



GROUP POLICY

N. PP-038 v.02

SUSTAINABILITY POLICY

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| Title | Sustainability Policy |
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| Document type | Group Policy |
| Proponent Functionⁱ (Group Process Owner) | Group ESG & Sustainability |
| Shared with | Corporate Governance |
| | HR |
| | Group Procurement & RE |
| | Group Operations Transformation |
| | IT |
| Verified by | Group Compliance |
| | Group Risk Management |
| | Group Organizational Governance & Processes |
| Approved by | Nexi S.p.A. Board of Directors |
| Date of approval | 04-11-2025 |
| Scope | <ul style="list-style-type: none"> • <i>Define ESG principles and guidelines adopted by Nexi Group.</i> • <i>Reference processes: identification, assessment, planning, management, monitoring, and reporting of ESG issues.</i> |
| Covered risk | <i>ESG risk mitigation aligned with the ERM Policy risk model</i> |
| Covered external regulation requirements | <ul style="list-style-type: none"> • <i>Compliance with the main national and international regulations on sustainability.</i> • <i>Main references:</i> <ul style="list-style-type: none"> - <i>Legislative Decree 125/2024</i> - <i>Directive (EU) 2022/2464</i> • <i>Further details in the “External and Internal References” section</i> |
| Applicability | <ul style="list-style-type: none"> • <i>Applies to all business lines and operating models within Nexi Group.</i> • <i>Encompasses all subsidiaries and branches.</i> |

ⁱ This document has been preliminarily shared with all Functions involved and the Proponent Function keeps the relevant evidence

REVIEW

| Version | Date of approval | Main updates |
|---------|------------------|--|
| 1 | 30-07-2020 | First issue |
| 2 | 04-11-2025 | <p>Main updates:</p> <ul style="list-style-type: none"> • The following sections have been introduced: <ul style="list-style-type: none"> 2.2) <i>Guidelines on sustainability matters relevant for the group</i> 2.2.2) <i>Responsible supply management</i> 2.2.3) <i>Respect of social values</i> 2.2.5) <i>Practices of good governance</i> 3.2) <i>Local responsibilities</i> 4) <i>Reporting</i> 5) <i>Definitions</i> 6) <i>External and internal references</i> • In addition, the following sections have been updated: <ul style="list-style-type: none"> 1) <i>Context</i> 2.1) <i>General Principles</i> 2.2.1) <i>Environmental protection</i> 2.2.4) <i>Privacy, data responsibility and information security</i> 3.1) <i>Group responsibilities</i> <p>Reasons for change:</p> <ul style="list-style-type: none"> • alignment with Directive (EU) 2022/2464 <i>Corporate Sustainability Reporting Directive (CSRD)</i>, <i>Delegated Regulation (EU) 2023/2772 introducing the European Sustainability Reporting Standards (ESRS)</i> and <i>Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (Taxonomy)</i>; • alignment with the Carbon Net-Zero target by 2040 and interim CO_{2e} reduction targets by 2030, already approved in 2021 and 2023 respectively; • alignment with the new structure of the Nexi Group. |

INDEX

| | | |
|----------|---|-----------|
| 1 | CONTEXT | 5 |
| 2 | PRINCIPLES AND GUIDELINES | 6 |
| 2.1 | GENERAL PRINCIPLES | 6 |
| 2.2 | GUIDELINES ON SUSTAINABILITY MATTERS RELEVANT FOR THE GROUP | 6 |
| 2.2.1 | ENVIRONMENTAL PROTECTION | 7 |
| 2.2.2 | RESPONSIBLE SUPPLY MANAGEMENT | 8 |
| 2.2.3 | RESPECT OF SOCIAL VALUES | 8 |
| 2.2.4 | PRIVACY, DATA RESPONSIBILITY AND INFORMATION SECURITY | 10 |
| 2.2.5 | PRACTICES OF GOOD GOVERNANCE | 11 |
| 3 | ROLES AND RESPONSABILITIES | 13 |
| 3.1 | GROUP RESPONSIBILITIES | 13 |
| 3.2 | LOCAL RESPONSIBILITIES | 15 |
| 4 | REPORTING | 17 |
| 5 | DEFINITIONS | 17 |
| 6 | EXTERNAL AND INTERNAL REFERENCES | 19 |
| 6.1 | EXTERNAL REFERENCES | 19 |
| 6.2 | INTERNAL REFERENCES | 20 |



