23	321	344
<b>Total</b>	<b>3,725</b>	<b>2,695</b>	<b>6,420</b>	<b>1,078</b>	<b>960</b>	<b>2,038</b>	<b>1,053</b>	<b>937</b>	<b>1,990</b>	<b>1,033</b>	<b>896</b>	<b>1,929</b>

Employees by geographical area	Nexi								
	2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Italy	1,078	960	2,038	1,053	937	1,990	1,033	896	1,929
Permanent	1,078	960	2,038	1,053	936	1,989	1,023	892	1,915
Temporary	-	-	-	-	1	1	10	4	14

Employees by geographical area	Nexi Group <sup>(1)</sup>		
	2021		
No.	Men	Women	Total
<b>Italy</b>	<b>1,078</b>	<b>960</b>	<b>2,038</b>
Permanent	1,078	960	2,038
Temporary	-	-	-
<b>Nordic Countries</b>	<b>1,347</b>	<b>773</b>	<b>2,120</b>
Permanent	1,323	743	2,066
Temporary	24	30	54
<b>DACH</b>	<b>577</b>	<b>353</b>	<b>930</b>
Permanent	537	312	849
Temporary	40	41	81
<b>Poland</b>	<b>505</b>	<b>465</b>	<b>970</b>
Permanent	412	290	702
Temporary	93	175	268
<b>CEE</b>	<b>218</b>	<b>144</b>	<b>362</b>
Permanent	216	142	358
Temporary	2	2	4
<b>Total</b>	<b>3,725</b>	<b>2,695</b>	<b>6,420</b>

(1) The geographical breakdown given in the table has changed from the geographical breakdown given in the 2020 Statement. The approach adopted in 2021 reflects the significant changes in the geographical areas in which the Group operates following the merger between Nexi and Nets according to the geographical classification in the Methodological Note.



## NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER

Employee entry and exit by gender <sup>(1)</sup>	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees entered	293	210	503	39	36	75	87	97	184	259	180	439
Employees exited	246	189	435	35	27	62	70	66	136	62	32	94
<b>Total (entered - exited)</b>	<b>47</b>	<b>21</b>	<b>68</b>	<b>4</b>	<b>9</b>	<b>13</b>	<b>17</b>	<b>31</b>	<b>48</b>	<b>197</b>	<b>148</b>	<b>345</b>

(1) For Nexi, the methodology adopted for calculating the number of employees entering and leaving has changed compared to 2020: in 2021, the number of employees entering only includes new hires, and not reinstatements from corporate transactions or intra-group secondments; similarly, the number of employees leaving only includes terminations, not partial and end-of-service secondments or outgoing secondments. This methodology has been adopted in order to ensure comparability with Nets' data.

Employee entry and exit rate by gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees entered	7.9	7.8	7.8	3.6	3.8	3.7	8.3	10.4	9.2	25.1	20.1	22.8
Employees exited	6.6	7.0	7.0	3.2	2.8	3.0	6.6	7.0	6.8	6.0	3.6	4.9

Employee entry and exit by age	Nexi Group <sup>(1)</sup>								Nexi							
	2021				2021				2020				2019			
No.	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Employees entered	163	288	24	475	21	51	3	75	10	145	29	184	29	287	123	439
Employees exited	98	264	50	412	7	43	12	62	7	100	29	136	7	56	31	94
<b>Total (entered - exited)</b>	<b>65</b>	<b>24</b>	<b>-26</b>	<b>63</b>	<b>14</b>	<b>8</b>	<b>-9</b>	<b>13</b>	<b>3</b>	<b>45</b>	<b>-</b>	<b>48</b>	<b>22</b>	<b>231</b>	<b>92</b>	<b>345</b>

(1) The number of employees in the table of 'Employee entry and exit by gender' does not correspond to the number in the table of 'Employee entry and exit by age' because Polskie ePlatności does not record the age group for some employees. These employees are therefore excluded from the table of 'Employee entry and exit by age'.

Employee entry and exit rate by age	Nexi Group								Nexi							
	2021				2021				2020				2019			
%	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
Employees entered	24.5	7.2	1.6	7.7	50.0	4.0	0.4	3.7	27.8	10.8	4.7	9.2	60.4	20.9	24.2	22.8
Employees exited	14.7	6.6	3.3	6.7	16.7	3.4	1.6	3.0	19.4	7.5	4.7	6.8	14.6	4.1	6.1	4.9

Employee entry and exit by geographical area		Nexi					
		2021		2020		2019	
No.		Employees en-tered	Employees exit-ed	Employees en-tered	Employees exit-ed	Employees en-tered	Employees ex-ited
Italy		75	62	184	136	439	94
Nexi Group <sup>(1)</sup>							
2021							
No.		Employees entered		Employees exited			
Italy		75		62			
Nordic Countries		194		199			
DACH		108		80			
Poland		105		73			
CEE		21		21			
<b>Total</b>		<b>503</b>		<b>435</b>			

(1) The geographical breakdown given in the table has changed from the geographical breakdown given in the 2020 Statement. The approach adopted in 2021 reflects the significant changes in the geographical areas in which the Group operates following the merger between Nexi and Nets according to the geographical classification in the Methodological Note.

Employee entry and exit rate by geographic area		Nexi					
		2021		2020		2019	
%		Employee en-trance rate	Employee exit rate	Employee en-trance rate	Employee exit rate	Employee en-trance rate	Employee exit rate
Italy		3.7	3.0	9.2	6.8	22.8	4.9
Nexi Group <sup>(1)</sup>							
2021							
%		Employee entrance rate		Employee exit rate			
Italy		3.7		3.0			
Nordic Countries		9.1		9.4			
DACH		11.6		8.6			
Poland		10.8		7.5			
CEE		5.8		5.8			

(1) The geographical breakdown given in the table has changed from the geographical breakdown given in the 2020 Statement. The approach adopted in 2021 reflects the significant changes in the geographical areas in which the Group operates following the merger between Nexi and Nets according to the geographical classification in the Methodological Note.

## GRI 403-9

WORK-RELATED INJURIES <sup>(1)</sup>

Injuries	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Injuries	2	1	3	1	1	2	-	1	1	2	1	3
of which occurred in employees	2	1	3	1	1	2	-	1	1	2	1	3
of which occurred in workers who are not employees, but whose work and/or workplace is under the control of the organisation <sup>(2)</sup>	-	-	-	-	-	-	-	-	-	-	-	-

Injury rates	Nexi Group						Nexi					
	2021			2021			2020			2019		
%	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees	0.4	0.3	0.3	0.7	0.8	0.7	-	0.8	0.3	1.3	0.8	1.1

(1) The indicator was introduced by the new GRI reporting standard on workplace health and safety, which came into force in January 2021 and had already been integrated in the 2020 Statement. Therefore, the above data for 2020 differ from what was reported in the 2019 Statement in that the information was set according to the requirements of the standard previously in force, for which only two injuries at work were recorded.

The rates for 2020 have been calculated on all employees, without exclusion. The calculation was made according to the following formula "number of recordable injuries at work/ number of hours worked x 1,000,000 hours worked".

(2) Nets considered as "Workers who are not employees" its outsourced Facility Management workforce and its largest supplier that provides support related to application development and maintenance.

## GRI 404-1

## AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE

Average hours of training by professional category and gender	Nexi Group <sup>(1) (2) (3)</sup>						Nexi <sup>(1) (3)</sup>					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	4,028	670	4,698	4,028	646	4,674	2,099	592	2,691	1,918	524	2,441
Middle managers	13,714	10,869	24,583	13,492	10,729	24,221	14,861	10,034	24,895	18,231	9,293	27,524
Remaining employees	13,706	19,249	32,955	13,225	18,948	32,173	14,175	17,739	31,914	21,906	26,088	47,994
<b>Total</b>	<b>31,448</b>	<b>30,788</b>	<b>62,236</b>	<b>30,745</b>	<b>30,323</b>	<b>61,068</b>	<b>31,135</b>	<b>28,365</b>	<b>59,500</b>	<b>42,055</b>	<b>35,904</b>	<b>77,959</b>

Training hours by professional category and gender	Nexi Group <sup>(3)</sup>						Nexi <sup>(3)</sup>					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Average hours of training provided to executives	45.3	35.3	43.5	49.1	43.1	48.2	27.6	32.9	28.6	25.2	27.6	25.7
Average hours of training provided to middle managers	26.8	36.0	30.2	28.8	38.7	32.5	33.0	40.6	35.7	43.8	41.9	43.1
Average hours of training provided to remaining employees	16.4	21.4	19.0	25.0	28.4	26.9	27.2	26.5	26.8	40.5	39.8	40.1
<b>Average hours of training provided to employees</b>	<b>21.9</b>	<b>25.3</b>	<b>23.5</b>	<b>28.5</b>	<b>31.6</b>	<b>30.0</b>	<b>29.6</b>	<b>30.3</b>	<b>29.9</b>	<b>40.7</b>	<b>40.1</b>	<b>40.4</b>

Total number of employees trained in IT security by employee category	Nexi Group <sup>(3)</sup>			Nexi <sup>(3)</sup>					
	2021			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
No.									
Executives	53	11	64	53	11	64	5	3	8
Middle managers	442	263	705	438	255	693	89	51	140
Remaining employees	528	676	1,204	484	652	1,136	57	78	135
<b>Total</b>	<b>1,023</b>	<b>950</b>	<b>1,973</b>	<b>975</b>	<b>918</b>	<b>1,893</b>	<b>151</b>	<b>132</b>	<b>283</b>

(1) Nexi's executives benefited from more training hours in 2021. This is because the Covid-19 pandemic caused difficulties in completing the training in 2020. In addition, specific learning programmes for Nexi's executives (Leadership and Management Academy) were implemented in 2021.

(2) For this first reporting year for Nets, only the number of training hours for which the breakdown required by GRI indicator was available was considered, and therefore the value is not representative of the total training provided.

(3) In 2021, despite the continuation of the pandemic, Nexi increased the number of training hours provided and the number of course beneficiaries, as the manner in which the training was provided was changed to online.

