

# ESG Policy

**Kirey S.r.l.**

*Società a socio unico*

Sede legale: Viale Francesco Restelli 5, 20124 Milano

Capitale sociale: Euro 1.089.720,00 i.v.

Codice fiscale, partita IVA e numero di iscrizione al Registro delle Imprese di Milano: 06729880960

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## 1. INTRODUCTION TO ESG POLICY

### 1.1. General Principles

Kirey S.r.l. and the companies subject to its control and co-ordination (hereinafter jointly referred to as “**Kirey Group**”) carry out consulting, system integration and application management activities and are highly specialised in designing, implementing and maintaining IT solutions for medium-large companies, both private and public, as well as selling proprietary products with related services.

In a fast-changing global context, the Kirey Group recognises its responsibility to actively contribute to a sustainable future, integrating ESG principles into the heart of its business strategy, which is why it has acted in accordance with economic, social and environmental policies, which have always been understood as core values, since its establishment. The purpose of this document is to acknowledge the commitment to sustainability in the company's strategy and operations, and symbolises the result of the progressive commitment to the management on social and environmental issues, which is intended to involve all the companies that are part of the Kirey Group, as well as their employees and collaborators working at the offices in all the countries in which it operates.

### 1.2. Standards and core principles

The ESG Policy is intended to reinforce what is already stated in the Kirey Group Code of Ethics, constituting a declaration that commits Kirey Group to promoting the principles of responsible and sustainable development. In defining its principles Kirey Group is inspired by the main standards issued by international reference organisations, including:

- United Nations International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Convention on Civil and Political Rights and the International Convention on Economic, Social and Cultural Rights;
- Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect Respect and Remedy” Framework;
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and its applicable conventions;
- 10 principles of the Global Compact;
- GRI, ESRS and SASB standard;
- OECD Guidelines for Multinational Enterprises;
- United Nations Sustainable Development Goals (SDGs);
- Guiding Principles for the Promotion of Gender Equality Women's Empowerment Principles (WEPs).

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### 1.3. Policy and other Internal Group Sustainability Rules

This document draws its principles from and coordinates with the internal document corpus adopted by the Kirey Group, which was drawn up to better detail the more specific areas of intervention. These include:

- Organisation and management models pursuant to Italian Legislative Decree 231/01, where adopted by individual companies;
- Italian D.lgs. 81.08.
- Kirey Group Code of Ethics;
- PKG\_COMP\_LG03\_Politica per la parità di Genere, ove adottata;
- PKG\_FAC\_RE02\_Regolamento Facility;
- PKG\_HRE\_RE02\_Smart Working;
- PKG\_HRE\_RE05\_Diversity Equity and Inclusion regulation;
- PKG\_COMP\_LG01 \_ Whistleblowing reporting;

### 1.4. Objectives and scope at Kirey Group

Kirey Group is committed to responsible and sustainable operations, recognising that adopting sustainable business practices is not only critical to its reputation and success, but also to contributing positively to society and the environment in which Kirey Group operates. For this reason, Kirey Group's objectives are:

- To integrate ESG principles into one's strategic and operational decisions;
- To ensure the best compliance with national and international sustainability regulations;
- To promote a corporate culture that is responsible and oriented towards the long-term integration of ESG principles.

To ensure the pursuit of these objectives, the Kirey Group acts according to the following principles:

- **Environmental:** reduction of both direct and indirect environmental impact; adoption of cloud and digital technologies with low environmental impact; promotion of sustainable mobility and reduction in the use of paper and printers; support and development of a “green” approach by employees and collaborators;
- **Social:** promotion of diversity, equity and inclusion; support for corporate welfare, wellness and work-life balance initiatives; commitment to continuous staff training and professional development of its employees and collaborators; responsible interaction with its customers, partners and local realities;
- **Governance:** adoption of organisational models focused on transparency and compliance; prevention of conflicts of interest, clear policies on ethics and anti-corruption; monitoring of ESG

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risks through low-impact digital tools and dedicated KPIs; periodic publication of sustainability reports in accordance with international standards.

The principles outlined are reflected in the Kirey Group's specific commitments concerning:

- Ethics and integrity;
- Customers;
- People;
- Environment;
- Suppliers.

This document also emphasises, formalises and declines the Kirey Group's conviction that the creation of sustainable and long-term value must be pursued in compliance with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency, with a view to continuous improvement, operational efficiency and management cost-effectiveness.

## 2. KIREY GROUP COMMITMENTS

### 2.1. Ethics and integrity

Kirey Group is committed to operate in compliance with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency in all relations with stakeholders, promoting full compliance with the applicable legislation, as well as the highest ethical standards. For this reason, Kirey Group has adopted a Code of Ethics that enshrines principles and rules of conduct that promote, both internally and externally, a culture of ethics and integrity.

