

Environmental & Sustainability Policy

2026 Edition

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1.0 Purpose

This Environmental and Sustainability Policy defines the commitments and principles with which HRIT Srl integrates environmental protection, people's well-being and ethical conduct into its management system, in order to:

- reduce the direct and indirect environmental impacts of activities;
- promote responsible practices in the supply chain;
- promoting people's well-being and gender equality;
- ensure transparency, regulatory compliance and continuous improvement.

1.1 Scope

The Policy applies to all offices and all activities of HRIT Srl, to all personnel (employees and collaborators), suppliers and partners who process data or provide services on our behalf. It includes in particular:

- the use of resources (energy, water, materials) and office operations;
- the dematerialization of processes (exclusively digital archive; printing only if strictly necessary);
- waste management and separate collection;
- the adoption of modern and efficient devices and the use of the Microsoft cloud to minimize physical infrastructure and consumption;
- smart working practices as a lever for reducing impacts and reconciling life and work;
- community engagement initiatives (e.g. annual participation in the Race for the Cure in Rome with teams and families);
- the welfare plan (including meal vouchers even in remote work).

1.2 Approach and integration into management systems

HRIT Srl adopts an ESG (Environmental, Social, Governance) approach integrated into the existing certified systems and organizational models, in particular:

- ISO 9001 (Quality) — for process management and continuous improvement;
- ISO 27001 (Information Security) — for the management of risks and controls in cloud environments;
- ISO 37001 (Anti-corruption) and Model 231 — for ethics, compliance and responsibility;
- UNI/PdR 125 (Gender Equality) — for D&I objectives, actions and monitoring.

This Policy is consistent with the applicable environmental and social legislation and is inspired by international best practices (e.g. ISO 14001 principles for environmental management), although it does not currently represent an environmental certification.

1.3 Guiding principles

HRIT is committed to:

1. Prevention and reduction of direct and indirect environmental impacts, favoring dematerialization, digitization and energy efficiency.
2. Responsible use of resources, prioritizing energy and materials with a lower impact and reducing waste.
3. Circular economy, through separate collection, proper management of WEEE and structural reduction of paper.
4. Well-being and inclusion, promoting welfare, equal opportunities and participation in social initiatives.
5. Ethics and transparency, thanks to anti-corruption procedures, whistleblowing channels and clear communications on objectives and progress.
6. Supply chain engagement, with minimal ESG criteria and regulatory compliance for suppliers.
7. Continuous improvement, setting measurable goals, monitoring KPIs and periodically reviewing results.

1.4 Time Field and Updates

The Policy is reviewed at least annually by Management to verify its effectiveness, relevance and alignment with the expectations of stakeholders (customers, employees, communities, suppliers), and is updated in the event of regulatory, technological or organizational changes.

2.0 Governance, Roles and Responsibilities

2.1 Commitment of the General Management

The General Management (DG) of HRIT Srl assumes full responsibility for the definition, approval and dissemination of this Environmental and Sustainability Policy. The DG ensures that the policy is consistent with the company's values, sustainable development strategies and other certified management systems (ISO 9001, ISO 27001, ISO 37001, UNI/PdR 125). The Management:

- approves the sustainability objectives and the resources needed for their implementation;
- supervises planning, monitoring and continuous improvement activities;

- promotes a culture of environmental and social responsibility at every level of the organization;
- periodically verifies, during the Management Review, the degree of implementation and effectiveness of environmental and social initiatives.

2.2 Sustainability governance

The management of ESG (Environmental, Social, Governance) issues is entrusted to a transversal structure that involves the main roles of the HRIT IMS, with a view to integration and widespread responsibility.

Function / Role	Key responsibilities
Directorate-General (DG)	Approval of the sustainability policy and objectives. Oversight of regulatory compliance and ESG performance.
Compliance Manager (CM)	Overall coordination of ESG activities, updating of this Policy, support in risk assessment and reporting of sustainability actions.
Quality Manager (QM)	Operational implementation of environmental measures, management of the activities envisaged by the PR-AM-01 – Waste Management procedure, monitoring of environmental performance and KPIs.
IT Manager (ITM)	Implementation of dematerialization and digitization measures, sustainable use of IT resources, efficient management of cloud platforms.
HR Manager (HRM)	Management of welfare, gender equality and inclusion programs; promotion of sustainable behavior among employees.
Office Manager	Application of sustainable sourcing criteria, assessment of suppliers on an ESG basis and environmental compliance.
All Employees and Collaborators	They actively contribute to environmental protection, inclusion and the adoption of responsible behavior; they respect the policy and report any critical issues.

2.3 Communication and awareness

HRIT warrants that this Policy is:

- communicated to all staff, partners and suppliers;
- published on the company website and available to interested parties;
- subject to training and awareness-raising, so that each employee understands the impact of their activities and adopts behaviours consistent with the company's environmental and social commitments.