## GRI 404-3

### PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS

Employees involved in the PM system by professional category and gender <sup>(1)</sup>	Nexi <sup>(2)</sup>								
	2021			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
%									
Executives	95.1	93.3	94.8	98.7	94.7	97.9	98.7	94.7	97.9
Middle managers	98.7	96.4	97.9	97.1	96.0	96.7	96.9	96.4	96.7
Remaining employees	97.5	99.0	98.3	96.8	95.4	96.0	96.7	97.7	97.2

(1) Data from Nets are not included because, as explained in Section 3, heading "Responsibility to People", the performance review process is based on frequent dialogue between the employee and the manager.

(2) Figures do not include employees who joined in the last quarter of 2021. Nets executives, who are seconded to Nexi, are not part of the PM system and are included in the denominator for the calculation of the percentage. All the executives in Nexi's perimeter were involved in the PM system.

## GRI 405-1

### DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

Employees by professional category and gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
No.												
Executives	216	64	280	82	15	97	76	19	95	76	19	95
Middle managers	735	414	1,149	468	277	745	451	247	698	416	222	638
Remaining employees	2,774	2,217	4,991	528	668	1,196	526	671	1,197	541	655	1,196
<b>Total</b>	<b>3,725</b>	<b>2,695</b>	<b>6,420</b>	<b>1,078</b>	<b>960</b>	<b>2,038</b>	<b>1,053</b>	<b>937</b>	<b>1,990</b>	<b>1,033</b>	<b>896</b>	<b>1,929</b>

Employees by professional category and age	Nexi Group <sup>(1)</sup>								Nexi							
	2021				2021				2020				2019			
	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total	<30	30-50	>50	Total
No.																
Executives	1	171	107	279	-	50	47	97	-	59	36	95	-	58	37	95
Middle managers	28	746	350	1,124	6	456	283	745	7	448	243	698	11	421	206	638
Remaining employees	637	3,081	1,041	4,759	36	758	402	1,196	29	834	334	1,197	37	894	265	1,196
<b>Total</b>	<b>666</b>	<b>3,998</b>	<b>1,498</b>	<b>6,162</b>	<b>42</b>	<b>1,264</b>	<b>732</b>	<b>2,038</b>	<b>36</b>	<b>1,341</b>	<b>613</b>	<b>1,990</b>	<b>48</b>	<b>1,373</b>	<b>508</b>	<b>1,929</b>

(1) The age composition of Nets employees does not include 258 employees of the company Polskie ePłatności, as the figure was not available at this level of detail at the date of this Statement.

Average age of employees by gender	Nexi Group						Nexi					
	2021			2021			2020			2019		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Average age of employees	42.7	42.0	42.3	48.1	46.9	47.5	45.2	45.7	45.5	45.4	46.5	46.0

Employees belonging to protected categories by gender	Nexi <sup>(1)</sup>								
	2021			2021			2020		
No.	Men	Women	Total	Men	Women	Total	Men	Women	Total
Employees with disabilities	41	47	88	39	38	77	38	37	75
Other types of employees	1	4	5	2	7	9	2	7	9
<b>classified as protected categories</b>	<b>42</b>	<b>51</b>	<b>93</b>	<b>41</b>	<b>45</b>	<b>86</b>	<b>40</b>	<b>44</b>	<b>84</b>

## GRI 405-2

### RATIO OF BASIC SALARY AND REMUNERATION OF WOMEN TO MEN

Salary and remuneration ratio of women to men <sup>(1)</sup>	Nexi Group <sup>(2)(3)</sup>				Nexi			
	2021		2021		2020		2019	
No.	Basic salary	Remuneration	Basic salary	Remuneration	Basic salary	Remuneration	Basic salary	Remuneration
Executives	91.0	87.9	87.4	86.4	92.7	89.8	91.4	88.6
Middle managers	83.6	82.2	91.2	90.6	90.4	89.9	89.7	89.5
Remaining employees	80.8	79.2	91.8	91.8	91.8	92.0	93.3	89.6
<b>Total</b>	<b>85.2</b>	<b>84.0</b>	<b>90.1</b>	<b>89.6</b>	<b>91.6</b>	<b>90.6</b>	<b>91.5</b>	<b>89.2</b>

(1) The "Executives" category does not include data on the CEO and his first reports. The basic salary corresponds to the gross annual remuneration (GAR). Remuneration is calculated as salary plus any bonus/reward system.

(2) Among Nets data, information related to two legal entities of Polskie ePłatności is not included, as it was not available with this level of detail at the date of this Statement.

(3) The gender pay gaps between men and women were calculated and reported only at Group level and not able to reflect the structural differences of the local markets and roles across the different geographies with special features not comparable with each other.

## GRI 406-1

### INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN

Incidents of discrimination	Nexi Group		Nexi	
	2021	2021	2020	2019
No.				
Number of proven incidents of discrimination	-	-	-	-



## MODERNISATION AND PROGRESS OF THE EUROPEAN COUNTRIES

### GRI 102-13 MEMBERSHIP OF ASSOCIATIONS

#### The main associations of which Nexi Group is a member

<b>EDPIA - EUROPEAN DIGITAL PAY-MENTS INDUSTRY ALLIANCE</b>	Association bringing independent payment service providers based in Europe together. The aim is to contribute to the debate in defining the economic environment for digital payments, strengthening the visibility and understanding of this sector among regulators and European society.
<b>ABI – ITALIAN BANKING ASSOCIATION</b>	Association that operates by promoting initiatives for the growth of the banking and financial system, in a competitive perspective consistent with national and European Union legislation.
<b>ASSOFIN - ITALIAN CONSUMER AND REAL ESTATE CREDIT ASSOCIATION</b>	Association bringing together the main financial operators operating in the areas of credit to families and providing its members with a series of coordination, representation and legal, tax, administrative and advisory services on matters of common interest through its Internal Commissions and with the help of professionals and consultants.
<b>ASSBB - ASSOCIATION FOR THE DEVELOPMENT OF BANK AND STOCK MARKET STUDIES</b>	Association founded in 1973 to stimulate the interest of the academic and research world in economic, financial and especially banking studies in order to increase the knowledge and professional development of the operators of the banking and financial industry of our country.
<b>ASSONEBB - NATIONAL ENCYCLO-PAEDIA ASSOCIATION OF THE BANK AND STOCK MARKET</b>	Association for the development and dissemination of knowledge and banking and financial culture founded in 2005 following the transformation of the Enciclopedia della Banca e della Borsa SpA founded in 1972 by a group of banks, including the Bank of Italy.
<b>VALORE D</b>	Association of large companies created in Italy to support women's leadership in companies, promote gender balance and an inclusive approach in organisations.
<b>A.P.S.P. – ASSOCIATION OF PAY-MENT SERVICE PROVIDERS</b>	An association that aims to disseminate and promote the development, information and knowledge of payment institutions and therefore payment services and to promote related cultural activities.
<b>ANBP - NATIONAL ASSOCIATION OF POPULAR BANKS</b>	An association that has embraced the cardinal principles of Popular Credit, contributing to the development of a strong and organic identity based on the key concept of localism as an enhancement of the territory, social commitment and support for SMEs and families.
<b>ANRA NATIONAL RISK MANAGER ASSOCIATION</b>	An association that has brought together risk managers and company insurance managers since 1972.
<b>ASPEN INSTITUTE IT</b>	Association whose mission is the internationalisation of the entrepreneurial, political and cultural leadership of the country through a free comparison of different ideas and backgrounds to identify and promote common values, knowledge and interests.
<b>ITALIAN INTERNAL AUDITORS ASSOCIATION</b>	A non-profit association established in 1972 as an Italian affiliate of IIA, Institute of Internal Auditors to improve the governance, risk management and control systems of organisations through the enhancement of the Internal Audit Function.
<b>ASSONIME</b>	Association of Italian public limited companies. It deals with the study and treatment of problems affecting the interests and development of the Italian economy.
<b>COMUFFICIO</b>	National Association of Manufacturers, Importers and Distributors of ICT products and services.
<b>IAB ITALY</b>	Association that has stimulated the collaboration of its partners since 1998, with the aim of developing standards, research, certifications, training activities and meetings to discuss the digital advertising industry and best practices. IAB's work aims to build a sustainable future for digital advertising and give companies all the tools to overcome the challenges of the present and the future.
<b>ISACA</b>	With almost 140,000 associates in over 200 Chapters worldwide, it provides skills, certifications, communities, sponsorship and training courses relating to Assurance and Audit, Security, Cybersecurity, Risk and ICT Governance. Founded in 1969, ISACA is an independent non-profit association.
<b>RETAIL INSTITUTE</b>	Benchmark association of retail in Italy, promoting the culture and growth of the sector as a whole through the offer of essential content and strategic activities in order to be updated and competitive in an increasingly complex market scenario.
<b>AGCM - ITALIAN ANTITRUST AUTHORITY</b>	Independent administrative authority that supervises market competition.

