

# POLICY

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SUSTAINABILITY POLICY - GRUPPO NEXI

**COVER PAGE**

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## 1 INTRODUCTION

### 1.1 SCOPE

The purpose of this document is to define the principles and guidelines adopted by the Nexi Group (hereinafter also the “Group” or “Nexi”) concerning sustainability, with reference to the identification, evaluation, planning, management, monitoring and reporting of Environmental, Social and Governance issues relevant to the Group’s strategy and to all its internal and external stakeholders.

This document is a “Group Policy”, with which all the companies belonging to the Group, their corporate bodies, employees, collaborators, suppliers and other business partners operating in the name and on behalf of the Group itself, in all countries where it is present, should comply.

This Policy outlines:

- the reference principles on which the Group’s sustainability approach is based in relation to the management of the relevant environmental, social and governance issues (hereinafter also “relevant sustainability issues”) for the Group’s strategy and for all its stakeholders, with the aim of increasingly integrating sustainability into daily business processes and decisions;
- the roles and responsibilities of the Group Corporate Bodies and of the company departments involved in the planning, monitoring and continuous improvement of the management of sustainability issues;
- the guidelines defined and implemented by the Group with reference to the following sustainability issues:
  - environmental protection;
  - respect of human rights;
  - promotion of diversity and inclusion;
  - privacy protection;
  - data security;
  - fight against corruption;
  - tax matters.

### 1.2 RELEVANT REGULATIONS

This section lists the relevant regulations (both internal and external) and the reference standards considered in the definition of the Group Sustainability Policy.

#### National regulatory provisions and guidelines

- Italian law “D.Lgs 231/2001” (Administrative responsibility of legal entities) and subsequent amendments and additions
- Italian law “D.Lgs 254/2016”, implementing Directive 2014/95/EU of the European Parliament and of the Council on the communication of non-financial information and information on diversity
- Codice di Autodisciplina (Corporate Governance Code) for listed companies of the Italian Stock Exchange (Borsa Italiana – 2018)
- Codice di Corporate Governance (Corporate Governance Code) for listed companies of the Italian Stock Exchange (Borsa Italiana – 2020)

#### International regulatory provisions and guidelines

- The Universal Declaration of Human Rights (UDHR) adopted by the General Assembly of the United Nations (1948)
- ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work (1998)
- The United Nations Convention against Corruption (UNCAC – 2005)
- The United Nations Principles for Responsible Investment (PRI – 2006) and subsequent amendments and additions
- ILO (International Labor Organization) Declaration on Social Justice for a Fair Globalization (2008)
- The United Nations Guiding Principles on Business and Human Rights (2011)
- The Paris Agreement to limit the global warming to well below 2°C and pursuing efforts to limit it to 1.5°C (2015)
- The 2030 United Nations Agenda for Sustainable Development

(2015) defining the 17 Sustainable Development Goals (SDGs)

- EU Regulation n. 2016/679 (General Data Protection Regulation or GDPR – 2016)
- The GRI (Global Reporting Initiative) Guidelines to report sustainability (2016) and subsequent amendments and additions. The GRI is a non-profit body with the goal to globally support sustainability reporting
- The Task Force on Climate-related Financial Disclosures (TCFD) Recommendations on (voluntary) reporting of climate-related risks and opportunities (2017) and subsequent amendments and additions
- The European Commission Action Plan for sustainable finance (2018), currently under revision, and related regulatory measures approved and under approval, including the taxonomy of economic activities, climate benchmarks, and the European certification for green bonds
- The non-binding climate reporting guidelines from the European Commission (2019)
- EU Regulation n.2019/2088 on sustainability-related disclosures in the financial services sector (2019)
- The European Union “Green Deal”, referring to all the regulatory measures approved and being approved by the Commission and the European Parliament, which include, among other actions, an articulated policy on decarbonisation and on circular economy to strengthen the path of the member states of the European Union towards a zero-emission economy by 2050 (2020)