2.4 Review and continuous improvement

The Policy is reviewed at least once a year or on the occasion of significant regulatory, technological or organizational changes.

Environmental and social performance indicators are monitored and discussed during the Management Review, which approves any improvement actions and updates the sustainability objectives.

3.0 Resource Management (Energy, Water and Materials)

3.1 General principles

HRIT Srl recognizes that the efficient management of natural and energy resources is a key element of its environmental and social responsibility. The company is committed to minimizing consumption, optimizing the efficiency of its processes and reducing waste through sustainable practices integrated into daily activities, in compliance with environmental regulations and the principles of continuous improvement.

3.2 Energy and digital infrastructure

HRIT's activities are entirely supported by digital infrastructures based on cloud services (Microsoft 365 and Azure), which allow a significant reduction in energy consumption and environmental impact compared to local infrastructures.

Moreover, HRIT uses electricity sourced 100% from renewable energy, as certified by its energy provider.

This choice directly contributes to reducing the company's indirect emissions and supports the transition to sustainable energy models.

Key energy management actions include:

- Use of the Microsoft cloud, which guarantees energy-efficient data centers, with carbon neutrality policies already in place globally;
- Smart working and digital collaboration, which reduce home-work travel and related emissions;
- Modern and efficient devices, with purchase criteria based on low energy consumption and long life;
- Automatic shutdown or suspension of PCs after periods of inactivity and power off policies for printers and shared equipment;
- Periodic monitoring of electricity consumption and raising awareness among staff on virtuous behaviour (e.g. turning off lights and devices at the end of the day).

3.3 Water Use

HRIT's business activities do not involve water-intensive industrial or production processes.

Water consumption is limited to sanitation and domestic use only at the venue. In this context, HRIT's commitment is realized through:

- raising awareness among staff on the conscious use of water resources;
- periodic maintenance of the systems to prevent leaks and waste;
- preference for low-flow plumbing devices.

3.4 Materials and Consumables

The company's approach to materials management is based on three key principles: reduce, reuse and recycle.

In particular, HRIT:

- it has adopted a policy of total dematerialization of administrative and management processes, with an exclusively digital archive and printing allowed only if strictly necessary;
- it uses only FSC-certified paper for residual prints;
- carries out separate collection of paper, plastic and used toner in accordance with the PR-AM-01 — Waste Management procedure;
- ensures the correct disposal of WEEE (obsolete electrical and electronic equipment) through qualified suppliers.

3.5 Improvement and monitoring objectives

HRIT periodically monitors its environmental performance with the aim of:

- Maintain the reduction in paper consumption >90% compared to pre-digitization levels;
- progressively increase the share of sustainable purchases;
- encourage the spread of smart working as a tool for reducing environmental and social impacts;
- annually review opportunities for improvement in terms of energy efficiency, including through the choice of more sustainable ICT technologies.

4.0 Waste Reduction and Emissions

4.1 General commitment

HRIT considers the prevention and reduction of waste a priority objective of its environmental sustainability strategy.

The company is committed to reducing the production of waste at source, promoting reuse and ensuring the correct separate collection of all materials produced, ensuring compliance with current environmental legislation (Legislative Decree 152/2006 and subsequent amendments).

Waste management is based on the principles of responsibility, traceability and continuous improvement, in line with the provisions of the PR-AM-01 Procedure – Waste Management.

4.2 Reducing waste at source

Thanks to the complete digitization of business processes, HRIT has almost completely eliminated the use of paper, structurally reducing the production of waste deriving from office activities.

Archiving is entirely electronic, and printing is allowed only when mandatory for legal or operational reasons that cannot be replaced.

Purchases of materials and supplies also favor durable, refillable or recyclable products, thus reducing the generation of waste and packaging.

4.3 Separate collection and management of special waste

HRIT implements a separate collection system at the headquarters, with separate containers for paper, plastic, glass, organic and unsorted waste.

The management of special waste (e.g. toner, WEEE, batteries, electronic equipment) is carried out by qualified external suppliers, in full compliance with the regulations on transport, recovery and disposal.

All delivery and disposal activities are documented and traceable, ensuring maximum transparency in controls and compliance with environmental requirements.

4.4 Prevention and reduction of indirect emissions

Although HRIT does not carry out production activities that generate direct emissions, the company takes measures to contain indirect emissions associated with its processes and personnel activities, including:

- reduction of home-work travel thanks to the extensive use of smart working and digital collaboration tools;
- remote participation in meetings and trainings, minimizing travel and travel;
- use of energy-efficient cloud platforms (Microsoft 365 and Azure), which make it possible to reduce emissions from internal data centers;
- preference for local suppliers and partners, reducing logistics and the transport chain.

