LUTECH

SUSTAINABILITY STATEMENT 2025

LUTECH GROUP

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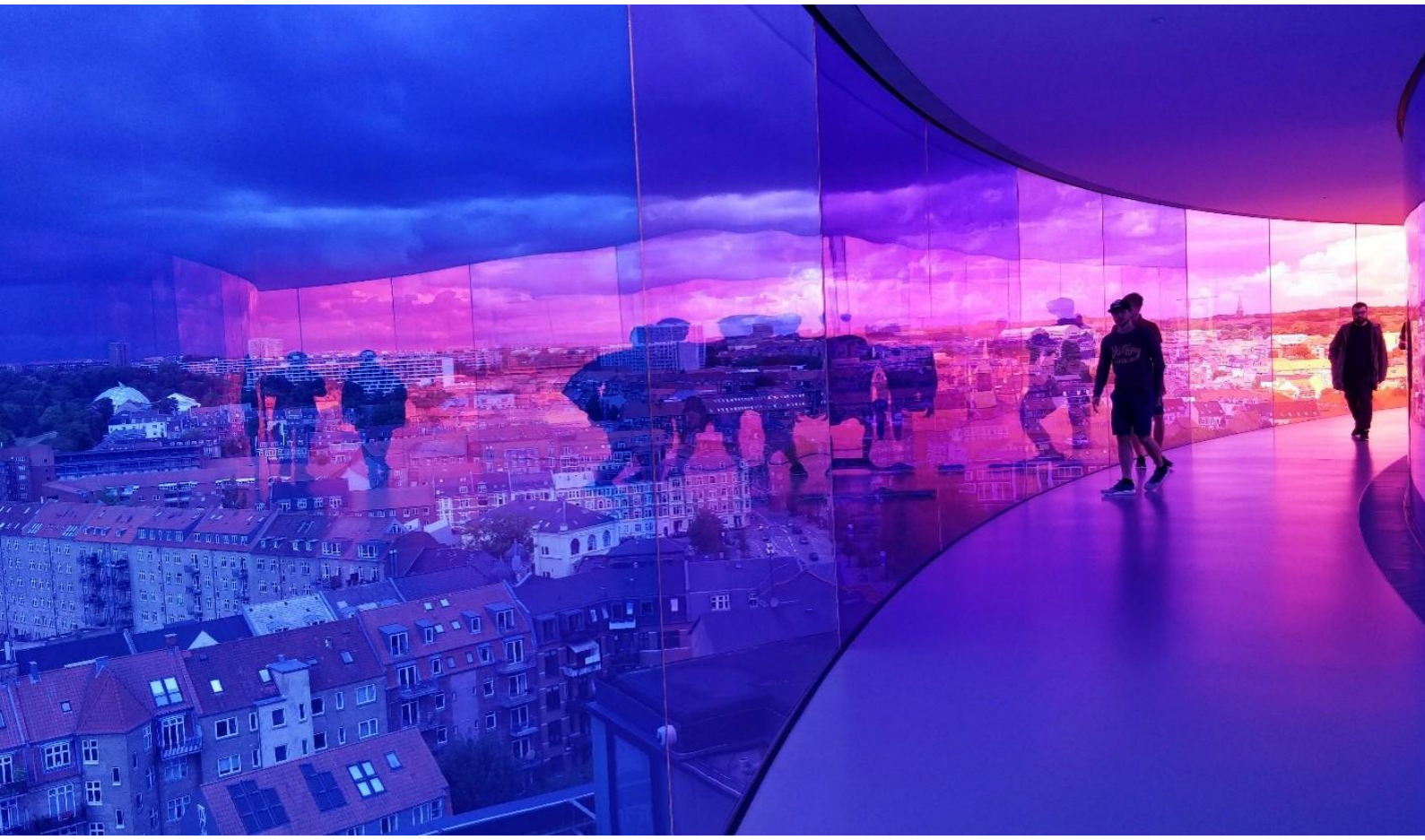
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GENERAL

1. Reporting criteria

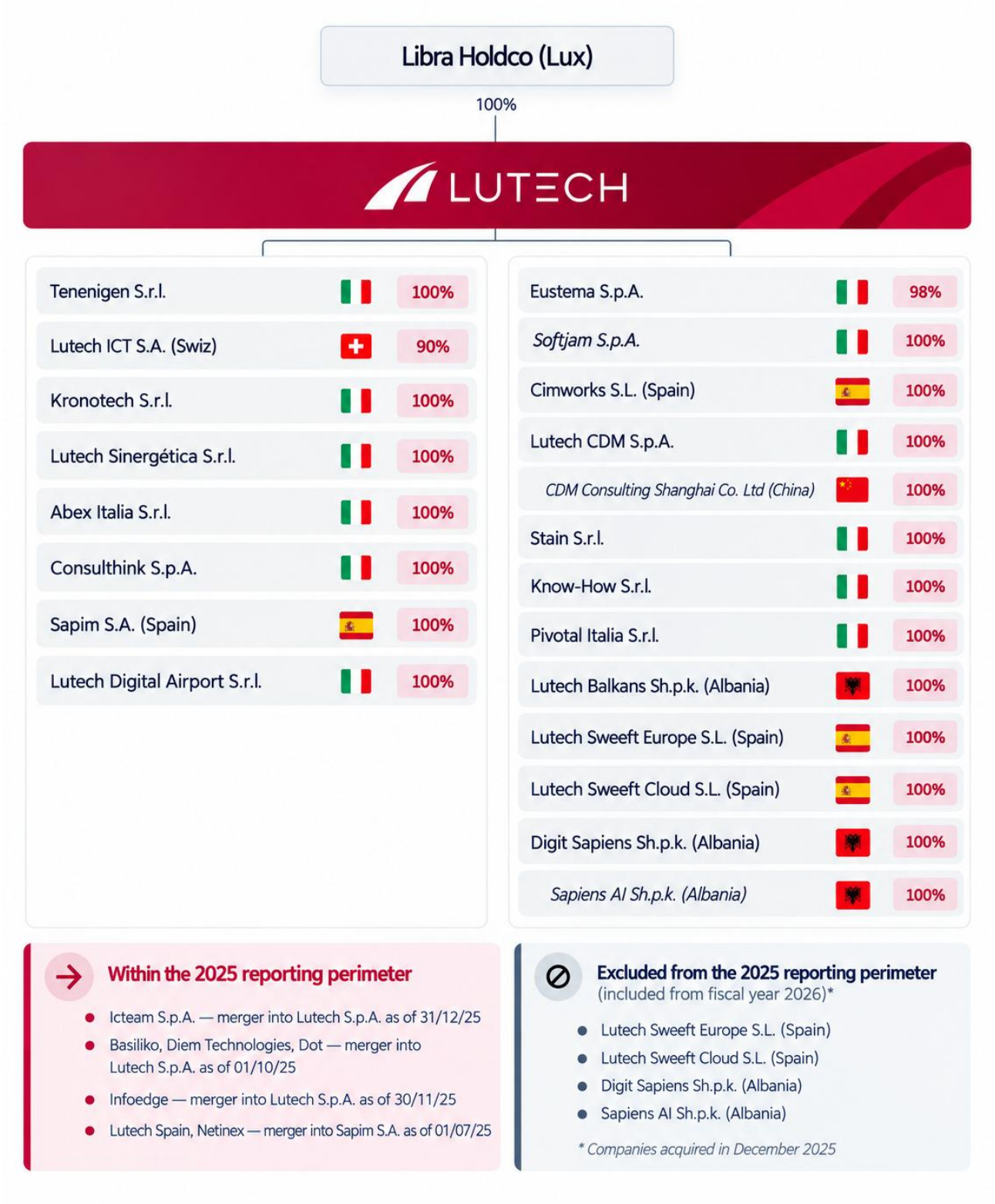


1.1 Disclosure Requirement BP-1 & BP-2 – General criteria for the preparation of a company's sustainability statement and disclosures relating to specific circumstances

These introductory paragraphs set out the criteria adopted for the preparation of the Consolidated Sustainability Report (hereinafter also referred to as the "Sustainability Report" or "Report") of the Lutech Group (hereinafter also referred to as the "Group"), covering the period 1 January 2025 to 31 December 2025 and prepared in accordance with the European Sustainability Reporting Standards (ESRS). In line with the previous financial year and with reference to the 2025 financial year, the Report has been drawn up on a voluntary basis, following an assessment of the applicable scope and timeframe, as the Group is not subject to the reporting obligation set out in Article 4 of Legislative Decree 125/2024, transposing Directive 2022/2464/EU (Corporate Sustainability Reporting Directive – CSRD).

Any transitional provisions (*phase-in*) applied are set out in the table in the ESRS Content Index.

The structure of the Lutech Group as at 31 December 2025 is shown in the following corporate structure diagram:



During 2025, the Group continued its path of growth and consolidation through extraordinary corporate integration and acquisition transactions.

With regard to mergers by incorporation, with effect for tax and company law purposes from 1 January 2025, the following companies were incorporated into Lutech S.p.A.: ICTeam S.p.A. (merger completed on 31 December 2025), Basiliko S.r.l., DIEM Technologies S.r.l., Dot S.r.l. (all three with the merger finalised on 1 October 2025) and Infoedge S.r.l. (merger finalised on 30 November 2025). In Spain, Lutech Spain S.L. and Netinex S.A. were merged into Sapim S.A. with effect from 1 July 2025. As regards new acquisitions, during 2025 the company Consulthink S.p.A. became part of the Group's scope.

It should also be noted that the subsidiaries Lutech ICT Solutions S.A. (Switzerland) and CDM Consulting Shanghai Co. Ltd (China), whilst already belonging to the Lutech Group during the previous financial year, had not been included in the scope of consolidation as they were deemed immaterial for reporting purposes. From this financial year onwards, these companies have been included, enabling a fully comprehensive and consistent scope of consolidation.

In December 2025, the Group also finalised the acquisition of four further companies – Lutech Sweeft Europe S.L., Lutech Sweeft Cloud S.L. (Spain), Digit Sapiens Sh.p.k. and Sapiens AI Sh.p.k. (Albania) – which joined the Group shortly before the end of the financial year.

The scope of this Consolidated Sustainability Report coincides with that of the Group's consolidated financial statements and includes the parent company, Lutech S.p.A., and the fully consolidated subsidiaries. However, the four companies acquired on 19 December 2025 – Lutech Sweeft Europe S.L., Lutech Sweeft Cloud S.L., Digit Sapiens Sh.p.k. and Sapiens AI Sh.p.k. – are excluded – as their entry into the Group took place shortly before the end of the financial year and does not allow for complete and representative reporting for the year in question; these companies will be included from the 2026 Consolidated Sustainability Report onwards.



The companies included within the scope of this Report constitute, for the purposes of this Report, the "Lutech Group".

The Lutech Group's Sustainability Report considers the entire value chain, including, where relevant, information relating to direct and indirect commercial relationships upstream and downstream of the Group's activities. Information relating to the value chain is provided primarily in qualitative form, with reference to the significant impacts, risks and opportunities identified through the double materiality process.

The Report is structured in accordance with the provisions of ESRS 1 and is organised into the following sections:

1) general information
2) environmental information
3) Social information
4) governance information

Each section sets out information relating to the material issues identified by the Group, describing the policies, actions, targets and metrics adopted.

The Group has not exercised the option to omit information relating to intellectual property, know-how or innovation outcomes, nor has it made use of the disclosure exemptions provided for in relation to imminent developments or matters under negotiation. The Report is based primarily on quantitative data from the Group's internal management systems; any estimates have been prepared on the basis of the best information available at the date of preparation and are adequately described in the relevant sections.

With regard to the time horizons adopted, in line with the previous financial year, the Group adopts the following reference time horizons:

- short term: 0 to 2 years, consistent with the Group's economic and financial planning horizons;
- medium term: over 2 years and up to 5 years;
- long term: over 5 years.

The Report is based primarily on quantitative data from the Group's internal management systems. With regard to metrics that include data relating to the upstream and/or downstream value chain, the Group uses, where possible, information derived from direct sources. Where it has been necessary to use indirect sources, proxies or industry averages, the basis for their preparation, the estimated level of accuracy and any actions planned to progressively improve their reliability in future reporting periods are described.

The Group also identifies any quantitative metrics that may be subject to levels of estimation uncertainty, highlighting, where relevant, the main causes and the assumptions adopted for the purposes of the assessment. As 2024 marked the first consolidated reporting period prepared in accordance with the ESRS on a voluntary basis for the entire Lutech Group, this Report includes, where available and comparable, comparative information relating to the previous financial year. However, some indicators may be subject to gradual methodological refinement in future reporting periods.

During the preparation of this Sustainability Report, a number of errors relating to previous periods were identified, requiring restatements or adjustments to the comparative information presented, in accordance with the provisions of ESRS 1. The nature of these errors and the related corrections are set out in the relevant thematic sections; see E1 – Climate Change and S1 – Own Workforce, to which reference should be made.

The Lutech Group is not subject to any further regulatory obligations regarding Sustainability Reporting, including the provisions set out in Article 8 of Regulation (EU) 2020/852 ("European Taxonomy").

Where information is included in this Report by reference to other corporate documents, the Group specifies its exact location, in accordance with the provisions of ESRS 1 – section 9.1 'Incorporation by reference'.

2. Governance

2.1 Disclosure requirement GOV-1 – Role of the Board of Directors, Management and Audit Com

The Lutech Group adopts a traditional governance model comprising clearly defined administrative, management and supervisory bodies (hereinafter also referred to as 'ADC'), each with distinct responsibilities in the areas of strategic supervision, operational management and independent oversight. In this context, sustainability – encompassing its environmental, social and governance dimensions (hereinafter also referred to as 'ESG') – is integrated into decision-making processes at the highest levels of the organisation.

Ultimate responsibility for ESG matters rests with the Group Chief Executive Officer, who oversees the relevant corporate processes, including those of an ESG nature. The individuals responsible for monitoring material issues and their associated impacts, risks and opportunities (hereinafter also referred to as "IROs") within the various ADC bodies work in close collaboration with this senior executive.

Each body sets out its responsibilities regarding Impacts, Risks and Opportunities in its respective corporate mission statements, in the terms of reference of the Boards of Directors and in the systemic policies on ESG matters, in accordance with the Procedure (PSQ-000) on the General Organisational Structure. This document makes them formally accountable for these matters and part of a structured ESG due diligence process.

Set out below is the composition, updated to 2025, of the administrative, management and supervisory bodies of the parent company Lutech S.p.A., indicating the positions held, gender and nature of the role.

Administrative, management and supervisory bodies

First Name and Surname	Position	Gender	Executive role	Independent
Tullio Pirovano	Chairman of the Board of Directors and Director	M	No	No
Di Franco Giuseppe	Chief Executive Officer and Director	M	Yes	No
Luca Donna	Chief Executive Officer and Director	M	Yes	No
Giancarlo Rodolfo Aliberti	Director	M	No	Yes
Roberto Osvaldo Lancellotti	Director	M	No	Yes
Gabriele Cipparrone	Director	M	No	No
Maria Paola Testa	Director	F	No	No
Anna Gatti	Director	F	No	Yes

The Board of Directors of Lutech S.p.A. comprises eight members, two of whom hold executive positions as Chief Executive Officers (25 per cent of the total) and six of whom do not hold executive positions (75 per cent). There is no provision for employee or other worker representation on the board.

About gender composition, the Board comprises six men (75 per cent) and two women (25 per cent).

The percentage of independent members of the Board of Directors is 25 per cent. Independence is assessed based on three criteria: the absence of significant financial ties with the Company, personal independence from major shareholders, and operational neutrality about day-to-day management.

It should be noted that, during the 2025 financial year, Marc Rafael Henckel held the position of Director until June 2025, the date on which he stepped down from the role. The table above therefore reflects the composition of the Board of Directors as of 31 December 2025.

It should be noted that Lutech S.p.A. is 97.71% owned by Libra HoldCo S.à r.l. and 2.29% by Lutech itself. The representatives of the APAX investment fund on the Board of Directors do not meet the independence requirements due to their links with the majority shareholder.

Board of Statutory Auditors

First Name and Surname	Position	Gender	Nature
Mario Broggi	Chairman of the Board of Statutory Auditors	M	Audit
Alessandro Rebora	Standing Auditor	M	Audit
Gianluca Donnini	Standing Auditor	M	Audit
Chiara Benedetta Francesca Setti	Alternate Auditor	F	Audit
Vito Giudice	Alternate Auditor	M	Audit

The Board of Statutory Auditors comprises five members (three standing and two alternate), all of whom perform supervisory functions and, by statutory definition, have no executive powers. The gender breakdown is as follows: four men (80 per cent) and one woman (20 per cent).

Sustainability Committee

First Name and Surname	Position	Gender	Executive Role
Roberto Lancellotti	Member of the Sustainability Committee	M	No
Mariapaola Testa	Member of the Sustainability Committee	F	No
Francesca Merella	Chief People Officer	F	No
Cristina Rossato	Chief Compliance Officer	F	No

In 2024, the Sustainability Committee of Lutech S.p.A. was established to strengthen governance of ESG issues. Its members are appointed and removed by resolution of the Board of Directors of the parent company, Lutech S.p.A., and may be chosen exclusively from among the executive or non-executive directors of the Company and the companies of the Lutech Group. The Articles of Association stipulate that at least one member must meet the independence criteria and at least one must possess adequate experience in the field of sustainability and sustainable development.

The Group's Chief People Officer and Chief Compliance Officer participate in the Committee's proceedings, without voting rights, in a technical support capacity. The activities identified by the Committee are then delegated to the Corporate Social Responsibility function for implementation within the parent company and the Group's companies. Further operational details are set out in the Sustainability Committee Regulations, published in the first quarter of 2024 (Articles 3 and 6).

Nomination and Remuneration Committee

First Name and Surname	Position	Gender	Executive Role
Anna Gatti	Chair of the Committee	F	No
Gabriele Cipparrone	Committee Member	M	No
Tullio Pirovano	Committee Member	M	No

The **Nomination and Remuneration Committee** of Lutech S.p.A. was established as part of the corporate governance framework to support the Board of Directors, in accordance with the principles and recommendations of the Corporate Governance Code. The relevant regulations were approved by the Board of Directors on 25 January 2024. The members and the Chair of the Committee are appointed by the Board of Directors, which also determines its composition and any removal from office. Members are selected on the basis of expertise relevant to the Committee's remit, with particular focus on governance, remuneration and management planning.

The Committee performs advisory and propositional functions in matters of **governance, appointments and remuneration**. In particular, it supports the **Board of Directors** in the selection and succession processes for management, in the self-assessment of corporate bodies and in the definition of remuneration and incentive policies for senior management.

The Committee's purpose is to ensure that decisions relating to the composition of the governing bodies and the remuneration of management are taken in accordance with criteria of transparency, competence, meritocracy and long-term sustainability, thereby contributing to good corporate governance and the creation of value for the Group.

Supervisory Body ("ODV")

First Name and Surname	Position	Gender	Executive Role
Varraso Gianluca	Chairman of the Supervisory Board	M	No
Cristina Rossato	Member of the Supervisory Board	F	No
Carlo Nardone	Member of the Supervisory Board	M	No

The Supervisory Body consists of 3 members (2 men and 1 woman) and operates in accordance with Legislative Decree 231/2001, with the function of monitoring the effectiveness of the Organisation, Management and Control Model adopted by Lutech S.p.A.

Compliance Function for the Prevention of Corruption ("FCPC")

First Name and Surname	Position	Gender	Executive Role

Mariacristina Palavezzati	FCPC Member	F	No
Rossato Cristina	FCPC Member	F	No
Monica Nutta	FCPC Member	F	No

The FCPC comprises three members, all of whom are women (100 per cent). None of the members hold executive positions.

Gender Equality Committee (CPG)

First Name and Surname	Position	Gender	Executive Role
Ciccarelli Carlo	CPG Member	M	Yes
Francesca Merella	CPG Member	F	Yes
Cristina Rossato	CPG Member	F	No
Elena Cortese	CPG Member	F	No
Mariacristina Palavezzati	CPG Member	F	No
Molinari Felice	CPG Member	M	No
Gianluca Capra[1]	CPG Member	M	Yes

The CPG comprises 7 members: 3 with executive roles (43%) and 4 without (57%). The gender breakdown is: 3 men (43%) and 4 women (57%).

Social Performance Team (SPT)

First Name and Surname	Position	Gender	Executive Role
Felice Molinari	SPT Member	M	No
Elena Cortese	SPT Member	F	No
Mariacristina Palavezzati	SPT Member	F	No
Capra Gianluca	SPT Member	M	Yes
Elena Maria Di Gaudio	SPT Member	F	No
Anna Maria Fasoli	SPT Member	F	No
Patrizia Cirino	SPT Member	F	No
Mario Giovanni Cernuschi	SPT Member	M	No

The SPT comprises 8 members: 1 with an executive role (Gianluca Capra, 12.5%) and 7 without (87.5%). The gender breakdown is: 3 men (37.5%) and 5 women (62.5%).

Diversity, skills and ESG expertise of ADC bodies

Expertise relating to the sectors, products and geographical areas in which Lutech S.p.A. operates is ensured by managers who have developed in-depth expertise in the evolution of the digital sector and IT services. Members of the ADC bodies have previously held positions in other companies within the sector, enabling them to strengthen their understanding of organisational and management dynamics.

In general, all members of the ADC bodies – whether they hold executive powers, are independent or not – have decades of experience in the sector and in the markets in which the Company operates. The representatives of the APAX investment fund on the Board of Directors have gained significant experience in the Italian market through previous investments and were selected for their recognised expertise in the technology sector.

In the ESG sphere, these professionals have developed a specific understanding through the review of policies and strategies that have enabled the Company to anticipate the timing and methods of data

[1] Joined the company in April 2026 to replace Ada Velati, who left the company in December 2025.

collection and analysis. A concrete example of this is the process of early simulation of mandatory reporting under the CSRD, launched by Lutech S.p.A. in 2023 for its own reporting and, from 2024, extended to cover the reporting of the entire Lutech Group.

The ADC bodies determine whether the necessary ESG expertise is – or will be – available by overseeing the following corporate functions, which, whilst not formally ADC bodies, liaise regularly with them:

- Corporate Social Responsibility (CSR) Function: this function is responsible for guiding Lutech S.p.A. in ESG matters, coordinating projects (including Sustainability Reporting) and promoting initiatives on environmental, social and governance issues, in collaboration with the various companies within the Group.
- Group HSE Function ensures that the company's activities are carried out in full compliance with Legislative Decree 81/08 (Health and Safety at Work) and Legislative Decree 152/06 (Consolidated Environmental Act); works alongside the Compliance function to develop, implement and monitor the occupational health and safety management system (ISO 45001:2018) and the environmental management system (ISO 14001:2015).
- Other ESG governance bodies within the Group's companies, which operate independently of the parent company.