1 CONTEXT

The purpose of this document (hereinafter the "Policy") is to guide the definition of the principles, strategies, guidelines, objectives and commitments adopted by Nexi Group (hereinafter also the "Group" or "Nexi") with reference to the Sustainability matters in the environmental, social and governance areas (hereinafter "ESG") relevant to the Group's strategy and to all its internal and external stakeholders, also in line with the requirements from the Directive (EU) 2022/2464 Corporate Sustainability Reporting Directive (hereinafter "CSRD") as transposed into Italian law Directive and by the Legislative Decree 125/2024.

Additionally, the Policy defines the roles and responsibilities of the Corporate Bodies and departments with respect to the sustainability matters, addressing crucial themes such as environmental protection, circular economy, respect for human rights, diversity and inclusion, privacy protection, data security, anti-corruption efforts, and tax matters.

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 Nexi itself, in all countries where it is present, shall comply.

2 PRINCIPLES AND GUIDELINES

2.1 GENERAL PRINCIPLES

Nexi Group aims to integrate sustainability into daily processes and decisions. The following principles (hereinafter General Principles) inspire how Nexi addresses the responsible management of its impacts, both towards the communities in which it operates and towards its people, in adherence to the relevant external and internal normative references listed in this Policy.

- **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 offered services and products and with them the quality of life in the territories in which the Group operates.
- **Double Materiality approach:** identification of relevant sustainability matters through the involvement of the Group functions, of top management, and of corporate bodies, as well as with the direct and recurring engagement of internal and external stakeholders (hereinafter Double Materiality Assessment). The prioritization of the sustainability matters resulting from the double materiality analysis is subject to periodic review and it is communicated together with the Double Materiality assessment results, within the Sustainability Statement in accordance with the specific procedure.
- **Cooperation:** contribution of the Group's organizational units, each for its own competences and activities, to contribute proactively to the responsible management of the ESG matters relevant to the Group, in line with the principles and guidelines defined in this Policy.
- **Integrity and fairness:** pursuit of ESG objectives guided by principles of integrity and fairness, also to avoid any fraud risk on ESG data and on green-washing, i.e. sustainability communications that constitute unfair practices between companies and consumers as false, deceptive or misleading.
- **Sustainability training, expertise, culture promotion:** gathering of sustainability competence, expertise, and awareness throughout the Group as critical enablers to succeed with Sustainability strategy execution. Possible ESG training need for the relevant internal stakeholders is identified in an aggregated manner through an internal recurrent monitoring, with training plans secured accordingly. Awareness initiatives for sustainability mindset are spread to engage all the people in the company.
- **Attracting, Developing, and Retaining Talent:** attraction, development, and retainment of talents by creating a supportive and engaging working environment in line with its ESG principles, approaches, awareness & culture programs.

2.2 GUIDELINES ON SUSTAINABILITY MATTERS RELEVANT FOR THE GROUP

The sustainability matters relevant for the Group are defined according to the General Principles of the Policy and the Double Materiality assessment. The following paragraphs provide a definition of the areas of commitment as well as an explanation of the main lines of action followed by the Group to achieve its objectives.

2.2.1 ENVIRONMENTAL PROTECTION

- **Climate Change Mitigation.** Nexi recognizes the importance and the challenges that climate change pose on the ecosystem, society and the economic context in which it operates. The Group contributes to combating the climate change i) by measuring its own direct and indirect climate impact, as well as the climate impact on its business model, ii) by committing to reduce its own emissions also through the efficiency and digitalization of its internal and external processes, to increase the resilience of its activities, to providing information on the initiatives activated and the results achieved, iii) by participating to research and public policy engagement on how to transition towards a low carbon economy in line with the Paris Agreement, iv) by contributing to relevant European or International climate networks to share best practice for the carbon transition to reach the goals set out in the Paris Agreement.