4.5 Management of electronic waste (WEEE)

The replacement of IT and technological devices takes place only when necessary and according to energy efficiency criteria.

Decommissioned devices are:

- refurbished or donated, if still functional;
- disposed of as electronic waste (WEEE) through specialized partners who guarantee the recovery of materials and the protection of sensitive data contained in devices (e.g. hard disks, SSDs). These operations are managed in accordance with the provisions of Legislative Decree 49/2014.

4.6 Monitoring and improvement

Although the company does not have the possibility to adopt specific quantitative environmental performance indicators, it nevertheless guarantees effective monitoring and continuous improvement of its environmental performance. This activity is carried out through periodic quality controls, internal audits and constant comparison with regulatory requirements and corporate environmental objectives. Any non-conformities or critical issues detected are analysed and managed through corrective actions, thus contributing to the continuous improvement of environmental performance. In addition, the company promotes staff engagement and awareness of good environmental practices as an integral part of its commitment to sustainability.

5.0 Sustainable sourcing

5.1 General principles

HRIT recognizes that procurement choices have a direct and indirect impact on the environmental, social and economic sustainability of its value chain. The company is committed to selecting and managing suppliers in a responsible and transparent manner, favoring partners who share its values in terms of ethics, environmental protection, human rights, gender equality and legality.

5.2 Criteria for selecting and evaluating suppliers

All suppliers of goods and services are evaluated on the basis of technical, economic, quality and sustainability criteria.

The following aspects are taken into account in the selection and qualification:

- compliance with environmental, labor and safety regulations;
- adoption of certified management systems (ISO 9001, ISO 14001, ISO 27001, etc.), where applicable;
- use of recyclable, eco-sustainable or low environmental impact materials;
- origin of products from traceable and responsible supply chains;
- fairness, transparency and ethical conduct in business.

Whenever possible, HRIT favors local or national suppliers, in order to reduce the environmental impact of transport and promote the development of the economic fabric of the territory.

5.3 Procurement of ICT goods and services

In the field of technological supplies, HRIT applies specific sustainability criteria:

- purchase of energy-efficient devices (Energy Star certifications or equivalent);
- preference for long-lasting products;
- use of cloud software and services managed by certified providers, in order to reduce the impact of local infrastructures and energy consumption;

5.4 Monitoring and improvement

The Office Manager, in coordination with the Compliance Manager, periodically monitors the performance of qualified suppliers, including through documentary checks or thematic audits.

The results of the assessments are included in the Management Review, which defines any actions to improve and update the ESG criteria applied to the supply chain.

6.0 Carbon Footprint and Commitments for Climate Neutrality

6.1 General approach

HRIT Srl recognizes that climate change represents one of the main global challenges of our time and that every organization, regardless of its size or sector of activity, has a responsibility to contribute to the reduction of greenhouse gas (GHG) emissions.

Although not an industrial or manufacturing company, HRIT is committed to reducing its carbon footprint, especially through the responsible management of energy resources, the digitization of processes and the promotion of sustainable behavior by staff.

6.2 Direct and indirect emissions (Scope 1, 2 and 3)

HRIT's environmental impact derives mainly from indirect emissions (Scope 2 and 3) associated with electricity consumption, staff travel and the use of cloud services.

There are no significant direct emissions (Scope 1), as the company does not own its own production plants, industrial boilers or vehicle fleets.

The main sources of impact are:

- energy consumption of offices;
- home-work travel of staff;
- use of digital infrastructures in the cloud;
- residual consumption of materials and supplies.

6.3 Emission reduction measures

HRIT adopts an integrated set of measures aimed at minimizing its indirect emissions, including:

- Complete digitization of business processes, with almost total elimination of paper printing;
- Smart working and remote collaboration, which significantly reduce travel and transport-related emissions;
- Use of the Microsoft 365 cloud and Azure, based on energy-efficient data centers and with declared carbon neutrality goals by 2030;
- Optimization of energy consumption in offices through efficient devices, LED lighting and automatic shutdown policies;
- Reduction and responsible management of technological waste, with traced WEEE disposal and recovery of materials.
- Use of 100% renewable electricity, to further reduce its carbon emissions and reinforce its contribution to climate mitigation.

6.4 Improvement plans and objectives

In the three-year period 2025—2027, HRIT intends to:

- identify additional emission reduction measures (e.g. lower-consumption devices, offsetting through environmental programmes or partnerships with local authorities);
- evaluate participation in voluntary offsetting initiatives or reforestation programs, in line with the size and activities of the organization.

6.5 Commitment to climate neutrality

HRIT is committed to contributing to the achievement of the European objectives of climate neutrality by 2050, through concrete actions of reduction, compensation and awareness.