<b>EPIF – EUROPEAN PAYMENT INSTITUTIONS FEDERATION</b>	Association bringing independent payment service providers based in Europe together. EPIF acts as a forum to exchange views, form common positions, exchange best practice and provide a wealth of information to its members and a wider audience. EPIF regularly meets with other stakeholders in the EU standard setting process on payments (banks, merchants, users and regulators).
<b>PSMEG – PAYMENT SYSTEM MARKET EXPERT GROUP</b>	The expert group's objective is to advise the Commission in the area of payments and to assist the Commission in the preparation of legislative acts or policy initiatives regarding payments, including fraud prevention issues related to payment industry and users
<b>EFIP – EUROPEAN FORUM FOR INNOVATION IN PAYMENTS</b>	The European Forum for Innovation in Payments (EFIP) is an informal joint initiative of the ECB and the European Commission. The main objective of the Forum is to contribute to increased economic efficiency and a deeper Single Market by fostering the development of an integrated, innovative and competitive market for retail payments in the EU. The Forum provides a platform for the exchange of information and views on issues of common concern to all stakeholders.
<b>ECSG – EUROPEAN CARD STAKE-HOLDERS GROUP</b>	The ECSG is a multistakeholder group whose main task is the definition of SEPA requirements for card-based services. Its membership is open to any entity which is active in the market for card related or card-based services in an EEA Member State. The ECSG brings together industry sectors along the value chain of card-based services.
<b>EPSM – EUROPEAN ASSOCIATION OF PAYMENT SERVICE PROVIDERS FOR MERCHANTS</b>	The EPSM is a non-profit trade association of payment service providers for merchants. EPSM's main objectives are to represent its members' interests and to provide a platform for exchanging news, information and views on the European payments market.
<b>EPI – EUROPEAN PAYMENTS INITIATIVE</b>	31 European banks/credit institutions and 2 third-party acquirers launched this initiative to create a new pan-European payment solution leveraging Instant Payments and cards.
<b>DANISH PAYMENTS COUNCIL</b>	The Danish Payments Council is a forum for collaboration on the payments of consumers and firms. The Council was set up by Danmarks Nationalbank and includes representatives of a broad range of stakeholders in the Danish payments infrastructure
<b>DANISH CHAMBER OF COMMERCE</b>	The Danish Chamber of Commerce is the network for the service industry in Denmark. It is one of the largest professional business organisations in Denmark whose goal is to make running a business easier by means of political influence and policy development.
<b>DANISH FINANCE SECTOR EMPLOYER ORGANISATION</b>	The Danish Finance Sector Employer organisation negotiates working conditions and collective agreements for the sector and aims to further the financial sector's regulatory environment.
<b>THE DANISH ICT INDUSTRY ASSOCIATION</b>	The Danish ICT Industry Association is the largest independent representative for the ICT business community in Denmark and aims to strengthen international competitive position and cost-effectiveness and works on legislative and regulatory affairs with key stakeholders.
<b>ICT NORWAY</b>	ICT Norway is the interest group for the Norwegian ICT industry. ICT Norway works to enlarge the market and remove obstacles, increase value for the industry, and helps reduce risk exposure and R&D co-operation, and access to capital and consortiums.
<b>CARD PAYMENT SWEDEN</b>	Card Payment Sweden (CPS) is an industry association of card acquirers and issuers that promotes the use of cashless payments by card in Sweden. CPS wants the Swedish market to continue to enjoy secure, efficient and commercially viable cashless payment transactions, that will benefit society as a whole.
<b>FINANCE FINLAND</b>	Finance Finland aims to influence the regulation and decision-making that affects the financial sector in Finland by raising decision-makers' awareness of the impact that regulation has on the financial sector and ultimately on society. Nets brings expertise to legislative processes and take part in societal discussion whenever it concerns the financial sector. Finance Finland also represents financial employers in the labour market.
<b>ESTONIAN CHAMBER OF COMMERCE AND INDUSTRY</b>	The Estonian Chamber of Commerce and Industry (ECCI) is the largest Estonian representative organization of entrepreneurs and was founded to represent and protect common interests of Estonian merchants, manufacturers, bankers, and ship-owners. The mission of the ECCI is to develop entrepreneurship in Estonia through business services and playing an active role in designing economic policy.

<b>BVZI – GERMAN FEDERATION ASSOCIATION OF PAYMENT AND E-MONEY INSTITUTIONS</b>	The aim of BVZI is to act in its members' common interests in its dealing with legislative authorities, the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), the German Federal Bank (Deutsche Bundesbank), German Banking Community (Deutsche Kreditwirtschaft), the German Federal Ministry of Finance (Bundesfinanzministerium) and card organisations.
<b>DFKA – DEUTSCHE FACHVERBAND FÜR KASSEN UND ABRECHNUNGS-SYSTEMTECHNIKIM BARGELD</b>	The DFKA is an entrepreneurial professional association that represents the interests of its members and the industry.
<b>BdS – BUNDESVERBAND DIE SYSTEMGASTRONOMIE</b>	The Federal Association of System Gastronomy eV (BdS) is an employer and business association that negotiates collective agreements and influences stakeholders through policy development.
<b>HCK – CROATIAN CHAMBER OF ECONOMY</b>	The Croatian Chamber of Economy is an independent professional and business organisation of all legal entities engaging in business.
<b>PONIP - Polska Organizacja Nie-bankowych Instytucji Płatności</b>	PONIP aims to protect common rights and represent the interests of the associated members to public administration bodies, trade unions and other organizations and institutions.
<b>ZBP – POLISH BANK ASSOCIATION</b>	The Polish Bank Association is representing and protecting common interests of member banks, inter alia with respect to legal regulations related to banking; Participating in legislative work of legislative commissions of the Sejm and the Senate; Cooperating with the National Bank, the government and the competent ministries in the area of operation of legal regulations applicable to the Polish banking system; Promoting of the banking sector and financial services; Constructing of the inter-bank infrastructure;
<b>National Payments Council – Bank of Slovenia</b>	National Payments Council provides a dialogue between all key stakeholders in the payment services market. The aim is to support balanced and sustainable development of the market for secure and efficient payment services in Slovenia, and to ensure its adaptation to changes in the international arena and an adequate place within the Single Euro Payments Area (SEPA).

## Nexi Group Partnerships and Collaborations

<b>Luiss Business School</b>	Nexi is a partner of the Luiss Business School. Group employees have the opportunity to participate in the MBAs promoted by the school itself, and our managers are involved in testimonials (lectures) and in the preparation of project work for the Master's programme students.
<b>RCS Academy Business School</b>	Nexi actively participates (advisory board, testimonials, scientific committee, project work) and/or sponsors Master's courses related to innovation, digital and transformation: Innovation Management & Digital Transformation, HR Management in digital transformation, new models for managing and enhancing human capital and Digital Marketing & Social Communication.
<b>The Human Resources Community</b>	Nexi participates through contributions and testimonies from its managers in major events aimed at national and multinational companies for the exchange of knowledge and skills on HR issues. In partnership with the HRC, training and updating projects for the internal HR structure were also carried out in 2021 and were intended for almost the entire company population, with daily online learning spaces during the months of remote work (learning square).
<b>ELIS</b>	In 2020, Nexi activated the collaboration with ELIS, a non-profit educational association that focuses on the person and work. Through scholarships, Nexi supports young, poor IT engineering students who specialise in innovation issues such as Cybersecurity & Blockchain, Data Analytics, Machine Learning & Software Development at the Innovation Hub of the Polytechnic Institute of Milan.

## CUSTOMER SATISFACTION

### GRI 103-2C COMPLAINTS

Number of complaints and main reasons		Nexi Group <sup>(1)</sup>				Nexi			
		2021		2021		2020		2019	
Categories	Descriptions	[no.]	[% of the total]	[no.]	[% of the total]	[no.]	[% of the total]	[no.]	[% of the total]
Outcome of the dispute after its definition	The customer does not agree with the dispute	3,072	17	3,042	36.7	4,763	51.9	4,433	59.5
Terms and conditions of contracts	The signed contract establishes terms and (economic or service-related) conditions that the customer declares have been applied differently	2,409	13.3	2,389	28.8	1,647	18	1,316	17.7
Loyalty programme #iosi	The customer complains about the loyalty programme (rewards, fees, points, etc.)	952	5.3	952	11.5	1,304	14.2	152	2.0
Services ancillary to cards (production and delivery of reports, insurance, provision of PIN codes, delivery of duplicates after card blockage, delivery of new cards, etc.)	Complaints by cardholders on a number of card-related services	434	2.4	431	5.2	304	3.3	497	6.7
Installation and maintenance of POS terminals	Merchant complaints on installation and maintenance of POS terminals	1,234	6.8	259	3.1	180	2	170	2.3
Correct/complete information at contact stage	The customer claims to have received unclear/incomplete/incorrect information during the contact phase	128	0.7	128	1.5	97	1.1	135	1.8
Covid 19	Merchants complain about receiving commission charges during lockdown periods / T&E merchants complain about Circuit rules ensuring refunds to cardholders on the basis of services not provided due to the pandemic	123	0.7	123	1.5	183	2	-	0.0
Authorisation processes	The customer complains about a denied authorisation, a revocation not processed	121	0.7	121	1.5	64	0.7	60	0.8
Call Centre accessibility (IVR and operator)	The customer states that the IVR is not user friendly or there are service shortcomings	110	0.6	92	1.1	77	0.8	31	0.4
Other reasons	-	9,530	52.6	750	9.1	556	6.1	672	8.9
<b>Total</b>		<b>18,113</b>	<b>100</b>	<b>8,287</b>	<b>100</b>	<b>9,175</b>	<b>100</b>	<b>7,466</b>	<b>100</b>

(1) The category "Other reasons" significantly impacts the total number of claims received by the Group, because it includes claims received by the different legal entities, each one having its own classification approach. For Nexi the main categories aggregated under "Other reasons" are "Site/app access/operation" (n. 73), "Security measures" (n. 71) and "Customer care service" (n.56). For Nets the main categories aggregated under "Other reasons" are "Payment services" (n. 33) and "Money transfer timing/delays" (n. 28).

Complaints outcome	Nexi Group				Nexi			
	2021		2021		2020		2019	
Status/ Outcome	[no.]	[%]	[no.]	[%]	[no.]	[%]	[no.]	[%]
Accepted	2,739	27.9	1,679	20.3	1,428	15.6	1,555	20.8
Not accepted	6,836	69.6	6,561	79.2	7,591	82.7	5,857	78.4
Processing	55	0.6	47	0.6	156	1.7	54	0.7
Not tracked	8,483	2.0	-	-	-	-	-	-
<b>Total</b>	<b>18,113</b>	<b>100</b>	<b>8,287</b>	<b>100</b>	<b>9,175</b>	<b>100</b>	<b>7,466</b>	<b>100</b>

## SUPPLY CHAIN

### GRI 304-1 PROPORTION OF SPENDING ON LOCAL SUPPLIERS <sup>(1-2)</sup>

Proportion of spending on local suppliers	Nexi		
	2021	2020	2019
%	[no.]	[no.]	[no.]
Spending on procurement from local suppliers (Italian)	91.0	94.0	93.0
Spending on procurement from foreign suppliers	9.0	6.0	7.0
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>

Nexi Group <sup>(3)</sup>	
2021	
Italy	91.0
Nordic Countries	78.1
DACH	83.4
Poland	97.7
CEE	76.4

(1) As a definition of local suppliers, the Nexi Group considers persons or organisations that are based in the geographic areas Italy, Nordic Countries (Denmark, Norway, Sweden, Finland, Estonia, Latvia, Lithuania and the United Kingdom), DACH (Germany, Austria and Switzerland), Poland and CEE (Croatia and Slovenia) and offer products or services to the affiliated companies of the Group in the specific geographic areas.