#### Reference Group regulations

- The Code of Ethics of Nexi SpA and its subsidiaries
- The Organization Model (Modello 231) of Nexi SpA and its subsidiaries
- CC-006 Nexi Group Anti-trust Code of Conduct
- RG-002 Nexi Group General Regulations
- RR-001 Nexi Payments SpA Anti-Money Laundering and Counter-Terrorism Regulations
- RR-001 Nexi Group General Regulations – Personal Data Protection and Treatment sections
- PP-008 Nexi Group Information Security Policy
- PP-011 Nexi Group Business Continuity Management Policy
- PP-018 Nexi Group Data Governance Policy
- PP-024 Nexi Group Policy on health and safety at work
- PP-026 Group Procurement Policy
- PP-029 Nexi Group Cyber Resilience strategy Policy
- PP-032 Nexi Group Enterprise Risk Management (ERM) Policy
- POG-031 Nexi Group Waste Management and Disposal (Environmental Requirements) Procedure
- POG-134 Nexi Group preparation of the consolidated non-financial declaration Procedure
- Nexi Policy Reward

#### International market standards

- SA 8000 - Corporate social responsibility management
- ISO 9001 - Quality system
- ISO 14001 - Environmental management
- ISO 27001 - Information security management
- ISO 22301 - Business continuity management
- PCI-DSS - Payment Card Industry Data Security Standard

### 1.3 VALIDITY OF THE DOCUMENT

This Policy is approved by Nexi SpA Board of Directors. It is subject at least to annual verification and, if necessary, to revision.

## 2 REFERENCE PRINCIPLES

The reference principles of this Policy are the following:

- **Dialogue with stakeholders:** interaction with the Group’s stakeholders to understand their needs and sustainability expectations, in order to use them as a lever to define corporate strategies and as a tool to manage and anticipate changes, with the aim of increasing the resilience of the Group business model, of improving the services and products offered and with them the quality of life of the territories in which the Group operates.

- **Material approach:** identification of relevant sustainability issues through the involvement of the Group functions, of top management, and of corporate bodies, as well as with a direct and recurring engagement of internal and external stakeholders.
- **Cooperation:** the contribution of the Group's organizational units, each for its own competences and activities, to contribute proactively to the responsible management of the social, environmental and governance issues relevant to the Group, in line with the principles and guidelines defined in this Policy.
- **Training and sustainability culture promotion:** accountability for the impacts of daily activities with reference to the relevant social, environmental and governance issues, through mandatory training plans and awareness-raising initiatives aimed at Group people, at corporate bodies and at Group stakeholders.
- **Transparency and reporting:** appropriate disclosure to shareholders and to all other stakeholders (both internal and external) on relevant environmental, social and governance performance, according to the defined procedures and dedicated institutional channels. In particular, the Nexi Group prepares and publishes yearly the consolidated non-financial Statement (hereinafter also the "Statement" or "NFS") according to the Italian law "D.Lgs 254/2016" (hereinafter also the "Decree") and to the Consob Deliberation n. 20267 of January 18th 2018.  
Furthermore, Nexi plans to implement progressively the recommendations of the Task Force for Climate-related Financial Disclosure (TCFD) and the non-binding climate reporting guidelines from the European Commission in order to disclose clear, comparable and consistent information referring to climate-change related risks and opportunities.

### 3 SUSTAINABILITY GOVERNANCE

#### 3.1 ROLES AND RESPONSIBILITIES

##### NEXI SPA BOARD OF DIRECTORS

Nexi SpA Board of Directors (hereinafter also the "BoD") is the corporate body responsible for the strategic direction and supervision of the Group's activities, results and sustainability impacts. In particular:

- it defines the principles, the guidelines, the objectives and the commitments with reference to the sustainability issues relevant for Nexi, in line with the Group's strategic objectives and with the needs and expectations of the internal and external stakeholders of the Group;
- it oversees the correct dissemination of the principles and of the guidelines defined in this Policy, as well as their application to all Group subsidiaries, as well as to their corporate bodies, their employees, collaborators, suppliers and all other business partners operating in name and on behalf of the Group in the territories in which the Group operates;
- it assesses periodically the results and impacts as well as the adequacy and effectiveness of the principles and guidelines for planning and managing the sustainability issues relevant for the Group, considering the changes in the Group internal and external context;
- consistently with the aim of creating sustainable value over time for all stakeholders and in compliance with the Corporate Governance Code of Listed Companies, as part of the programs for performance acknowledgment and of the provisions of the Remuneration Policy through the Remuneration Committee, it defines the path of progressive integration of the top management and executive directors strategic objectives with sustainability objectives, also called ESG objectives, with reference to components linked to parameters of environmental, social and governance sustainability;
- it redacts and approves the consolidated non-financial Statement, in accordance with the requirements of the current legislation, in order to ensure adequate reporting of the Group's sustainability activities, of the results achieved, of its commitments and of the significant sustainability impacts of the Group and on the Group.

##### BOARD OF DIRECTORS OF SUBSIDIARY COMPANIES

The Board of Directors of subsidiary companies of Nexi Group:

- implements the Sustainability Policy approved by the Parent Company's Board of Directors;
- is responsible for the full and faithful implementation of the principles and guidelines included in the Policy;
- promptly informs the Board of Directors of the Parent Company of any evolution deemed significant regarding the relevant sustainability issues within its competence

##### CONTROL, RISK AND SUSTAINABILITY COMMITTEE

The Control, Risk and Sustainability Committee performs propositional and consultative functions vis-à-vis the Parent Company's Board of Directors in matters of sustainability. In particular:

- it examines and evaluates the sustainability issues related to the conduct of business and the dynamics of interaction with stakeholders, with the aim of continuously improving the Group's sustainability profile;
- it monitors Nexi's positioning on sustainability issues aiming at a constant alignment with current and emerging regulations and with best market practices;
- following the request of the Board of Directors, it expresses opinions on any further sustainability issues;
- it examines and assesses the Group non-financial Statement.

##### MANAGEMENT

The Management formulates sustainability plans and related objectives and is responsible for their implementation in line with the strategies, principles, guidelines and objectives defined by the Parent Company's Board of Directors. In particular:

- it contributes to the identification of relevant sustainability issues;
- it proposes objectives and initiatives, also considering business and sustainability risks;
- it implements the initiatives and it reports on the results achieved and on the progress made towards the objectives defined and approved by the Parent Company's Board of Directors;
- it carries out internal and external advocacy activities, involving the Group's internal and external stakeholders;
- it reports promptly to the function in charge of Corporate Social Responsibility any evolution, within its competence, deemed significant on the sustainability issues relevant to the Group,

##### THE FUNCTION IN CHARGE OF CORPORATE SOCIAL RESPONSIBILITY

Specific function within the Corporate & External Affairs function, which:

- coordinates and monitors the overall process of preparing the Group's consolidated non-financial Statement;
- coordinates the development of the sustainability strategy through dialogue and involvement of the Management;
- reports to the Control, Risks and Sustainability Committee on the Group's consolidated non-financial Statement, on the development of sustainability strategies, on the results achieved and on the progress with respect to the objectives in line with the strategy, principles and guidelines defined by Nexi Board of Directors

### 4 GUIDELINES ON SUSTAINABILITY ISSUES RELEVANT FOR THE GROUP

#### 4.1 ENVIRONMENTAL PROTECTION

- 4.1.1 **Combating climate change.** Nexi recognizes that climate change has a significant impact on the ecosystem, society and the economic context in which it operates. The Group contributes to combating climate change i) by measuring its direct and indirect impact, as well as the climate impact on its business model, ii) by committing to reduce its emissions (also through the digitalization of its internal and external processes) and to increase the resilience of its activities, providing information on the initiatives activated and the results achieved, and iii) by participating in the discussion on public and private policies for a transition towards a low carbon economy.