Nexi is dedicated to taking decisive steps to reduce its greenhouse gas (GHG) emissions across its own operations and value chain. Nexi's contribution to climate change mitigation stems from energy efficiency and the use of renewables, both within its own business operations (Scope 1 and 2 emissions) and through its suppliers' products and services (Scope 3 emissions). Accordingly, Nexi has committed to be carbon net-zero by 2040 and to interim carbon reduction targets by 2030 aligned to the 1.5°C scenario according to the Paris Agreement and already approved by the Science Based Target Initiative. Nexi aims to achieve such climate targets by putting in place a carbon transition plan and by fostering sustainable practices across its own operations and entire value chain.

- **Energy Efficiency and Renewable Energy.** Nexi is committed to a range of emission reduction measures designed to limit energy consumption, use of renewable energy and increase overall energy efficiency throughout its own operations. These measures include adopting cutting-edge energy-efficient technologies, improving data centers and facilities' energy consumption, fostering a culture of responsible energy use by promoting energy-saving practices among its workforces. Nexi is fully committed to achieving a 100% renewable energy target for its Scope 2 emissions by 2030.
To support the transition to net-zero within its value chain, Nexi collaborates with suppliers and partners to mobilize them to commit to carbon net-zero ambition and to set their own carbon reduction targets aligned to the Science Based Target Initiative, and so to communicate their emissions transparently. In addition, Nexi is open to sharing climate actions' best practices and know-how on digital solutions' carbon footprint and related benefits in the payment ecosystem and institutional networks to generate mobilization towards more sustainable solutions and actions in the payment sector and in society.
- **Environmental and Energy Management System.** Nexi is committed to establishing, implementing, maintaining, and continuously improving a Group-wide environmental management system, progressively adopting processes and solutions aligned with leading market standards, i.e. ISO 14001, ISO50001, EMAS.
- **Management of environmental emergencies.** Nexi holds the utmost importance to personal safety and business continuity in the event of environmental emergencies, and adopts, where

deemed appropriate, adequate prevention and response measures for possible significant environmental emergency situations.

- **Circular Economy.** Nexi is committed to recurrently monitor and improve the impact of its products, services and processes, considering their entire life cycle. Nexi is committed to adopting a circular approach to resource use that reduces waste and promotes sustainable consumption across its operations and solutions. A primary focus is on reducing its reliance on non-renewable materials, such as plastics and microplastics, and progressively replacing these with renewable, low-impact alternatives where possible. To mitigate environmental impacts further, Nexi is committed to fostering practices of reuse, repurposing, recycling, and implementing end-of-life measures for materials and equipment to maximize their lifespan and minimize waste generation. Nexi's solutions are increasingly designed with digital approach in mind, thereby reducing reliance on hardware. For propositions that do require hardware, Nexi also offers low-impact, multi-purpose devices that minimize waste and extend product lifecycles. In alignment with its sustainability values, Nexi actively encourages its value chain to adopt circular economy principles, supporting practices that reduce waste, optimize resource efficiency, and minimize environmental impacts.

2.2.2 RESPONSIBLE SUPPLY MANAGEMENT

Nexi recognizes the importance of its suppliers and related actions to drive continuous ESG performance improvements throughout its business, so to progress towards its carbon net-zero and SBTi CO_{2e} reduction targets, support respect of human rights and the adoption of fair and just working conditions. Nexi manages suppliers and the relationships with them through well-defined procurement and supply chain processes, even including the suppliers' self-assessment practice based on ESG criteria. Critical principles such as respect for human rights, child labor risk mitigation, net-zero alignment, safety records, anti-corruption compliance are part of the supplier's qualification and audit processes. Nexi's criteria are fully aligned with UN Conventions, the International Labor Organization (ILO) standards, and all effective legislation to ensure responsible and sustainable supplier practices. This structured framework helps Nexi to uphold its own sustainability values as well as to foster ethical relationships across its supply chain.

2.2.3 RESPECT OF SOCIAL VALUES

- **Workers and Affected Communities.** 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 "International Labour Organization's Declaration on Fundamental Principles and Rights at Work", together with the core conventions on which it is based.
- **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.