For highly specialised areas of expertise, Lutech S.p.A. also engages qualified external consultants who, in an advisory capacity, contribute to raising awareness and improving ESG impacts, liaising with the parent company and with individual Group companies where the issue in question specifically relates to one of them.

The management of Lutech S.p.A. plays a fundamental role in the processes, controls and governance procedures that monitor ESG impacts, risks and opportunities. The role of management in the processes for monitoring material issues and the associated IROs is primarily represented by the Group Chief Executive Officer, who – as indicated – bears ultimate responsibility for and oversees ESG processes.

Control over the management of material issues and the associated impacts, risks and opportunities is exercised through the CSR function – which forms part of the parent company's Compliance function – which operates in coordination with the various Group companies and encourages their participation in the processes for developing systemic ESG policies and procedures.

The corporate governance bodies of Lutech S.p.A. review the objectives defined following the IRO analysis process and monitor progress through a monitoring mechanism triggered when critical issues are identified by the CSR department or by a specific Group company. The corporate governance bodies take these reports into account, assessing each case individually and deciding whether and how to intervene to mitigate a risk or maximise an opportunity.

The Sustainability Committee plays a key coordinating role in this process: the activities it identifies are delegated to the CSR function for implementation within the parent company and the Group's subsidiaries. Further operational details are set out in the Regulations of the Sustainability Committee (published in the first quarter of 2024), with particular reference to Articles 3 and 6, which provide further details on controls and the methods of integration with other internal functions across the various Group companies.

Summary of 2025 Governance Data:[2]

Body	No. of Members	Executive	Women	Men
Board of Directors	8	2 (25%)	2 (25%)	6 (75%)
Board of Statutory Auditors	5	0 (0%)	1 (20%)	4 (80%)
Sustainability Committee	2	0 (0%)	1 (50%)	1 (50%)
Nominations and Remuneration Committee	3	0 (0%)	1 (33%)	2 (67%)
Supervisory Board	3	0 (0%)	1 (33%)	2 (67%)
FCPC	3	0 (0%)	3 (100%)	0 (0%)
CPG	7	3 (43%)	4 (57%)	3 (43%)
SPT	8	1 (12.5%)	5 (62.5%)	3 (37.5%)
Grand total	36	6 (17%)	17 (47 per cent)	19 (53 per cent)

2.2 Disclosure requirement GOV-2 – Information provided to the Board of Directors, Management and Audit Committees and sustainability issues addressed by them

During the 2025 reporting period, the Lutech Group's Board of Directors, Management and Supervisory Bodies were regularly informed about material issues and the potential Impacts, Risks and Opportunities associated with ESG issues, as well as the progress of the Group's sustainability actions and policies.

As indicated in the following paragraphs, it should be noted that the IROs reported for 2025 are not directly attributable to the outcomes of the preliminary double materiality process conducted during the reporting year, but rather derive from an identification process carried out on the basis of elements that emerged within the management systems and analyses conducted in accordance with applicable ISO standards and other organisational and control mechanisms already in place within the Group.

The 2025 Double Materiality analysis, in fact, was primarily aimed at identifying the material issues relevant to the Lutech Group and has not yet provided for a structured formalisation of the Impacts, Risks and Opportunities (IROs) associated with individual material issues.

During 2025, the ADC bodies confirmed and monitored the relevant issues that had emerged from the previous materiality assessment and, at the same time, initiated activities aimed at methodologically updating the assessment process, with a view to progressively refining the analysis. This process will enable, in the next reporting period, a more precise identification, assessment and prioritisation of the IROs relevant to the Group.

[2] The figures relate exclusively to the parent company, Lutech S.p.A. They include all the company's formal governance bodies (Board of Directors, Board of Statutory Auditors, Sustainability Committee, Supervisory Board, FCPC, CPG, SPT). The proportion of independent directors on the Board of Directors is 25 per cent (2 out of 8 directors).

In line with last year, the coordination of activities was ensured by the CSR function of the parent company, Lutech S.p.A., in consultation with the Sustainability Committee and the key corporate functions involved in ESG processes, including as part of the management reviews required by the Group's certified management systems and during the preparation of the Consolidated Sustainability Report for the 2025 financial year.

During the financial year, the ADC bodies received regular updates regarding:

- progress on updating the double materiality analysis;
- the status of implementation of ESG policies and processes;
- the progress of the improvement actions and targets defined at Group level.

Discussions between the ADC bodies, the CSR function and the relevant corporate functions also contributed to updating and consolidating the Group's internal regulatory framework, through the maintenance and review of key ESG policies and procedures, including:

- (POL-900) Sustainability Policy – unchanged from 2024
- (MAM-POL) Environmental Policy – expansion to the Group's scope planned from 2026
- (PSQ-500) Anti-Corruption Policy – updated during 2025
- (POL-960) Social Responsibility Policy – updated during 2025
- (POL-970) Diversity, Equity and Inclusion Policy – adopted during 2025
- (POL-971) Parenting Policy – adopted in 2025, with extension to the Group's scope planned for 2026
- (MSL-POL) Occupational Health and Safety Management System Policy – Health and safety policies and management systems, where applicable (ISO 45001:2018 certified); extension to Group level is planned for 2026, with a corresponding update to the documentation.

For a complete list of Group policies and those of individual subsidiaries, please refer to the 'Summary Table – Policies' at the end of this chapter, and to the relevant detailed information in the thematic chapters.

The effectiveness and adequacy of the policies referred to above are monitored by the corporate functions responsible for the respective ESG issues and coordinated by the CSR function, which forms part of the Group's Compliance department and oversees the process of information gathering, monitoring and reporting.

The Group's approach to managing IROs is guided by the principles of prevention and continuous improvement. In particular, with regard to impacts and risks, the Group favours a precautionary approach aimed at anticipating potential negative effects and defining mitigation and prevention measures. At the same time, with regard to opportunities, the ADC bodies adopt a data-driven and forward-looking approach, based on scenario analysis and the assessment of the potential strategic, economic and reputational benefits arising from ESG initiatives.

2.3 Disclosure Requirement GOV-3 – Integration of sustainability performance into incentive schemes

The Lutech Group's 2025 remuneration policy does not include variable components linked to sustainability objectives or issues and, at present, there are no plans to introduce incentive schemes of this nature in the coming years. Furthermore, during the reporting year, the Group did not adopt any incentive schemes for

members of the Board of Directors, Management and Supervisory bodies linked to greenhouse gas (hereinafter also 'GHG') emission reduction targets, nor was their performance assessed against the achievement of such targets.

2.4 Disclosure Requirement GOV-4 – Statement on Due Diligence

The Lutech Group recognises due diligence as the ongoing process aimed at identifying, preventing and mitigating actual and potential negative impacts on the environment and people.

In the process leading to the preparation of this report, the Lutech Group has considered the main international instruments that provide guidelines for integrating due diligence into sustainability processes. Reference is made to the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The elements set out below form an integral part of the process implemented for the 2025 Sustainability Report, based on tools currently in use within the Group.

Correlation table: due diligence elements and ESRS

Key elements of due diligence	Relevant sections in the 2025 Sustainability Report
Integrating due diligence into governance, strategy and the business model	• ESRS 2 – GOV-2 • ESRS 2 – SMB-3 • G1
Stakeholder engagement at all key stages of due diligence	• ESRS 2 - GOV-2 • ESRS 2 – SMB-2 • ESRS 2 – IRO-1 • ESRS 2 – IRO-2 • S1-2 • S2-2 • S4-2
Identification and assessment of adverse impacts	• ESRS 2 - IRO-1 • ESRS 2 – SMB-3
Measures to address the negative impacts	• MDR-A • E1-3 • S1-3 • S1-4 • S2-3 • S2-4 • S4-3 • S4-4
Monitoring the effectiveness of interventions and communications	• ESRS 2 - GOV-1 • ESRS 2 - GOV-2 • ESRS 2 - GOV-5 • DR-T

2.5 Disclosure requirement GOV-5 – Risk management and internal controls over Sustainability Reporting

Throughout 2025, the Lutech Group has progressively consolidated an integrated system for managing risks associated with the Consolidated Sustainability Reporting process, drawing on the management systems and organisational models already in place and adopted by the Group's companies.

The ESG risk management and control framework is based on the integration of the main certified systems and governance models adopted by the Group, including:

- ISO 9001:2015 – Quality management system;
- ISO 20000-1:2018 – IT Service Management System;
- ISO/IEC 27001:2022 – Information security management system;
- ISO 14001:2015 – Environmental management system;
- ISO 14064-1:2018 – Quantification and reporting of greenhouse gas emissions;
- ISO 45001:2018 – Occupational health and safety management system;
- ISO 37001:2016 – Anti-bribery management system;
- UNI/PdR 125:2022 – Management system for gender equality;
- SA8000 – Social Responsibility System
- Organisational Model pursuant to Legislative Decree 231/2001.
- SGPDP – Personal Data Protection Management System

The risk management process is characterised by:

- the involvement of the business functions within Group companies that are potentially exposed to ESG risks and opportunities;
- the engagement of the relevant departments in the processes of identifying, analysing and assessing risks associated with the collection, management and reporting of ESG data;
- the establishment of internal control mechanisms and periodic monitoring, through which the responsible departments report any anomalies, critical issues or areas for improvement to the process coordinators;
- the implementation of corrective actions and mitigation measures consistent with the identified level of risk.

The model adopted by the Group is characterised by an inclusive and progressively integrated approach, aimed at involving the various subsidiaries whilst respecting the organisational and operational specificities of each entity, whilst at the same time promoting the harmonisation of ESG control and reporting processes.

All control and risk management processes relating to Sustainability Reporting also provide for:

- cross-checking of ESG control procedures and information flows;
- training sessions dedicated to the functions involved in the collection and validation of reporting data;
- processes for sharing and verifying information with front-line staff and management representatives.

About the internal control system applied to the Sustainability Reporting process, the Group has confirmed the following categories of risk, which are distinct from and in addition to the material issues identified in the Double Materiality analysis, as identified since the previous reporting year:

- risks relating to the completeness and integrity of the data collected;
- risks relating to the accuracy of estimates and calculation methods;
- risks linked to the availability of information throughout the value chain;
- risks arising from failure to meet deadlines for data collection and consolidation.

Specific mitigation strategies are in place for each risk category, including activities such as the prior verification and validation of data, ongoing dialogue with stakeholders across the value chain, monitoring of reporting deadlines, and the strengthening of internal controls over ESG data collection processes.

The findings of risk assessment and monitoring activities contribute to the definition of new Group-wide processes and organisational controls, as well as to the assignment of specific responsibilities to the functions involved in the production and validation of sustainability data. In parallel, the Group promotes dedicated training programmes aimed at enhancing awareness, skills and the ability to manage ESG risks within the consolidated scope.

3. Strategy

3.1 SBM-1 Disclosure Requirement – Strategy, business model and value chain

The Lutech Group

Founded in 1996 and headquartered in Milan, the Lutech Group has established itself over the course of almost three decades as one of Italy's leading players in the Information and Communication Technology sector, operating consistently and significantly both on the domestic market and, to an increasing extent, internationally. The Group stands out for its ability to offer integrated, high value-added ICT solutions, supporting client organisations throughout the entire digital transformation journey: from strategic consultancy to technological implementation, right through to ongoing systems management and post-delivery support.

The Group's growth trajectory has been characterised by a development strategy combining both organic growth and acquisitions, which has progressively expanded its expertise, geographical presence and ability to respond to a rapidly evolving market. Details regarding acquisitions, mergers and other changes to the corporate structure are set out in section *"1.1 BP-1 & BP-2 – General criteria for the preparation of the organisation's sustainability statement and disclosures relating to specific circumstances*".

The business model

The Lutech Group's business model is based on an integrated approach to digital transformation, combining specialised technological expertise, proprietary solutions and a widespread presence across Italy's key industrial sectors. The Group operates through companies focused on specific service areas, which work together synergistically to ensure end-to-end coverage of clients' digital needs.

The offering is organised into seven main areas, supported across the board by Research & Development (R&D) activities:

- Infrastructure Solutions (LutechCloud) – technology and cloud infrastructure services, supporting business continuity and the scalability of corporate information systems.
- Managed Services (LutechServices) – ongoing management of systems, applications and infrastructure, with the aim of ensuring efficiency, availability and operational security over time.
- Digital Transformation (LutechDigital) – consultancy and implementation services for the digital transformation of business processes, with an approach focused on innovation and technological integration.
- Proprietary sector-specific solutions (LutechSolutions) – in-house developed vertical software solutions, designed to meet the specific needs of the key industrial sectors served.
- Cybersecurity (LutechCybersecurity) – specialised cybersecurity services to protect clients' information assets and digital infrastructure.
- Business Consulting (Lutech Consulting / Lutech Next) – strategic and organisational consultancy services, supporting business decision-making and change management.

- Artificial Intelligence (GenAI, AI Agent, hyperautomation, Bot / Virtual Assistant) – a division launched in 2025, focusing on generative artificial intelligence, advanced automation and virtual assistants; this rapidly growing area is being progressively integrated into the Group's other service lines.

R&D activities are fuelled by university partnerships and Open Innovation initiatives developed through the Lutech Campus, the Group's open innovation hub based at its headquarters, which involves academic institutions, research centres, technology partners, start-ups and clients in co-innovation programmes.

Key customers and markets

The Lutech Group serves complex organisations across the main sectors of the Italian economy, holding leadership positions in several segments:

- In the Energy, Utilities & Transportation sector, the Group serves all the major players in the supply chain, with vertical expertise across the entire value chain – generation, distribution and retail – and distinctive solutions in SAP, Digital Twin, Data and Trading Solutions.
- In the Manufacturing sector, the Group operates throughout Italy with a comprehensive end-to-end offering for the Digital Factory: PLM, CAD/CAM, ERP, MES/MOM, AI, IoT and Digital Twin.
- In the Public Sector & Healthcare sector, the Group operates within central and local government, with vertical expertise in welfare, pensions and benefits, further consolidated through the acquisition of Eustema S.p.A. in 2024.
- In the Telco & Media sector, the Group serves the top four national operators – TIM, Vodafone, WindTre and Fastweb – with specific expertise in Telco NOCs and digital broadcasting for RAI, Sky and Mediaset.
- In the Finance & Insurance sector, the Group supports insurance clients with core and horizontal systems and manages application services for the leading Italian banks, with expertise in Salesforce CRM.
- In the Fashion & Retail sector, the Group offers omnichannel expertise, with strength in Salesforce and data-driven approaches, as well as industrial performance solutions for the luxury industry.

The key markets in which the Group operates and the breakdown of revenue from third parties by country are set out in the table below:

Continent	Country	Amount (k€)
Europe	Austria	27.74
	Belgium	684.06
	Bulgaria	22.55
	Croatia	20.59
	Czech Republic	11.47
	France	2,649.32
	Germany	6,139.71
	Greece	3,911.84
	Hungary	67.67
	Ireland	91.90
	Italy [3]	831,285.04

[3] The figure for Italy also includes Albania.

Continent	Country	Amount (k€)
	Luxembourg	509.44
	Malta	237.44
	Netherlands	349.18
	Norway	15.59
	Poland	55.18
	Portugal	45.21
	Romania	19.20
	San Marino	230.57
	Serbia	267.91
	Slovakia	0.23
	Spain	26,497.88
	Sweden	104.25
	Switzerland	14,261.76
	Turkey	17.68
	United Kingdom	1,035.03
Asia	China	319.41
	Korea	48.81
America	Brazil	13.66
	United States	217.25
Africa	South Africa	1.07
	Tunisia	0.74

As regards the number of employees broken down by geographical area, the Group has a total of 5,184 employees in Italy, plus 202 employees in Spain, 199 employees in Albania, 8 employees in Switzerland and 4 employees in China.

The Group operates nationally and internationally without any significant restrictions on the sale of its services, except for restrictions linked to embargoes due to geopolitical reasons or trade disputes, and to dual-use technology, which may only be transferred subject to ministerial authorisation. The sectors in which the Group operates are not subject to enhanced reporting requirements under the ESRS.

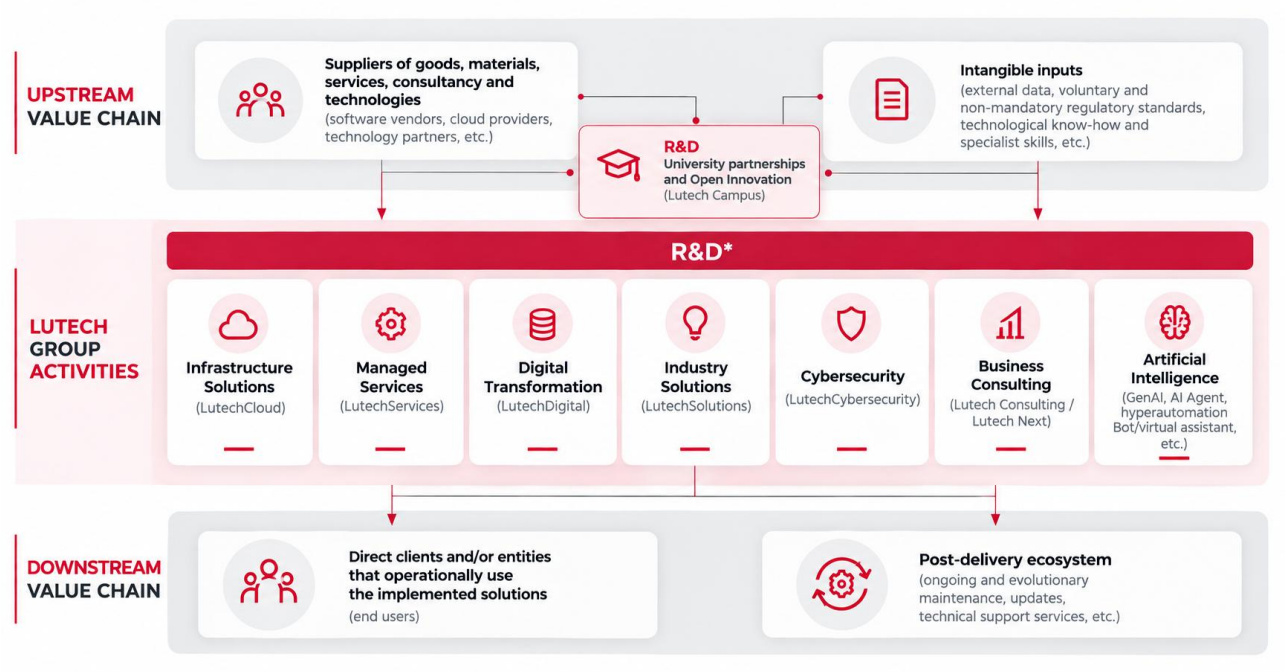
The value chain

The Lutech Group stands out for its integrated and responsible approach throughout the entire value chain, which encompasses all stages of the service delivery cycle, from the procurement of necessary inputs through to ongoing post-delivery customer relations.

- Upstream, the Group sources goods, services, consultancy and technologies from a qualified ecosystem of suppliers, which includes software vendors, cloud providers and technology partners. These are complemented by intangible inputs – external data, regulatory standards, technological know-how and specialist expertise – which fuel the Group's capacity for innovation. R&D activities, carried out in collaboration with universities and research centres through the Lutech Campus, are a key enabler at this stage.

- In its operational activities, the Group delivers its solutions through the seven areas described in the business model, within an integrated and synergistic system. Services are delivered by multidisciplinary teams with high levels of sector-specific specialisation, supported by proprietary technological assets, digital platforms and cloud infrastructure. Human resources management and development are critical elements of this phase, given the knowledge-intensive nature of the Group's activities.
  Downstream, delivery and marketing activities are managed directly by the Group's companies, which maintain direct relationships with end customers. The relationship with the customer does not end with the handover of the project: a structured post-delivery ecosystem guarantees continuous, evolutionary and corrective maintenance, technological updates and technical support, ensuring the long-term value of the implemented solutions.

A graphical representation of the Lutech Group's value chain is presented below.



Sustainability Strategy

As at 31 December 2025, the Lutech Group had not yet defined a formalised, unified sustainability strategy, understood as a comprehensive framework of integrated and structured ESG objectives, actions and targets. Although such a formalised framework is not yet in place, the Group already adopts and monitors various elements typical of a strategic approach to sustainability, including the definition of priorities for action, the implementation of dedicated initiatives and the monitoring of specific objectives and indicators relating to issues deemed relevant. The comprehensive formalisation of these elements is, however, considered a key area for the progressive consolidation of the Group's ESG approach, in line with the steering and oversight role assigned to the Sustainability Committee.

During the reporting year, the Group has aligned its sustainability initiatives with several commitment areas which, whilst not constituting formal objectives under ESRS standards, set out a clear strategic direction consistent with stakeholders' expectations:

- On **the environmental front**, the Group is progressively implementing measures aimed at reducing its climate impact. For example, Lutech S.p.A. and several Group companies have entered into contracts for the supply of electricity from renewable sources, backed by Guarantees of Origin (GO), with a commitment to reduce Scope 2 emissions associated with their energy consumption. Further details on the actions taken are set out in the thematic sections of this report, with reference to ESRS E1 – Climate Change.
- On **the social front**, the Group promotes initiatives supporting inclusion, gender equality and skills development, with a particular focus on young talent in STEM fields and the local communities where the Group operates. The relevant actions are described in the sections dedicated to ESRS S1, S2 and S4.
- In **terms of governance**, the Group has launched a structured process for collecting and reporting sustainability information, partly in response to growing demands from customers – particularly regarding supplier qualification and assessment processes – and from investors.

- In terms of stakeholders, the Group maintains ongoing relationships with its key stakeholders – including customers, employees, suppliers, local communities and institutions – and takes their expectations into account in decision-making processes relevant to sustainability. The methods of engagement are described in the following section of this chapter.

The Lutech Group recognises the growing importance of ESG issues within its competitive environment and in its relationships with customers, investors and regulators. Although it does not yet have a formalised sustainability strategy with quantitative targets approved by its governing bodies, the Group has incorporated certain elements of direct relevance to sustainability into its strategic decisions.