These principles are further reinforced by the Organisational, Management and Control Models envisaged by Italian Legislative Decree 231/2001, where adopted, with the aim of improving corporate governance, limiting the risk of the commission of the offences entailing the liability envisaged by the Italian Legislative Decree 231/2001. In this sense, by way of example only, Kirey Group:

- shall not tolerate any type of conduct contrary to the principles set forth in the aforementioned documents, including the offer, promise and giving, as well as the solicitation, acceptance and receipt of payments by persons of the Kirey Group and anyone acting in the name of or on behalf of the same for the purpose of obtaining an undue advantage;
- undertakes to make available a reporting channel for any conduct that is contrary to the principles set out in the above-mentioned documents, as well as to verify all reports received, while ensuring that those who make reports in good faith are not subject to retaliation, discrimination or penalisation, whether direct or indirect, and that their identity is protected, without prejudice to legal obligations and the protection of the rights of the companies or persons wrongly accused and/or in mala fide.

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## 2.2. Customers

Kirey Group aims to generate value for its clients by ensuring high quality standards, service accessibility, safety and efficiency. A particular attention is paid to creating solid relationships of trust, based on the ability to offer methods, effective and concrete solutions, always perceived as quality. In this regard, Kirey Group is committed to:

- conduct themselves and their business relations according to the principles of availability, professionalism and politeness, providing accurate, complete, clear and truthful information on the products and services offered, so as to allow the counterparty to make an informed choice;
- not discriminate arbitrarily against customers or seek to leverage strong positions to their disadvantage;
- to always comply with commitments made and obligations towards customers in accordance with contractual terms;
- promptly and efficiently handle any complaints and suggestions received;
- not spreading communications that may in any way be misleading and/or damage the reputation of customers;
- require its customers to adopt behaviours and practices in line with the principles that inspire Kirey Group, as defined in the Code of Ethics, the Organisation and Management Models pursuant to the Italian Legislative Decree 231/01 (where adopted), the Gender Equality Policy (where adopted) and this document.

The Kirey Group takes a responsible approach to managing the flow of data and information, which it receives on an ongoing basis from clients. Clients' privacy is ensured through the adoption of high standards of data protection and security, as well as the appointment of a Data Protection Officer (DPO).

## 2.3. People

Kirey Group is aware that people represent the driving force of the company and the channel through which to offer quality services and generate new ideas. Kirey Group therefore believes that the ability to attract and retain the best talents is crucial to create value in the long term, and for this reason it is committed to developing its human resources starting from the selection process and throughout their career, investing in their well-being and professional development. In this regard, Kirey Group promotes a work-life balance by developing appropriate programmes and initiatives, also in terms of mobility and flexibility.

Kirey Group, moreover, considers training and updating the skills of its employees to be essential resources for its own success and competitiveness; in this regard, it promotes continuous learning and designs training courses aimed at improving skills and abilities and promoting professional growth, accompanying its employees in building their future.

Kirey Group is also committed to promoting the inclusion and valorisation of diversity through the adoption of specific programmes and policies, with the aim of offering all employees a peaceful and inspiring working environment, in which everyone can feel at ease and dedicate themselves to their work in the best possible conditions.

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Moreover, at the basis of the company's activities, there is a constant and imperative commitment to guaranteeing safety at work through the adoption of appropriate policies, promoting a culture of risk prevention and management, and involving and sensitising all personnel to active and responsible participation.

## 2.4. Environment

Although aware of the low significance of the environmental impacts generated by its business, Kirey Group nevertheless intends to play an active role in the diffusion of responsible behaviour and in the management of the risks and challenges that may arise in the short and long term from the environmental point of view. In particular, in the context of the activities that take place within the company premises, Kirey Group is committed to responsible waste management (specific signs and staff training), energy efficiency (use of equipment with low environmental impact) and support for sustainable mobility, also and above all thanks to its smart working policies.

In addition, Kirey Group implements practical actions aimed at reducing energy consumption and emissions produced, including those related to the mobility of its professionals.

Kirey Group intends to evolve from a reactive to a proactive approach, integrating environmental sustainability into business strategy and decision-making processes. The goal is to contribute, also as a low direct impact company, to building a more resilient, equitable and planet-friendly economic ecosystem

## 2.5. Suppliers

Kirey Group's objectives include growth in the sustainability of its supply chain in both the short and medium to long term. In order for suppliers and business partners to operate inspired by the same principles and criteria of ethical-social and environmental responsibility that guide Kirey Group's activities, the latter undertakes to require the adoption of behaviors and practices in line with the principles by which Kirey Group is inspired, defined within the Code of Ethics, the Models of Organization and Management pursuant to the Italian Legislative Decree 231/01 (where adopted), the Gender Equality Policy (where adopted) and this document

## 3. DISTRIBUTION AND UPDATES

Kirey Group is committed to the widespread adoption of the principles herein both within and outside the organization, and to this end has established a dedicated team internally to which operational responsibility is entrusted and which will integrate elements from all departments of Kirey Group.

Through the establishment of the ESG team, Kirey Group's purpose is to produce an annual Sustainability Report containing performance indicators, goals achieved and future goals with the additional task of overseeing the pursuit of the goals in accordance with the principles that Kirey Group has set itself.

This document will be reviewed periodically to assess its adequacy and to determine any changes to be made and/or actions for improvement.

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