Nexi opposes all forms of unlawful discrimination across all aspects of employment, including recruitment, compensation, benefits, training, and career progression.

- **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.
- **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 verify the adoption by suppliers, collaborators and other business partners of similar commitments.
- **Health and safety in the workplace.** Nexi is committed to protecting the health and safety of its employees and all the people with whom it interacts; to this end, the Group promotes the creation and maintenance of adequate working environments in terms of workers' health and safety, ensuring compliance with national and international directives on the subject.
- **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.
- **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.
- **Accessibility and support to the productive sectors.** Nexi contributes to spread the culture and benefits of digital payment 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 support people with disabilities / physical limitations access to digital payment services through dedicated interfaces and software products.

The Group's activities also contribute to support productive sectors with reference to the economic landscape by simplifying and facilitating payment transactions for and among the actors involved.

- **Diversity, Equity & Inclusion (DEI).** Nexi Group recognizes that the greatest value for the Group is its own people and that technological development takes place through human capital development. The Group has made gender diversification, experience and skills the distinctive element of its people in response to the expectations of people and stakeholders, generating value for them and for the company. Nexi believes that an inclusive and diverse organization attracts and retains the best talent and strengthens the position as a leading provider of digital payment solutions. The following DEI principles are set forth with the intention to promote:
 - **Enhancement of Diversification.** The diversification of gender, experience, and skills of the Group's resources is a distinctive element in response to the growing challenges of the market in which Nexi operates. This includes diversity within its administration, management, and control bodies, in compliance with the regulatory requirements expected on listed companies. The composition and diversity of the administrative, management, and supervisory bodies are disclosed, highlighting their roles and responsibilities in sustainability matters.
 - **Promotion of an inclusive culture.** Nexi is committed to create an inclusive environment, building on the diversity of employees and through fostering a "One Nexi" culture, in line with the Group

values. Nexi is committed to creating a workplace where every employee feels valued and included, leveraging the Nexi “Diversity Value & Behaviors” framework, which inspires and provides guidance to both leaders and employees in fostering an inclusive culture across the company. DEI training is a fundamental tool for everyone at Nexi to build awareness and promote an inclusive culture.

- **Equal pay and gender equality.** Nexi commits to maintaining fair and transparent compensation and benefits policies, with regular reviews to ensure internal and external equity and consistently making pay decisions based on objective criteria to uphold fairness and minimize bias.
- **Equal Opportunities:** Ensuring fair development opportunities through equal access to training, individual development plans for all employees, and fostering fair career advancement and internal mobility opportunities based on skills, competencies, and merits.
- **Maternity and Paternity Rights:** Nexi recognizes maternity and paternity rights as fundamental social values. Nexi actively supports maternity, ensuring a smooth and fair return to work through targeted measures such as flexible working hours, knowledge updates, and continuous professional development; Nexi also supports paternity, in full compliance with applicable regulations and local agreements.
- **Support to Vulnerable and Underrepresented Groups:** Nexi is committed to improving processes to better support vulnerable or underrepresented groups as part of the DEI journey (including people with disabilities, gender, sexual and multi-cultural minorities). Nexi aims to ensure that every individual feels valued and respected, contributing to a richer, more innovative business culture.

2.2.4 PRIVACY, DATA RESPONSIBILITY AND INFORMATION SECURITY

- **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 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’s 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 for the purposes for which the data was collected. Therefore, the authorized personnel operate 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 anonymization or destruction.

Lastly, Nexi prohibits personnel authorized to process personal data from using such data for purposes not authorized or intended by the companies within the Nexi Group.”

- **Data Security.** Data security is a key priority for Nexi; 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 (hereinafter “ISMS”) to protect the Group’s information assets, in line with the IT risk appetite defined at company level.

The ISMS is inspired by ISO standards and by industry’s best practices, and it 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 security incident management, vulnerability management and business continuity procedures.

- **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 implementing all the security initiatives necessary to guarantee an adequate level of data protection, extending these protection measures to protect its customers.
- **Structured approach.** Nexi believes that effective protection of the information it manages must be based on a structured, complete and continuous approach to security. This approach to security considers 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.
- **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 regarding their skills and in compliance with regulations and contractual obligations with its customers, suppliers, collaborators and other business partners.