The Management promotes a corporate culture oriented towards environmental awareness and undertakes to periodically review the results achieved, setting new objectives in line with the best practices of environmental sustainability and with the expectations of customers and stakeholders.

7.0 Community Involvement and Welfare

7.1 General principles

HRIT considers people — both within and outside the organization — as the cornerstone of its sustainability. HRIT recognizes that sustainability is not only about

the environment, but also about the well-being of people and the positive contribution to the community in which it operates.

The company considers its staff and the social context of reference as integral parts of its corporate value, committing itself to promoting individual well-being, active participation and social cohesion.

These principles are consistent with the social responsibility objectives defined in the integrated HRIT system (ISO 9001, UNI/PdR 125, Model 231) and with the United Nations Sustainable Development Goals (SDGs), in particular points 3 — *Health and well-being*, 5 — *Gender equality* and 8 — *Decent work and economic growth*.

7.2 Staff well-being and corporate welfare

HRIT takes a proactive approach to managing organizational well-being, through internal policies aimed at improving work-life balance, employee satisfaction, and sustainable productivity.

Key initiatives implemented include:

- a corporate welfare plan that provides flexible benefits and meal vouchers recognized even in the case of remote work;
- the promotion of smart working as an ordinary way of working, based on trust, autonomy and responsibility;
- moments of aggregation and team building to strengthen the sense of belonging and internal collaboration.

HRIT considers the well-being of its employees a strategic component of corporate sustainability and periodically monitors their perception through feedback and internal interviews.

7.3 Community Engagement and Social Initiatives

The company actively promotes the involvement of staff in social and solidarity initiatives, strengthening its link with the local community.

An emblematic example is the annual participation in the "Race for the Cure" in Rome, in which HRIT participates with the whole team and their families and close ones, supporting research and awareness in the fight against women's cancers.

Joining this event represents an opportunity to combine corporate values and social responsibility, stimulating team spirit, inclusion and solidarity.

HRIT considers this initiative its main social responsibility project and intends to maintain it as a regular event, while evaluating the possibility of complementing it in the future with other solidarity welfare activities or donations to organizations operating in the fields of health and human care.

7.4 Health, Safety and Wellbeing

HRIT Srl ensures a safe and healthy working environment in full compliance with Italian Legislative Decree 81/2008, adopting all necessary preventive and organizational measures to protect the health and safety of its employees and collaborators.

The company promotes a culture of safety embedded in everyday operations and extended to remote and hybrid work, ensuring that all staff operate under safe and sustainable conditions.

In this regard, HRIT:

- provides regular training on occupational health and safety;
- assesses specific risks related to office-based and remote work activities;
- encourages safe and responsible behavior, including proper workstation ergonomics;
- supports awareness initiatives on psychological well-being, preventive healthcare, and work—life balance.

The protection of health and safety is an integral part of HRIT's ESG policies, contributing directly to its social sustainability and responsibility towards its people.

7.5 Accountability and monitoring

The General Management and the HR Manager ensure the planning and implementation of welfare and community engagement activities, monitoring the results and the degree of participation. The effectiveness of the welfare plan and social initiatives is evaluated in terms of participation, staff satisfaction and positive impact on the corporate climate.

8.0 Diversity, Inclusion and Gender Equality

8.1 General principles

HRIT Srl promotes an organizational culture based on respect, equity and the enhancement of individual differences, recognizing diversity as a source of innovation, creativity and long-term sustainability.

The company considers inclusion and gender equality an integral part of its social responsibility and ESG strategies, in line with UNI/PdR 125:2022 and its Diversity and Inclusion Policy.

8.2 Diversity and Inclusion Management System

HRIT's Diversity and Inclusion Management System, inspired by the principles of UNI/PdR 125:2022, is aimed at promoting inclusive, fair and non-discriminatory working conditions.

Through the Diversity and Inclusion Committee (CDI), HRIT:

- defines measurable objectives and performance indicators (KPIs) on equality and inclusion;
- ensures gender representation in roles of responsibility and decision-making processes;
- promotes fair and meritocratic HR processes, free of bias and stereotypes;
- ensures equal pay, equal opportunities for growth and training for all employees;
- supports parenting through work-life balance measures and organisational flexibility tools (e.g. agile work, reversible part-time, equal leave);
- it carries out continuous training and awareness-raising initiatives on the issues of diversity, stereotypes and the prevention of harassment at work.

8.3 Inclusion and company culture

HRIT considers diversity not only as an ethical value, but as a strategic lever for corporate sustainability.

The company is committed to creating an environment in which each person:

- is respected and valued regardless of gender, age, orientation, religion, origin or disability;
- can freely contribute with their skills and perspectives;
- find support and protection in the event of discriminatory behavior or behavior detrimental to personal dignity.