(2) The proportion of expenditure on local suppliers is calculated by considering expenditure on "local" suppliers (i.e., based in the same geographical areas as the Group's operating sites) as the numerator and total expenditure on suppliers of the same operating sites as the denominator.

(3) Part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd) and Edigard are not included in the data presented in the table (data not available).

## ENVIRONMENTAL PROTECTION

### GRI 301-1 MATERIALS USED BY WEIGHT OR VOLUME

Materials by type <sup>(1)</sup>	Nexi Group <sup>(3)</sup>		Nexi	
	2021	2021	2020	2019 <sup>2</sup>
Renewable materials used	61.9	11.8	6.9	27.9
Non-renewable materials used	406.0	277.2	181.9	46.9
<b>Total</b>	<b>467.9</b>	<b>289.0</b>	<b>188.8</b>	<b>74.7</b>

(1) "Non-renewable materials used" include packaging boxes, cardboard, envelopes, cartridges, plastic (for payment card personalisation), plastic envelopes for sending payment cards. The category "renewable materials used" includes recycled paper and non-recycled paper.

(2) The 2019 disclosure does not include data relating to materials used for Nexi Payments' payment cards.

(3) The offices of the Nets Denmark UK Branch, Edigard Latvia, the Nets Denmark A/S Eesti branch, the Nets Denmark A/S Latvia branch and the Nets Denmark A/S Lithuania branch are not material to the reporting perimeter in terms of size (i.e. number of employees working at the site) and are therefore excluded from the tables.

**GRI 302-1 ENERGY CONSUMPTION WITHIN THE ORGANISATION <sup>(1)</sup>**

**GRI 305-1 DIRECT (SCOPE 1) GHG EMISSIONS <sup>(1)</sup>**

**GRI 305-2 ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS <sup>(1)</sup>**

	Nexi Group		Nexi	
Energy consumption	2021	2021	2020	2019
<b>Direct emissions - Scope 1 (tCO<sub>2</sub>e) <sup>(2)</sup></b>	<b>2,038.7</b>	<b>971.7</b>	<b>1,075.5</b>	<b>1,189.1</b>
<b>Total direct energy (Gj)</b>	<b>31,551.6</b>	<b>16,352.0</b>	<b>17,635.3</b>	<b>21,363.1</b>
<b>- renewable (Gj)</b>	<b>497.2</b>	<b>497.2</b>	<b>1,011.8</b>	<b>846.6</b>
- of which self-produced photovoltaic energy (kWh)	138,113.9	138,113.9	281,052.0	235,153.0
- of which self-produced geothermal energy (kWh)	-	-	-	-
<b>- not renewable (Gj)</b>	<b>31,056.6</b>	<b>15,854.8</b>	<b>16,623.5</b>	<b>20,516.6</b>
- of which natural gas consumption (m <sup>3</sup> ) <sup>(3)</sup>	138,199.8	109,085.4	176,280.5	306,977.0
- of which diesel and burning oil consumption for generators (litres) <sup>(4)</sup>	8,075.0	-	2,350.0	n.d.
- of which petrol consumption attributable to the company fleet (litres) <sup>(5)</sup>	143,187.4	57,952.8	9,845.7	6,323.3
- of which diesel consumption for company cars (litres) <sup>(5)</sup>	397,242.2	115,137.0	140,872.7	212,724.5
- of which additional company fleet consumption (estimate - l petrol) <sup>(6)</sup>	44,373.9	44,373.9	6,968.9	n.d.
- of which additional company fleet consumption (estimate - diesel) <sup>(6)</sup>	94,533.8	94,533.8	94,721.0	n.d.
<b>Indirect emissions - Scope 2 (tCO<sub>2</sub>e) (Location Based) <sup>(7)</sup></b>	<b>4,432.0</b>	<b>2,524.3</b>	<b>3,281.8</b>	<b>3,786.1</b>
<b>Indirect emissions - Scope 2 (tCO<sub>2</sub>e) (Market Based) <sup>(7)</sup></b>	<b>3,630.5</b>	<b>75.9</b>	<b>91.6</b>	<b>242.2</b>
<b>Total indirect energy (Gj)</b>	<b>64,019.3</b>	<b>35,535.5</b>	<b>40,105.4</b>	<b>43,613.5</b>
<b>- renewable (Gj)</b>	<b>35,152.9</b>	<b>34,285.2</b>	<b>38,564.8</b>	<b>40,836.6</b>
- of which electricity purchased from the grid covered by Guarantees of Origin for the Group offices (KWh) <sup>(8)</sup>	7,331,862.7	7,090,831.7	8,614,778.2	11,343,507.0
- of which electricity purchased from the grid covered by Guarantees of Origin for the activities of the Data Centres owned by the Group (KWh) <sup>(9)</sup>	2,432,845.3	2,432,845.3	2,097,668.8	-
<b>- not renewable (Gj)</b>	<b>28,866.4</b>	<b>1,250.2</b>	<b>1,540.6</b>	<b>2,776.9</b>
- of which non-renewable electricity purchased from the grid (kWh) <sup>(10)</sup>	6,659,627.6	-	-	346,532.0
- of which non-renewable electricity for plug-in hybrid car consumption (estimate kWh) <sup>(11)</sup>	78,332.0	57,625.1	8,046.6	n.d.
- of which district heating (KWh) <sup>(12)</sup>	960,830.8	193,101.0	243,090.0	245,760.0
- of which district cooling (KWh) <sup>(12)</sup>	319,640.2	96,560.0	176,800.0	179,060.0

(1) The offices of the Nets Denmark UK Branch, Edigard Latvia, the Nets Denmark A/S Eesti branch, the Nets Denmark A/S Latvia branch and the Nets Denmark A/S Lithuania branch are not material to the reporting perimeter in terms of size (i.e. number of employees working at the site) and are therefore excluded from the tables. Only petrol and diesel consumption are included for the 22 hybrid cars (12 in the Nordic Countries and 10 in the DACH area) as it has not been possible to estimate the amount of electricity consumed.

(2) For Nets, Scope 1 emissions related to Ratepay refer to the year 2020 due to the difficulty in finding data in the reporting year 2021.

(3) For Nexi, December consumption has been estimated based on December 2020 consumption, due to data not being available at the date of this statement.

(4) For the Nets data centre in Norway, oil consumption has been estimated.

(5) For Nexi, the data refers to the company cars of Mercury Payments Services and the company cars of the Nexi, Nexi Payments and Helpline fleet equipped with fuel cards. Diesel and petrol consumption is calculated based on an external report provided by the supplier ENI. For Nets CEE, estimates were made based on the previous year's consumption. Three company cars in Finland were omitted due to missing data.

(6) The additional consumption of the company fleet refers to the share of company cars in the fleet of Nexi, Nexi Payments and Helpline not supplied with fuel cards. For these vehicles, an estimate was made of the consumption traced for the cars provided with fuel cards.

(7) It should be noted that, as already reported in the 2020 Consolidated Non-Financial Statement, the 2019 values relating to indirect Scope 2 Location Based and Market Based emissions have been recalculated with respect to those reported in the 2019 Statement for the Nexi Italia perimeter. The 2019 values had been overestimated due to the incorrect application of the conversion factors of non-renewable indirect energy of "district heating" (kg vs tons). The recalculated Scope 2 Location Based value is 3,786.1 tCO<sub>2</sub> versus the previous 78,501.1 tCO<sub>2</sub>; the recalculated Scope 2 Market Based value is 242.2 tCO<sub>2</sub> versus 74,961.2 tCO<sub>2</sub>.

The Scope 2 Location Based Emissions are calculated based on indirect consumption, using the Location-Based emission factors for Italy defined by the ABI Guidelines on the application in the Bank of the GRI Environmental Standards of 2020. The Scope 2 Market Based Emissions are calculated based on the percentage of renewable sources with certificate of origin declared by the supplier for the year 2020 and 2021 - 100% for all offices and Data Centres - and the emission factors declared by the Association of Issuing Bodies for the Residual Mix of Italy. The heating data for part of Nets Switzerland SA are derived from estimates of consumption in previous years due to a lack of data for the reporting year.

(8) For Nexi, December consumption has been estimated based on December 2020 consumption due to data not being available at the date of this statement.

(9) In order to present the figure for indirect energy in 2021, the approach used in 2020 has been repeated: the figure has been included with a granularity to highlight the energy used to power the Group's premises and the activities of the Group's own Data Centres. In 2019, instead, the energy consumption related to the Data Centres had been represented together with the consumption of the Group's offices in the category "renewable energy", renamed "Electricity purchased from the grid covered by Guarantees of Origin" in 2020. For Nexi, the data centre values in 2021 refer to the Group-owned data centres located in Pero and Settimo, Milan. The December 2021 consumption calculation for the Data Centre in Pero, Milan, was estimated due to the absence of final data at the moment of drafting this Statement.

Energy consumption related to the other Nexi Data Centres is reported in the indicator 302-2 "Energy consumption outside the organisation", as it relates to fully outsourced Data Centres - infrastructures, including servers, racks and network equipment not owned by Nexi.

In the course of 2021, the equipment previously located in the Vicenza and Pont-Saint-Martin Data Centres was transferred to the Pero and Settimo Data Centres in Milan. This generated a decrease in the share of energy dedicated to outsourced Data Centres, and a consequent increase in the share of energy consumed by the owned Data Centres.