Strategic elements with an impact on sustainability

The Group directs its investments towards innovative projects that reconcile the adoption of AI technologies with compliance with environmental and social parameters, recognising that responsible technological innovation is an enabler both for the Group's competitiveness and for the creation of shared value with customers and society.

The growing focus on people – further strengthened by the merger of Lutech Advanced Solutions into Lutech S.p.A. in 2024, which brought the parent company's workforce alone to over 3,000 employees – translates into policies on human capital development, inclusion and organisational wellbeing that underpin day-to-day operational decisions.

The Group also promotes joint initiatives on environmental and social sustainability, recognising that the impact of its operations extends throughout the entire value chain.

Key challenges for the future

The main challenge for the Group is to formalise an ESG strategy consistent with the company's new scale and regulatory expectations, in consultation with the Sustainability Committee. This includes integrating internal functions into the ESG data collection process, improving environmental performance despite the expansion of the scope of consolidation, and actively involving all Group companies in a shared ESG vision.

3.2 SBM-2 Disclosure Requirement – Interests and views of stakeholders

Stakeholder engagement plays a central role in the management of the Lutech Group's activities and in defining its sustainable development strategies. Communication, combined with the ability to listen and engage in ongoing dialogue, is the primary tool in the relationship between the Group and its stakeholders, with the aim of creating shared value and guiding strategy, the business model and sustainability reporting in an increasingly coherent manner.

In line with this approach, the Group has developed its own stakeholder engagement process, drawing inspiration from the AA1000 Stakeholder Engagement Standard (SES) guidelines, which are based on three fundamental principles:

1 **inclusivity**, understood as the involvement of the various categories of stakeholders;

2 **relevance**, defined as the ability to identify and assess sustainability issues that are material to the Group and its stakeholders;
3 **alignments**, understood as the ability to provide coherent responses through targeted decisions, actions and communications.

These principles underpin the double materiality process and the identification of impacts, risks and opportunities (IROs) related to ESG issues.

Stakeholder mapping

The main categories of stakeholders of the Lutech Group as of 31 December 2025, identified through a structured stakeholder analysis approach and updated as part of the double materiality process, are:

- Shareholders, the Board of Directors, Senior Management and Executives, who are responsible for setting the strategic direction and supervising the Group's activities;
- Employees, i.e. all active workers as of 31 December 2025;
- External collaborators (non-employees), including self-employed workers, freelancers, agency workers, technical, strategic and commercial consultants, and external professionals;
- Suppliers and technology partners, comprising companies and professionals who provide products and services along the value chain;
- Lenders, such as banks, brokers and insurance companies;
- Customers, both public and private;
- Local communities, including third sector organisations, non-profit organisations (ONLUS), NGOs and local associations;
- Public institutions, such as ministries, universities and research bodies, provided they do not have commercial relationships with the Group.

Methods and frequency of engagement

Dialogue with stakeholders is tailored to the specific characteristics of each category of stakeholder; a brief overview is provided below. Further details on the channels and dynamics of engagement are then explored in greater depth within the individual thematic chapters.

For **employees, managers, senior management and external collaborators**, engagement takes place on a regular basis throughout the year, through surveys, internal forums, training sessions and corporate communities, with the aim of gathering feedback useful for managing organisational processes and identifying relevant sustainability issues.

For **customers**, engagement takes place periodically throughout the year via customer satisfaction surveys (CSAT), dedicated events and dialogue initiatives aimed at understanding emerging needs and market expectations.

For **suppliers and technology partners**, engagement takes place on an annual basis, including through structured dialogue and audits, where applicable, with the aim of monitoring ethical, social and compliance aspects throughout the value chain.

For **lenders**, engagement takes place every two years, unless earlier updates are required due to regulatory, financial or strategic changes.

As part of the double materiality process, the Group also implements specific engagement initiatives aimed at different categories of stakeholders through digital surveys and structured consultation tools designed to identify and assess material issues for the purposes of Sustainability Reporting. Engagement is tailored according to the representativeness of the stakeholder categories and their relevance to ESG issues. The coordination of stakeholder engagement activities and the related information flows is overseen by the Group's Corporate Social Responsibility function, which is responsible for the methodological framework, the classification of stakeholders, and the collection and analysis of contributions received for the purpose of updating the double materiality assessment and relevant corporate policies.

Each stakeholder category contributes to the process of defining the Group's priorities.

Shareholders, the Board of Directors, senior management and executives provide strategic guidance and oversight of key ESG issues. Employees and external collaborators contribute operational knowledge, feedback from the field and suggestions for improvement. Suppliers and technology partners contribute innovation and best practice throughout the value chain. Customers articulate market needs and evolving expectations. Lenders provide increasingly structured ESG benchmarks and requirements.

The views and expectations gathered through these processes help to guide the Group's strategic decisions and represent a significant input into the identification, assessment and prioritisation of impacts, risks and opportunities (IRO). These contributions support the definition and updating of material issues, the strengthening of the ESG risk management system and the evolution of the business model.

The outcomes of engagement activities are shared with the governance bodies and relevant corporate functions and contribute to the adoption of policies, actions and investments consistent with the Group's sustainability priorities.

The effectiveness of engagement activities is monitored using quantitative and qualitative indicators, including the survey participation rate, the level of response completion, the quality of the feedback collected, participation in training initiatives and the level of use of internal and external communication tools, where applicable to the various categories of stakeholders.

3.3 Disclosure Requirement SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model

During the 2024–2025 reporting period, the process of identifying material issues was carried out through a structured stakeholder consultation, which enabled the Group to identify the following issues as material in accordance with the ESRS standards:

Issue	Sub-issue	Sub-sub-issue
E1 – Climate Change	Adaptation	
	Mitigation	
	Energy	
S1 - In-house	Working conditions	Safe employment
		Working hours

Issue	Sub-issue	Sub-sub-issue
workforce		Fair wages
		Work-life balance
		Health and safety
	Equal treatment and equal opportunities for all	Gender equality and equal pay
		Training and skills development
		Employment and inclusion of people with disabilities
		Diversity
S2 - Workers along the value chain	Working conditions	Safe employment
		Working hours
		Health and safety
	Equal treatment and equal opportunities for all	Gender equality and equal pay
		Training and skills development
		Diversity
S4 – Consumers and end users	Personal safety of consumers and/or end-users	Health and Safety
G1 - Corporate conduct	Corporate culture	
	Management of supplier relationships, including payment practices	
	Active and passive bribery	Prevention and detection, including training
		Accidents

In parallel with and in anticipation of the next reporting cycle, the Group has begun preliminary work to map the impacts, risks and opportunities (IRO) associated with each material issue. This activity – described in the following pages – does not yet constitute a full double materiality analysis in accordance with the ESRS standards, which requires a systematic assessment of both the significance of impacts on the environment and people (impact materiality) and the financial effects on the Group's performance (financial materiality). It does, however, provide a basis for the planned development from the next financial year onwards, when the process will be conducted in full compliance with the ESRS, as described in more detail in section 4.1.1.

ESRS E1 – Climate change

The Lutech Group's operations generate Scope 1 and 2 emissions (data centres, offices, vehicle fleets) and Scope 3 emissions along the value chain. The growing adoption of computationally intensive AI models may increase energy consumption, whilst efficient data centres and the procurement of renewable energy represent mitigation measures. In terms of risks, the Group is exposed to volatility in energy costs, extreme weather events that may impact business continuity, and regulatory developments in climate-related matters. The main opportunities relate to the development of digital solutions to improve customers' energy efficiency.

ESRS S1 – Own workforce

The Group works to ensure the wellbeing, flexibility and professional development of its employees. The main risks relate to the skills gap in emerging technologies (cloud, AI, cybersecurity), the ergonomic and

psychosocial risks associated with remote working, and heatwaves affecting its Spanish offices. In terms of equality, the use of AI systems in HR processes may introduce algorithmic bias. Risks relating to non-compliance with workers' rights and the proper management of employees' personal data continue to be monitored. The impacts, risks and opportunities relating to the in-house workforce will be analysed based on the entire workforce of the Lutech Group, consisting mainly of highly qualified office staff working in the ICT, consultancy and digital services sectors, including technical, professional and managerial roles. Manual or operational activities are predominantly outsourced and form part of the value chain (analysed under ESRS S2). This scope encompasses all the Group's own workers on whom the Group has a significant impact, as included in the SBM 3 – ESRS 2 disclosure, which considers in a unified manner the effects arising both from direct operations and from interactions with the value chain through services, products and commercial relationships. The IROs relating to the Group's own workforce are therefore interpreted with reference to the entire population of the Group's workers, understood as a single, homogeneous basis for potential and actual impacts linked to the organisation of work, HR processes and the technological and digital evolution of the operating model.

ESRS S2 – Workers in the value chain

The technology supply chain – in particular the extraction of critical minerals and assembly in high-risk contexts – could expose the Group to the risk of being associated with forced or child labour practices, with potential breaches of the relevant regulations. Opportunities lie in the development of strategic partnerships with qualified suppliers and in the creation of integrated technological ecosystems.

In this context, the workers in the value chain on whom the Group may have a significant impact are identified as those involved in commercial relationships with the company, namely workers operating under service contracts on behalf of the Lutech Group.

The categories of workers potentially affected include 24-hour service desk operators, customer support technicians (software and hardware), surveillance system installers, facility management staff and warehouse staff.

In particular:

- workers operating at the Group companies' premises but not employed by the Group include staff of the companies responsible for maintaining the premises;
- workers upstream in the value chain include distributors and suppliers of hardware;
- workers further down the value chain include those involved in technical and professional consultancy activities.
- Within these categories, workers with specific vulnerabilities – whether linked to personal circumstances (e.g. disability) or to the working environment (e.g. remote workers, young workers, women, migrants or those in trade union contexts) – may be more exposed to potential negative impacts. The management of these aspects is the responsibility of suppliers, in compliance with applicable legislation and the contractual standards adopted by the Group.

At present, no geographical areas or categories of supply have been identified as posing a significant risk of child labour or forced labour.

ESRS S4 – Consumers and end users

The main risks relate primarily to cyber security (cyber incidents, data breaches with GDPR implications), the quality and accuracy of data transmitted to customers, and the continuity of IT services. The integration of AI systems into the solutions provided introduces risks of non-compliance with the AI Act and of algorithmic discrimination against end users. Opportunities include co-innovation with customers and the development of sustainable and compliant digital solutions.

Consumers and end users potentially affected by significant impacts are the Lutech Group's clients, in both the B2B and B2C sectors, predominantly large and medium-sized enterprises and public administrations operating in highly regulated sectors such as telecommunications, media, energy and utilities, transport, financial services, healthcare, manufacturing and public administration. The Group's products and services are designed to improve clients' technological and digital processes, with a particular focus on operational efficiency and system security.

Potential risks to consumers do not stem from the intrinsic characteristics of the services offered – which are technological in nature and generally neutral – but from their possible misuse or the inadequate management of the solutions implemented.

To safeguard rights relating to confidentiality, personal data protection, non-discrimination and freedom of expression, the Group applies management systems consistent with EU Regulation 2016/679 (GDPR), which are extended to the main legal entities within the Group's scope. Furthermore, the Parent Company and certain Group companies hold certifications such as ISO 20000-1:2018 for IT service management and ISO/IEC 27001:2022 (with extensions ISO/IEC 27017 and ISO/IEC 27018) for information security.

For the remaining Group companies, a process of gradual organisational and corporate harmonisation is planned for the two-year period 2025–2026, involving the extension of the Parent Company's policies, management systems and scope of certification.

Where such certifications are not in place, the quality and transparency of information provided to customers are guaranteed through established channels such as:

- the Group's corporate website;
- technical project documentation;
- training and development services;
- technical support during the commissioning and delivery phases.

Finally, given the nature of the Group's business, no inherently vulnerable consumers or end-users have been identified as a specific category. Should the Group's solutions be used by such categories, the Group incorporates accessibility and usability considerations right from the design stage (Human-Centred Design).

ESRS G1 – Business Conduct

The Group's governance is based on the Code of Ethics, anti-corruption measures and a culture of transparency. The main risks include corruption and fraud in commercial activities and accounting processes (relevant under Legislative Decree 231/2001), the misuse of donations and sponsorships as a means of undue influence – with particular attention to the Albanian context – and the selection of suppliers without adequate ESG due diligence. Strengthening whistleblowing, compliance and responsible supply chain management practices serves both as a risk mitigation measure and as an opportunity to enhance the Group's positioning with investors and partners.

4. Management of impacts, risks and opportunities

4.1 IRO-1 Disclosure Requirement – Description of processes for identifying and assessing material impacts, risks and opportunities

During the reporting year, the Group updated its double materiality analysis in line with changes to the Group's scope. The process began with a review of the organisational context and the value chain, followed by the engagement, via a survey, of a representative group of internal and external stakeholders, categorised as follows and described in more detail in section *"3.2 SBM-2 Disclosure Requirement – Stakeholders' Interests and Views*": Management and Executives, Employees, Suppliers and Technology Partners, Lenders, Customers, Local Communities and Associations, Public Institutions and Non-employees.

Each stakeholder was asked to rate the materiality of sustainability issues on a scale of 1 to 5[4] , with the aim of confirming or updating the material issues from the previous cycle. The results of the consultation confirmed the five material issues already identified: ESRS E1, ESRS S1, ESRS S2, ESRS S4, ESRS G1.

The results set out in the table below summarise the findings of the double materiality assessment carried out by the Group for the 2025 financial year.

Results of the 2025 double materiality assessment

ESRS	Impact materiality – stakeholder engagement	Lutech Group impact materiality	Financial materiality	Material[5]
E1 – Climate Change	3.90	3.47	0.3	✓
S1 – In-house workforce	4.05	4.14	4.2	✓
S2 – Workers in the value chain	3.91	3.59	1.1	✓
S4 – Consumers and end users	4.36	4.11	5.4	✓
G1 – Corporate conduct	4.22	4.47	3.9	✓

For each material issue identified, this table shows:

- the **materiality of impact** based on stakeholder engagement, corresponding to the average score assigned by the stakeholders involved in the consultation process via survey, reflecting the perceived relevance of the Group's environmental and social issues;

4 For the purposes of defining the materiality threshold, a value of 2.5 (on a scale of 1 to 5) has been adopted, in line with the methodology used in the previous reporting period, which corresponded to 5 on a scale of 1 to 10.
5 Material in terms of impact and/or financial materiality.

- the **materiality of impact** as assessed by the Lutech Group, i.e. the average score resulting from the internal assessment of the same issues carried out by management and the relevant corporate functions;
- **financial materiality**, corresponding to the score assigned by financial stakeholders, such as banks and credit institutions, reflecting the significance of the risks and opportunities associated with each issue in terms of their current or prospective effects on the Group's economic, equity and financial position;
- the outcome regarding **classification as a material issue**, determined by comparing the scores obtained with the materiality threshold defined in the methodology.

As mentioned in the preceding paragraphs, the process carried out does not constitute a double materiality analysis within the meaning of the ESRS standards: the consultation covered material issues as a whole, without a structured assessment of the individual impacts, risks and opportunities associated with them from the two perspectives of impact materiality and financial materiality. The IROs associated with the material issues were therefore mapped on a preliminary basis – as described in the previous paragraph – with the aim of establishing a methodological framework for the next reporting cycle.

From the 2026 financial year onwards, the Group will conduct a dual materiality analysis in accordance with the provisions of the CSRD, Legislative Decree 125/2024 and the ESRS standards, following the EFRAG guidelines (IG1 Materiality Assessment and IG2 Value Chain).

The process will begin with a preliminary analysis of the context in which the Group operates and of its upstream and downstream value chain, aimed at identifying specific activities, commercial relationships and geographical areas that present a high risk of potential negative impacts, dependencies or risks. This analysis will be supplemented by the results of a benchmarking analysis of best practices and the regulatory framework, considering the interests expressed by stakeholders. On this basis, both positive and negative impacts – actual and potential – as well as financially material risks and opportunities will be identified.

The IROs thus identified will be assessed and prioritised using a model that considers severity and likelihood of occurrence, defining materiality thresholds consistent with the Group's profile. The process will conclude with validation by the governance bodies, and the results will be incorporated into a dual materiality matrix which will serve as the basis for the Group's ESRS reporting.

Compared with 2024, greater methodological consistency has been ensured in the reporting year regarding the material issues identified, as part of a process of gradual alignment with the requirements set out in the ESRS standards.

4.2 IRO-2 Disclosure Requirement – ESRS disclosure requirements covered by the company's sustainability statement

Set out below are the list of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B) and the ESRS Content Index.

List of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B)					
Disclosure requirement and corresponding item of information	**SFDR reference**	**Third Pillar reference**	**Reference to the Benchmark Regulation**	**Reference to EU climate legislation**	**Chapter on sustainability reporting 2025**
ESRS 2 GOV-1 Gender diversity on the board, paragraph 21(d)	X		X		Disclosure requirement relating to ESRS 2 GOV-1 – Role of the Board, Management and Supervisory Bodies
ESRS 2 GOV-1 Percentage of independent members of the board of directors, paragraph 21(e)			X		Disclosure requirement relating to ESRS 2 GOV-1 – Role of the Board, Management and Supervisory Bodies
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	X				Disclosure requirement GOV-4 – Statement on due diligence
ESRS 2 SBM-1 Involvement in activities related to the fossil fuels sector, paragraph 40(d)(i)	X	X	X		Not applicable
ESRS 2 SBM-1 Involvement in activities related to the production of chemicals, paragraph 40(d)(ii)	X		X		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)(iii)	X		X		Not applicable
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco, paragraph 40(d)(iv)			X		Not applicable
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, paragraph 14				X	E1-1 – Transition plan for climate change mitigation
ESRS E1-1 Companies excluded from benchmarks aligned with the Paris Agreement, paragraph 16(g)		X	X		E1-1 – Transition plan for climate change mitigation
ESRS E1-4 GHG emission reduction targets, paragraph 34	X	X	X		Disclosure requirement E1-4 – Climate change mitigation targets
ESRS E1-5 Fossil fuel energy consumption broken down by source (climate-high-impact sectors only), paragraph 38	X				Disclosure requirement E1-5 – Energy consumption and energy mix
ESRS E1-6 Gross Scope 1, 2 and 3 emissions and total GHG emissions, paragraph 44	X	X	X		Disclosure requirement E1-6 – Gross Scope 1, 2 and 3 GH emissions and total GH emissions

List of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B)					
ESRS E1-6 Intensity of gross GHG emissions, paragraphs 53 to 55	X	X	X		Disclosure requirement E1-6 – Gross GHG emissions under Scopes 1, 2 and 3, and total GHG emissions
ESRS E1-7 GHG removals and carbon credits, paragraph 56				X	Not applicable
ESRS E1-9 Disclosure of the benchmark portfolio's exposure to climate-related physical risks, paragraph 66			X		Phase-in
ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risks, paragraph 66(a) **ESRS E1-9** Location of significant assets exposed to material physical risks, paragraph 66(c)		X			Phase-in
ESRS E1-9 Breakdown of the carrying amount of its property assets by energy efficiency classes, paragraph 67(c)		X			Phase-in as set out in Appendix C (ESRS 1) of Delegated Regulation (EU) 2023/2772.
ESRS E1-9 Degree of the portfolio's exposure to climate-related opportunities, paragraph 69			X		Phase-in
ESRS E2-4 Quantity of each pollutant listed in Annex II to the E-PRTR Regulation (European Pollutant Release and Transfer Register) released into the air, water and soil, paragraph 28	X				Not material
ESRS E3-1 Water and marine resources, paragraph 9	X				Not material
ESRS E3-1 Dedicated policy, paragraph 13	X				Not material
ESRS E3-1 Sustainability of oceans and seas, paragraph 14	X				Not material
ESRS E3-4 Total water recycled and reused, paragraph 28(c)	X				Not material
ESRS E3-4 Total water consumption in m^3 relative to net revenue from own operations, paragraph 29	X				Not material
ESRS 2 IRO-1 – E4, paragraph 16(a)(i)	X				Not material
ESRS 2 IRO-1 – E4, paragraph 16(b)	X				Not material
ESRS 2 IRO-1 – E4, paragraph 16(c)	X				Not material
ESRS E4-2 Sustainable agricultural and land-use policies or practices, paragraph 24(b)	X				Not material
ESRS E4-2 Sustainable marine/ocean use practices or policies, paragraph 24(c)	X				Not material

List of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B)					
ESRS E4-2 Policies to address deforestation, paragraph 24(d)	X				Not material
ESRS E5-5 Non-recycled waste, paragraph 37(d)	X				Not material
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	X				Not material
ESRS 2 – SBM 3 – S1 Risk of forced labour, paragraph 14(f)	X				ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
ESRS 2 – SBM3 – S1 Risk of child labour, paragraph 14(g)	X				Disclosure requirement S1-1 – Policies relating to the company's own workforce
ESRS S1-1 Policy commitments on human rights, paragraph 20	X				Disclosure requirement S1-1 – Policies relating to the company's own workforce
ESRS S1-1 Policies on due diligence regarding the issues covered by International Labour Organisation Core Conventions 1 to 8, paragraph 21			X		Disclosure requirement S1-1 – Policies relating to the company's own workforce
ESRS S1-1 Procedures and measures to prevent human trafficking, paragraph 22	X				Disclosure requirement S1-1 – Policies relating to the company's own workforce
ESRS S1-1 Policy on the prevention of, or management system for, workplace accidents, paragraph 23	X				Disclosure requirement S1-1 – Policies relating to the company's own workforce
ESRS S1-3 Mechanisms for handling complaints/grievances, paragraph 32(c)	X				Disclosure requirement S1-3 – Processes for addressing adverse impacts and channels enabling own employees to raise concerns
ESRS S1-14 Number of fatalities and number and rate of work-related injuries, paragraph 88(b) and (c)	X		X		Disclosure requirement S1-14 – Health and safety metrics
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities or illnesses, paragraph 88(e)	X				Disclosure requirement S1-14 – Health and safety metrics
ESRS S1-16 Unadjusted gender pay gap, paragraph 97(a)	X		X		Disclosure requirement S1-16 – Remuneration metrics (pay gap and total remuneration)
ESRS S1-16 Excessive pay gap in favour of the chief executive, paragraph 97(b)	X				Disclosure requirement S1-16 – Remuneration metrics (pay gap and total remuneration)
ESRS S1-17 Incidents relating to discrimination, paragraph 103(a)	X				Disclosure requirement S1-17 – Incidents, complaints and significant impacts relating to human rights
ESR S1-17 Failure to comply with the UN	X		X		Disclosure requirement