Confidential channels are in place for reporting and managing non-compliant behaviour, in compliance with the confidentiality, impartiality and protection of all parties involved, in coordination with the provisions of Model 231 and the company whistleblowing system.

8.4 Training and awareness raising

All HRIT employees participate in annual training and awareness-raising initiatives on the issues of gender equality, the prevention of discrimination and the promotion of diversity.

Training is also extended to the top management, so that leaders can act as role models and advocates for inclusive culture.

HRIT transparently communicates the progress and results of its internal equality and inclusion initiatives, including through the publication of the Policy and Code of Ethics on its website.

8.5 Commitment to equity and social sustainability

Through the SGDI and welfare and flexibility policies, HRIT contributes to the achievement of social sustainability goals and the creation of shared value for people, communities and stakeholders.

A focus on diversity and gender equality is an integral part of the HRIT ethical governance model and helps to strengthen the organization's reputation, trust and social responsibility.

9.0 Transparency and Reporting

9.1 Principles of transparency and accountability

HRIT Srl bases its business on the principles of transparency, fairness and responsibility towards all interested parties — customers, employees, suppliers, partners and communities. The Management considers transparency an essential element of sustainability and is committed to communicating its environmental, social and governance (ESG) policies, initiatives and performance in a clear, accurate and verifiable manner.

Internal reporting and external communication are carried out in compliance with current regulations, contractual requirements with customers and the principles of corporate confidentiality and personal data protection (GDPR).

9.2 Communication and accessibility of information

All the main policies and procedures of the Management Systems, including those relating to information security, quality, anti-corruption, diversity and sustainability, are made available:

- to all staff through internal company tools;

- to customers and stakeholders upon request or, where appropriate, through publication on the institutional website;
- to competent authorities and certification bodies during audits or verifications.

HRIT's goal is to ensure that the information disseminated is up-to-date, consistent, and understandable, fostering trust and collaboration between the organization and stakeholders.

9.3 ESG performance reporting and monitoring

Even in the absence of a formal sustainability report, HRIT carries out periodic internal reporting of its ESG performance, in particular on:

- social initiatives, welfare and gender equality;
- staff training and awareness;
- audit and regulatory compliance activities.

These data are consolidated and analyzed during the Management Review, which represents the formal moment of verification and approval of the results and improvement actions in the field of sustainability. In terms of environmental sustainability, HRIT does not undertake effective monitoring of consumption but periodically carries out staff awareness work on good environmental practices in order to reduce the consumption of energy and raw materials within its offices. The premises, the electronic devices present and the sanitary water systems are recently implemented and guarantee the best possible technology in terms of water and energy saving.

9.4 Commitment to external transparency

HRIT is committed to progressively improving the level of transparency towards customers and stakeholders, with the aim of:

- integrate its internal reporting over time with structured ESG indicators;
- communicate environmental, social, and ethical objectives systematically;
- respond in a timely and documented manner to sustainability questionnaires or compliance requests from customers and partners;
- to promote the dissemination of the culture of sustainability inside and outside the organization.

9.5 Consistency with other governance tools

HRIT transparency and reporting are based on the principles already enshrined in:

- Code of Ethics and Model 231, which guarantee fairness and responsibility in the management of decision-making processes;

- Diversity and Inclusion Management System (UNI/PdR 125), which provides for public performance indicators;
- Information Quality and Security Management System (ISO 9001 and ISO 27001), which ensures traceability and documentary verification of all operational activities.

These tools, integrated into the IMS, form the basis of the sustainable and transparent governance model adopted by HRIT.

10.0 Ethics, Anti-Corruption and Whistleblowing

10.1 General principles of integrity

HRIT Srl bases its business on the principles of legality, transparency, fairness and responsibility, recognizing business ethics as a pillar of sustainability and trust in relationships with customers, suppliers, partners and institutions.

The company is committed to conducting every operation with integrity and compliance with the law, preventing any form of corruption, bribery, fraud, conflict of interest or abuse of power.

These principles are formalized and implemented through:

- the Organization, Management and Control Model pursuant to Legislative Decree 231/2001, aimed at preventing crimes relevant to corporate administrative liability;
- ISO 37001:2016 certification — Anti-Corruption Management System, which defines procedures, controls and specific responsibilities for the prevention of corruption;
- the Code of Ethics, which establishes the conduct expected of employees, collaborators and business partners.

10.2 Prevention of corruption and ethical conduct

The HRIT management system provides for preventive and corrective measures to ensure that all business operations are carried out in a transparent and traceable manner, in particular:

- segregation of roles and separation of functions to reduce the risk of conflicts of interest;
- due diligence procedures on customers and suppliers to verify their ethical and reputational reliability;

- internal controls on procurement processes, expenses, donations and sponsorships;
- obligation for all employees to comply with the principles of the Code of Ethics and to report conduct contrary to company values;
- periodic training of personnel on anti-corruption principles, on the ethical management of business relationships and on Model 231.