Between the end of 2020 and the beginning of 2021, the Data Centres in Sesto San Giovanni and Milan Viale Richard were also decommissioned, and the equipment was transferred to the Data Centres in Pero and Settimo, Milan. The energy consumed by the two decommissioned Data Centres in 2021 is zero, as the equipment had already been relocated before the start of 2021, although the final closure of the Data Centre took place at a later date.

(10) For one location in Denmark, the electricity consumption is based on 2020 data. The Nets company Paytrail only provides data for their main office as data for a smaller office is not available.

(11) For Nexi, the significant increase in the figure (240,197.40 kWh) refers to consumption by plug-in hybrid cars and is due to a change in the perimeter: 56 plug-in hybrid cars for 2021, compared to 6 plug-in hybrid cars for 2020.

(12) In the 2019 Statement, the data on district cooling and district heating were reported in an aggregate manner. As in 2020, the 2019 figure unchanged in its total value is reported here in relation to the two specific categories. Part of the data of part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd) for heating is based on last year's data due to the unavailability of data for 2021. For two offices in Denmark, the consumption is based on 2020 data.

**GRI 302-2 ENERGY CONSUMPTION OUTSIDE THE ORGANISATION**
**GRI 305-3 OTHER INDIRECT (SCOPE 3) GHG EMISSIONS**

	Nexi Group		Nexi	
	2021	2021	2020	2019
<b>Indirect emissions - Scope 3 (tCO<sub>2</sub>e)</b>	<b>8,354.4</b>	<b>3,518.6</b>	<b>1,247.3</b>	<b>-</b>
<b>Of which produced by fuel and energy related activities (tCO<sub>2</sub>e) <sup>(1)</sup></b>	<b>2,225.7</b>	<b>1,145.5</b>	<b>837.3</b>	<b>-</b>
<b>Of which produced by used materials (tCO<sub>2</sub>e)</b>	<b>599.7</b>	<b>448.1</b>	<b>331.4</b>	<b>-</b>
Materials used by weight or volume (t) <sup>(2)</sup>	415.3	289	188.8	
<b>Of which produced by Business Travel (tCO<sub>2</sub>e) <sup>(3)</sup></b>	<b>344.1</b>	<b>196.1</b>	<b>72.4</b>	<b>-</b>
- of which cars (Km)	823,983.10	715,517.00	9,203.00	1,299,917.00
- of which trains (Km)	660,706.00	570,739.00	582,636.00	3,626,487.00
- of which aircraft (Km)	461,523.00	383,229.00	246,714.00	1,430,890.00
<b>Of which produced by waste (tCO<sub>2</sub>e)</b>	<b>16</b>	<b>9.8</b>	<b>6.2</b>	<b>-</b>
Waste by type and disposal method <sup>(4)</sup>	751.1	525	664.4	
<b>Of which produced by Upstream Leased Assets (tCO<sub>2</sub>e)</b>	<b>936.2</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Market Based</b>				
- of which electricity purchased from the network covered by Guarantees of Origin for the activities of fully outsourced Data Centres <sup>(5)</sup>	2,839,458.50	488,523.00	1,584,739.50	n.d.
<b>Of which produced by commuting activities (tCO<sub>2</sub>e) <sup>(6)</sup></b>	<b>2,841.7</b>	<b>1,377.4</b>	<b>n.d.</b>	<b>n.d.</b>
<b>Of which produced by activities related to the use of products sold (tCO<sub>2</sub>e) <sup>(7)</sup></b>	<b>90.2</b>	<b>90.2</b>	<b>n.d.</b>	<b>n.d.</b>
<b>Of which produced by activities related to end-of-life disposal of products sold (tCO<sub>2</sub>e) <sup>(8)</sup></b>	<b>17.5</b>	<b>17.4</b>	<b>n.d.</b>	<b>n.d.</b>
<b>Of which produced by energy use of leased assets (tCO<sub>2</sub>e) <sup>(9)</sup></b>	<b>1,283.3</b>	<b>234.2</b>	<b>n.d.</b>	<b>n.d.</b>

n.d.= not disclosed

(1) For Nexi, the increase in emissions from fuel and energy activities is due to the increase in fuel resulting from increased use of the company's fleet in 2021.

(2) The total materials used are also shown in the table for GRI indicator 301-1. For Nets Estonia (a company of Nets Denmark A/S), assumptions were made for December 2021 based on the November figures. Polskie ePłatności excludes material data referring to envelopes and cartridges. Part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd) made estimates for the purchase of cardboard and cartridge material. The annual consumption of material purchased by Nets Sweden has been estimated based on data from the first half of the year.

(3) For Nexi, the increase in emissions from business trips is due to the increase in the number of car journeys. The distance travelled in kilometres by employees could not be found within Concardis, Polskie ePłatności and Ratepay.

(4) The total waste considered is also shown in the table for GRI indicator 306-2. It is not always possible for Nets to have detailed data on waste consumption as the offices are rented and waste management depend on the type of contract Nets has with the owner of the offices. This prevents the retrieval of specific data for those offices where waste management is directly managed by the owner and included in the rent. Part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd) and Przelewy 24 provided an estimate based on the costs to the disposal company. For Nets Estonia, due to the lack of data for December 2021, estimates were made based on the total waste generated in November 2021. Ratepay only collects e-waste: during 2021 this was not disposed of.

(5) In continuity with the approach used in 2020, in order to ensure a more precise representation of consumption, the figure for energy consumed for the activities of data centres in full outsourcing is also shown in 2021. The figure was calculated using the market-based approach. The same emissions calculated using a Location-Based approach amounted to approximately 2,102.3 tCO<sub>2</sub>e for Nexi Group). For Nets, no data was found for Ratepay in relation to their data centres for the year 2021; therefore, 2020 data was used. For Nets Norway, the consumption figure for one of the data centres was estimated. For Nets Estonia, the figures for December 2021 are the result of estimates based on November data.

(6) Due to commuting, Scope 3 emissions were calculated for the first time in 2021 in line with the commitment to improve the mapping of the Group's environmental impacts and provide a more complete and transparent disclosure. For Nexi, the data comes from a survey submitted to employees as part of the activities carried out by the Mobility Manager (for more information see section 3, chapter 4 "Responsibility towards People". For Nets, the values are calculated from the emission intensity per Nexi employee multiplied by the number of Nets employees.

(7) Disclosure of Scope 3 emissions due to the use of products sold was introduced for the first time in 2021, in line with the Group's ongoing commitment to improve the mapping of its environmental impacts and consequently to develop a more complete and transparent disclosure. No primary data on electricity consumption of POSs are available. Therefore, the calculation of emissions for Nexi has been estimated. For the perimeter of Nets, the electricity consumption of POSs has been included in the Downstream Leased Assets category.

(8) Disclosure of Scope 3 emissions due to end-of-life disposal of products was introduced for the first time in line with the Group's ongoing commitment to improve the mapping of its environmental impacts and consequently to develop a more comprehensive and transparent disclosure. For Nexi, this category includes POSs sold and cards sold. For Nets, only cards sold are considered.

(9) Disclosure of Scope 3 emissions due to the consumption of leased products was introduced for the first time in 2021 in line with the Group's ongoing commitment to improve the mapping of its environmental impacts and consequently to develop a more complete and transparent disclosure. No primary data on electricity consumption of POSs are available. Therefore, the calculation of emissions for both Nexi and Nets has been estimated. The POS figure includes all active terminals at the end of the year, regardless of terminal ownership. The emission factor used for this category is Location Based and varies for individual countries. The assumption is that the country of use of the POS terminal corresponds to the country in which it was leased.



**GRI 303-3 WATER WITHDRAWAL <sup>(1)</sup>**

	<b>Nexi Group <sup>(2)</sup></b>		<b>Nexi</b>
<b>MI</b>	<b>2021</b>	<b>2021</b>	<b>2020</b>
Surface water	0.7	-	-
of which from areas with low levels of water stress	0.7	-	-
Groundwater	937.9	893.1	591.9
of which from areas with low water stress	933.9	892.5	590.3
of which from areas with extremely high water stress	0.6	0.6	1.6
Seawater	-	-	-
Water produced	-	-	-
Water resources of third parties	35.7	35.0	37.0
of which from areas with low water stress	31.2	31.0	32.2
of which from areas with medium - high water stress	1.0	0.6	2.6
of which from areas with extremely high water stress	3.5	3.5	2.2
<b>Total</b>	<b>974.3</b>	<b>928.1</b>	<b>628.9</b>

(1) Indicator 303-3 was introduced by the new GRI reporting standard on water and effluents, which came into force in January 2021. The data shown in the table are, therefore, not comparable with the information included in the 2019 Statement, as the information was reported according to the old version of the standard, according to which water withdrawals of 49,927 m<sup>3</sup> were recorded in 2019, of which 33,392 m<sup>3</sup> were from aqueduct and 16,535 m<sup>3</sup> from surface water.

The areas with water stress have been identified through the Aqueduct Water Risk Atlas. For the office in Via Montefeltro in Milan, the quantities of water withdrawn were estimated based on the number of employees, working days, average daily consumption per capita of 50 litres/day and a reduction of 0.8 due to Covid-19 (Formula: no. employees \* 50 litres/day \* 255 days \* 0.8). Nexi's water consumption in 2020 has been recalculated due to an error identified in the consumption of the resource from third-party sources.

With reference to Nexi's biggest variations:

- Marcallo con Casone (MI), Mercury Payment Services SpA: anomaly identified due to the lack of readings last year, so this year reports the adjustment with respect to last year's lack of accounts.
- Cividale del Friuli (UD), Help Line SpA: the 2020 data has been changed, as the value reported on the meter was entered and not the consumption of the year.
- Monteriggioni and Siena (SI), Nexi Payments SpA: this year the data comes from invoices, while last year an estimate was made based on users. The 2020 disclosure does not include the office in Via Chianesi - Rome.

(2) Part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd): calculation based on an estimate using data collected from 1 July 2019 to 30 June 2020. Nets Estonia: estimated water consumption in December 2021 equal to November 2021. The offices of Polskie ePłatności are excluded from the table due to the absence of information on the type of water consumption in the leased buildings. The offices of the Nets Denmark UK Branch, Edigard Latvia, the Nets Denmark A/S Eesti branch, the Nets Denmark A/S Latvia branch and the Nets Denmark A/S Lithuania branch are not material to the reporting perimeter based on the dimension (i.e. number of employees working at the site) and are, therefore, excluded from the tables.