2.2.5 PRACTICES OF GOOD GOVERNANCE

- **Business Conduct.** Pursuant to the principles set forth in the Code of Ethics, Nexi Group is committed to preventing bribery and corruption in all forms. Nexi aligns with applicable laws and regulations as well as with international standards and guidelines; Nexi also aligns with industry best practices in relation to anti-bribery and corruption. The Group has zero tolerance towards any form of bribery or corruption and condemns any such episode without exception, whether as a corruptor or corrupted, 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.
- **Organizational model.** The Group has adopted a Group-wide Anti-Corruption Policy that outlines its approach to combating corruption. The Italian companies within the Group have also adopted their own Organization and Management Model pursuant to Legislative Decree 231 of 2001.
- **Whistleblowing channels.** The Group is committed to fighting bribery in the context in which it operates, promoting integrity and bribery-free ways of doing business among all its stakeholders. Any indications or suspicion of corruption could also be reported through the dedicated whistleblowing channels made available by the Group as outlined in the Group Whistleblowing Policy. Reports received are subject to a follow-up process that involves timely evaluation of the information provided and adoption of appropriate remedial plans to address detected deviations to ensure compliance with applicable laws and regulations.

- **Mandatory action.** The Group ensures that any suspicion of a possible act of bribery or other corruptive activity, both with reference to its own activities and to those of its supply chain, is assessed and, where appropriate, investigated, taking any disciplinary and / or legal measure necessary to safeguard its business and reputation. Appropriate internal procedures are in place to regulate internal roles and responsibilities related to the fight against bribery and corruption.
- **Tax Matters.** 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.
- **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.
- **IT Corporate System.** IT corporate systems are periodically updated and maintained following Nexi internal processes. Further, IT corporate systems are updated to enable the implementation of the pertinent CSRD regulatory framework and internal control system.
- **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. 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 people accused falsely or in bad faith. Each legal Entity has its own specified procedures to report complaints.
- **Internal Control System.** Nexi has an internal control and risk management system in place; it comprises of a set of rules, procedures and organizational structure aimed at identifying, measuring, managing and monitoring the main risks including ESG matters, as specified in the Group Policy Internal Control and Risk Management System.
- **Succession Plan.** Nexi has a Succession Planning process in place, approved by the Board of Directors, addressing strategic roles (CEO and first-line reports, including Control Functions) as specified in the Report on Corporate Governance and Ownership Structure. The Succession Planning process has the scope to: i) Ensuring management continuity in the medium/long term; ii) Promoting business sustainability for shareholders and key stakeholders, mitigating risk factors.
Nexi Group has adopted: i) An approach aligned with the best practices of the Italian and international markets and consistent with the guidelines of Consob and the Corporate Governance Code; ii) A methodology integrated with the management, development, and enhancement tools of the Nexi Group; iii) A solid process, based on a rigorous and objective comparison between internal candidates and the best candidates in the market (mapping external talents for 3 strategic roles: Chief Executive Officer, Chief Financial Officer, and Chief Information Officer). The process is conducted annually to ensure alignment with business needs and continuity with development actions, where applicable.

3 ROLES AND RESPONSABILITIES

The Sustainability Governance at Nexi foresees Group and Local level responsibilities with the aim of ensure evaluation, decision making, implementation and reporting of sustainability matters in a consistent and aligned way across the Group.

3.1 GROUP RESPONSIBILITIES

NEXI BOARD OF DIRECTORS

Nexi Board of Directors is the corporate body responsible for the strategic direction and supervision of the Group's activities, results and sustainability impacts. In particular, Nexi's Board of Directors, with the aim of supporting the pursuit of "Sustainable Success" in line with the Group's strategic objectives and with the needs and expectations of the internal and external stakeholders of the Group:

- approves the sustainability matters relevant for Nexi, as well as the related strategies, objectives and commitments, through the validation of materiality analysis, public commitments, policies and ESG disclosures, in accordance with the requirements of the current legislation;
- approves the general sustainability principles and guidelines on sustainability matters relevant for the Group of this Policy;
- assesses periodically the results and impacts as well as the adequacy and effectiveness of the principles and guidelines for planning and managing the sustainability matters relevant for the Group, considering the changes in the Group internal and external context, based on the defined information flows;
- 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;
- approves the consolidated Sustainability Statement as part of the Group Integrated Report, in accordance with the requirements of the current legislation.