List of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B)					
Guiding Principles on Business and Human Rights and the OECD, paragraph 104(a)					S1-17 – Incidents, complaints and significant impacts relating to human rights
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the supply chain, paragraph 11(b)	X				ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model
ESRS S2-1 Political commitments on human rights, paragraph 17	X				Disclosure requirement S2-1 – Policies relating to workers in the value chain
ESRS S2-1 Policies relating to workers in the value chain, paragraph 18	X				Disclosure requirement S2-1 – Policies relating to workers in the value chain
ESRS S2-1 Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	X		X		Disclosure requirement S2-1 – Policies relating to workers in the value chain
ESRS S2-1 Due diligence policies on matters covered by the International Labour Organisation's Core Conventions 1 to 8, paragraph 19			X		Disclosure requirement S2-1 – Policies relating to workers in the value chain
ESRS S2-4 Human rights issues and incidents in its upstream and downstream value chain, paragraph 36	X				Disclosure requirement S2-4 – Actions taken to address material impacts on workers in the value chain and approaches to managing material risks and realising material opportunities for workers in the value chain, as well as the effectiveness of such actions
ESRS S3-1 Policy commitments on human rights, paragraph 16	X				Not material
ESRS S3-1 Failure to comply with the UN Guiding Principles on Business and Human Rights, ILO principles or the OECD Guidelines, paragraph 17	X		X		Not material
ESRS S3-4 Human rights issues and incidents, paragraph 36	X				Not material

List of disclosure items referred to in the cross-cutting and thematic principles derived from other EU legislative acts (Annex B)					
ESRS S4-1 Policies relating to consumers and end-users, paragraph 16	X				Disclosure requirement S4-1 – Policies relating to consumers and end-users
ESRS S4-1 Failure to comply with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	X		X		Disclosure requirement S4-1 – Policies relating to consumers and end-users
ESRS S4-4 Human rights issues and incidents, paragraph 35	X				Disclosure requirement S4-4 – Actions taken to address material impacts on consumers and end-users, and approaches to managing material risks and realising material opportunities in relation to consumers and end-users, as well as the effectiveness of such actions
ESRS G1-1 United Nations Convention against Corruption, paragraph 10(b)	X				Disclosure requirement G1-1 – Policies on corporate culture and business conduct
ESRS G1-1 Protection of whistleblowers, paragraph 10(d)	X				Disclosure requirement G1-1 – Policies on corporate culture and business conduct
ESRS G1-4 Fines imposed for breaches of laws against active and passive bribery, paragraph 24(a)	X		X		Disclosure requirement G1-4 – Confirmed cases of active or passive bribery
ESRS G1-4 Regulations on combating active and passive corruption, paragraph 24(b)	X				Disclosure requirement G1-4 – Confirmed cases of active or passive bribery

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
ESRS 2 – GENERAL INFORMATION		
ESRS 2 BP-1 General criteria for the preparation of the Sustainability Report		Disclosure requirements BP-1 & BP-2 – General criteria for the preparation of a company's sustainability statement and disclosures relating to specific circumstances
ESRS 2 BP-2 Disclosure in relation to specific circumstances		Disclosure requirements BP-1 & BP-2 – General criteria for the preparation of a company's sustainability statement and disclosures relating to specific circumstances
ESRS 2 GOV-1 Role of the administrative, management and supervisory bodies		Disclosure requirements relating to ESRS 2 GOV-1 – Role of the Board of Directors, Management and Supervisory Bodies

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
ESRS 2 GOV-2 Information provided to the company's administrative, management and supervisory bodies and sustainability issues addressed by them		Disclosure requirement GOV-2 – Information provided to the company's administrative, management and supervisory bodies and sustainability issues addressed by them
ESRS 2 GOV-3 Integration of sustainability performance into incentive schemes		Disclosure requirement GOV-3 – Integration of sustainability performance into incentive schemes
ESRS 2 GOV-4 Statement on due diligence		Disclosure requirement GOV-4 – Statement on due diligence
ESRS 2 GOV-5 Risk management and internal controls over sustainability reporting		Disclosure Requirement GOV-5 – Risk Management and Internal Controls over Sustainability Reporting
ESRS 2 SBM-1 Strategy, business model and value chain		Disclosure requirement SBM-1 – Strategy, business model and value chain
ESRS 2 SBM-2 Stakeholders' Interests and Views		Disclosure requirement SBM-2 – Stakeholders' interests and views
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model		Disclosure requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model
ESRS 2 IRO-1 Description of the process for identifying and assessing material impacts, risks and opportunities		Disclosure requirement IRO-1 – Description of the processes for identifying and assessing material impacts, risks and opportunities
ESRS 2 IRO-2 Disclosure requirements of the ESRS covered by the company's Sustainability Report		Disclosure requirement IRO-2 Disclosure requirements for the ESRS covered by the company's Sustainability Report
MDR-P		Minimum disclosure requirements – Policies MDR-P, MDR-A, MDR-T & MDR-M
MDR-A		Minimum disclosure requirements – Policies MDR-P, MDR-A, MDR-T & MDR-M
MDR-T		Minimum disclosure requirements – Policies MDR-P, MDR-A, MDR-T & MDR-M
MDR-M		Minimum disclosure requirements – Policies MDR-P, MDR-A, MDR-T & MDR-M
ESRS E1 – CLIMATE CHANGE		
GOV-3 Integration of sustainability performance into incentive schemes		Disclosure requirement GOV-3 – Integration of sustainability performance into incentive schemes
E1-1 Transition plan for climate change mitigation		E1-1 – Transition plan for climate change mitigation
SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model		Disclosure requirement SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model
IRO-1 Description of the processes for identifying and assessing material climate-related impacts, risks and opportunities		Disclosure requirement IRO-1 – Description of the processes for identifying and assessing material impacts, risks and opportunities
E1-2 Policies relating to climate change mitigation and adaptation		Disclosure requirement E1-2 Policies relating to climate change mitigation and adaptation
E1-3 Actions and resources relating to climate change policies		Disclosure requirement E1-3 Actions and resources relating to climate change policies
E1-4 Objectives relating to climate change mitigation and adaptation		Disclosure requirement E1-4 – Targets relating to climate change mitigation
E1-5 Energy consumption and energy mix		Disclosure requirement E1-5 – Energy consumption and energy mix

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
E1-6 Gross GHG emissions under Scopes 1, 2 and 3, and total GHG emissions		Disclosure requirement E1-6 – Gross GHG emissions under Scopes 1, 2 and 3, and total GHG emissions
E1-7 GHG removals and GHG emission mitigation projects financed with carbon credits	Not applicable	
E1-8 Internal carbon pricing	Not applicable	
E1-9 Expected financial impacts of material physical and transition risks and potential climate-related opportunities	Phase-in	
ESRS E2 – POLLUTION		
IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities related to pollution	Not material	
E2-1 Policies relating to pollution	Not material	
E2-2 Actions and resources relating to pollution	Not material	
E2-3 Objectives relating to pollution	Not material	
E2-4 Air, water and soil pollution	Not material	
E2-5 Substances of concern and substances of very high concern	Not material	
E2-6 Expected financial effects of significant risks and opportunities related to pollution	Not material	
ESRS E3 – WATER AND MARINE RESOURCES		
IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities related to water and marine resources	Not material	
E3-1 Policies relating to water and marine resources	Not material	
E3-2 Actions and resources relating to water and marine resources	Not material	
E3-3 Objectives relating to water and marine resources	Not material	
E3-4 Water consumption	Not material	
E3-5 Expected financial impacts arising from significant risks and opportunities related to water and marine resources	Not material	
ESRS E5 – RESOURCE USE AND THE CIRCULAR ECONOMY		
IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities related to resource use and the circular economy	Not material	
E5-1 Policies relating to resource use and the circular economy	Not material	
E5-2 Actions and resources relating to resource use and the circular economy	Not material	
E5-3 Objectives relating to resource use and the circular economy	Not material	
E5-4 Incoming resource flows	Not material	

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
E5-5 Outflows of resources	Not material	
E5-6 Expected financial impacts arising from significant risks and opportunities related to the use of resources and the circular economy	Not material	

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
ESRS S1 – OWN WORKFORCE		
SBM-2 Stakeholders' interests and views		Disclosure requirement relating to ESRS 2 SBM-2 – Stakeholders' interests and views
SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model		ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model
S1-1 Policies relating to the company's own workforce		Disclosure requirement S1-1 – Policies relating to the organisation's own workforce
S1-2 Processes for engaging the organisation's own workforce and employee representatives regarding impacts		Disclosure requirement S1-2 – Processes for engaging own employees and employee representatives regarding impacts
S1-3 Processes for addressing adverse impacts and channels enabling the organisation's own workforce to raise concerns		Disclosure requirement S1-3 – Processes for addressing adverse impacts and channels enabling the organisation's own workforce to raise concerns
S1-4 Actions taken in response to material impacts on the organisation's own workforce and approaches to managing material risks and pursuing material opportunities relating to the organisation's own workforce, as well as the effectiveness of such actions		Disclosure requirement S1-4 – Actions taken to address impacts and approaches relevant to the mitigation of material risks and the pursuit of material opportunities in relation to the company's own workforce, as well as the effectiveness of such actions and approaches
S1-5 Targets relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities		Disclosure requirement S1-5 – Objectives relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities
S1-6 Characteristics of the organisation's employees		Disclosure requirement S1-6 – Characteristics of the organisation's employees
S1-7 Characteristics of non-employee workers within the company's own workforce		Disclosure requirement S1-7 – Characteristics of non-employees within the company's own workforce
S1-8 Coverage of collective bargaining and social dialogue		Disclosure requirement S1-8 – Coverage of collective bargaining and social dialogue
S1-9 Diversity metrics		Disclosure requirement S1-9 – Diversity metrics
S1-10 Fair wages		Disclosure requirement S1-10 – Fair wages
S1-11 Social protection		3.7 Disclosure requirement S1-11 – Social protection
S1-12 People with disabilities		3.8 Disclosure requirement S1-12 – People with disabilities
S1-13 Training and skills development metrics		Disclosure requirement S1-13 – Training and skills development metrics
S1-14 Health and safety metrics		Disclosure Requirement S1-14 – Health and Safety Metrics
S1-15 Work-life balance metrics		Disclosure requirement S1-15 – Work-life balance metrics
S1-16 Remuneration metrics (pay gap and total remuneration)		Disclosure requirement S1-16 – Remuneration metrics (pay gap and total remuneration)
S1-17 Incidents, complaints and significant impacts relating to human rights		Disclosure requirement S1-17 – Incidents, complaints and significant impacts relating to human rights
ESRS S2 – WORKERS IN THE VALUE CHAIN		
SBM-2 Stakeholders' interests and views		Disclosure requirement relating to ESRS 2 SBM-2 – Stakeholders' interests and views
SBM-3 Material impacts, risks and opportunities and their interaction with		ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
the strategy and business model		
S2-1 Policies relating to workers in the value chain		Disclosure requirement S2-1 – Policies relating to workers in the value chain
S2-2 Processes for engaging workers in the value chain regarding impacts		Disclosure requirement S2-2 – Processes for engaging workers in the value chain regarding impacts
S2-3 Processes for addressing adverse impacts and channels enabling workers in the value chain to raise concerns		Disclosure requirement S2-3 – Processes for addressing adverse impacts and channels enabling workers in the value chain to raise concerns
S2-4 Actions taken to address material impacts on workers in the value chain and approaches to managing material risks and realising material opportunities for workers in the value chain, as well as the effectiveness of such actions		Disclosure requirement S2-4 – Actions taken to address material impacts on workers in the value chain and approaches to managing material risks and realising material opportunities for workers in the value chain, as well as the effectiveness of such actions
S2-5 Objectives relating to the management of significant adverse impacts, the enhancement of positive impacts, and the management of significant risks and opportunities		Disclosure requirement S2-5 – Objectives relating to the management of significant adverse impacts, the enhancement of positive impacts and the management of significant risks and opportunities
ESRS S3 – AFFECTED COMMUNITIES		
SBM-2 Stakeholders' interests and views	Not material	
SBM-3 Significant impacts, risks and opportunities and their interaction with the company's strategy and business model	Not material	
S3-1 Policies relating to communities affected	Not material	
S3-2 Processes for engaging affected communities regarding impacts	Not material	
S3-3 Processes for addressing adverse impacts and channels enabling affected communities to raise concerns	Not material	
S3-4 Actions taken to address material impacts on affected communities and approaches to managing material risks and realising material opportunities for affected communities, as well as the effectiveness of such actions	Not material	
S3-5 Objectives relating to the management of significant negative impacts, the enhancement of positive impacts, and the management of significant risks and opportunities	Not material	
ESRS S4 – CONSUMERS AND END USERS		
SBM-2 Stakeholders' interests and views		Disclosure requirement relating to ESRS 2 SBM-2 – Stakeholders' interests and views
SBM-3 Significant impacts, risks and opportunities and their interaction with the company's strategy and business model		ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model
S4-1 Policies relating to the communities affected		Disclosure requirement S4-1 – Policies relating to consumers and end-users
S4-2 Processes for engaging stakeholders regarding impacts		Disclosure requirement S4-2 – Processes for engaging consumers and end-users regarding impacts

ESRS Content Index		
Disclosure requirements	**Notes**	**Chapter: Sustainability Reporting 2025**
S4-3 Processes for addressing adverse impacts and channels enabling affected communities to raise concerns		Disclosure requirement S4-3 – Processes for addressing adverse impacts and channels enabling consumers and end-users to raise concerns
S4-4 Actions taken to address material impacts on affected communities and approaches to managing material risks and realising material opportunities for affected communities, as well as the effectiveness of such actions		Disclosure requirement S4-4 – Actions taken to address material impacts on consumers and end-users, and approaches to managing material risks and realising material opportunities in relation to consumers and end-users, as well as the effectiveness of such actions
S4-5 Objectives relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities		Disclosure requirement S4-5 – Objectives relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities
ESRS G1 – CORPORATE CONDUCT		
ESRS 2 GOV-1 Role of the administrative, management and supervisory bodies		Disclosure requirements relating to ESRS 2 GOV-1 – Role of the Board of Directors, Management and Supervisory Bodies
IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities		Disclosure requirement IRO-1 – Description of the processes for identifying and assessing material impacts, risks and opportunities
G1-1 Policies relating to corporate culture and business conduct		Disclosure requirement G1-1 – Policies on corporate culture and business conduct
G1-2 Management of supplier relationships		Disclosure requirement G1-2 – Management of supplier relationships
G1-3 Prevention and detection of active and passive corruption		Disclosure requirement G1-3 – Prevention and detection of active and passive corruption
G1-4 Cases of active or passive bribery		Disclosure requirement G1-4 – Confirmed cases of active or passive bribery
G1-5 Political influence and lobbying activities		Disclosure requirement G1-5 – Political influence and lobbying activities
G1-6 Payment practices		Disclosure requirement G1-6 – Payment practices

4.3 Minimum disclosure requirements – MDR-P, MDR-A, MDR-T & MDR-M policies

The minimum disclosure requirements set out in the ESRS with regard to policies (MDR-P), actions (MDR-A), targets (MDR-T) and metrics (MDR-M) are addressed in the relevant sections of the thematic chapters of this document, where each item of information is discussed in relation to the relevant material topic.

To assist with consultation of the document and to facilitate the retrieval of some of the essential information required by the ESRS standards, the following sections contain summary tables which enable the reader to identify, for each material topic, the key elements relating to the policies adopted and their scope of application, as well as the actions implemented and the resources allocated.

These summaries are provided solely for guidance and reference purposes and do not replace the analytical content set out in the individual thematic sections, to which readers are referred for a complete description of the management model, organisational responsibilities, methodologies adopted and results achieved during the reporting period.

Summary table – Policies

ESRS	Policy	Brief description	Scope of the policy	Responsible for implementation	Internationally recognised tools	Availability
Cross-cutting policies						
E1, S1, S2, S4	Sustainability Policy (POL-900)	Sets out the guiding principles of the Group's sustainability strategy, with commitments regarding its own workforce (protection of human rights, non-discrimination, training, health and safety), workers in the value chain (respect for human rights, sustainable procurement) and customers (transparency, reduction of environmental impacts, reporting)	Lutech Group	CFO and Managing Director of the Lutech Group's Board of Directors	SDGs – 2030 Agenda (UN)	Website and supplier tools
S1, S2, S4	Social Responsibility Policy (POL-960)	Sets out the Group's commitments in accordance with SA8000 towards employees (workers' rights, non-discrimination), suppliers and value chain partners (audits, awareness-raising) and customers (transparency, ethical conduct)	Lutech Group	CEO of Lutech S.p.A. (operational oversight entrusted to the Social Performance Team – SPT)	SA8000:2014, integrated with UNI/PdR 125:2022	Company intranet and Group website
S4, G1	Policy on Responsible Artificial Intelligence (POL-980)	Governs the ethical, safe and transparent use of AI within the Group, ensuring human oversight of decisions ('human in the loop'), the prevention of algorithmic discrimination and the protection of end-users' rights; identifies AI applications that should not be pursued and integrates with the Lutech BrAIn framework	Lutech Group	Data Privacy Manager and Data Analytics Practice Manager (processing); CEO (approval)	GDPR (EU Regulation 2016/679); EU regulatory framework on AI (AI Act)	Public, accessible to all interested parties
Thematic policies						
E1	Environmental Policy (MAM-POL)	Definition of the Group's commitments to environmental protection, emissions reduction and the environmental transition.	Lutech S.p.A. (to be extended to the whole Group from 2026)	Management of Lutech S.p.A.	ISO 14001:2015	Website
	Car Policy (REG-001)	Definition of the criteria for the allocation and use of company cars, with a focus on decarbonising the fleet.	Lutech Group	CEO of the Lutech Group	ISO 14001:2015 ISO 14064-1:2018	Company intranet
S1	Occupational Health and Safety Policy (MSL-POL)	Definition of commitments and principles to ensure a healthy and safe working environment, by eliminating hazards, reducing risks and	Lutech S.p.A.; extension to the entire Group planned for 2026	Group CEO of Lutech S.p.A.	ISO 45001:2018 (in addition to Legislative Decree 81/08 and, where applicable, SA8000 and UNI/PdR 125:2022)	Company intranet

ESRS	Policy	Brief description	Scope of the policy	Responsible for implementation	Internationally recognised tools	Availability
		pursuing continuous improvement in working conditions				
	Diversity, Equity and Inclusion Policy – DE&I (POL-970)	Definition of commitments and principles to promote a corporate culture based on inclusion, equity and the valuing of diversity (gender-neutral recruitment, pay equity, work-life balance, zero tolerance of abuse and harassment)	Lutech Group	Group CEO of Lutech S.p.A. (governance overseen by the Gender Equality Committee – CPG)	UNI/PdR 125:2022, ISO 30415, SA8000	Company intranet and corporate website
	Parenting Policy (POL-971)	Definition of commitments and safeguards to support a balance between parents' private lives and professional commitments (maternity and paternity leave in addition to statutory requirements, paid at 100%)	All parents employed by Lutech S.p.A. (to be extended to all the Group's Italian companies by 2026)	Group CEO of Lutech S.p.A. (operational implementation entrusted to the HR Department)	No specific international standard – national regulatory reference: Legislative Decree 151/2001; consistent with SA8000	Company intranet
S2	Policy on Sustainable and Responsible Procurement (POL-940)	Integrates ESG criteria into procurement and supplier management across four areas (management, economic, environmental, social); on the social front, requires suppliers to protect workers' health and safety, ensure the absence of child labour and forced labour, respect freedom of association, ensure fair pay and promote welfare, diversity and inclusion; suppliers' ESG performance constitutes evaluation and qualification criteria on a par with economic criteria	Lutech Group, including direct suppliers, subcontractors and all business partners	Chief Corporate Operations Officer	ISO 20400:2017, SA8000, ILO Tripartite Declaration on Multinational Enterprises, ETI Base Code	Company website and direct distribution to suppliers
S2 **S4**	Code of Conduct for Suppliers and Partners (POL-941)	Sets out the ethical, social, environmental and governance principles that form an integral part of the contractual relationship with suppliers and partners; with regard to workers in the value chain, it requires the prohibition of child labour and forced labour, respect for freedom of association and collective bargaining, decent working conditions, compliant pay and working hours, the prevention of discrimination and harassment, and the protection of health and safety; It also governs corporate integrity, anti- ,	Lutech Group	Group Chief Executive Officer of Lutech	Universal Declaration of Human Rights (UN), ILO Declaration on Fundamental Principles and Rights at Work	Public document, made available during the qualification and management of the commercial relationship

ESRS	Policy	Brief description	Scope of the policy	Responsible for implementation	Internationally recognised tools	Availability
		fair competition, privacy and environmental protection				
	Policy on Responsible Artificial Intelligence (POL-980)	Sets out principles and objectives for the ethical, secure, transparent and compliant development and use of AI systems, with a focus on privacy by design and the protection of personal data; it integrates with the Lutech BrAIn framework for the responsible adoption of AI to benefit processes, governance and the customer experience, ensuring respect for end-users' rights in line with the EU regulatory framework on AI	Lutech Group	Chief Executive Officer	GDPR (EU Regulation 2016/679); European regulatory framework on AI (AI Act)	Public, accessible to all interested parties
S4 G1	Personal Data Protection Policy (POL-600)	Sets out the principles and governance framework for the protection of personal data through the Personal Data Protection Management System (SGPDP), ensuring that the data of consumers and end-users is processed fairly, transparently and in accordance with their rights; supported by internal procedure PSQ-605 on data processing and retention, updated in line with the Binding Corporate Rules	Lutech Group (excluding Lutech Balkans Sh.p.k., Lutech ICT Solutions S.A. (Switzerland) and CDM Consulting Shanghai Co. Ltd)	Chief Executive Officer	GDPR (EU Regulation 2016/679); Binding Corporate Rules (BCR)	Published
	Information Security Management System Policy (MSI-POL)	Sets out the principles and governance framework for the protection of the organisation's information assets through the Information Security Management System (ISMS), ensuring the confidentiality, integrity and availability of information – including data relating to customers, suppliers and other stakeholders – by balancing accepted risk with required protection; incorporates guidelines extending to cloud services and the protection of personally identifiable information (PII)	Lutech S.p.A.; extension to the entire Group (to be incorporated into POL-400) scheduled for March 2026	Lutech Management	ISO/IEC 27001:2022, ISO/IEC 27017, ISO/IEC 27018	Published
	Anti-Corruption Policy (PSQ-500)	Establishes the principle of zero tolerance towards all forms of corruption (public/private, active/passive); defines principles and rules of	Abex Italia S.r.l. Consulthink S.p.A Know-How S.r.l. Kronotech S.r.l. Lutech CDM	Compliance Function for the Prevention of Corruption (drafting); Lutech Group Board of Directors (approval)	UNI ISO 37001:2016; UN Convention against Corruption (UNCAC)	Implemented in the documentation systems of the Group's companies