**GRI 306-3 WASTE PRODUCED**

**GRI 306-4 WASTE NOT INTENDED FOR DISPOSAL**

Waste by type	Nexi Group <sup>(4)(5)</sup>			Nexi <sup>(4)</sup>				
	Waste pro-duced	Waste not intended for disposal		Waste produced		Waste not intended for disposal		
Tons	2021		2021	2020	2019	2021	2020	2019
Hazardous waste	2.3	1.1	1.0	11.3	4.2	1.0	-	-
Non-hazardous waste	723.8	649.9	524.0	653.1	616.5	524.0	-	-
<b>Total</b>	<b>726.1</b>	<b>648.0</b>	<b>525.0</b>	<b>664.4</b>	<b>620.7</b>	<b>525.0</b>	<b>-</b>	<b>-</b>

Waste not intended for disposal by recovery operation	Nexi Group <sup>(4)(5)</sup>			Nexi <sup>(3)(4)</sup>		
	2021			2021		
Tons	On-site <sup>(58)</sup>	Off-site <sup>(59)</sup>	Total	On-site	Off-site	Total
<b>Hazardous waste</b>	<b>0.2</b>	<b>1.0</b>	<b>1.2</b>	<b>0.2</b>	<b>0.8</b>	<b>1.0</b>
Preparation for re-use	-	-	-	-	-	-
Recycling	-	1.0	1.0	-	0.8	0.8
Other recovery operations. (e.g., downcycling, upcycling, composting or anaerobic digestion)	0.2	-	0.2	0.2	-	0.2
<b>Non-hazardous waste</b>	<b>382.9</b>	<b>264.0</b>	<b>646.9</b>	<b>357.5</b>	<b>166.5</b>	<b>524.0</b>
Preparation for re-use	-	3.7	3.7	-	-	-
Recycling	25.4	260.3	285.7	-	166.5	166.5
Other recovery operations. (e.g., downcycling, upcycling, composting or anaerobic digestion)	357.5	-	357.5	357.5	-	357.5
<b>Total</b>	<b>383.1</b>	<b>264.9</b>	<b>648.0</b>	<b>357.7</b>	<b>167.3</b>	<b>525.0</b>

(1) Definition: On-site disposal.

(2) Definition: Disposal at an external site.

(3) Amendments to GRI Standard 306 came into force in 2022, so the table does not include data for 2020 and 2019.

(4) Nexi did not generate any waste from data centre management in 2021. During 2021, Nexi carried out a census and reorganisation of the paper archives in all its offices. In addition, renovations carried out in the building at Corso Sempione 55, Milan (headquarters) resulted in the removal and disposal of furniture no longer in use. Thus, although there was no significant change in the total amount of waste generated in 2020, the individual waste categories changed, leading to a reduction in hazardous waste generated.

(5) Part of Nets Switzerland Ltd (formerly CCV Switzerland Ltd) and Przelewy24 are not included in the data perimeter (not available). The offices of the Nets Denmark UK Branch, Edigard Latvia, the Nets Denmark A/S Eesti branch, the Nets Denmark A/S Latvia branch and the Nets Denmark A/S Lithuania branch are not material to the reporting perimeter based on the dimension (i.e. number of employees working at the site) and are, therefore, excluded from the tables.

**GRI 307-1 NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS**

Cases of non-compliance	Nexi Group		Nexi	
No.	2021	2021	2020	2019
Total monetary value of significant fines [eur]	-	-	-	-
Total number of non-monetary sanctions	-	-	-	-
Cases where recourse has been made to dispute resolution systems	-	-	-	-





# 6

## ANNEXES

A. Reconciliation table of material topics and GRI Standards Content Index	134
B. GRI Standards content Index	136
C. Methodological note	140
D. Report of the Auditing Firm	144

## A. RECONCILIATION TABLE OF MATERIAL TOPICS AND GRI STANDARDS CONTENT INDEX

Areas of Italian Legislative Decree 254/2016	Material topics identified by the Nexi Group	GRI Reference Standards	Scope of impacts		
			Impacts within the Nexi Group	Impacts external to the Nexi Group	Limitations
<b>Staff</b>	Talent attraction & employer branding	401: <b>Employment</b>	Whole Group		
	Employees training, development and appraisal	404: <b>Training and education</b>	Whole Group		
<b>Staff/Human Resources</b>	Diversity and equal opportunities	405: <b>Diversity and equal opportunity</b>	Whole Group		
		406: <b>Non-discrimination</b>	Whole Group		
	Well-being and sustainable welfare	401: <b>Employment</b>	Whole Group		
	Workers' rights and labour relations	402: <b>Labour/management relations</b>	Whole Group		
	Health and safety promotion	403: <b>Workplace health and safety</b>	Whole Group		
<b>Customers</b>	Privacy and data security	418: <b>Customer privacy</b>	Whole Group	Customers	
	Customer satisfaction	*	Whole Group	Customers	
	Business continuity	*	Whole Group	Customers/ Community and territory	
	Operational excellence	*	Whole Group	Customers/ Community and territory	
	Transparency and fairness	206: <b>Anti-competitive behaviour</b>	Whole Group	Customers/ Community	
		417: <b>Marketing and labelling</b>	Whole Group	Innovation/ Community and territory	
		419: <b>Socio-economic compliance</b>	Whole Group		
<b>Chain</b>	Responsible supply chain management	204: <b>Procurement practices</b>	Whole Group	Suppliers	
<b>Environment</b>	Energy transition and climate change	201: <b>Economic performance</b>	Whole Group	Community and territory/ Ambiente	
		302: <b>Energy</b>	Whole Group		
		305: <b>Emissions</b>	Whole Group		
		307: <b>Environmental compliance</b>	Whole Group		
	Responsible consumption	301: <b>Materials</b>	Whole Group		
<b>Community</b>	Digital transition and cashless society		Whole Group	Community Innovation/ Community and territory	
<b>Corruption</b>	Conduct integrity	205: <b>Anti-corruption</b>	Whole Group	Customers/ Community and territory	
		207: <b>Taxes</b>	Whole Group	Customers/ Community and territory	
		419: <b>Socio-economic compliance</b>	Whole Group	Customers/ Community and territory	

\* For material topics not directly related to GRI Standards aspects, please refer to the table "Key performance indicators" on page 139 and the GRI Standards content index.





## B. GRI STANDARDS CONTENT INDEX

Prepared in accordance with GRI Standards core option <sup>(58)</sup>

Disclosure	Indicator description	Omissions	Page number/ Notes
<b>GRI 102: GENERAL INFORMATION 2016</b>			
<b>PROFILE OF THE ORGANISATION</b>			
102-1	Name of the organisation		p. 110
102-2	Activities, brands, products and services		pagg. 23-24
102-3	Location of headquarters		pag. 110
102-4	Location of operations		pag. 110
102-5	Ownership and legal form		pagg. 22; 142-144
102-6	Markets served		pagg. 23-24
102-7	Scale of the organisation		pagg. 12; 22-24
102-8	Information on employees and other workers		pag. 116
102-9	Supply chain		pagg. 88-90
102-10	Significant changes to the organisation and its supply chain		pagg. 88-90
102-11	Precautionary principle or approach		pagg. 50-56
102-12	External initiatives		pagg. 24-28
102-13	Membership of associations		pagg. 122-124
<b>STRATEGY</b>			
102-14	Statement from senior decision-maker		pagg. 6-9
102-15	Key impacts, risks and opportunities		pagg. 50-56
<b>ETHICS AND INTEGRITY</b>			
102-16	Values, principles, standards and norms of behaviour		pagg. 10; 43-45
102-17	Mechanisms for advice and concerns about ethics		pagg. 44-45
207-1	Approach to taxation		pagg. 57-58
207-2	Tax governance, control and risk management		pagg. 57-58
207-3	Stakeholder engagement and management of tax concerns		pagg. 57-58
207-4	Country-by-country reporting	Information not available due to different regulatory deadline	pagg. 35-40
<b>GOVERNANCE</b>			
102-18	Governance structure		pagg. 35-40
102-19	Delegating authority		pagg. 37-40
102-22	Composition of the highest governance body and its committees		pagg. 36; 111
102-24	Nominating and selecting the highest governance body		pagg. 35-37
102-25	Conflicts of interest		pag. 59
102-26	Role of the highest governing body in setting goals, values and strategies		pagg. 35-39
102-27	Collective knowledge of highest governance body		pag. 35
102-28	Evaluating the highest governance body's performance		pag. 37
102-30	Effectiveness of risk management processes		pagg. 41-42
102-31	Review of economic, environmental and social topics		pagg. 37-40; 50-56
102-32	Highest governance body's role in sustainability reporting		pagg. 37-40

<sup>58</sup> Where there are boundary limitations with respect to GRI indicators, particularly in relation to Nets data, these are appropriately reported and disclosed in the text and in notes to the data for which disclosure is provided in this Statement.