CONTROL AND RISK COMMITTEE

The Control and Risk Committee supports the Board of Directors with preparatory and advisory functions in matters related to the internal control and risk management system. In particular, the Committee:

- evaluates, after consulting with the "*Dirigente Preposto*" responsible for preparing the Group's accounting documents, the statutory auditor (or audit firm), and the Board of Statutory Auditors, the proper application of accounting principles and their consistency for the preparation of the consolidated financial statements (including the standards applied for the preparation of the Sustainability Statement);
- assesses the suitability of periodic financial and non-financial information to represent the company's business model, strategies, impacts, and performance;

ⁱ Pursuant to Corporate Governance Code.

- examines, in coordination with the Innovation and Sustainability Committee, the data collection and consolidation system for the preparation of the Group's Sustainability Statement pursuant the applicable legislation;
- conducts a preliminary review, in coordination with the Innovation and Sustainability Committee, of the Sustainability Statement, providing an opinion for approval by the Board of Directors;
- expresses opinions on specific aspects related to the identification of key business risks, including ESG risks, and supports, through appropriate preliminary analysis, the assessments and decisions of the Board of Directors concerning the management of risks arising from detrimental events of which the latter has become aware;
- evaluates the achievement of sustainability plan objectives, in coordination with the Innovation and Sustainability Committee.

INNOVATION AND SUSTAINABILITY COMMITTEE

The Innovation and Sustainability Committee supports the Board of Directors with advisory and preparatory functions in matters of innovation and sustainability. Specifically, the Committee:

- provides opinions and proposals on strategic decisions related to innovation and sustainability;
- expresses preliminary evaluations on updates to internal policies and regulatory documents concerning innovation and sustainability within the Board's competence;
- supports the Remuneration and Appointment Committee in the formulation of proposals regarding plans, objectives, rules, and company procedures related to aspects of social and environmental matters, and more generally on sustainability issues, in accordance with current legislation;
- examines and evaluates sustainability issues connected to the conduct of business activities and the dynamics of interaction with stakeholders in the ESG field, as well as supports the Board of Directors in integrating sustainability into the definition of corporate strategies, with particular attention to the Materiality Analysis of topics relevant for long-term value creation for the Company and the Group and in defining the materiality matrix;
- examines and evaluates, in coordination with the Control and Risk Committee, the system for collecting and consolidating data for the preparation of the Group's Sustainability Statement;
- conducts a preliminary review, in coordination with the Control and Risk Committee, of the Sustainability Statement, providing an opinion for approval by the Board of Directors;
- verifies the achievement of objectives of any sustainability plan approved by the Board of Directors, in coordination with the Control and Risk Committee for matters within its competence;
- periodically monitors the main sustainability KPIs, the implementation of any climate or CO_{2e} reduction strategies, adherence to major international ESG initiatives, as well as the Nexi's positioning on sustainability issues, with particular reference to its placement in sustainability indices and with respect to major international ratings (e.g., Carbon Disclosure Project, Standard & Poor's CSA), reporting any developments and updates periodically to the Board of Directors.

CHIEF EXECUTIVE OFFICER (CEO)

The Chief Executive Office with the support of the Executive Committee (hereinafter “ExCo”) is responsible for the implementation and monitoring of the Group’s ESG strategy, the coordination of operational decisions, and the alignment of business functions with corporate ESG objectives.

As part of these responsibilities, the CEO and ExCo address matters related to sustainability, to the extent that they fall within the scope of strategic execution, risk management, and operational oversight. This includes:

- identifying and monitoring ESG risks;
- supporting the implementation of initiatives aligned with the Group’s ESG strategy and objectives;
- coordinating the activities of relevant functions to ensure consistency with the Group’s sustainability commitments;
- monitoring progress and reporting on ESG-related actions indicators to the appropriate governance bodies.