ESRS	Policy	Brief description	Scope of the policy	Responsible for implementation	Internationally recognised tools	Availability
		conduct for the prevention, identification and management of corruption risks, governing relations with public officials, corruption between private individuals, due diligence on agents/consultants, M&A, sanctions lists and political contributions	S.p.A., Lutech Digital Airport S.r.l. Lutech Sinergetica Ltd Lutech S.p.A. Pivotal Italia Ltd Softjam S.p.A. Stain S.r.l. Tenenigen S.r.l.			
G1	Whistleblowing Policy (PSQ-501)	Governs the Group's reporting system, defining operational procedures, roles and responsibilities for handling reports (Legislative Decree 231/2001 and Legislative Decree 24/2023); ensures the confidentiality of the whistleblower, prohibits retaliation and provides the safeguards required by law; applicable to internal and external whistleblowers (employees, suppliers, customers, partners, consultants, shareholders)	Lutech Group companies that have adopted the procedure (some with autonomous local bodies: Eustema S.p.A., Lutech ICT Solutions S.A. (Switzerland) and Softjam S.p.A.; Sapim S.A. with an autonomous policy)	Lutech Group Board of Directors (approval); Supervisory Body, Social Performance Team, Gender Equality Committee and Compliance Function (management by area)	Legislative Decree 231/2001, Legislative Decree 24/2023 (transposition of the EU Whistleblowing Directive)	Dedicated channel lutech.integrityline.com (some companies have their own internal systems)
	Code of Ethics	A document setting out core values which, in conjunction with the 231 Model, defines principles and rules of conduct to prevent predicate offences and promote a corporate culture based on respect for human rights, non-discrimination, integrity, the protection of confidential information, health and safety, and the responsible use of technology (including AI)	Group companies that have adopted it (Eustema S.p.A., Know-How S.r.l., Kronotech S.r.l., Lutech CDM S.p.A., Lutech Digital Airport S.r.l., Lutech Sinergetica S.r.l., Pivotal Italia S.r.l., Softjam S.p.A., Stain S.r.l., Tenenigen S.r.l.); applicable to directors, employees, contractors, shareholders and stakeholders	Board of Directors of the Lutech Group (approval), adopted by subsidiaries applying Model 231	Legislative Decree 231/2001	Public

Summary table – Actions

ESRS	Action	Scope of application	Timeframe (planned, ongoing, completed*)
E1	Environmental management and monitoring of GHG emissions	Lutech Group	Ongoing
	Review and extension of the Environmental Policy to subsidiaries	Lutech Group	Planned for 2026
	Electrification of the company fleet and development of charging infrastructure	Lutech Group	Ongoing
	Procurement of electricity from renewable sources	Lutech Group	Ongoing
	Development of the Group's Climate Transition Plan	Lutech Group	Planned 2026–2027
S1	Maintenance and improvement of Management Systems (ISO 45001:2018 / SA8000)	Lutech S.p.A. (ISO 45001:2018 and SA8000), Eustema S.p.A. (ISO 45001:2018 and SA8000), Consulthink S.p.A. (ISO 45001:2018)	Ongoing
	Achievement and maintenance of UNI/PdR 125:2022 certification	Lutech S.p.A., Eustema S.p.A., Consulthink S.p.A.	Ongoing
	Confirmation and consolidation of remote working	Lutech Group	Ongoing
	Community Equity and Empowerment	Lutech Group	Ongoing
	Continuing Professional Development Programme and Lutech Learning Platform	Abex Italia S.r.l., Consulthink S.p.A., Know-How S.r.l. Kronotech S.r.l., Lutech CDM S.p.A., Lutech Digital Airport S.r.l., Lutech S.p.A. Lutech Sinergetica S.r.l. Pivotal Italia S.r.l., Stain S.r.l. Tenenigen S.r.l., Lutech Balkans Sh.p.k.	Ongoing
	"#includiamoCI!" project – 3rd edition	Lutech Group	Ongoing
	"#IAmRemarkable" project	Lutech Group	Ongoing
	"The Inspirational Mix" project and relaunch of the Next Gen Community	Lutech Group	Ongoing
	"MIND THE GENDER GAP!" project	Lutech Group	Ongoing
	"Ask Yourself How You're Doing" (Wellbeing Initiative)	Lutech Group	Ongoing
	WeMeetWeCare	Lutech Group	Ongoing
	Charity Marathons (Lutech Community Running Team)	Lutech Group	Ongoing
	"Female Ingenuity" 2025 edition	Lutech Group	Ongoing
	Virtual Job Meeting Inclusion Day	Lutech Group	Completed
	STEM Girls Digital Recruiting Week	Lutech Group	Completed

ESRS	Action	Scope of application	Timeframe (planned, ongoing, completed*)
	Digital Diversity Week (DRW Girls STEM)	Lutech Group	Completed
	BUDDY Programme Maintenance	Lutech Group	Ongoing
	Parenting Programme	Lutech S.p.A. (2025), to be extended to the whole Group in 2026	Planned for 2026
	Great Place to Work 2025®	Lutech Group	Ongoing
S2	Supply chain monitoring and social responsibility audits	Lutech S.p.A., Eustema S.p.A. and Consulthink S.p.A. (SA8000 certified)	Ongoing
	Integration of ESG criteria into supplier qualification and assessment processes	Lutech Group	Ongoing
S4	Involvement of consumers and end-users and monitoring of satisfaction	Lutech Group	Ongoing
	Renewal of ESG ratings and participation in customer qualification programmes	Lutech Group	Ongoing
	Definition of responsible AI principles and their dissemination across the Group	Lutech Group	Ongoing
	Integrated management of the Personal Data Protection System (SGPDP) and the Information Security Management System (SGSI)	Lutech Group	Ongoing
	Maintenance and continuous improvement of the integrated management systems (Quality, IT Services, Information Security and Personal Data Protection)	Abex Italia S.r.l., Lutech CDM S.p.A., CDM Consulting Shanghai Co. Ltd, Consulthink S.p.A., Eustema S.p.A., Kronotech S.r.l., Sapim S.A., Softjam S.p.A., Stain S.r.l., Lutech ICT Solutions S.A. (Switzerland)	Ongoing

ENVIRONMENTAL

ESRS E1 – ENVIRONMENTAL AND CLIMATIC CHANGES



List of references

Disclosure requirements	Reference
E1 IRO-1 – Description of the processes for identifying and assessing material climate-related impacts, risks and opportunities	General Information Section ESRS 2 IRO-1 – Description of the processes for identifying and assessing material impacts, risks and opportunities
E1 GOV-3 – Integration of sustainability performance into incentive schemes	General Information Section ESRS 2 GOV-3

1. Strategy

1.1 Disclosure requirement – E1-1 – Transition plan for climate change mitigation

ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model

Throughout 2025, the Lutech Group continued its climate analysis, monitoring the main sources of greenhouse gas (GHG) emissions and the measures progressively implemented over time. As part of the process of identifying material issues related to climate change, the Group continued to monitor available information and potential factors of exposure to climate risks.

Although the launch of a structured analysis of the resilience of the strategy and business model to climate change – together with the formulation of a climate transition plan – was initially scheduled for 2025, the Group has decided to postpone its development until 2026, to ensure a more robust methodological approach, supported by greater consolidation of internal processes and broader involvement of the relevant corporate functions.

In this context, in the next reporting cycle, the Lutech Group plans to launch a structured process to identify and assess physical climate risks – namely extreme weather events and chronic climate changes that could impact the company's operations – through the involvement of the relevant internal contacts. The aim is to ascertain whether any significant adverse climate events have already occurred over time and to identify potential material physical risks. In parallel, the Group will develop a mapping of climate impacts, risks and opportunities (IRO), in line with ESRS standards, to assess the presence of physical or transition risks, progressively extending the analysis to the value chain, with particular attention to suppliers and energy dependencies in the geographical and operational contexts in which the Group operates. The process will also include an assessment of the feasibility of developing a climate scenario analysis, aimed at examining, in a structured and forward-looking manner, the potential effects of physical and transition risks on the Group's activities and its value chain, as well as supporting an assessment of the business model's resilience to climate change.

Finally, it should be noted that, in the reporting year, the Lutech Group is excluded from the EU Paris-aligned benchmarks, in accordance with the criteria set out in Article 12 of Delegated Regulation (EU) 2020/1818.

1.2 Disclosure requirement E1-2 – Policies relating to climate change mitigation and adaptation

About the material topic of 'Climate Change', the Lutech Group has established an integrated system of policies and management tools that reflect a concrete and progressive commitment to environmental responsibility, with specific reference to climate change mitigation and adaptation.

This system is organised across three distinct yet interconnected levels of documentation; within this framework, a review of the Environmental Policy (MAM-POL) is scheduled for 2026, with the aim of developing it into a Group Policy and strengthening the progressive harmonisation of environmental guidelines across the Group's companies:

- a strategic level, represented by the Environmental Management System Manual (MAM-000), a governance document through which Lutech S.p.A. has established, implemented and maintains its Environmental Management System in accordance with ISO 14001:2015 and ISO 14064-1:2018;
- a tactical level, comprising the guiding policies, namely the Sustainability Policy (POL-900), the Environmental Policy (MAM-POL) of the parent company and of the companies certified to ISO 14001:2015, and the Car Policy (REG-001);
- and an operational level, comprising the procedures and instructions that translate these guidelines into concrete actions.

Governance of this system is entrusted to the ES Management System, appointed as the Environmental Management System Manager (RSGA), which works in close collaboration with the Chief HSE Officer, who is responsible for mandatory environmental compliance. The entire framework is approved and overseen by the Chief Executive Officer, reflecting the management's commitment to making environmental management an integral part of the corporate strategy. Lutech S.p.A.'s Environmental Management System is certified to the ISO 14001:2015 standard and incorporates the requirements of the ISO 14064-1:2018 standard for the inventory of greenhouse gas emissions.

Within the Group, in addition to Lutech S.p.A., Eustema S.p.A. is also certified to both ISO 14001:2015 and ISO 14064-1:2018. Consulthink S.p.A. and Sapim S.A. have achieved ISO 14001:2015 certification.

The Sustainability Policy (POL-900), given its cross-cutting nature, will be discussed in greater detail in the chapter dedicated to workers in the value chain and in the information on Governance. The Car Policy (REG-001), whilst governing a specific operational area, is of strategic importance in the context of climate change by virtue of its objective of fully electrifying the fleet by 2032. Here, for all the policies mentioned, reference is made to the environmental aspects they contain, together with the contents of the Environmental Policy (MAM-POL) and the Environmental Management System Manual (MAM-000) relating to the Parent Company.

Cross-cutting policies

Sustainability Policy (POL-900)

POL-900, approved by the CFO and Chief Executive Officer of the Board of Directors of Lutech S.p.A. and applicable to the entire Group, sets out the guiding principles of the sustainable growth strategy, integrating ethical, social and environmental aspects in line with the SDGs of the 2030 Agenda. Published on the company website and shared via the supplier qualification tool, the policy is therefore accessible to both the external public and supply chain partners. On the environmental front, the Policy is structured around the principle of integrating the protection, enhancement and regeneration of the environment and natural ecosystems into business processes, with the aim of reducing direct and indirect impacts and promoting sustainable procurement.

Aware of the environmental impacts generated by its activities, Lutech is taking concrete action on several fronts: in the selection of suppliers, environmental and social performance are evaluation criteria alongside

economic ones. With regard to emissions, the Group is committed to monitoring and reporting CO_2 emissions with the support of external assurance, identifying areas for efficiency improvements and, where necessary, resorting to offsetting. Particular attention is paid to staff travel and the use of renewable energy. Finally, Lutech promotes the continuous improvement of environmental performance in offices and data centres through reducing plastic use, encouraging remote working, educating staff on the responsible use of resources, and the gradual adoption of renewable energy.

Thematic Policies

Environmental Policy (MAM-POL)

The MAM-POL, approved by the Management of Lutech S.p.A. and applicable to Lutech S.p.A., sets out the fundamental commitments to protect the environment, reduce climate-changing emissions and promote a just and transparent environmental transition. Drawn up in accordance with the ISO 14001:2015 standard and made public, the policy serves as the guiding document for Lutech S.p.A.'s certified Environmental Management System. In it, Lutech S.p.A. formalises its commitment to the continuous improvement of environmental performance, the prevention of pollution, compliance with mandatory legislation and the gradual reduction of the impacts generated by its activities. The Environmental Policy serves as the overarching framework for all processes and operational practices involved in managing significant environmental aspects, from greenhouse gas emissions to waste management, from energy efficiency to corporate mobility, ensuring consistency and continuity across the entire Environmental Management System.

Finally, it should be noted that Consulthink S.p.A., Eustema S.p.A. and Sapim S.A. have their own separate environmental policies.

Car Policy (REG-001)

REG-001, approved by the Group Chief Executive Officer of Lutech S.p.A. and applicable to the entire Group, governs the allocation and use of company cars by employees and contractors for business purposes, setting out criteria, obligations and responsibilities throughout the entire life cycle of the company car. Drafted in accordance with the requirements of ISO 14001:2015 and ISO 14064-1:2018 and published on the company intranet for all Group employees and contractors, the policy governs the allocation process – based on professional level and subject to an annual mileage of over 10,000 km – as well as the pre-leasing conditions, the choice of model from a catalogue managed by the Procurement department, the standard duration of long-term hire contracts – ordinarily set at 48 months and 120,000 km – and the conditions for early return, including the relevant penalties. The assignee's obligations include exercising the utmost care when using the vehicle, complying with the Highway Code, ensuring proper maintenance is carried out by the hire company, refraining from smoking on board, fitting winter tyres during the specified period, and completing the necessary forms in the event of accidents, damage or theft. Traffic fines are the sole responsibility of the driver and are managed via the company's ZCarFleet platform; damage not covered by comprehensive insurance – including damage to the interior and failure to clean the vehicle – is charged in full to the user.

From an environmental perspective, the policy serves as an operational tool designed to support the Group's decarbonisation objectives: the company fleet is set to be fully converted to electric vehicles by 2032, with a commitment to introduce as many zero-emission vehicles as possible from onwards, starting with new lease contracts currently in progress. To support this transition, the policy introduces a differentiated mileage reimbursement scheme – €0.16/km for internal combustion engine vehicles and €0.10/km for electric

vehicles, which are provided with a charge card for recharging – which provides a tangible incentive for the adoption of low-impact powertrains, contributing directly to the reduction of Scope 1 emissions.

1.3 Disclosure Requirement E1-3 – Actions and Resources Relating to Climate Change Policies

In line with the integrated policy framework described in the previous paragraph, the Lutech Group has defined a set of actions dedicated to climate change mitigation, adaptation to its effects and energy management, with the aim of progressively reducing the direct and indirect environmental impacts of its operations.

The actions described below are organised according to the main areas of focus adopted by the Group and relate to the 2025 reporting year. For each action, the nature – ongoing, under development or planned – and the scope of application are indicated.

Action 1 – Environmental management and monitoring of GHG emissions

This action constitutes the systematic oversight of the Group's environmental commitments and is based on two main pillars: the annual monitoring of greenhouse gas emissions in accordance with the GHG Protocol and, where applicable, in accordance with ISO 14064-1:2018; and the maintenance and continuous improvement of the Environmental Management System certified to ISO 14001:2015.

During 2025, the Group continued to extend the calculation of its corporate carbon footprint to all sites and across the entire corporate scope, utilising dedicated tools for emissions monitoring and strengthening environmental data collection processes. Oversight of the Environmental Management System of the parent company and the three subsidiaries that have implemented it was also maintained, ensuring regulatory compliance, the periodic updating of significant environmental aspects and the involvement of the relevant departments in the process of continuous improvement.

Action 2 – Review and extension of the Environmental Policy to subsidiaries

This action aims to progressively extend (scheduled for 2026) the Environmental Policy, as well as the environmental guidelines and controls already in place at the parent company, to the subsidiaries, as part of the process of harmonising ESG processes initiated in recent financial years.

This initiative forms part of the broader development of the Group's Transition Plan (see Action 5), helping to consolidate a unified approach to managing environmental issues at Group level.

Action 3 – Electrification of the company fleet and development of charging infrastructure

This ongoing initiative by the Lutech Group implements the strategic objective of progressively electrifying the company fleet by 2032, as set out in the Car Policy (REG-001). During 2024, 266 electric and hybrid

vehicles were ordered, intended to gradually replace approximately 90 per cent of the current diesel cars in the fleet. The transition of lease contracts towards zero- or low-emission vehicles is proceeding systematically as contracts come to an end.

To support this transition, 20 charging points (wall boxes) were installed at the Cinisello Balsamo site in 2024, representing an investment classified under property, plant and equipment amounting to €69,629.62. During 2025, the charging infrastructure was further expanded, as shown in the table below.

Site	2024	2025
Cinisello Balsamo	4	24
Milan – Park West	0	15
Bari – Mazzitelli	2	2
Naples – Centro Direzionale	2	2
Rome - Grezar	17	17

This initiative forms part of the Group's wider mobility management programme and contributes to reducing Scope 1 emissions associated with corporate travel.

Action 4 – Procurement of electricity from renewable sources

This ongoing Group initiative aims to reduce Scope 2 emissions by contracting for electricity supplies from renewable sources, supported, where available, by Guarantees of Origin or Certificates of Origin.

By the end of 2024, the Group had met approximately 65 per cent of its energy requirements through certified renewable energy suppliers. During 2025, the process of extending this coverage continued, reaching 100% for Lutech S.p.A. and Lutech Sinergetica S.r.l. This initiative complements the process of rationalising and optimising energy supply contracts initiated in previous years.

Action 5 – Development of the Group's Climate Transition Plan

This action aims to develop a Transition Plan which, based on climate scenario analyses and the outcomes of the double materiality process expected in the coming financial year, will set out in a structured manner the Group's potential emission reduction trajectories, priorities for action and the relevant strategic guidelines on climate issues.

The Plan will progressively incorporate the findings from GHG emissions monitoring and assessments of the potential effects of climate change on the business model, serving as the strategic framework for the development of the Group's future decarbonisation initiatives.

2. Metrics and targets

2.1 Disclosure Requirement E1-4 – Climate Change Mitigation Targets

Reducing climate-changing emissions is an increasing priority for the Lutech Group, which is establishing – as outlined in the section on the Transition Plan – a structured and progressive path towards the decarbonisation of its operations.

At this stage, the Group has introduced a systematic monitoring system for greenhouse gas emissions and has set a series of targets which, whilst not yet formally aligned with the 1.5°C global warming containment scenarios set out in the Paris Agreement nor based on specific climate scenario analyses, do make a concrete contribution to reducing CO_2eq emissions and to the gradual integration of climate considerations into the Group's operational and strategic management.

The Group has not yet adopted formalised emission reduction targets in accordance with science-based standards (SBTi or equivalent); in the meantime, it is maintaining and progressively strengthening its Environmental Management Systems certified to the ISO 14001:2015 standard, with a scope currently already covering several operating companies.

In particular, ISO 14001:2015 certification is already in place for Lutech S.p.A., Eustema S.p.A., Consulthink S.p.A. and Sapim S.A., confirming an environmental management system that is progressively being harmonised at Group level.

In parallel, the GHG emissions reporting system is structured in accordance with the Group's GHG Protocol and, where applicable, reinforced by verifications and quantification approaches compliant with the ISO 14064-1:2018 standard. This standard is, in fact, adopted by specific companies within the Group, in particular Eustema S.p.A. and Lutech S.p.A., helping to enhance the robustness, traceability and reliability of emissions data. Overall, the integration of certified management systems (ISO 14001:2015), emissions reporting and verification standards (ISO 14064-1:2018 where applicable) and structured monitoring in accordance with the GHG Protocol serves to enhance the quality of the Group's environmental information system.

In the process of defining climate targets and related policies, the Lutech Group has also involved its key internal stakeholders. In particular, employees have been involved through the annual Mobility Management survey, a tool that gathers information on travel habits and preferences regarding sustainable mobility, guiding decisions relating to the company fleet and charging infrastructure.

The climate change targets currently set by the Lutech Group are described below.

Target 1 – 100% of electricity sourced from renewable energy

As part of its commitment to reducing the indirect impacts associated with energy consumption (Scope 2 emissions), the Lutech Group, with reference to Lutech S.p.A. and Lutech Sinergetica S.r.l., has set itself the objective of ensuring and maintaining 100 per cent coverage of its electricity requirements through

procurement from certified renewable sources, by purchasing Guarantees of Origin (GO) or equivalent instruments.

During 2025, this target was achieved by Lutech S.p.A. and Lutech Sinergetica S.r.l., which now source all their electricity from certified renewable sources. This achievement contributes to the structural reduction of indirect Scope 2 emissions and forms part of the commitments set out in the Group's Sustainability Policy.

The Group is also considering the gradual extension of this approach to its other subsidiaries. This process is closely linked to the rationalisation and optimisation of operational sites in major Italian cities, including Milan, Rome and Naples. As part of this process, all new domestic offices will be supplied, where technically and contractually feasible, with electricity from certified renewable sources, thereby promoting the gradual adoption of sustainable energy practices across the Group.

Objective 2 – Transition of the company fleet to low-emission engines

In accordance with the provisions of the Group's Car Policy (REG-001), the Lutech Group has set a target of ensuring that at least 70 per cent of its company fleet is powered by electric vehicles (EVs) by 2032. This initiative forms part of a wider programme to decarbonise the company's transport operations and aims to progressively reduce the direct emissions associated with staff travel.

As at 31 December 2025, the company fleet comprised approximately 1,442 vehicles, of which 488 were electric or hybrid, accounting for 34 per cent of the total. The transition is proceeding gradually and systematically through the renewal of expiring hire contracts, with priority given to the adoption of zero- or low-emission vehicles.