- 4.1.2 **Compliance with environmental regulations.** Nexi Group operations are carried out, at all levels, in full compliance with the national and international environmental laws applicable to the Group. Nexi constantly monitors the evolution of the environmental regulatory framework, and is committed to timely and fully align with emerging regulatory requirements.
- 4.1.3 **Reduction of the environmental impact.** Nexi's actions relating to environmental sustainability are consistent with a progressive reduction of the Group's environmental impact. In defining initiatives aligned with its environmental commitment, Nexi constantly monitors and acts to reduce Greenhouse Gas emissions from its data centers, production sites and buildings. In addition, Nexi adopts policies that encourage green and shared mobility options with reference to its logistics and employee mobility needs.
- 4.1.4 **Environmental sustainability of products, services and processes.** Nexi is committed to continuously monitor and improve the impact of its products, services and processes, considering their entire life cycle. The Group regularly assesses its consumption of raw materials and energy and it defines actions to reduce their use while ensuring business effectiveness.
- 4.1.5 **Responsible management of supply chain.** Nexi recognizes the importance of an active control of its supply chain to increase the environmental sustainability of its business through the application of specific procedures to assess and improve sustainability, involving both suppliers, collaborators and other business partners in its initiatives.
- 4.1.6 **Environmental Management System.** Nexi is committed to establishing, implementing, maintaining and continuously improving a Group-wide environmental management system, gradually adopting processes and solutions that comply with the main market standards, including ISO 14001.
- 4.1.7 **Management of environmental emergencies.** Nexi attaches the utmost importance to personal safety and business continuity in the event of environmental emergencies and it adopts adequate prevention and response measures for possible significant environmental emergency situations

## 4.2 RESPECT OF HUMAN RIGHTS

Nexi is committed to promote respect for human rights in all areas of its operations by adhering with its activities to internationally recognized frameworks including the "Universal Declaration of Human Rights", the "United Nations Guiding Principles on Business and Human Rights" and the "ILO Declaration on Fundamental Principles and Rights at Work".

- 4.2.1 **Non-discrimination.** With respect to all its stakeholders, both internal and external, and in carrying out all its activities and processes, Nexi fights any form of discrimination, whether due to gender, skin color, race, language, ethnicity, disability, sexual orientation and gender identity, economic status, religion, national or social origin, state, political opinion, union membership, age or any other personal characteristics. Nexi also combats, without exception, any form of sexual harassment and sexism in the workplace.
- 4.2.2 **Fair and just working conditions.** Nexi complies with national and international labor regulations, it complies with minimum wage requirements and it guarantees that overtime is remunerated as established by laws, collective labor agreements or industry standards. To develop skills and leadership, and to create the best team of people operating in the payments market, Nexi develops and implements its People Strategy, through the key tools of Performance Management, Training, Reward and Sustainable Welfare. Performance Management is the tool adopted to give value to the contribution of each individual employee to business results, according to a meritocratic approach. Training represents a strategic factor for Nexi Group. It is an integrated system of differentiated paths, innovative methods and approaches defined to develop and enhance the skills, atti-

tudes and passions of each employee. It makes use of a plurality of training tools and contents specifically designed and it draws inspiration from market best practices and from the experiences of Nexi people.

The Reward system is based on the principles that guide Nexi's remuneration programs and consequent actions: alignment with values and with business strategy, performance, competitiveness and equity, transparency and communication.

Nexi Welfare is the Group's sustainable welfare program which, by integrating contractual welfare initiatives with leading practices on the market, provides differentiated initiatives / services and benefits dedicated to the well-being of Nexi's people and their families, in order to create lasting and sustainable value for employees, their families and the territory in which they live and to support them in the reconciliation between private and working life.