The company does not tolerate any form of corruption, direct or indirect, and guarantees that any violations are subject to disciplinary measures and communication to the competent bodies.

10.3 Whistleblowing system and whistleblower protection

HRIT has set up a confidential whistleblowing channel, in compliance with Legislative Decree 24/2023 and integrated into Model 231, which allows employees, collaborators and third parties to report in good faith:

- violations of the Code of Ethics or company policies;
- conduct contrary to the law, transparency or fairness;
- potentially corrupt or discriminatory practices.

The whistleblowing system guarantees:

- absolute confidentiality of the identity of the whistleblower;
- absence of retaliation or discrimination against those who make a report in good faith;
- impartial and timely management of reports by the Supervisory Body (ODV).

The reporting methods and protections for the whistleblower are described in the Whistleblowing Report Management Procedure available to all staff.

10.4 Social responsibility and legal compliance

HRIT ensures full compliance with national and international laws on labour, the environment, anti-corruption and the protection of human rights.

The company is committed to maintaining high ethical standards in conducting business and to making responsible decisions in its dealings with customers, suppliers and partners, contributing to sustainable and transparent economic development.

Periodic internal audits and ISO 37001 and 231 audits guarantee the continuity and effectiveness of the ethical-organizational system, ensuring the constant improvement of corporate governance practices.

11.0 ESG Compliance and Risk Management

11.1 General Principles of Compliance

HRIT Srl takes a systematic and proactive approach to regulatory compliance and the management of environmental, social and governance (ESG) risks.

All business activities are planned and conducted in full compliance with applicable national and international laws, contractual requirements and voluntary standards to which the organization adheres.

HRIT's goal is to ensure that its processes and behaviors always comply with the principles of legality, integrity and sustainability, preventing negative impacts on the environment, people and corporate reputation.

11.2 Integrated Management System (IMS)

Compliance and control of ESG risks are ensured through Management Systems that combine the requirements of:

- ISO 9001:2015 — Process quality and customer satisfaction;
- ISO 27001:2022 — Information security and data protection;
- ISO 37001:2016 — Anti-bribery;
- UNI/PdR 125:2022 — Gender equality, diversity and inclusion;
- Organisational Model Legislative Decree 231/2001 — Corporate administrative liability.

This integrated system makes it possible to monitor risks related to quality, ethics, IT security and social impacts in a coordinated manner, ensuring consistency and traceability in business decisions.

11.3 Identification and assessment of ESG risks

HRIT periodically carries out an analysis of ESG risks and opportunities, with the aim of:

- identify potential risks that may affect environmental, social and governance dimensions;
- assess their likelihood and impact;
- define prevention, mitigation and monitoring measures;
- seize opportunities for improvement and sustainable innovation.

Key areas of analysis include:

- social risks (equality, well-being, workers' rights, relations with the community);
- governance risks (corruption, cybersecurity, privacy, regulatory non-compliance).

In environmental matters, HRIT does not analyse consumption data but raises awareness among staff on the correct use of energy, water and raw material resources. It also raises awareness of the correct disposal of waste through separate collection.

These analyses are documented and reviewed at least once a year by the Compliance Manager, in collaboration with the department heads and the General Management.

11.4 Control and improvement mechanisms

HRIT's Management Systems include planned internal audits, conducted by qualified personnel, to verify the effectiveness of control measures and compliance with ESG requirements.

Audits produce reports and action plans that are monitored until any non-conformities or observations are completely closed.

The results of the audits are included in the Management Review, which represents the decision-making moment for:

- approve ESG improvement targets;
- update internal policies and procedures;
- reviewing emerging risks and opportunities for sustainable innovation.

11.5 Accountability and communication

Responsibility for ESG compliance is shared at all levels of the organization. Especially:

- the General Management ensures that the IMS has adequate resources and tools;
- the Compliance Manager coordinates integrated risk management and compliance with environmental, social and anti-corruption regulations;
- all the Heads of Departments ensure the correct application of policies and controls in their respective areas;
- Employees and collaborators are required to comply with internal procedures and to report any violations or critical issues.

Communication on risks and mitigation measures takes place in a transparent and documented manner, through periodic meetings, training and dissemination of regulatory updates.

11.6 Continuous improvement and conscious risk culture

HRIT promotes a corporate culture oriented towards risk awareness and shared responsibility, encouraging proactive and sustainable behavior. Every event, incident or non-conformity is considered a learning opportunity, analyzed with root cause analysis methodologies and treated through corrective and preventive actions.

The guiding principle is that of continuous improvement, in line with the philosophy of the PDCA (Plan—Do—Check—Act) cycle, which is the foundation of all HRIT management systems.