To support the electrification programme, the Group has also launched a plan to develop charging infrastructure at its sites, with the aim of ensuring that all sites with over 100 employees are covered by 2026. During 2025, there was a significant expansion of the charging network. At the Cinisello Balsamo site, the number of charging points increased from 4 to 24, whilst 15 charging points were installed for the first time at the Park West site. The Bari Mazzitelli, Naples – Centro Direzionale and Rome Grezar sites maintained the same number of charging points as in the previous financial year, with 2, 2 and 17 charging points respectively. Overall, the increase in available infrastructure reflects the Group's commitment to supporting the gradual electrification of its fleet through the appropriate development of charging capacity and to promoting increasingly sustainable corporate mobility.

Objective 3 – Maintaining zero non-conformities under ISO 14001:2015 certification

The Lutech Group has set itself the objective of maintaining zero non-conformities identified within its Environmental Management Systems certified to the ISO 14001:2015 standard, with reference to the following companies: Lutech S.p.A., Consulthink S.p.A., Eustema S.p.A. and Sapim S.A.

Lutech S.p.A. has been ISO 14001:2015 certified since 2012, demonstrating a long-standing commitment to the systematic management and continuous improvement of its environmental performance. Maintaining this standard reflects the Group's approach to regulatory compliance, which is viewed not merely as a minimum threshold to be met, but as a driver for continuous improvement, in line with the principles of the Environmental Management System adopted.

2.2 Disclosure requirement E1-5 – Energy consumption and energy mix

In 2025, the Lutech Group recorded a total energy consumption of 21,283.77 MWh, down from 24,109.50 MWh in 2024 (-11.7%). This trend reflects both the Group's operational dynamics and the energy efficiency initiatives implemented during the financial year. The comparison with the previous financial year must also be interpreted considering changes in the scope of consolidation and reporting resulting from extraordinary transactions carried out during the year.

In 2025 the Group continued its growth trajectory through mergers by incorporation and corporate acquisitions, as illustrated in ESRS 2. For the purposes of this Consolidated Sustainability Report, Abex Italia S.r.l., Consulthink S.p.A., Lutech ICT Solutions S.A. (Switzerland) and CDM Consulting Shanghai Co. Ltd (China) have been included in the reporting scope for the first time. Consequently, the comparability of the data with that of 2024 is affected by the different composition of the reporting scope.

Furthermore, during 2025, the Group refined its methodology for the collection, classification and consolidation of energy data, introducing a greater level of detail in the information sources and in the criteria for allocating consumption to the various categories set out by the ESRS. To ensure the comparability of information over time, the comparative figures for the 2024 financial year have consequently been restated using the updated methodology. This restatement concerned solely methodological and data presentation aspects and does not reflect any substantial changes in the Group's energy performance during the reference period.

The Group's energy requirements continue to be predominantly met by fossil fuels, which in 2025 accounted for 88 per cent of total energy consumption (18,819.75 MWh), down from the 95 per cent recorded in 2024 (22,880.61 MWh). The decrease in consumption from fossil fuels (-17.7 per cent) is mainly attributable to the reduction in the consumption of petroleum-derived fuels, which fell from 17,494.36 MWh in 2024 to 15,185.83 MWh in 2025 (-13.2 per cent), as well as to the significant decrease in electricity, heat, steam and cooling purchased from fossil fuel sources, amounting to 790.25 MWh in 2025 compared with 2,426.59 MWh in the previous financial year (-67.4 per cent).

Natural gas consumption remains broadly stable, falling from 2,959.66 MWh in 2024 to 2,843.68 MWh in 2025 (-3.9%). No consumption of coal, coal products or other fossil fuels was recorded.

Consumption attributable to nuclear sources remains marginal, falling from 155.44 MWh in 2024 to 57.63 MWh in 2025, representing a substantially insignificant share of the overall energy mix.

As regards renewable sources, in 2025 the Group recorded a significant increase in the consumption of electricity purchased from certified renewable sources, rising from 1,073.44 MWh in 2024 to 2,406.39 MWh in 2025 (+124.3 per cent). Consequently, the share of energy from renewable sources in total energy consumption rose from 4% to 11%. The Group did not record any consumption of renewable fuels or any self-generated energy from renewable sources.

Overall, the energy mix shows a gradual improvement compared with the previous financial year, characterised by a reduction in the share of fossil fuels and an increase in the use of electricity purchased from certified renewable sources. This trend reflects both developments in the Group's energy procurement

strategy and the differing operational characteristics and energy mixes of the companies included within the scope of consolidation.

The Group continues to monitor its energy consumption and related supply sources, with the aim of progressively increasing the use of energy from renewable sources, improving the energy efficiency of its operations and supporting the transition towards a low-emission development model.

With regard to the energy intensity of activities in sectors with a high climate impact, the Lutech Group does not report the relevant indicator as its economic activities do not fall within the sectors with a high climate impact identified by ESRS E1. Therefore, the disclosure required for this indicator does not apply to the Group.

Lutech Group energy consumption			
	Unit of measurement	2024[6]	2025
Consumption of coal and coal products	MWh	0.00	0.00
Consumption of crude oil and petroleum products	MWh	17,494.36	15,185.83
Consumption of natural gas	MWh	2,959.66	2,843.68
Fuel consumption from other fossil sources	MWh	0.00	0.00
Consumption of electricity, heat, steam and cooling purchased or obtained from fossil fuel sources	MWh	2,426.59	790.25
Total energy consumption from fossil fuels	MWh	22,880.61	18,819.75
Share of fossil fuels in total energy consumption	%	95%	88%
Consumption from direct nuclear sources	MWh	155.44	57.63
Share of consumption from nuclear sources in total energy consumption	%	0.64%	0%
Consumption of fuels from renewable sources, including biomass	MWh	0.00	0.00
Consumption of electricity, heat, steam and cooling purchased or obtained from certified renewable sources	MWh	1,073.44	2,406.39
Consumption of self-generated renewable energy without the use of fuels	MWh	0.00	0.00
Total consumption of renewable energy	MWh	1,073.44	2,406.39
Share of renewable sources in total energy consumption	%	4%	11%
Total energy consumption	MWh	24,109.50	21,283.77

[6] During the 2025 financial year, the Group refined its methodology for collecting, classifying and consolidating energy data, improving the level of detail of the information sources and the allocation of consumption to the categories set out in the ESRS. The 2024 comparative figures have consequently been restated for comparability purposes. The restatement is attributable exclusively to methodological improvements and does not result from changes in underlying energy performance or from corrections of material errors.

2.3 Disclosure requirement E1-6 – Gross GHG emissions from Scopes 1, 2 and 3, and total GHG emissions

In 2025, the Lutech Group's total gross greenhouse gas emissions, calculated using the location-based approach, amounted to 21,610.23 tCO_2e, a decrease of 32.34% compared with the 31,937.90 tCO_2e recorded in 2024.

Direct emissions (Scope 1) totalled 4,733.31 tCO_2e, a decrease of 9.75% compared with 2024 (5,244.50 tCO_2e). These emissions stem mainly from fuel consumption by the company's vehicle fleet, which accounts for approximately 85% of Scope 1 emissions, whilst the remainder is attributable to natural gas consumption for heating and fugitive emissions associated with air-conditioning systems.

Indirect emissions associated with purchased energy (Scope 2), calculated using the location-based approach, amounted to 1,121.17 tCO_2e, broadly in line with the figure recorded in 2024 (1,141.10 tCO_2e), representing a 2 per cent reduction.

Other indirect emissions along the value chain (Scope 3) stood at 15,755.74 tCO_2e, down 38% from the 25,552.30 tCO_2e recorded in the previous financial year. Scope 3 emissions represent the largest component of the Group's carbon footprint, accounting for 73 per cent of total emissions.

The most significant Scope 3 categories are employees' commutes (Category 7), which account for approximately 29 per cent of the Group's total emissions, followed by activities related to fuels and energy (Category 3) and capital goods (Category 2), which account for 16 per cent and 15 per cent of total emissions respectively.

A comparison with 2024 shows a significant reduction in total emissions, attributable primarily to Scope 3 emissions. This trend is mainly due to the gradual improvement in the quality of available data, the increased use of primary data and the consequent reduction in the assumptions and estimates used in quantifying emissions, which have enabled a more accurate and precise representation of the GHG inventory.

About the market-based approach, Scope 2 emissions stand at 360.07 tCO_2e, 67.9 per cent lower than the corresponding location-based figure, thanks to the purchase of electricity covered by Guarantees of Origin by Lutech S.p.A. and Lutech Sinergetica S.r.l. Consequently, the Group's total emissions under the market-based approach amount to 20,849.12 tCO_2e.

During 2025, the Group also continued to improve its processes for collecting and managing environmental data. The emissions inventory was prepared in accordance with the principles of the GHG Protocol, adopting an operational control approach and relying primarily on primary data, supplemented where necessary by internal methodologies and estimates by analogy. The gradual improvement in the quality and coverage of the data is a key factor in enhancing the reliability of the information and supporting the Group's future decarbonisation initiatives.

Finally, it should be noted that the Group does not own any facilities subject to regulated emissions trading schemes (ETS); therefore, none of its Scope 1 emissions fall within the scope of such mechanisms.

Lutech Group greenhouse gas emissions			
Gross GHG emissions	**Unit of measurement**	**2025**	**2024**

Scope 1 gross GHG emissions	tCO_2e	4,733.31	5,244.50
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading schemes	%	0	0
Gross Scope 2 greenhouse gas emissions based on location	tCO_2e	1,121.17	1,141.10
Gross Scope 2 greenhouse gas emissions based on market	tCO_2e	360.07	N/A
Gross Scope 3 greenhouse gas emissions	tCO_2e	15,755.74	25,552.29
Total greenhouse gas emissions (based on localisation)	tCO_2e	21,610.23	31,937.90
Total greenhouse gas emissions (market-based)	tCO_2e	20,849.12	N/A

Lutech Group Scope 3 details for 2025			
Category / description	**Unit of measurement**	**Value**	**Uncertainty %**
Category 1 – Purchased goods and services			
Purchased goods	t CO_2eq	331.31	**18.3%**
Cloud services	t CO_2eq	773.53	**15.7%**
Remote working	t CO_2eq	24.12	**10.4%**
Goods purchased for resale	t CO_2eq	777.70	**20.2%**
Category 2 – Capital goods			
Fuel production and infrastructure related to company cars	t CO_2eq	3,320.68	**5.7%**
Category 3 – Fuel and energy-related activities			
Infrastructure related to heating and to energy imports	t CO_2eq	3,351.40	**5.0%**
Category 4 – Transport and upstream distribution			
Road freight transport	t CO_2eq	2.23	**8.5%**
Maritime freight transport	t CO_2eq	0.0013	**9.8%**
Category 6 – Business travel			
Hotel nights	t CO_2eq	60.56	**8.2%**
Air travel	t CO_2eq	411.91	**5.2%**
Car	t CO_2eq	271.55	**10.6%**
Ferry	t CO_2eq	0.02	**8.3%**
Train	t CO_2eq	91.48	**8.3%**
Category 7 – Commuter transport			
Bus	t CO_2eq	259.95	**9.6%**
Car	t CO_2eq	5,600.09	**4.9%**
Electric scooter	t CO_2eq	0.61	**10.1%**
Motorbike	t CO_2eq	220.87	**9.0%**
Trams/underground	t CO_2eq	71.89	**7.9%**
Train	t CO_2eq	160.01	**8.3%**

Category 9 – Downstream transport and distribution			
Road freight transport	t CO_2eq	26.73	**12.8%**
Maritime freight transport	t CO_2eq	0.04	**19.0%**
Total	**t CO_2eq**	**15,755.74**	**2.6%**

Lutech Group Scope 3 Breakdown 2024			
Category / description	**Unit of measurement**	**Value**	**Uncertainty %**
Category 1 – Purchased goods and services			
Purchased goods	t CO_2eq	392.35	**15.40%**
Cloud services	t CO_2eq	4,639.39	**23.30%**
Remote working	t CO_2eq	22.01	**22.40%**
Goods purchased for resale	t CO_2eq	2,217.16	**28.30%**
Category 2 – Capital goods			
Fuel production and infrastructure related to company cars	t CO_2eq	5,069.92	**8.10%**
Infrastructure related to heating and electricity imports	t CO_2eq	380.79	**8.00%**
Category 4 – Transport and upstream distribution			
Road freight transport	t CO_2eq	2.49	**22.40%**
Maritime freight transport	t CO_2eq	0.01	**22.40%**
Category 6 – Business travel			
Hotel nights	t CO_2eq	58.61	**11.00%**
Air travel	t CO_2eq	334.64	**22.40%**
Bus	t CO_2eq	0.78	**14.10%**
Car	t CO_2eq	140.82	**15.60%**
Train	t CO_2eq	84.69	**14.10%**
Category 7 – Commuter transport			
Bus	t CO_2eq	1,442.06	**22.40%**
Car	t CO_2eq	5,316.43	**26.70%**
Electric scooter	t CO_2eq	0.26	**22.40%**
Car sharing and taxis	t CO_2eq	5,159.01	**28.30%**
Motorbikes	t CO_2eq	151.08	**22.40%**
Trams/underground	t CO_2eq	48.84	**22.40%**
Train	t CO_2eq	61.8	**22.40%**
Category 9 – Downstream transport and distribution			
Road freight transport	t CO_2eq	28.23	**22.40%**
Maritime freight transport	t CO_2eq	0.93	**22.40%**
Total		**25,552.30**	**12.00%**

Emissions intensity, calculated as the ratio of total greenhouse gas emissions (based on location) to consolidated net revenue, stands at 0.00002430 $tCO_2e/€$ in 2025.

Emissions intensity			
	Unit of measurement	2025	2024[7]
Total location-based emissions	tCO_2e	21,610.23	31,937.90
Net revenue €	€	889,226,000	819,337,317
Emissions intensity	$tCO_2e/€$	0.00002430	0.00003898

[7] As part of the ongoing process of improving and refining ESG metrics, it should be noted that the emissions intensity indicator has undergone a methodological realignment to ensure full consistency in its application across different reporting periods.
To ensure maximum comparability of the time series and consistency of the calculation criteria with the current financial year, the emissions intensity figure for 2024 has been recalculated by strictly applying the ratio of total *location-based* emissions (31,937.90 tCO_2e) to consolidated net revenue (€819,337,317).

SOCIAL

ESRS S1 – OWN WORKFORCE



List of references

Disclosure requirement	Reference
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	General Information Section ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model

1. Strategy

1.1 Disclosure requirement relating to ESRS 2 SBM-2 – Interests and views of stakeholders r interests

The interests, views and rights of those working on behalf of the Lutech Group have always been held in high regard, guiding the Group's strategy and business model by highlighting expectations, needs and suggestions regarding remuneration or career progression, work-life balance, and Diversity and Inclusion (DE&I) management. For this reason, the Group's own workforce is regarded as a key stakeholder group and is therefore engaged at various levels by the Group itself.

The way in which corporate strategy is shaped by the views of the workforce is positively influenced by the many open channels of dialogue and communication that characterise the Lutech Group's approach to listening to its employees, gathering information and useful insights for the development of business strategies which – as far as human resources are concerned – identify dialogue and the opportunity to gather bottom-up input as their two fundamental pillars.

In line with the approach adopted in previous years, feedback channels such as surveys, *one-to-one* interviews with staff, regular update meetings for the professional appraisal of employees (through scheduled feedback sessions) and qualitative performance assessments were also implemented throughout 2025. These activities continued to take place on a half-yearly and annual basis for all staff and across every role within the organisation.

The strategic initiative launched in previous financial years reached a significant turning point with the 'Speak Up' survey conducted in 2023, which involved the entire workforce and identified three key areas for action: Learning & Development, Group Identity and Performance Appraisal. Considering these findings, the action plans developed in 2024 were further consolidated and refined during 2025:

1. **Learning & Development:** Following the initiatives launched in 2024 to promote the use of the Lutech Learning platform and foster a *growth mindset* culture through dedicated training programmes and events, in 2025 the Group further strengthened its Learning & Development strategy. In particular, the platform was rebranded, accompanied by a reorganisation of the content and training catalogues and an update to the offering with new content. New programmes dedicated to people development were also introduced, including initiatives linked to the *Job Framework* and *Talent Programmes*. These measures have helped to make the learning experience more effective, accessible and focused on the continuous development of skills.
2. **Group Identity:** The '*Wonder Lutech*' gamification project, launched in 2024 with the aim of fostering integration amongst staff from the Group's various legal entities and offices, evolved during 2025 into *the 'WeMeetWeCare'* project. The initiative took the form of a series of fun and charitable events organised across various regions, with the dual aim of strengthening the sense of belonging and collaboration amongst colleagues whilst, at the same time, generating a positive impact on local communities through the involvement of third sector organisations. The project has thus helped to promote a corporate culture based on inclusion, participation and social responsibility.

3. **Performance Appraisal**: The Performance Management process, introduced with the H1 2024 appraisal cycle and aimed at developing technical, behavioural and managerial skills, was fully consolidated during 2025. The system, based on a structured and ongoing dialogue between managers and staff, is a key tool for guiding professional development, fostering personal growth and supporting fair and transparent decision-making processes. In 2025, the process involved 4,714 people, representing 91 per cent of the eligible workforce within the Lutech Group, confirming the central role of performance appraisal in promoting a culture of feedback and continuous improvement.

At an organisational level, responsibility for the Group's HR policies and processes lies with the Chief People Officer, who reports directly to the Group Chief Executive Officer. The Chief People Officer ensures that HR policies are consistent with the company's objectives and applicable legislation, coordinating the main people management processes – from recruitment to professional development, training, performance management, remuneration policies and incentive schemes – and liaising with the Group's compliance systems regarding gender equality and inclusion, social responsibility, health and safety, anti-corruption, privacy and data protection.

In support of this mission, the People Engagement division is specifically dedicated to engaging and mobilising staff around values of paramount importance to the company, such as Diversity, Equity and Inclusion (DE&I), intergenerational integration, wellbeing, mental health, work-life balance and the onboarding of new recruits. This area includes initiatives related to mental wellbeing, such as 'Ask Yourself How You're Doing' and 'Inspirational Mix', an event dedicated to the onboarding of new recruits under 30.

Finally, the Group continues to rely on an internal communication ecosystem comprising the intranet, online landing pages, newsletters and company communities. These channels are structured to ensure two-way communication, serving both top-down communications and the collection of messages and proposals from staff directed at senior management (bottom-up). All these initiatives highlight how the views of the workforce consistently shape the company's strategy and business model.

2. Management of impacts, risks and opportunities

2.1 Disclosure Requirement S1-1 – Policies relating to the workforce

People are a key factor in the success and growth of the Lutech Group; for this reason, the wellbeing, protection of rights and professional development of its workforce are central elements of the Group's management model. In this context, Lutech promotes fair and safe working conditions, opportunities for training and professional development, the protection of health and safety, and an inclusive working environment based on respect for equal opportunities and human dignity.

The management of these aspects is governed primarily by the Group Code of Ethics, supplemented, where necessary, by specific policies and procedures adopted by individual companies in accordance with local regulations, particular organisational requirements or Group policies. These instruments apply to the entire Group workforce and define the principles, responsibilities and expected standards of conduct. For further details on the Code of Ethics, please refer to Chapter G1 – Corporate Conduct.

To support the implementation of these principles, some Group companies have adopted certified management systems compliant with international standards. Lutech S.p.A., Consulthink S.p.A. and Eustema S.p.A. have systems certified to ISO 45001:2018 for occupational health and safety, UNI/PdR 125:2022 for gender equality and SA8000:2014 for social responsibility (apart from Consulthink S.p.A.). These certifications help to strengthen the management of issues relating to the protection of people, the promotion of fair and inclusive working environments and respect for workers' rights, providing operational support for the implementation of the Group's policies.

With regard to human and labour rights, the Group operates in compliance with applicable legislation and with the collective agreements, contracts or contractual provisions in force in the countries where the individual Group companies operate, whilst also promoting conduct consistent with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The Lutech Group's MOG-001 Code of Ethics defines the principles and values that guide the Group's conduct towards its employees and all stakeholders, promoting respect for human dignity, equal opportunities, individual freedom and the fundamental rights of workers. In this context, the Code of Ethics expressly prohibits any form of forced or compulsory labour, human trafficking, modern slavery and child labour, and requires employees, contractors, business partners and suppliers to comply with these principles.

Given the geographical location of its operations and the characteristics of the Information & Communication Technology (ICT) sector in which it operates, the Group considers the risk of exposure to forced labour, human trafficking or child labour to be insignificant about its workforce. Nevertheless, respect

for human rights and workers' rights constitutes a fundamental principle of the corporate governance system and is referred to in the Code of Ethics as a requirement applicable to all the Group's activities.

The Lutech Group's MOG-001 Code of Ethics also recognises the valuing of people, professional growth and skills development as essential elements for the organisation's sustainable success. In line with these principles, the Group guarantees all staff access to training opportunities aimed at developing technical, professional and managerial skills, whilst ensuring criteria of fairness, inclusion and equal opportunities.

The planning, delivery and monitoring of training are supported by the Lutech Learning platform, which enables the management and tracking of the entire training cycle, from identifying training needs to recording the activities carried out. The training programme includes technical training courses, programmes for the development of soft skills, and compulsory courses relating to regulatory compliance and the management systems adopted by the Group.

In line with the provisions of MOG-001, the Lutech Group's Code of Ethics, staff are involved in specific training activities aimed at promoting ethical and responsible behaviour, as well as raising awareness of company policies regarding health and safety at work, the prevention of corruption, the protection of personal data, information security, social responsibility and gender equality.

To foster the corporate culture and awareness of the principles set out in the Code of Ethics, all new recruits take part in onboarding and induction programmes designed to introduce them to the Group's values, key company policies, internal procedures and the required standards of conduct. These programmes are designed to ensure equal access for the entire workforce, regardless of their working arrangements or the need to balance work and personal life.

About staff wellbeing and the work-life balance, the Group promotes organisational models based on flexibility. In this context, Lutech S.p.A. and certain Group companies have adopted internal regulations on remote working aimed at facilitating a better balance between work and personal commitments.

Issues relating to health and safety at work are governed both by the MOG-001 Code of Ethics and by specific policies and management systems implemented by certain Group companies. In particular, companies certified to the ISO 45001:2018 standard have adopted an Occupational Health and Safety Management System Policy designed to promote a culture of prevention, ensure compliance with current legislation and internal requirements, and raise awareness amongst employees, customers, suppliers and partners of the importance of safe and sustainable working environments.

About diversity, inclusion and equal opportunities, the Group promotes an organisational culture based on respect for individuals and the celebration of diversity. The Code of Conduct and Corporate Ethics prohibits any form of discrimination based, amongst other things, on race, ethnic origin, skin colour, sex, sexual orientation, gender identity, age, disability, religion, political opinions, nationality or social origin, in accordance with applicable legislation. Furthermore, the UNI/PdR 125:2022 and SA8000 certifications further reinforce the Group's commitment to promoting equal opportunities, diversity and respect for workers' rights.