- 4.2.3 **Child labour.** Nexi does not tolerate any form of child labor. The Group does not employ people under the mandatory minimum age according to local laws and verifies the adoption by suppliers, collaborators and other business partners of similar commitments.
- 4.2.4 **Health and safety in the workplace.** Nexi is committed to protecting the health and safety of its employees and all of the people with whom it interacts; to this end, the Group promotes the creation and maintenance of adequate working environments in terms of worker health and safety, ensuring compliance with national and international directives on the subject
- 4.2.5 **Freedom of association and collective bargaining.** Nexi respects the right of employees to freely join trade union associations and their right to collective bargaining at all levels.
- 4.2.6 **Privacy and freedom of opinion.** Nexi respects the privacy and freedom of opinion of its employees, suppliers, collaborators and business partners, establishing internal structures and procedures aimed at protecting these rights
- 4.2.7 **Accessibility and support to the productive sectors.** Nexi contributes to the spread of the digital payments culture and of new technologies by facilitating access to services for the community, including the services provided by the public administration. The Group also demonstrates its commitment to supporting people with disabilities / physical limitations access to financial services through dedicated interfaces and software products. The Group's activities also support key production sectors in the reference economic landscape by facilitating financial transactions for all the actors involved.
- 4.2.8 **Supply chain implications.** Nexi acknowledges its responsibility in the respect of human rights also referring to its supply chain; for this reason, in selecting suppliers, collaborators and business partners Nexi also evaluates respect of human rights and the adoption of fair and just working conditions

## 4.3 PROMOTION OF DIVERSITY AND INCLUSION

Nexi is aware that the greatest value for the Group is its people and that technological development takes place only through human capital development.

The Group has made gender, experience and skills diversities the distinctive element of its people in response to the growing market challenges in which it operates and is committed to promoting diversity also within the Group's administrative, management and control bodies, complying with regulatory requirements for listed companies.

- 4.3.1 **Promotion of an inclusive culture.** Through its People Strategy, Nexi is committed to promoting the value of people by establishing an inclusive corporate identity, called One Nexi, which promotes and values diversity in terms of gender, hard and soft skills, personal abilities and passions. We are constantly committed to integrating people with disabilities in our workforce in accordance with current legislation, and to promote in the future inclusion and care initiatives addressing new emerging needs.

**4.3.2 Equal pay and gender equality.** As part of the provisions of its remuneration and incentive Policies, Nexi commits to offer equal remuneration by guaranteeing the application of the principle of equal opportunities and promoting policies to combat the gender gap.

#### 4.4 PRIVACY PROTECTION

Nexi complies with current privacy legislation and informs each employee of the nature of the personal data being processed, the methods of treatment, the areas of communication, adopting the appropriate measures to guarantee its confidentiality.

The Group also defines the list of data that each employee is entitled to process. To this end, it prepares and delivers specific appointment letters to subjects authorized to process the data.

The aforementioned authorized personnel, in processing personal data, operate by guaranteeing the highest confidentiality of the information they possess, considering, in any case, all personal data as confidential data and in some cases subject to secrecy.

The work procedure and the people behavior in processing personal data are aimed at preventing any risk to the data itself. This includes avoiding that personal data is subject to accidental destruction and loss, that unauthorized persons can obtain access to the data, and that unauthorized or non-compliant data processing operations are performed vs. the purposes for which the data was collected. Therefore, the authorized personnel operates with the utmost diligence and attention in all stages of data treatment, starting from the exact moment of data acquisition, to its possible update, as well as for its conservation and eventual cancellation or destruction.

Lastly, Nexi bans the personnel authorized to process personal data to process data for purposes not foreseen by the companies that are part of Nexi Group.

#### 4.5 DATA SECURITY

Data security is one of Nexi's corporate priorities; the Group makes significant continuous investments to strengthen its technical and organizational tools to ensure data security.

Nexi has defined and implemented an Information Security Management System ("SGSI"), to protect the Group's information assets, in line with the IT risk appetite defined at company level.

The Nexi Group Information Security Management System is inspired by ISO standards and by industry best practices, and provides a holistic approach to ensure data security in all situations.

This approach includes the definition and periodic update of an IT security strategy, of internal data protection and IT security policies, of accident management and escalation policies, of vulnerability management and business continuity procedures.