GROUP ESG & SUSTAINABILITY FUNCTION

The Group ESG & Sustainability, reporting to the Group Legal, Corporate & External Affairs and ESG unit, has the following responsibilities:

- coordinating and monitoring the overall process of preparing the Group’s Sustainability Statement;
- coordinating the development of the sustainability strategy through dialogue and involvement of the Management as well as internal and external relevant stakeholders;
- reporting to the Control & Risks Committee and Innovation & Sustainability Committee on the Group’s Sustainability Statement, on the development and achievements of sustainability strategies and objectives, in line with the principles and guidelines defined by Nexi Board of Directors.

3.2 LOCAL RESPONSIBILITIES

BOARD OF DIRECTORS OF SUBSIDIARY COMPANIES

The Board of Directors of subsidiary companies of Nexi:

- is responsible for ensuring the implementation of this Policy, which covers all aspects of business operations relevant at the local level, except for purely formal amendments, which must be locally approved by the Chief Executive Officer, the General Manager, or the Sole Director/Chairman, providing a detailed explanation of the reasons and interests that influenced the decision.
- oversees the full and faithful implementation of the principles and guidelines included in the Policy, this responsibility is exercised by the Board of Directors of each subsidiary, or by the relevant governing body, through the review of local implementation reports, alignment checks with Group directives, and the evaluation of any deviations or corrective actions required;
- promptly informs the Board of Directors of Nexi of any significant evolution regarding sustainability matters falling within the scope of responsibility of the respective Legal Entity.

LOCAL CEO

- The Local CEO, with support of local management/committee and in coordination with relevant Group functions, is responsible for the implementation and operational oversight of the Group's ESG strategy at local level, ensuring alignment with corporate ESG objectives and with the principles and guidelines set out in the Policy.

4 REPORTING

Nexi has established structured and transparent information flows to ensure effective oversight of sustainability matters by its governance bodies. These flows are addressed to the Board of Directors, the Control and Risk Committee, and the Innovation and Sustainability Committee, supporting strategic alignment and continuous improvement in ESG performance.

The information shared includes:

- **Biannual strategic updates:** on the implementation of the Group's sustainability strategy.
- **Annual ESG rating reviews:** including improvement plans and results.
- **Double materiality assessment:** re-assessed and approved annually for coordinated evaluation and integration into strategic planning.
- **New Group-level commitments** (e.g., net-zero targets).

In case of significant deviations or emerging risks, issues are escalated to the relevant Committees and ultimately to the Board of Directors.

5 DEFINITIONS

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|--------------------------|---|
| Double Materiality | <i>Double materiality is a concept in sustainability that encompasses two dimensions: financial materiality and impact materiality. This dual perspective emphasizes the importance of understanding both the financial implications of sustainability issues and the company's responsibility towards its environmental and social impacts.</i> |
| Paris Agreement | <i>International treaty that came into effect on November 4, 2016, which establishes a comprehensive action plan aimed at limiting global warming.</i> |
| Scope 1 | <i>Direct greenhouse gas emissions from sources owned or controlled by the company.</i> |
| Scope 2 | <i>Indirect emissions from the generation of electricity, steam, heat or cooling, purchased or acquired, which the company consumes.</i> |
| Scope 3 | <i>All indirect greenhouse gas emissions (not included in Scope 2 emissions generated in the company's value chain, including upstream and downstream emissions.</i> |
| Sustainability Statement | <i>Section of the Group Integrated Report that provides comprehensive and comparable information on sustainability matters relevant to the Group's business model, strategy, and impacts, prepared in accordance with Directive (EU) 2013/34 as amended by Directive (EU) 2022/2464 (CSRD), and the European Sustainability Reporting Standards (ESRS) issued by EFRAG.</i> |