As at the reporting date, the Group has not yet formalised specific quantitative commitments or programmes dedicated to vulnerable groups within its workforce. However, the principles of inclusion, non-discrimination, the protection of human rights and the promotion of diversity are applied across the board within the policies and management systems adopted by the Group.

Full details of the policies relating to Theme S1 – Own workforce are set out below:

Cross-cutting policies

Sustainability Policy (POL-900) – Lutech Group

POL-900, approved by the CFO and Chief Executive Officer of the Board of Directors of Lutech S.p.A. and applicable to the entire Group, sets out the guiding principles of the sustainable growth strategy, integrating ethical, social and environmental aspects in line with the SDGs of the 2030 Agenda. Published on the company website and shared via the supplier qualification tool, the policy is accessible to the general public and supply chain partners alike, as well as to all internal and external stakeholders who request it.

With regard to its own workforce, the Policy is structured around the pillar 'Protection of human rights, quality of working relationships and working conditions', through which Lutech is committed to recognising and respecting human and labour rights, as recognised by conventions and declarations in force at national and international level, condemning all forms of child labour, forced labour and discrimination based on age, racial and ethnic origin, nationality, political and trade union views, religious beliefs, sexual orientation, gender identity or any other personal characteristic unrelated to the workplace.

The Policy also provides for the appropriate development of employees' skills through the provision of effective training, career paths based on merit, and an objective performance appraisal system, alongside the guarantee of an inclusive working environment that discourages incidents of discrimination, exploitation, bullying and harassment. Finally, Lutech is committed to ensuring the health and safety of all work environments, including those involving remote working, and to protecting the confidentiality of employees' personal data in full compliance with current privacy legislation.

Social Responsibility Policy (POL-960) – Lutech Group

The Social Responsibility Policy (POL-960), approved by the Chief Executive Officer of Lutech S.p.A. and applicable to the entire Lutech Group, sets out the organisation's commitments regarding the protection of human and labour rights in accordance with the SA8000:2014 standard, integrated in version 01 with the requirements of UNI/PdR 125:2022 on gender equality. The policy is made publicly available to employees via the company intranet and is published on the Group's website; it serves as the reference framework for the responsible management of employment relationships within the Group.

With regard to its own workforce, the policy governs and safeguards aspects relating to the prohibition of child labour and forced labour, health and safety at work, freedom of association and collective bargaining, non-discrimination, the fairness of disciplinary procedures, compliance with working hours and the guarantee of remuneration in accordance with applicable collective agreements. The policy also promotes inclusion, equity and the celebration of diversity, ensuring equal opportunities in recruitment, training, professional development and career progression.

Management is committed to ensuring the continuous improvement of the SA8000 Management System, providing staff with training and raising awareness on issues of ethics and social responsibility, carrying out periodic monitoring of social performance, and ensuring that reporting channels are accessible to workers. Responsibility for overseeing this policy lies with the Social Performance Team (SPT), which supervises the implementation of the system and collaborates with the relevant company departments responsible for health, safety, compliance and supervision.

Thematic policies

Occupational Health and Safety Policy (MSL-POL) – Lutech S.p.A.

The MSL-POL, approved by the Group Chief Executive Officer of Lutech S.p.A., currently applies to Lutech S.p.A. – including sites, offices, products, services and the supply chain – with plans to extend it to all Group companies from 2026. The policy sets out the commitments and principles for ensuring a healthy and safe working environment, eliminating hazards, reducing risks and pursuing continuous improvement in working conditions. It has been drawn up in accordance with ISO 45001:2018, as well as Legislative Decree 81/08 and, where applicable, the SA8000 and UNI/PdR 125:2022 standards and is made available to all staff via the company intranet. It should be noted that, in addition to Lutech S.p.A., Eustema S.p.A. and Consulthink S.p.A. also have their own ISO 45001:2018-certified occupational health and safety management systems.

The policy is structured around a set of fundamental commitments undertaken by senior management, which actively involve all levels of the organisation: the ongoing raising of awareness amongst all staff regarding workplace safety and the prevention of accidents and occupational diseases; compliance with current legislation in all operational areas; the involvement of customers, suppliers and partners in health and safety matters; the clear definition of tasks and responsibilities throughout all business processes; the precise identification of hazards and the assessment of risks for anyone directly or indirectly connected to the company's activities; the provision of ongoing training and information to all employees to prevent accidents and occupational diseases; and, finally, the promotion of a sustainable work-life balance, with a focus on reducing work-related stress.

Management carries out periodic internal audits to verify the effectiveness of the system and plans the necessary corrective and improvement actions, regularly reviewing the policy to ensure it remains consistent with the business context.

POL-970 Diversity, Equity and Inclusion (DE&I) Policy – Lutech Group

POL-970, approved by the Group Chief Executive Officer of Lutech S.p.A. and applicable to all staff of the Lutech Group's legal entities – including consultants, suppliers and subcontractors – and in interactions with all business associates (customers, partners and other stakeholders) – sets out the commitments and principles for promoting a corporate culture based on inclusion, equity and the valuing of diversity as strategic resources for innovation. Drafted in accordance with the reference standard UNI/PdR 125:2022 (Gender Equality Certification System), the ISO 30415 guideline, the SA8000 standards for Social Responsibility, the Code of Ethics and the Model pursuant to Legislative Decree 231/2001; the policy is classified as public and is accessible via the company intranet and the corporate website. This Policy was introduced from the 2025 reporting year onwards, demonstrating the Group's commitment to these issues.

The policy is structured around a set of fundamental commitments and strategic operational guidelines that actively involve all levels of the organisation: the implementation of transparent, impartial and gender-neutral selection and recruitment processes; the adoption of merit-based and non-discriminatory criteria in career management and promotions; ensuring equal pay for equal work to reduce the gender pay gap and guarantee a living wage; providing practical support for parenthood and care responsibilities through programmes to facilitate a return to work and the promotion of leave schemes; implementing measures to promote work-life balance through flexible working arrangements such as remote working; a zero-tolerance approach to preventing abuse and harassment in the workplace, underpinned by the internal reporting

channel (Whistleblowing Platform); and the provision of ongoing training and awareness-raising programmes on DE&I issues. Governance of the system is overseen by the Gender Equality Committee (CPG), supported by a dynamic KPI monitoring dashboard for half-yearly management reports, whilst the policy's suitability and consistency with the corporate context are regularly assessed during periodic reviews and management reviews.

Parenting Policy (POL-971) – Lutech S.p.A.

POL-971 (introduced in 2025), approved by the Group Chief Executive Officer of Lutech S.p.A. and applicable to all parents employed by Lutech S.p.A. (extended in 2026 to all Italian companies within the Lutech Group) – including biological, adoptive or foster parents – sets out the commitments and safeguards designed to provide practical support for balancing private life with professional commitments, whilst recognising parenthood as an opportunity to acquire new skills. Drafted in full compliance with Legislative Decree 151/2001 (Consolidated Law on Maternity and Paternity) and developed in line with the SA8000 Social Accountability Policy, the Human Rights Policy, the Code of Ethics and the Organisation and Management Model pursuant to Legislative Decree 231/2001, the policy is classified for internal use only and is accessible and available for consultation on the Company Intranet in the Compliance section.

The policy is structured around a set of concrete measures that go beyond the current regulatory framework, actively engaging the HR Department in providing comprehensive information to expectant parents regarding their rights and obligations: the introduction of an additional month of maternity leave, fully funded by Lutech and paid at 100 per cent, to be added to the five months required by law (to be taken under the 2+3, 1+4 or 0+5 options); the introduction of 10 additional working days' paternity leave, fully funded by the company and paid at 100 per cent, in addition to the 10 days required by law (to be taken within 5 months of the birth, including on a non-consecutive basis or whilst the mother is on maternity leave); a guarantee that these extensions do not affect annual leave or other contractual entitlements; and protection against discrimination to ensure a strong relationship between the employee and the company before, during and after leave. The policy sets out specific application procedures to be followed with the HR Department (within 30 days of the birth for mothers and via a dedicated planning form for fathers) and encourages the reporting of any breaches or inconsistencies in good faith through the confidential channels of the Lutech Group's Whistleblowing Platform.

2.2 Disclosure Requirement S1-2 – Processes for engaging the Group's own employees and employee representatives regarding impacts

The management of material issues and their material, actual or potential impacts on the Group's workforce requires ongoing dialogue with the Group's staff and their representatives, to understand needs, expectations and potential critical issues relating to working conditions and organisational wellbeing. In this context, the Lutech Group promotes the involvement of its workforce through various channels of information, consultation and dialogue, in line with its organisational model and the applicable regulatory framework.

As in previous years, the involvement of employees takes place through both formal and informal channels, which include dialogue with trade union representatives and tools for direct communication with staff. In particular, the Group encourages discussion on issues relating to working conditions, health and safety,

equal treatment, the protection of workers' rights, the confidentiality of personal data and, more generally, respect for human rights.

This involvement is achieved through various tools and processes, including:

- meetings between the company and trade union representatives;
- meetings and discussions between employees and trade union representatives;
- communications from trade union representatives to employees via digital channels and company noticeboards;
- company communications via traditional internal communication channels;
- periodic surveys, structured meetings and one-to-one interviews aimed at gathering feedback and perspectives from employees.
- All Hands: an internal company event for all Group employees, designed to present strategic priorities, organisational updates and key business results;

The approach adopted by the Group combines information-sharing, participatory and consultative methods, with the aim of fostering ongoing dialogue between the organisation and the workforce. In the context of trade union relations, employee representatives may also bring specific needs or issues of collective interest to the company's attention, including through formalised opportunities for discussion.

Responsibility for dialogue with trade union representatives lies with the Industrial Relations & Integration Effectiveness function, whilst the Chief People Officer oversees the processes for workforce engagement at an operational level. The Chief Compliance Officer (CCO), through the Corporate Social Responsibility department, also supports training and awareness-raising activities on ESG issues, facilitating the collection and consideration of internal stakeholders' perspectives to inform the development of the Group's organisational model and initiatives. The individuals involved possess specific expertise in the fields of industrial relations, trade union negotiation and the management of organisational dialogue, gained through previous experience and dedicated training programmes.

A significant role in workforce engagement is also played by the Workers' Safety Representatives (RLS), who act as points of contact for matters relating to health and safety at work. The RLS represent the entire workforce and serve as a channel for gathering reports, needs and observations relating to working conditions. To ensure greater responsiveness to specific organisational needs, some RLSs also develop greater specialisation in relation to business contexts or operational sites, whilst maintaining a cross-functional representative role.

Employees can contact the RLSs via dedicated channels, which are communicated during training sessions and made available through the Group's internal communication tools, including the company intranet. The involvement of the workforce in health and safety matters is also a key element in the implementation of certified management systems, including ISO 45001:2018, where applicable.

In accordance with the provisions of Legislative Decree 81/08 and the management systems adopted, the relevant company departments – including the HSE department, Management System, Corporate Social Responsibility and Workers' Safety Representatives – are involved in the various stages of health and safety management processes, including risk assessment, accident analysis and the definition of improvement actions and objectives.

As at the reporting date, the Group had not entered into any global framework agreements with workers' representatives regarding respect for human rights and its own workforce.

About assessing the effectiveness of mechanisms for workforce engagement and understanding the perspectives of any vulnerable groups, the Group has not yet adopted formalised and structured methodologies. These aspects represent an area of ongoing consolidation in the development of sustainability and workforce management processes.

2.3 Disclosure requirement S1-3 – Processes for addressing adverse impacts and channels enabling the Group's own employees to raise concerns

The Lutech Group promotes a working environment based on dialogue, active listening and the opportunity for employees to raise concerns, issues or potential adverse impacts related to their work experience. In this context, the Group employs tools and processes designed both to manage any adverse impacts on its own workforce and to gather reports and feedback from employees.

About reporting and remedial mechanisms, the Group has established dedicated channels enabling employees to report non-compliant behaviour, organisational issues, problems relating to working conditions or other situations likely to have a negative impact on the workforce. These tools are accessible to company staff and are managed in a manner that ensures confidentiality, the protection of whistleblowers and the prevention of retaliation.

In particular, the Group provides:

- internal communication tools, including online communities and the company intranet, which facilitate the sharing of information, discussion and the collection of feedback;
- direct channels of communication with the relevant company departments (e.g. HR, management, employee representatives and Health and Safety Representatives);
- a whistleblowing platform, which can also be used confidentially or anonymously where applicable, designed for reporting non-compliant behaviour, regulatory breaches or other relevant situations.

Throughout 2025, the Group continued to consolidate the use of tools for reporting and managing internal issues, emphasising the use of structured processes for handling, analysing and managing complaints and reports from the workforce.

Should any significant negative impacts – whether actual or potential – on its own workforce emerge, the Group adopts an approach geared towards continuous improvement, which involves the progressive identification of the underlying causes and the definition of any corrective or mitigating measures. In general, this approach is structured around the following stages:

- identification and analysis of issues, through reports received, monitoring of internal indicators, dialogue with the workforce and consultation with the relevant departments;
- definition of remedial or improvement actions, tailored to the nature of the identified impact and potentially relating, for example, to health and safety, organisational wellbeing, work-life balance, professional development or organisational processes;

- implementation and monitoring of the actions, including through discussions with the departments involved and periodic reviews aimed at assessing their effectiveness over time.

The Group's approach to reporting and complaints mechanisms is based on the principle of constructive dialogue and collaboration between the company and its employees. Issues raised are viewed as opportunities to improve organisational processes and the working environment, within a framework designed to ensure that concerns are heard, that procedures are followed correctly, and that different points of view are respected. The Group does not tolerate retaliatory or discriminatory behaviour towards individuals who make reports in good faith.

Depending on the nature and significance of the issues raised, the handling of reports involves the relevant company departments, including HR and Compliance, and, in cases of greater significance, the governing bodies. Employees are informed of the existence of these channels for dialogue and reporting during the onboarding process and via the usual internal communication channels.

The effectiveness of the complaint and reporting management processes is monitored through periodic reviews of the processes, analysis of the issues raised and evaluation of the actions implemented, including within the framework of the management systems adopted by the Group (such as ISO 45001:2018, SA8000 and UNI/PdR 125:2022, where applicable), which provide for structured processes of monitoring, auditing and continuous improvement.

As at the reporting date, the Group does not yet have formalised methodologies in place to systematically assess the workforce's level of awareness regarding the available channels, nor the perceived effectiveness of these channels by employees. An initial approach to this issue can be seen at Lutech S.p.A., where the survey linked to the UNI/PdR 125:2022 certification process includes, amongst other aspects investigated, the perception of clarity regarding reporting channels, although this does not currently constitute a dedicated or systematic monitoring tool. Similarly, the strengthening of structured tools for gathering the perspectives of any vulnerable groups represents an area of progressive consolidation in the evolution of the Group's workforce management model.

2.4 Disclosure requirement S1-4 – Actions taken to address significant impacts and approaches relevant to the mitigation of material risks and the pursuit of material opportunities in relation to its own workforce, as well as the effectiveness of such actions and approaches

In line with the integrated policy framework described in the previous paragraph, the Lutech Group has defined and consolidated a set of measures dedicated to the responsible management of its workforce, with the aim of ensuring safe and dignified working conditions, promoting the well-being of its people, valuing diversity and supporting the professional and personal development of its employees. The actions described below are organised around the main human resources management levers adopted by the Group and relate to the 2025 reporting year, distinguishing between ongoing actions, those currently under development and those planned for the next two years.

Action 1 – Maintenance and improvement of Management Systems (ISO 45001:2018 / SA8000)

Applicable to Lutech S.p.A. and Eustema S.p.A. (ISO 45001:2018 and SA8000) and Consulthink S.p.A. (ISO 45001:2018) and of an ongoing nature, this action systematically safeguards the Group's commitments regarding occupational health and safety and corporate social responsibility. It involves the maintenance and continuous improvement of two complementary management systems: the ISO 45001:2018 standard, which sets out the requirements for an occupational health and safety management system aimed at preventing accidents and occupational diseases, and the SA8000 standard, which certifies compliance with workers' rights in accordance with the ILO's international conventions – covering areas such as child labour, forced labour, health and safety, freedom of association, non-discrimination, disciplinary practices, working hours and remuneration.

Throughout 2025, the Group continued to update and improve its occupational health and safety processes, ensuring compulsory and voluntary training for workers, the regular monitoring of indicators relating to accidents and occupational diseases, and the active involvement of the relevant departments in the process of continuous improvement. Regulatory compliance monitoring covered the entire corporate scope, with particular attention paid to updating risk assessments and periodically reviewing the preventive and protective measures adopted.

Action 2 – Obtaining and maintaining UNI/PdR 125:2022 certification

Applicable to Lutech S.p.A., Eustema S.p.A. and Consulthink S.p.A. and of an ongoing nature, this action forms part of the Group's broader commitment to gender equality and the promotion of diversity in the workplace. UNI/PdR 125:2022 is the Italian reference standard for the certification of gender equality in organisations: it certifies the corporate management system through specific KPIs across six areas – culture and strategy, governance, HR processes, growth opportunities and the inclusion of women, gender pay equity, parental support and work-life balance.

Throughout 2025, activities to monitor and improve the gender equality management system continued, with the aim of maintaining the certifications obtained and progressively extending the scope of application.

The certification process was accompanied by the monitoring of the indicators set out in the standard, a review of internal policies, and the involvement of HR and management functions in the process of continuous improvement.

Action 3 – Confirmation and consolidation of remote working

Applicable across the entire Lutech Group and of an ongoing nature, this action forms part of the Group's corporate welfare programme and is designed to promote a healthy work-life balance, reduce staff turnover and minimise stress-related illness.

During 2025, the Group confirmed and consolidated the flexible working model, ensuring it was accessible to all eligible staff. The effectiveness of this action is monitored through the periodic assessment of staff turnover rates, requests for leave, indicators of stress-related work-related illness and productivity data.

Action 4 – Community Equity and Empowerment

Applicable across the entire Lutech Group and ongoing in nature, this initiative aims to combat isolation amongst the workforce, improve internal communication and increase staff engagement and a sense of belonging on issues of Diversity, Equity & Inclusion.

The Community is an internal social network open to all Group staff on a voluntary basis, accessible via VivaEngage (formerly Yammer). The aim is to engage the workforce by sharing culture, information, opinions and projects on inclusion, empowerment and gender equality as shared values. The Community is fuelled by topics, spontaneous posts and regular features – including *'Dictionary'* (a shared glossary on equality and empowerment), *'Culture Tips'* (suggestions on films, books and events related to equity) and *'Corporate News'* (Group initiatives and projects with an impact on social sustainability) – as well as periodic surveys on topics proposed by the community itself.

Throughout 2025, the Group continued and expanded the Community's activities, which now has 277 members and has attracted a total of 2,440 participants. Monitoring was carried out by tracking the participation rate in individual projects and the number of initiatives proposed, as indicators of the level of engagement and the sense of organisational connection perceived by staff.

Action 5 – Continuing Professional Development Programme and Lutech Learning Platform

Applicable to most of the Group's companies (Abex Italia S.r.l., Consulthink S.p.A., Know-How S.r.l., Kronotech S.r.l., Lutech CDM S.p.A., Lutech Digital Airport S.r.l., Lutech S.p.A., Lutech Sinergetica S.r.l., Pivotal Italia S.r.l., Stain S.r.l., Tenenigen S.r.l. and Lutech Balkans Sh.p.k.).

As an ongoing initiative, this programme is designed to maintain, develop and update the skills of the workforce, encompassing both cross-functional (core) and specialist (technical) competencies, thereby contributing to employees' professional development, improved productivity, talent retention and the Group's competitiveness.

During 2025, the Group continued and further structured its continuous professional development programmes, extending the Lutech Learning digital platform to all companies within its scope; this platform enables employees to access a wide range of training content and freely enrol in modules of interest.

Through this platform and the additional training programmes delivered by the Group, professional development courses were provided for all business functions, with the aim of strengthening technical, managerial and soft skills.

Progress on this initiative was monitored through the number of training hours delivered, the number of participants in training activities, and the indicators of skills development and training programme effectiveness recorded throughout the year.

Initiative 6 – "#includiamoCI!" Project – 3rd edition

Applicable across the entire Lutech Group and of an ongoing nature, this initiative forms part of the Group's Diversity, Equity & Inclusion programme and aims to improve internal communication, promote inclusive behaviour and increase staff engagement on issues of diversity and equity.

The project takes the form of a training programme comprising three webinars on the themes of empowerment, equity and gender discrimination – focusing in 2025 on *Parenting*, *Communication Skills* and *Artificial + Human Intelligence* – open to all Group staff on a voluntary basis and enriched by the presence of an Executive Sponsor for each session. Throughout 2025, the Group continued to roll out the project across all companies within its scope, fostering the development of an organisational culture based on respect and the celebration of differences. Progress was monitored by tracking the participation rate in the project's initiatives.

Action 7 – "#IAmRemarkable" Project

Applicable across the entire Lutech Group and ongoing in nature, this initiative aims to tackle low self-worth in the workplace by promoting employees' ability to promote themselves and build self-esteem.

Launched in 2016 at Google as part of its DE&I programmes and subsequently developed into an independent, globally promoted initiative, it is delivered within the Lutech Group by three certified facilitators. The project is structured as a Virtual Tour comprising a monthly session on Teams (max. 10 participants) and at least one in-person workshop per year (max. 20 participants), each lasting 90 minutes, on a voluntary basis. Throughout 2025, the Group continued and expanded the project. Monitoring was carried out by tracking the participation rate in the sessions as an indicator of staff response to empowerment initiatives.

Action 8 – 'The Inspirational Mix' project and relaunch of Community Next Gen

Applicable to the entire Lutech Group and of an ongoing nature, this action is specifically aimed at new recruits under 30 and is designed to reduce isolation amongst the younger workforce, encourage their engagement and improve retention rates in the early stages of their careers.

The Inspirational Mix is a quarterly event, an integral part of the onboarding programme for new recruits under 30. In February 2025, a special edition took place, involving 110 people under 30 in a listening session on Generation Z, from which three priority areas emerged: mental health and FOMO, the need for clarity on business processes, and an interest in artificial intelligence. This edition led to the creation of the Under-30 Ambassadors' Community on Viva Engage. The two subsequent events, in June and November 2025,

focused on the theme of AI – featuring visits to interactive installations at STEP – FuturAbility District. Progress was monitored by tracking the participation rate amongst the target group.