**4.5.1 Relevance of data for Nexi business.** Nexi considers the information it manages to be a fundamental resource for pursuing its business objectives. The Group commits to implement all the security initiatives necessary to guarantee an adequate level of data protection, extending these protection measures to protect its customers.

**4.5.2 Structured approach.** Nexi believes that an effective protection of the information it manages must be based on a structured, complete and continuous approach to security. This approach to security takes into account the Group's security objectives and the information that needs protection in order to identify and assess the security risks and define adequate mitigation measures.

**4.5.3 Engagement at all levels.** Nexi recognizes that the definition, implementation, review, maintenance and improvement of its approach to security must involve all internal and external subjects who access company information, each with regard to their skills and in compliance with regulations and contractual obligations with its customers, suppliers, collaborators and other business partners.

**4.5.4 Independent audit.** Nexi's information security management system is certified according to the reference market standards including ISO 27001.

#### 4.6 FIGHT AGAINST CORRUPTION

Nexi operates in compliance with the laws, regulations, international standards and guidelines, both national and foreign, relevant for anti-corruption. The Group adopts appropriate organizational models and tools in line with the achievement of this purpose.

The Group condemns any form of corruption without exception, whether as a corruptor or corruptee, regardless of whether the beneficiary of this act is a public official or a private individual, and regardless of whether or not an undue advantage is obtained.

**4.6.1 Organizational model.** Complying with current legislation and with best market practices, the Group adopts its Code of Ethics and defines its own Organization and Management Model ("Modello 231"). These models, published through the Group's institutional website, provide Nexi with the tools necessary to actively contribute to the prevention and fight against all forms of corruption.

**4.6.2 Whistleblowing channels.** Nexi asks to all its employees, suppliers, collaborators, business partners and customers to contribute to a corruption-free environment. Any indications of corruption must be immediately reported through the dedicated whistleblowing channels made available by the Group Companies and specified in their Code of Ethics and 231 Organization and Management Models.

**4.6.3 Mandatory action.** Should Nexi learn of any non-compliance with respect to its commitment to fight corruption, both with reference to its own activities and to those of its supply chain, Nexi will immediately take any disciplinary and / or legal measure necessary to safeguard its business and reputation. Appropriate internal procedures, periodically updated to ensure their effectiveness, regulate internal roles and responsibilities related to the fight against corruption

#### 4.7 TAX MATTERS

**4.7.1 Tax compliance.** Nexi commits to comply fully with tax laws and practices in the countries in which it operates, both in their form and in their substance. To achieve this goal, the Group acts in compliance with regulations, national and international standards, and aligning with the OECD principles whenever necessary.

**4.7.2 Tax risk management.** Nexi reduces its tax risk exposure from its activities by applying the utmost diligence in all processes relevant for compliance with its tax obligations. With reference to tax planning, the Group benefits from available tax incentives, concessions and exemptions in line with the provisions of relevant tax legislation.

#### 5 MANAGEMENT OF BREACHES

Employees, suppliers or other stakeholders, who notice breaches of the guidelines set by this Policy, are required to report any relevant fact and / or information. In particular, information must be addressed to:

- the Company's e-mail address:  
Nexi S.p.A.: OdV\_Nexi@nexi.it  
or
- in case of anonymous reports, by post to the address of the Company's registered office, to the attention of the Supervisory Body
- to the Head of the internal reporting system for breaches (Whistleblowing) who must inform the Supervisory Body<sup>1</sup>.

The reporting parties in good faith are guaranteed against any form of retaliation, discrimination or penalization. In all cases the confidentiality of the identity of the reporting party will be guaranteed, except for legal obligations and the protection of persons accused falsely or in bad faith.

#### 6 DIFFUSION

Nexi provides this Sustainability Policy to all internal and external stakeholders who request it. This Policy is available on the Group's website through its Sustainability section.

<sup>1</sup> For Whistleblowing, the responsible function is Compliance & AML. For breaches referring to Compliance & AML, the responsible function is Internal Audit.