Disclosure	Indicator description	Omissions	Page number/ Notes
<b>STAKEHOLDER ENGAGEMENT</b>			
102-40	List of stakeholder groups		pag. 24
102-41	Collective bargaining agreements		pag. 77
102-42	Identifying and selecting stakeholders		pag. 24
102-43	Approach to stakeholder engagement		pagg. 24-28
102-44	Key topics and concerns raised		pag. 24
<b>REPORTING PRACTICE</b>			
102-45	Entities included in the consolidated financial statements		pag. 140
102-46	Defining report content and topic boundaries		pagg. 140-142; 29-30
102-47	List of material topics		pag. 31
102-48	Restatements of information		pag. 140
102-49	Changes in reporting		pagg. 29; 140-142
102-50	Reporting period		pagg. 140-142
102-51	Date of most recent report		pagg. 140-142
102-52	Reporting cycle		pagg. 140-142
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<b>ECONOMIC PERFORMANCE: SPECIFIC STANDARDS</b>			
<b>GRI 201: ECONOMIC PERFORMANCE 2016</b>			
GRI 103	Management approach 2016		pagg. 92-99
201-2	Financial implications and other risks and opportunities due to climate change		pagg. 39-40; 50-54; 92-96
<b>GRI 204: PROCUREMENT PRACTICES</b>			
GRI 103	Management approach 2016		pagg. 88-91
204-1	Proportion of spending on local suppliers		pagg. 89; 126
<b>GRI 205: ANTI-CORRUPTION 2016</b>			
GRI 103	Management approach 2016		pagg. 42-47
205-2	Communication and training about anti-corruption policies and procedures		pag. 112
205-3	Established incidents of corruption and actions taken		pag. 113
<b>GRI 206: ANTI-COMPETITIVE BEHAVIOUR 2016</b>			
GRI 103	Management approach 2016		pagg. 57-59
206-1	Legal actions for anti-competitive behaviour, antitrust and monopoly practices		pag. 113
<b>ENVIRONMENTAL PERFORMANCE: SPECIFIC STANDARDS</b>			
<b>GRI 301: MATERIALS 2016</b>			
GRI 103	Management approach 2016		pagg. 97-99
301-1	Materials used by weight or volume		pag. 126
<b>GRI 302: ENERGY 2016</b>			
GRI 103	Management approach 2016		pagg. 94-96; 99
302-1	Energy consumption within the organisation		pag. 127
302-2	Energy consumption outside of the organisation		pag. 128

Disclosure	Indicator description	Omissions	Page number/ Notes
<b>GRI 303: WATER AND EFFLUENTS 2018</b>			
GRI 103	Management approach 2016		pag. 95
303-3	Water withdrawal		pag. 129
<b>GRI 305: EMISSIONS 2016</b>			
GRI 103	Management approach 2016		pagg. 93-94
305-1	Direct (Scope 1) GHG emissions		pagg. 94; 127
305-2	Energy indirect (Scope 2) GHG emissions		pagg. 94; 127
305-3	Other indirect (Scope 3) GHG emissions		pagg. 94; 128
<b>GRI 306: WASTE 2020</b>			
GRI 103	Management approach 2016		pagg. 97-98
306-1	Waste generation and significant waste-related impacts		pagg. 97-99
306-2	Management of significant waste-related impacts		pagg. 97-99
306-3	Waste generated		pag. 130
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<b>GRI 307: ENVIRONMENTAL COMPLIANCE 2016</b>			
GRI 103	Management approach 2016		pagg. 92-99
307-1	Non-compliance with environmental laws and regulations		pag. 130
<b>SOCIAL PERFORMANCE: SPECIFIC STANDARDS</b>			
<b>GRI 401: EMPLOYMENT 2016</b>			
GRI 103	Management approach 2016		pagg. 76-87
401-1	New employee hires and employee turnover		pagg. 117-118
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees		pagg. 83-84
<b>GRI 402: LABOUR/MANAGEMENT RELATIONS 2016</b>			
GRI 103	Management approach 2016		pagg. 76-87
402-1	Minimum notice periods regarding operational changes		pag. 84
<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018</b>			
GRI 103	Management approach 2016		pagg. 86-87
403-1	Occupational health and safety management system		pagg. 86-87
403-2	Hazard identification, risk assessment and incident investigation		pagg. 53;86-87
403-3	Occupational health services		pagg. 86-87
403-4	Worker participation, consultation and communication on occupational health and safety		pagg. 26;84-87
403-5	Worker training on occupational health and safety		pagg. 80-82
403-6	Promotion of worker health		pagg. 83-87
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		pagg. 53;86-87
403-9	Work-related injuries		pagg. 87;119

Disclosure	Indicator description	Omissions	Page number/ Notes
<b>GRI 404: TRAINING AND EDUCATION 2016</b>			
GRI 103	Management approach 2016		pagg. 80-82
404-1	Average hours of training per year per employee	As regards the number of hours of training provided, at the moment no, or only partial, data broken down by gender and professional category is available for the Nets perimeter. Therefore, this data is not included in the calculation of the overall indicator relating to average hours provided. The company undertakes to provide full disclosure of the indicator next year.	pagg. 119-120
404-3	Percentage of employees receiving regular performance and career development reviews		pag. 120
<b>GRI 405: DIVERSITY AND OPPORTUNITY 2016</b>			
GRI 103	Management approach 2016		pagg. 77-78
405-1	Diversity of governance bodies and employees		pagg. 113;120
405-2	Ratio of basic salary and remuneration of women to men		pag. 121
<b>GRI 406: NON-DISCRIMINATION 2016</b>			
GRI 103	Management approach 2016		pagg. 44; 77-78
406-1	Incidents of discrimination and corrective actions taken		pag. 121
<b>GRI 417: MARKETING AND LABELLING 2016</b>			
GRI 103	Management approach 2016		pagg. 59-61
417-3	Incidents of non-compliance concerning marketing communications		pag. 114
<b>GRI 418: CUSTOMER PRIVACY 2016</b>			
GRI 103	Management approach 2016		pagg. 48-50; 56; 73-75
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		pag. 115
<b>GRI 419: SOCIO-ECONOMIC COMPLIANCE 2016</b>			
GRI 103	Management approach 2016		pagg. 20-23; 34-63
419-1	Non-compliance with laws and regulations in the social and economic area		pag. 115
<b>KEY PERFORMANCE INDICATORS</b>			
<b>CUSTOMER SATISFACTION</b>			
GRI 103	Management approach 2016		pagg. 70-75
-	Net Promoter Score		pag. 72
<b>BUSINESS CONTINUITY</b>			
GRI 103	Management approach 2016		pagg. 54-56; 74-75
-	Cybersecurity training		pagg. 80-82
<b>OPERATIONAL EXCELLENCE</b>			
GRI 103	Management approach 2016		pagg. 70-75
GRI 103-2C	Number of customer complaints		pag. 125
<b>DIGITAL TRANSITION AND CASHLESS SOCIETY</b>			
GRI 103	Management approach 2016		pagg. 64-69
-	Investments in technology		pag. 65

## C. METHODOLOGICAL NOTE

### Legal requirements and reporting principles

The Consolidated Non-Financial Statement (hereinafter also the “Statement”) of Nexi has been prepared pursuant to Italian Legislative Decree 254/2016 (hereinafter also the “Decree”), and Consob Resolution No. 20267 of 18 January 2018 and in accordance with the GRI Standards, “in accordance - core” option defined in 2016 by the Global Reporting Initiative, and subsequent updates, taking the form of an autonomous document, as permitted by the aforementioned <sup>60</sup>.

With the aim of providing comprehensive information on the Group’s performance to all other stakeholders, voluntary qualitative and quantitative indicators have been added to the GRI Standards indicators, with reference to certain material issues, in line with the requirements of the standards. A GRI Standards Index is available on page 136 et seq. This summarises the data and information in the Statement in consideration of the material aspects identified.

The aspects reported in the Statement have been identified following the principle of materiality and in line with those of the GRI Standards - relevance, inclusiveness, sustainability context, completeness and reporting perimeter - and ensure an understanding of the Group’s activities, results, impact on stakeholders and on the Group itself. The Nexi Group’s Materiality Matrix was updated in 2021 to capture any changes attributable to the acquisition of Nets, which occurred in July 2021, in relation to the expectations of all of the Group’s stakeholders and the impacts that governance, economic, social and environmental aspects might have on their decisions, as well as the impacts that the same aspects might have on business, in view of the new areas where the Group operates. Details of the analysis conducted to update the Materiality Matrix are shown on page 29 and following.

In addition, the Statement was drafted taking into account the Enforcement Priorities defined by the European Securities and Markets Authority (ESMA) for 2021, with reference to the impacts of the Covid-19 pandemic.

Starting with the 2021 reporting, the Nexi SpA is subject to disclosure requirements on the integration of sustainability into its business activities, in accordance with the classification defined by the European Taxonomy and pursuant to Regulation (EU) 2020/852, Delegated Regulation (EU) 2021/2139 on climate and Delegated Regulation (EU) 2021/2178 on the content and presentation of information. The quantitative indicators associated with the European Taxonomy are presented through the form and references of the Consolidated Financial Statements. The report of the independent Auditing Firm is attached to this Statement and does not include the information on the European Taxonomy reported in chapter 4 “European Taxonomy” as a separate section of the Statement.

In order to provide full disclosure on the risks and opportunities associated with climate change, the Nexi Group Statement also includes reference to the disclosure requirements published in June 2017 by the Task Force on Climate-related Financial Disclosures (TCFD). These references are indicated in the text.

### Reporting period and perimeter

The perimeter of the companies covered by the Statement includes the Parent Company Nexi SpA and the companies consolidated as of 31 December 2021.

Consolidated Nexi Group companies and related consolidation percentage at 31 December 2021:

- Nexi Payments SpA (99.29%)
- Mercury Payment Services SpA (100%)
- Help Line SpA (69.24%)
- Nets Topco 3 S.à.r.l. (100%)
- Nets US, LLC (100%)
- Service HUB (100%)
- PforCards (100%)
- SIA Pay (100%)
- SIA Central Europe (100%)

<sup>60</sup> Italian Legislative Decree no. 254/2016, art. 4 and art. 5, point 3 b.

- New SIA Greece (100%)

Non-financial information relating to the activities of Service Hub is not disclosed in this Statement as it was not operational, had no employees and did not generate any impacts during 2021. The company became operational in 2022 following the merger of Nexi SpA with SIA.

Non-financial information relating to the activities of Nets US, LLC is not disclosed in this Statement because it was not operational during 2021.

Non-financial information relating to the activities of the companies PforCards, SIA Pay, SIA Central Europe and New SIA Greece is not disclosed in this Statement, as the effective date of the merger of these companies, signed on 16 December 2021, is 1 January 2022.

The data and information contained in the Statement relate to the period from 1 January to 31 December 2021, except for the data related to Nets which have been included from the date of acquisition, 1 July 2021. The figures for Nets are therefore from 1 July to 31 December 2021.