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|---------------------|---|
| Sustainable Success | <p><i>The objective guiding the actions of the Board of Directors to creating long-term value for the benefit of the shareholders, taking into account the interests of other stakeholders relevant to the company</i></p> |
| Value chain | <p><i>All activities, resources and relationships related to the Group's business model and the external context in which it operates. It covers the elements that the enterprise uses and relies on to create its products or services, from conception to delivery, consumption and end of life. These activities, resources and relationships include:</i></p> <ul style="list-style-type: none"> <i>i. those that are part of the company's own operations, such as human resources;</i> <i>ii. those in its procurement, marketing and distribution channels, such as the purchase of materials and services or the sale and delivery of products and services; and</i> <i>iii. the financial, geographical, geopolitical and regulatory context in which the enterprise operates.</i> <p><i>Upstream actors (e.g., suppliers) provide the products or services used in the development of the company's products or services, while downstream actors (e.g., distributors and customers) receive the company's products or services. Although the ESRS refers to the "value chain" in the singular, it is generally accepted that the enterprise may operate across multiple value chains.</i></p> |

6 EXTERNAL AND INTERNAL REFERENCES

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

6.1 EXTERNAL REFERENCES

| External regulation requirements | Regulatory reference |
|---|--|
| Defines the administrative responsibility of legal entities. | Italian law "D.Lgs 231/2001" (Administrative responsibility of legal entities) and subsequent amendments and additions |
| Establishes governance principles for listed companies. | <i>Codice di Corporate Governance</i> for Listed Companies of the Italian Stock Exchange (Borsa Italiana, 2020) |
| Transposes Directive 2022/2464/EU into Italian law, mandating enhanced sustainability reporting. | Italian law "D.Lgs 125/2024", implementing Directive 2022/2464/EU, known as the Corporate Sustainability Reporting Directive (CSRD), into Italian law |
| Establishes a global framework for combating corruption. | The United Nations Convention against Corruption (UNCAC – 2005) |
| Outlines corporate responsibility to respect human rights. | The United Nations Guiding Principles on Business and Human Rights (2011) |
| Commits to limiting global warming under specified thresholds. | The Paris Agreement to limit the global warming to well below 2°C and pursuing efforts to limit it to 1.5°C (2015) |
| Sets requirements for data privacy and protection across the EU. | EU Regulation n_2016/679 General Data Protection - GDPR (2016), also adopted by the European Economic Area (EEA) |
| Introduces transparency requirements in financial sustainability disclosures. | EU Regulation n.2019/2088 on sustainability-related disclosures in the financial services sector - SFDR (2019) |
| Encompasses policies for decarbonization and circular economy goals. | 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 decarbonization and on circular economy to strengthen the path of the member states of the European Union towards a zero-emission economy by 2050 (2020) |
| Defines environmentally sustainable economic activity classifications. | EU Taxonomy Regulation 2020/852 (2020) |
| Mandates transparency in supply chain due diligence for the companies in Norway. | Norwegian Transparency Act (2022) |
| Defines the principles of sustainability reporting, namely the standards for carrying out Sustainability Reporting. | Delegated regulation EU - 2023/2772 European Sustainability Reporting Standards – ESRS (2023) |
| Introduces the duty of due diligence in relations with the value chain for companies that meet specific size thresholds in terms of employees and turnover. | EU Directive 2024/1760 Corporate Sustainability Due Diligence Directive CSDDD(2024) |

6.2 INTERNAL REFERENCES

- CC-006 Nexi Group Anti-trust Code of Conduct
- CC-007 The Code of Ethics of Nexi S.p.A. and its subsidiaries
- PP-001 Group internal Regulatory System
- GL-002 Group Compensation Policy
- GL-005 Group Internal Control and Risk Management System
- GL-011 Group Data Protection Guidelines
- POG-031 Nexi Group Waste Management and Disposal (Environmental Requirements) Procedure
- POG-134 Nexi Group Sustainability Statement Reporting Procedure
- PP-026 Group Procurement Policy
- PP-032 Nexi Group Enterprise Risk Management (ERM) Policy
- PP-041 Anti-Bribery and Corruption Policy
- PP-047 Group Business Continuity Management Policy
- PP-048 Group Security Policy
- PP-056 Group Whistleblowing Policy
- RR-020 Regolamento Dirigente Preposto
- The Organization, Management and Control Model (Modello 231) of Nexi S.p.A. and its subsidiaries