12.0 Innovation and Continuous Improvement in Sustainability

12.1 Innovation as a lever for sustainability

HRIT Srl considers technological and organizational innovation a key element for achieving sustainability goals.

Through the digitization of processes, intelligent automation and cloud management of IT infrastructures, the company reduces its environmental impact, improves operational efficiency and promotes a sustainable, scalable and resilient business model.

Innovation is not just a technical factor, but a component of HRIT 's corporate culture, which encourages continuous improvement, collaboration, and the pursuit of solutions that generate shared value for customers, people, and communities.

12.2 Digitalization and sustainable transformation

HRIT's strategy is based on a digital transformation oriented towards sustainability:

- total dematerialization of processes, with almost complete elimination of paper and secure digital archiving;
- smart working and digital collaborative tools that reduce travel, consumption and environmental impacts;

- Microsoft 365 and Azure cloud infrastructure, which guarantees energy efficiency, data security and reduced emissions compared to on-premises servers;
- adoption of intelligent software and platforms to optimize information flows and reduce manual activities with low added value;
- constant technological updating, with a preference for low-power and long-lasting devices and solutions.

These actions strengthen HRIT's ability to combine innovation, competitiveness and environmental responsibility.

12.3 Culture of learning and continuous improvement

The company adopts the principle of continuous improvement (PDCA) as the basis of its integrated management system.

Each process is monitored, measured, and reviewed, and the results obtained are used to identify areas for optimization.

Staff are actively involved in the improvement cycle through:

- periodic training on sustainability, IT security and social responsibility issues;
- review meetings and structured feedback between team and management;
- internal initiatives to raise awareness on sustainable behaviour (efficient use of resources, smart mobility, waste reduction).

People involvement is considered the driver of responsible innovation and sustainable growth.

12.4 Innovation in processes and services

HRIT fosters innovation within its outsourcing operations by streamlining procedures, automating administrative processes, and ensuring continuous staff development in line with regulatory changes.

The solutions developed or adopted aim to:

- improve energy efficiency and customer cybersecurity;
- promote paper reduction, document automation and secure data digitization;
- ensure business continuity and IT resilience, indirectly contributing to the sustainability of customers' systems.

The goal is to create a positive effect along the value chain, supporting sustainability even outside the organization.

12.5 Research, partnerships and collaborative innovation

HRIT promotes an open approach to innovation, based on collaboration with customers, technology partners, educational institutions and professional networks.

Through participation in industry communities, events and refresher programs, the company maintains constant attention to new sustainable technologies (e.g. green cloud, ethical artificial intelligence, responsible cybersecurity).

This approach makes it possible to anticipate technological trends and to adopt solutions that improve environmental and social performance in the medium and long term.

12.6 Improvement review and traceability

The results — in terms of reduced impacts, organizational improvements or social benefits — are integrated into the SGI's ESG reporting process and improvement plans.

In this way, HRIT ensures consistency between innovation, sustainability and governance, ensuring that every technological change produces measurable and positive value for the environment and society.

13.0 Collaborations and Partnerships for Sustainability

13.1 Role of collaboration in HRIT strategy

HRIT Srl recognizes that sustainability cannot be achieved in isolation, but through active collaboration with its stakeholders — customers, suppliers, bodies, institutions, trade organizations and local communities. The company considers partnerships as a fundamental tool for spreading culture, innovation and sustainable practices, enhancing cooperation and the sharing of skills as levers for collective growth.

13.2 Collaborations with customers and technology partners

As part of its services, HRIT works closely with partners and technology providers, promoting secure, digital and environmentally friendly solutions. The adoption of Microsoft 365 and Azure Cloud represents a strategic choice oriented towards sustainability, as it allows you to reduce energy consumption and emissions related to local infrastructures, while improving the security and resilience of information systems.

13.3 Networks, associations and professional communities

The company actively participates in industry communities, conferences and working groups dedicated to cybersecurity, quality, sustainability and gender equality, contributing to the dissemination of ESG best practices.

This participation allows HRIT to:

- keep up to date with emerging environmental and social regulations and standards;
- share experiences and good practices with other organisations;

Through these professional networks, HRIT consolidates its position as a responsible and aware player within the Italian ICT and consulting landscape.

13.4 Commitment to the community and the territory

In addition to professional collaborations, HRIT maintains an active link with the community in which it operates, supporting local social and cultural initiatives.

The annual participation in the Race for the Cure in Rome, which involves the team and their families, represents a concrete example of shared social responsibility and support for public health and inclusion causes.

Looking ahead, HRIT is evaluating the possibility of expanding its collaborations with local bodies and associations to promote digital education, environmental sustainability and equal opportunities, thus contributing to local sustainable development.