Where required by GRI standards, quantitative data has been provided by geographic area, with the following categorization:

Scope	Geograph-ical area	Company	Country
Nexi	Italy	Nexi Payments SpA, Mercury Payment Services SpA, Helpline SpA	Italy
Nets	Nordic Countries	Nets Denmark A/S and its branches Paytrail Oy and its subsidiaries EDIGard AS and its subsidiary and branch Signaturgruppen A/S Poplatek Oy Poplatek Payments Oy Storebox ApS Nets Sweden AB Nets Estonia AS and its branch	Denmark, Sweden, Norway, Finland, Estonia, Latvia, Lithuania and United Kingdom
	Poland	P24 Dotcard Sp. z o.o. (or P24) and its subsidiaries, Centrum Rozliczen Elektronicznych Polskie and Platnosci S.A. (or Polskie ePłatności, or PeP) and their subsidiaries	Poland
	DACH	Concardis GmbH and its subsidiaries, including Ratepay GmbH	Germany, Austria and Switzerland
	CEE	Nets CEE d.o.o. Slovenia (controlled by Concardis Holding GmbH) Nets CEE d.o.o. Croatia (controlled by Concardis Holding GmbH)	Slovenia and Croatia

To ensure comparability with information from previous years, the quantitative data included in the Statement are presented as follows:

- historical quantitative data for 2019 and 2020 for Nexi;
- quantitative data for 2021 for Nexi;
- consolidated quantitative data as of 2021 for Nexi, period from 1 January to 31 December 2021, and Nets, period from 1 July to 31 December 2021, except for data that, also in line with the requirements of the GRI Standard, presents a precise picture at December 31, 2021.

The following are exceptions to the above definition the quantitative data relating to the European Taxonomy, which include the consolidated quantitative data as of 2021 for Nexi, period from 1 January to 31 December 2021, and Nets, period from 1 July to 31 December 2021.

Finally, in the context of the reporting of material topics and related management methods, for greater completeness and clarity in the representation of information, where useful, a separate disclosure is provided for Nets and Nexi, in order to appropriately highlight the individual specificities. With regard to Nets data, in cases where it has not been possible to collect data with the level of detail required by GRI for this first year of reporting, any limitations in terms of scope and coverage have been duly noted in the text and in the notes.

### Reporting process

The Statement was prepared in accordance with the organisational procedure "Preparation of the Consolidated Non-Financial Statement" which governs:

- responsibility and involvement of company functions, including the identification and evaluation of relevant material topics;
- methods of extraction, collection and certification by the owners of non-financial data;
- responsibility activities of the corporate bodies, including the issuance of the favourable opinion of the Control and Risk and Sustainability Committee on the Materiality Matrix and Statement and their approval by the Nexi SpA Board of Directors.

Specific training sessions on the obligations under the Decree and the entire non-financial reporting process were carried out during 2021 for the companies that entered the perimeter following the merger with Nets.

The Consolidated Non-Financial Statement was approved by Nexi's Board of Directors at its meeting on 10 March 2022 and is subject to a limited audit by the external auditors PricewaterhouseCoopers SpA, in accordance with the criteria set out in the *"International Standard on Assurance Engagement 3000 Revised"*.

The independent auditors' report is attached to this Statement and does not include the information on the European Taxonomy reported in a separate section referred to in Chapter 4 "European Taxonomy" of the Statement itself.

### Dissemination of the Statement

The Statement is transmitted to Consob and to the Milan Companies Register in accordance with the procedures established by Italian Legislative Decree 254/2016 and Consob Resolution no. 20267 of 18 January 2018. It is also disseminated through publication on the website [www.nexigroup.com](http://www.nexigroup.com) in the Sustainability section and distributed, together with the 2021 Consolidated Financial Statements, at the Annual General Meeting at the end of the financial year. The Statement is published annually.

For further information on the Statement and its contents, please contact the ESG Function of the Nexi Group by writing to the following e-mail address: [csr@nexi.it](mailto:csr@nexi.it).







**NEXI SPA**

**INDEPENDENT AUDITOR'S REPORT ON THE CONSOLIDATED  
NON FINANCIAL STATEMENT PURSUANT TO ARTICLE 3,  
PARAGRAPH 10, OF LEGISLATIVE DECREE NO. 254/2016 AND  
ARTICLE 5 OF CONSOB REGULATION NO. 20267 OF JANUARY  
2018**

**YEAR ENDED 31 DECEMBER 2021**



## ***Independent auditor's report on the consolidated non-financial statement***

*pursuant to article 3, paragraph 10, of Legislative Decree No. 254/2016 and article 5 of CONSOB Regulation No. 20267 of January 2018*

To the Board of Directors of Nexi SpA

Pursuant to article 3, paragraph 10, of Legislative Decree No. 254 of 30 December 2016 (the "Decree") and article 5 of CONSOB Regulation No. 20267/2018, we have performed a limited assurance engagement on the consolidated non-financial statement of Nexi SpA and its subsidiaries (hereafter the "Group" or "Nexi Group") for the year ended 31 December 2021 prepared in accordance with article 4 of the Decree and approved by the Board of Directors on 10 March 2022 (hereafter the "NFS").

Our review does not extend to the information set out in the section "4 - European Taxonomy" of the NFS, required by article 8 of European Regulation 2020/852.

### ***Responsibility of Management and those charged with Governance for the NFS***

The Directors are responsible for the preparation of the NFS in accordance with article 3 and 4 of the Decree and with the "GRI-Sustainability Reporting Standards" defined in 2016, and updates versions (hereafter the "GRI Standards"), identified by them as the reporting standards.

The Directors are responsible, in the terms prescribed by law, for such internal control as they determine is necessary to enable the preparation of a NFS that is free from material misstatement, whether due to fraud or errors.

Moreover, the Directors are responsible for identifying the content of the NFS, within the matters mentioned in article 3, paragraph 1, of the Decree, considering the activities and characteristics of the Group and to the extent necessary to ensure an understanding of the Group's activities, its performance, its results and related impacts.

Finally, the Directors are responsible for defining the business and organisational model of the Group and, with reference to the matters identified and reported in the NFS, for the policies adopted by the Group and for the identification and management of risks generated and/or faced by the Group.

The Board of Statutory Auditors is responsible for overseeing, in the terms prescribed by law, compliance with the Decree.

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### ***PricewaterhouseCoopers SpA***

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### ***Auditor's Independence and Quality Control***

We are independent in accordance with the principles of ethics and independence set out in *the Code of Ethics for Professional Accountants* published by the *International Ethics Standards Board for Accountants*, which are based on the fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional behavior. Our audit firm adopts *International Standard on Quality Control 1 (ISQC Italy 1)* and, accordingly, maintains an overall quality control system which includes processes and procedures for compliance with ethical and professional principles and with applicable laws and regulations.

### ***Auditor's responsibilities***

We are responsible for expressing a conclusion, on the basis of the work performed, regarding the compliance of the NFS with the Decree and with the GRI Standards. We conducted our engagement in accordance with *International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information* (hereafter “ISAE 3000 Revised”), issued by the *International Auditing and Assurance Standards Board (IAASB)* for limited assurance engagements. The standard requires that we plan and apply procedures in order to obtain limited assurance that the NFS is free of material misstatement. The procedures performed in a limited assurance engagement are less in scope than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised (*reasonable assurance engagement*) and, therefore, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the NFS were based on our professional judgement and consisted in interviews, primarily with company personnel responsible for the preparation of the information presented in the NFS, analysis of documents, recalculations and other procedures designed to obtain evidence considered useful.

In particular, we performed the following procedures:

1. analysis of the relevant matters reported in the NFS relating to the activities and characteristics of the Group, in order to assess the reasonableness of the selection process used, in accordance with article 3 of the Decree and with the reporting standards adopted;
2. analysis and assessment of the criteria used to identify the consolidation area, in order to assess their compliance with the Decree;
3. comparison of the financial information reported in the NFS with that reported in the Group's Consolidated Financial Statements;
4. understanding of the following matters:
  - business and organisational model of the Group, with reference to the management of the matters specified by article 3 of the Decree;
  - policies adopted by the Group with reference to the matters specified in article 3 of the Decree, actual results and related key performance indicators;
  - key risks, generated and/or faced by the Group with reference to the matters specified in article 3 of the Decree.

With reference to those matters, we compared the information obtained with the information presented in the NFS and carried out the procedures described under point 5 a) below;



5. understanding of the processes underlying the preparation, collection and management of the significant qualitative and quantitative information included in the NFS. In particular, we held meetings and interviews with the management of Nexi SpA and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, consolidation, processing and submission of the non-financial information to the function responsible for the preparation of the NFS.

Moreover, for material information, considering the activities and characteristics of the Group:

- at holding level
  - a) with reference to the qualitative information included in the NFS, and in particular to the business model, the policies adopted and the main risks, we carried out interviews and acquired supporting documentation to verify their consistency with available evidence;
  - b) with reference to quantitative information, we performed analytical procedures as well as limited tests, in order to assess, on a sample basis, the accuracy of consolidation of the information;
- for the subsidiaries Nexi Payments SpA and Nets Denmark AS, which were selected on the basis of their activities, their contribution to the performance indicators at a consolidated level and their location, we carried out meetings with local management and gathered supporting documentation regarding the correct application of the procedures and calculation methods used for the key performance indicators.

### **Conclusions**

Based on the work performed, nothing has come to our attention that causes us to believe that the NFS of Nexi Group as of 31 December 2021 has not been prepared, in all material respects, in compliance with articles 3 and 4 of the Decree and with the GRI Standards.

Our conclusions on the NFS of Nexi Group do not extend to the information set out in the section “4 - European Taxonomy” of the NFS, required by article 8 of European Regulation 2020/852.

Milan, 7 April 2022

PricewaterhouseCoopers SpA

*Signed by*

Lia Lucilla Turri  
(Partner)

*Signed by*

Paolo Bersani  
(Authorised signatory)

*This report has been translated from the Italian original solely for the convenience of international readers. We have not performed any controls on the NFS 2021 translation.*

## Nexi SpA

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