13.5 Shared value and sustainable growth

Every collaboration is considered by HRIT as a relationship of mutual value, in which trust, transparency and responsibility form the basis for sustainable development. Through its partnerships, HRIT aims to generate shared value, contributing to the

economic and technological growth of the sector, environmental protection and the well-being of people and communities.

14.0 Objectives and Metrics (KPIs) 2025–2027

14.1 Premise

HRIT Srl adopts an approach based on measurable and monitorable objectives, connected to the three pillars of sustainability:

- Environmental (E — Environmental)
- Social (S — Social)
- Governance and Ethics (G — Governance)

The objectives are reviewed annually during the Management Review and updated based on the results obtained, regulatory changes and the expectations of interested parties.

KPIs are monitored by the Compliance Manager with the support of the department heads and are integrated into the Integrated Management System (IMS).

14.2 Objectives and KPIs – Environmental Dimension

Area	Objective	KPIs	Target 2027	Responsible
Paper consumption	Further reduce the use of paper in offices	% reduction in prints compared to 2023	≥ 95% discount	RQ/A — ITM
Dematerialization	Maintain fully digital archive	% digitally managed documents	100%	ITM
Waste management	Improve separate collection and WEEE traceability	% sorted waste / total	≥ 95%	RQ/A
Smart working	Consolidating agile working as a measure to reduce emissions	% staff in smart working at least 2 days/week	≥ 80%	HRM

14.3 Objectives and KPIs – Social Dimension

Area	Objective	KPIs	Target 2027	Responsible
Welfare and well-being	Strengthening the corporate welfare plan	Number of active initiatives or benefits	+25% compared to 2024	HRM
Training and awareness	Train all staff on sustainability, safety and inclusion	% of employees trained annually	100%	HRM – CM
Gender equality (UNI/PdR 125)	Maintain and improve the KPIs of the IMS	Average KPI SGDI	≥ 80/100	CDI – HRM
Community Engagement	Promoting social and territorial initiatives	No. of annual initiatives	≥ 2	HRM
Indoor climate and satisfaction	Monitor organizational well-being	Annual Staff Survey	≥ 85% satisfied	HRM

14.4 Objectives and KPIs – Governance and Ethics Dimension

Area	Objective	KPIs	Target 2027	Responsible
Compliance	Ensure continuous updating and compliance with ESG laws	Compliance audits completed/year	100%	CM
Integrity and anti-corruption	Maintain ISO 37001 certification	Positive external audit	Annual	CM – DG
Whistleblowing	Ensuring safe access and protection of the whistleblower	No. of correctly managed reports	100%	Supervisory body
Transparency and communication	Improve communication stakeholders	ESG to No. of published policies or reports	≥ 3	CM – DG
ESG risks	Integrating ESG assessment into corporate Risk Assessment	ESG risk register update	Annual	CM

14.5 Review and improvement of objectives

Each objective is reviewed annually during the Management Review. Based on the results achieved and the new context scenarios, the Management may:

- confirm or update targets;
- introduce new KPIs;
- Initiate specific improvement plans.

The results are communicated internally to staff and, where required, to customers and certification bodies, as part of the transparency and continuous improvement process.

15.0 Management Review, Approval and Communication

15.1 Management Review

The General Management of HRIT Srl reviews this Environmental and Sustainability Policy *at least once a year*, verifying:

- consistency with the company's strategic objectives and with the internal and external context;
- effectiveness in promoting environmental, social and governance improvements;
- relevance to applicable regulatory, contractual and voluntary requirements;
- the level of achievement of the objectives and KPIs defined in the three-year plan;
- Opportunities for further education

The Management Review is the decision-making moment to approve new improvement actions, define dedicated resources and validate the results achieved in the three-year period.

15.2 Responsibility for maintenance and improvement

The responsibility for managing and updating this Policy is assigned to the Compliance Manager, who:

- ensures the periodic revision of the document;
- coordinates the collection of ESG data and the verification of KPIs;
- ensures consistency of the Policy with other company policies (quality, safety, anti-corruption, diversity and inclusion);
- supports the Management in planning objectives and in communicating internal and external results.

Each update to the Policy is approved by the General Management, documented by revision number and date, and communicated to all staff.

15.3 Communication and dissemination

This Policy is:

- distributed internally to all staff through corporate communication channels (intranet, e-mail, awareness meetings);
- published on the HRIT website to ensure transparency and accessibility to external stakeholders (customers, suppliers, partners, certification bodies);
- Available on request for audits, customers and competent authorities.

HRIT is committed to ensuring that every employee is familiar with the contents of the Policy and understands its strategic value, promoting widespread awareness of the importance of sustainability and corporate social responsibility.

15.4 Approval

This *Environmental and Sustainability Policy* has been approved by the General Management of HRIT Srl and is the official reference for all corporate activities and decisions related to ESG issues.