Action 9 – 'MIND THE GENDER GAP!' Project

Applicable across the entire Lutech Group and ongoing in nature, this initiative is aimed at secondary and lower secondary school pupils and seeks to raise awareness of STEM subjects and potential career paths regardless of gender, with a particular focus on encouraging girls to pursue careers in technology and science.

The format consists of 90–120-minute workshops combining presentations, experiential games, small-group work and multimedia content, offered free of charge to schools. In 2025, in its third year, the project reached around 170 secondary school pupils in Bari (100 at the Liceo and 60 at the Istituto Tecnico) and is now spreading across the whole country. Progress was monitored through the number of schools reached and the number of participants involved in the sessions.

Action 10 – "Ask yourself how you're doing" (Wellbeing Initiative)

Applicable across the entire Lutech Group and ongoing in nature, this initiative aims to support employees' psychological wellbeing through a professional, confidential and accessible psychotherapy and coaching service.

In 2023, the Group entered a partnership with Serenis, an online medical centre specialising in psychotherapy and coaching, with which a customised Lutech/Serenis landing page was created. Through this page, every employee can access content and advice on psychological wellbeing, engage in journaling, book an initial introductory consultation and take advantage of four free sessions offered by the company, with the option to continue at a reduced rate. In May 2025, to mark Mental Health Month, the initiative was relaunched with leaflets distributed across all the Group's offices. The theme of mental health and FOMO, which emerged as a priority in the 2025 edition of The Inspirational Mix, was explored in greater depth through dedicated posts and content curated by the Next Gen Community Ambassadors.

Action 11 – WeMeetWeCare

Applicable across the entire Lutech Group, this initiative stems from listening to the workforce through the 2024 Great Place to Work survey, which highlighted the need for more opportunities to meet and socialise. The initiative aims to promote engagement and wellbeing within the company, strengthening the sense of community amongst colleagues across different sites whilst generating a positive impact on the local community.

The project consists of a series of fun, charity-focused events organised at a local level, made possible by the network of Site Ambassadors present at all sites – internal representatives who, together with the People Engagement team, identify local charitable organisations and co-create events that encourage participation. In 2025, WeMeetWeCare supported 17 organisations through 18 events, with the participation of over 1,300 people from the Lutech Group. Progress was monitored through the number of events held, organisations involved and participating employees.

Action 12 – Charity Marathons (Lutech Running Team Community)

Applicable to the entire Lutech Group and ongoing in nature, this initiative is promoted by the Lutech Running Team Community and aims to strengthen team spirit, promote healthy lifestyles and generate a positive social impact in the local area.

In 2025, the Group took part in charity races – including the Rome Marathon and the Milan Marathon – with 12 runners involved. A fundraising campaign was also organised in support of AIRC, raising €5,743 by the end of the year, a sum which was matched by the company. On 28 February 2025, an awareness-raising webinar on prevention and healthy lifestyles was held, attended by around 600 Group employees. Progress was monitored through the number of events and participants, and the amount of funds raised.

Action 13 – "Ingenio al Femminile" 2025 edition

Applicable across the entire Lutech Group, this external initiative aims to promote and support female excellence in STEM degree programmes, contributing to the advancement of Goal 5 – Gender Equality – of the UN 2030 Agenda.

The Lutech Group participates in the "Ingenio al Femminile" Degree Thesis Award, organised by the National Council of Engineers in collaboration with Cesop HR Consulting Company. The theme of the fifth edition (2025) was 'Artificial Intelligence for the New Challenges of 2050'. Participation in the project included the creation of single-brand posts and short videos by the Talent Acquisition team, with the aim of highlighting the Group's profile as an inclusive and attractive organisation for female talent in the technical and scientific fields.

Action 14 – Virtual Job Meeting Inclusion Day

Applicable across the entire Lutech Group, this external initiative aims to promote the inclusion in the workplace of people with disabilities and those belonging to protected categories, by communicating the Group's inclusive culture and broadening the pool of suitable candidates.

On 14 March 2025, the Group took part in the Virtual Edition of Inclusion Job Day, a fully online event enabling companies to meet candidates with disabilities and from protected categories (including those covered by Article 18 of Law 68/99) via a web platform compliant with WCAG 2.0 Level AA guidelines. Progress was monitored based on the number of interactions with target candidates and the applications received during the event.

Action 15 – STEM Girls Digital Recruiting Week

Applicable across the entire Lutech Group, this external initiative aims to attract young female talent in the STEM fields, helping to reduce the gender gap in technological and scientific professions.

On 11 December 2025, the Group took part in the STEM Girls Digital Recruiting Week, a 100 per cent online event organised by Cesop, which connects innovative companies with female undergraduates and recent graduates in STEM subjects. Taking part in the event enabled the Group to showcase its culture and values, meet suitable candidates and interact virtually with individuals whose profiles matched its recruitment needs.

Initiative 16 – Digital Diversity Week (DRW Girls STEM)

Applicable to the entire Lutech Group, this external initiative aims to connect the Group with young female talent in STEM sectors, reinforcing the company's image as an inclusive and innovative organisation.

In May 2025, the Group took part in Digital Diversity Week, organised by Innovation Manager Hub, a 100% digital event that enables companies to set up a virtual stand, publish job vacancies and arrange video interviews with suitable candidates. Progress was monitored through the number of interactions and applications received during the event.

Action 17 – Continuation of the BUDDY Programme

Applicable across the entire Lutech Group and ongoing in nature, this initiative forms part of the company's onboarding process and aims to support the integration of new recruits during their first few weeks with the company, reducing initial disorientation and fostering the development of meaningful relationships from the moment they join.

A Buddy is an internal mentor who supports new colleagues as they take their first steps in the company, guiding them through the key stages and conveying the Group's organisational culture. In 2025, the programme was maintained and consolidated, with active support for the Buddy Community and a focus on ensuring the quality of the onboarding experience. Monitoring was carried out by tracking the number of new recruits supported and the level of satisfaction recorded during the initial stages of the process.

Action 18 – Parenting Programme

Introduced at Lutech S.p.A. in 2025 and currently being rolled out across the entire Lutech Group in 2026, this initiative aims to support employees throughout the parenting journey – from pregnancy to returning from parental leave – by minimising the impact on their careers and encouraging them to remain with the company, particularly women.

The programme includes support measures, communication initiatives and flexible working arrangements designed for expectant parents and new parents, with the aim of making parenthood a sustainable experience within their career path. The initiative is scheduled to be extended to all companies within the Group's scope in 2026. Progress was monitored through the number of employees involved and post-leave retention indicators.

Action 19 – Great Place to Work 2025®

Applicable to the entire Lutech Group and of an ongoing nature, this action addresses the objective of measuring and improving the organisational climate, gathering feedback from the workforce and strengthening the Group's positioning as an attractive employer that cares for the wellbeing of its people.

During 2025, the Group joined the Great Place to Work® certification programme for its offices in Italy, Spain and Albania, undergoing the survey and assessment process set out by the international methodology. The initiative involved a total of over 4,500 employees across the three countries, recording high levels of participation (92 per cent in Italy, 89 per cent in Spain and 91 per cent in Albania), confirming the effectiveness of the feedback tools adopted by the Group.

The survey results highlighted the key strengths perceived by the workforce, including the quality of relationships with managers, the inclusive and collaborative working environment, and organisational flexibility, whilst also identifying specific areas for improvement relating to career development pathways, systems for recognising and valuing staff, employee welfare, internal communication, and management's responsiveness to the operational needs of the organisations.

The findings from the survey form a central element of the process of continuous improvement in human resources management policies and guide the definition of subsequent initiatives in the areas of professional development, engagement and organisational wellbeing. Progress was monitored through Trust Index® scores, the results of the Culture Audit™, survey participation rates and the periodic analysis of the identified areas of strength and improvement.

Action 20 – Solidarity and Local Impact Initiatives

Applicable to the entire Lutech Group and of an ongoing nature, this action brings together solidarity initiatives spontaneously promoted by employees and corporate departments, with the aim of generating a positive impact on the local community and strengthening a shared sense of social responsibility.

During 2025, the Group provided a platform and visibility for initiatives open to free and voluntary participation: at the Naples offices, colleagues took part in the 'Uovo Sospeso' initiative, voluntarily donating Easter sweets distributed by the Italian Red Cross (Somma Vesuviana branch) to local families in need; at the Cinisello and Milan offices, meanwhile, charity stalls run by volunteers from Opera Cardinal Ferrari for the Canovalandia network were hosted. Monitoring was carried out based on the number of initiatives carried out and the number of employees involved.

3. Metrics and objectives

3.1 Disclosure requirement S1-5 – Objectives relating to the management of significant adverse impacts, the enhancement of positive impacts, and the management of significant risks and opportunities

Objective – Zero non-conformities in certified management systems (ISO 45001:2018, SA8000, UNI/PdR 125:2022)

In the social sphere, the Lutech Group is currently pursuing an annual objective aimed at maintaining the absence of non-conformities in its certified management systems, with particular reference to ISO 45001:2018 (Occupational Health and Safety), SA8000 and UNI/PdR 125:2022.

During 2025, no instances of non-compliance were recorded in the management systems of Lutech S.p.A., within their respective scopes of application.

In the coming years, the Group will assess the opportunity to further expand and structure its ESG objectives, as part of the development of a formalised sustainability strategy with specific targets.

3.2 Disclosure requirement S1-6 – Characteristics of the company' 's employees

Set out below are the main characteristics of the Lutech Group's workforce as at 31 December 2025, compared with the previous financial year, in accordance with the requirements of ESRS S1-6.

As at 31 December 2025, the Group employed a total of 5,597 staff, an increase of 12.4 per cent compared with the 4,980 in 2024 (+617 staff). The gender breakdown of the workforce remains broadly stable: men account for 73.4 per cent of the total (4,109 employees), whilst women account for 26.6 per cent (1,488 employees). Compared with 2024, there has been an increase in both the male workforce (+435 employees; +11.8%) and the female workforce (+183 employees; +14.0%), with a slight improvement in the proportion of female employees within the total workforce.

In 2025, there were no employees classified in the gender categories 'Other' or 'Not stated'.

About contract types, the Group continues to be characterised by a predominantly stable workforce: 5,416 employees (96.8 per cent) are employed on permanent contracts, whilst 181 employees (3.2 per cent) are on fixed-term contracts. Compared with 2024, the number of permanent employees increased by 499 (+10.1%), whilst the number of fixed-term contracts rose from 63 to 181, reflecting the growth in the workforce and the need to recruit new staff.

From a geographical perspective, most employees are on contracts relating to Italy, totalling 5,184 employees (5,010 on permanent contracts and 174 on fixed-term contracts), corresponding to approximately 92.6 per cent of the total workforce. There are, in contrast, 413 employees on contracts based in other countries (406 on permanent contracts and 7 on fixed-term contracts), a significant increase compared with the 158 in 2024, mainly due to the expansion of the Group's international operations.

Characteristics of Lutech Group employees		
Gender	**2025**	**2024**
Male	4,109	3,674
Women	1,488	1,305
Other	0	0
Not stated	0	1
Total	5,597	4,980

Employees by contract type, gender and geographical area 2025					
	Men	**Women**	**Other**	**Not stated**	**Total**
Total number of employees	4,109	1,488	0	0	5,597
Number of permanent employees					
of whom on contracts relating to Italy	3,704	1,306	0	0	5,010
of which under contracts relating to foreign countries	264	142	0	0	406
Number of fixed-term employees					
of whom on contracts relating to Italy	137	37	0	0	174
of which under contracts relating to foreign countries	4	3	0	0	7
Number of full-time employees	4,080	1,352	-	-	5,432
Number of part-time employees	29	136	-	-	165

Employees by contract type, gender and geographical area 2024					
	Men	**Women**	**Other**	**Not stated**	**Total**
Total number of employees	3,674	1,305	0	1	4,980
Number of permanent employees	3,632	1,284	0	1	4,917
of which under contracts relating to Italy	3,535	1,224	0	0	4,759
of which under contracts relating to foreign countries	97	60	0	1	158
Number of employees on fixed-term contracts	42	21	0	0	63
of which under contracts relating to Italy	37	15	0	0	52
of which under contracts relating to foreign countries	5	6	0	0	11
Number of full-time employees	3,638	1,175	-	-	4,813
Number of part-time employees	37	130	-	-	167

Lutech Group staff turnover			
Employees who have left the group	**Unit of measurement**	**2025**	**2024**
Number of employees who have left the group	N	858	571
Employee turnover rate	%	15.69	11.00

Lutech Group staff turnover rate			
Employees who joined the group	**Unit of**	**2025**	**2024**

	measurement		
Number of employees who joined the Group	N	1,073	644
Staff turnover rate	%	19.62	13.00

During 2025, the Lutech Group recorded 858 departures, an increase compared with the 571 in 2024 (+50.3%). Consequently, the staff turnover rate rose from 11.0% to 15.69%. This increase is consistent with the expansion of the workforce and the Group's scope during the financial year, which has led to a higher number of staff joining and leaving the organisation.

At the same time, the Group recorded 1,073 new hires, compared with 644 in the previous year (+66.6%), with a turnover rate of 19.62%, up from 13.0% in 2024. The high number of new hires reflects the Group's growth trajectory, driven both by business development and by operations to expand the scope of the Group.

Overall, the net balance between new hires and departures remains positive (+215 employees), indicating a net increase in the workforce during 2025. Although both the turnover rate and the staff turnover rate are up on the previous financial year, the number of new hires continues to exceed the number of departures, confirming the strengthening of the Group's workforce.

The composition of the workforce also confirms a clear predominance of full-time employment contracts. As of 31 December 2025, 5,432 employees (97.1 per cent of the workforce) were employed on full-time contracts, whilst 165 employees (2.9 per cent) were employed on part-time contracts. Part-time employment mainly concerns female staff: 136 women (9.1 per cent of female employees) compared with 29 men (0.7 per cent of male employees). By contrast, the full-time workforce comprises 4,080 men and 1,352 women, confirming that this type of contract is by far the most common form of employment within the Group.

3.3 Disclosure requirement S1-7 – Characteristics of non-employees within the company's own workforce

As of 31 December 2025, the Lutech Group employed 1,767 non-permanent workers, down from the 1,821 non-permanent workers recorded in 2024 (-3.0%)

The main component of non-permanent staff consists of personnel provided by companies primarily engaged in recruitment, selection and the supply of staff, totalling 1,675 in 2025 (compared with 1,648 in 2024), accounting for approximately 95 per cent of the total number of non-permanent staff. These staff support the Group in carrying out its project and operational activities, contributing specialist expertise and technical skills that complement those available in-house.

The Group also makes use, to a more limited extent, of self-employed workers, numbering 92 in 2025 (compared with 112 in 2024), who are generally engaged to meet temporary needs, for highly specialised activities or for specific project initiatives of limited duration.

The number of non-permanent staff is expressed in terms of Full-Time Equivalents (FTE). The FTE represents the ratio between the time worked by the employee during the reference period and the standard working hours expected of a full-time employee. The figure therefore considers the actual contribution of non-permanent staff to the Group's activities, regardless of the type of contract in place.

For reporting purposes, the number of non-employee workers is calculated as the average figure for the reference period, to provide a more comprehensive picture of any changes that have occurred during the financial year.

The slight reduction in the total number of non-permanent staff compared with 2024 is mainly attributable to the decrease in the use of self-employed workers, partially offset by the increase in staff provided by specialist staffing agencies. This trend reflects the flexible management of the Group's operational needs, which relies on such resources primarily to temporarily supplement internal expertise, support specific projects and ensure adequate levels of operational capacity in line with the evolution of the activities carried out.

The figures reported are based on information available in the Group's management systems and provided by the relevant corporate departments. No estimates have been made; therefore, the information disclosed refers to actual final figures.

Non-employees of the Lutech Group		
Non-employee workers	**2025**	**2024**
Total number of non-employee workers	1,767	1,821
Self-employed workers	92	112
Workers supplied by firms primarily engaged in the recruitment, selection and supply of staff	1,675	1,648

3.4 Disclosure requirement S1-8 – Coverage by collective bargaining and social dialogue

The Lutech Group recognises the role of collective bargaining and social dialogue as fundamental tools for the protection of workers' rights and the promotion of fair and transparent industrial relations.

In 2025, all of the Group's Italian employees, totalling 5,184, were covered by national collective labour agreements (CCNL), with a coverage rate of 100 per cent, in line with the figures recorded in 2024 (4,619 employees, 100 per cent coverage).

With regard to employee representation in the workplace, in 2025, 5,059 Italian employees out of a total of 5,184 were represented by employee representatives, equivalent to 98 per cent of the workforce, an increase compared with the 93 per cent recorded in 2024 (4,283 employees represented out of a total of 4,619).

The figure relating to the percentage of employees covered by employee representatives was determined, for both reference financial years (2025 and 2024), using a calculation method based on identifying all trade union representatives present at the Group's various sites. Specifically, based on the site to which each representative belongs and the applicable collective agreement, the entire workforce at the relevant site was considered to be covered by the relevant trade union representation.

2025			
	Collective bargaining coverage		Social dialogue
Coverage rate	Employees – EEA (for countries with > 50 employees, account for > 10 % of	Employees – non-EEA (estimate for regions with > 50 employees representing > 10 % of total	Workplace representation (EEA only) (for countries with > 50 employees representing >

	total workforce	employees)	10 per cent of total employees)
0–19 per cent			
20–39%			
40–59%			
60–79%			
80–100%	X		X

2024			
	Collective bargaining coverage		Social dialogue
Coverage rate	Employees – EEA (for countries with > 50 employees, account for > 10 % of total workforce	Employees – non-EEA (estimate for regions with > 50 employees representing > 10 % of total employees)	Workplace representation (EEA only) (for countries with more than 50 employees representing more than 10 per cent of the total workforce)
0–19%			
20–39%			
40–59%			
60–79%			
80–100%	X		X

3.5 Disclosure requirement S1-9 – Diversity metrics ( )

In 2025, the Lutech Group had a total of 5,597 employees, of whom 971 were men and 311 were women aged under 30, 2,117 were men and 859 were women aged 30–50, and 1,021 were men and 318 were women aged over 50.

In 2024, the workforce totalled 4,980 employees, broken down as follows: 895 men and 260 women aged under 30, 1,857 men and 758 women aged 30–50, and 922 men and 288 women aged over 50. There were no individuals in the 'Other' category across the three age groups.

With regard to the breakdown by **professional category**, in 2025 the **'Managers'** category comprised, in the 30–50 age group, 89 per cent men and 11 per cent women, whilst in the over-50 age group the proportion of men was 87 per cent and that of women 13 per cent; there were no managers in the under-30 age group.

In 2024, the composition of the **'Managers'** category was essentially the same: in the 30–50 age group, women accounted for 8 per cent and men for 92 per cent, whilst in the over-50s age group, women accounted for 15 per cent and men for 86 per cent. Again, in 2024, there were no managers in the under-30 age group.

In the **middle management** category, the proportion of women stood at 23 per cent in the 30–50 age group and 17 per cent in the over-50 age group in 2025. In 2024, it stood at 23 per cent in the 30–50 age group and 17 per cent in the over-50s. In the under-30 age group, in 2024, women accounted for 11 per cent of the category, whilst men accounted for 89 per cent.

About the **'white-collar workers'** category, which represents the largest segment of the workforce, the proportion of women in 2025 stands at 25 per cent in the under-30 age group, 30 per cent in the 30–50 age group and 29 per cent in the over-50 age group. In 2024, the corresponding percentages were 23 per cent, 31 per cent and 29 per cent.

As regards the **Manual Workers** category, the workforce was predominantly male in both financial years. In 2024, there were no women in the under-30 and 30–50 age groups, whilst in the over-50 age group the distribution was **equal**, with one man and one woman.

About **apprentices**, in 2024 this category was present exclusively in the under-30 age group and comprised 100 men and 19 women, accounting for 84 per cent and 16 per cent respectively of the total for this category in that age group. In 2024, however, there were no individuals in the work experience category.

2025									
Distribution of employees by age	< 30			30–50			>50		
	Men	Women	Other	Men	Women	Other	Men	Women	Other
Managers	0	0	0	32	4	0	123	19	0
Paintings	1	0	0	244	72	0	320	65	0
White-collar workers	771	263	0	1,813	777	0	564	231	0
Workers	1	0	0	19	0	0	3	1	0
Directors	0	0	0	0	0	0	10	2	0
Apprentices	117	30	0	6	2	0	0	0	0
Work placement	81	18	0	3	4	0	1	0	0
Total	971	311	0	2,117	859	0	1,021	318	0
% of senior managers	0	0	0	89	11	0	87	13	0
% Middle management	100	0	0	77	23	0	83	17	0
% of employees	75	25	0	70	30	0	71	29	0
% Manual workers	100	0	0	100	0	0	75	25	0
% Directors	0	0	0	0	0	0	83	17	0
% Apprentices	80	20	0	75	25	0	0	0	0
% Internship	82	18	0	43	57	0	100	0	0

2024									
Breakdown of employees by age	< 30			30–50			>50		
	Men	Women	Other	Men	Women	Other	Men	Women	Other
Managers	0	0	0	45	4	0	124	21	0
Paintings	8	1	0	251	73	0	304	60	0
White-collar workers	785	240	0	1,541	681	0	493	206	0
Workers	2	0	0	20	0	0	1	1	0
Apprentices	100	19	0	0	0	0	0	0	0
Total	895	260	0	1,857	758	0	922	288	0
% of senior managers	0	0	0	2.4	0.5	0	13.4	7.3	0
% Middle management	0.9	0.4	0	13.5	9.6	0	33	20.8	0
% of employees	87.7	92.3	0	83	89.8	0	53.5	71.5	0
% Manual workers	0.2	0	0	1.1	0	0	0.1	0.3	0
% Directors	0	0	0	0	0	0	0	0	0
% Apprentices	11.2	7.3	0	0	0	0	0	0	0

Regarding senior management, in 2025 the Lutech Group included within this scope the Chief Executive Officer of the parent company, its senior leadership (members of the Leadership Team and the Heads of Industry/Territory) and the Chief Executive Officers of the Group's companies. Based on this definition, senior management comprises 31 people, of whom 26 are men (84 per cent) and 5 are women (16 per cent). In 2024, the scope had been determined by considering all roles contractually equivalent to that of a senior manager and comprised 171 people, of whom 150 were men (88 per cent) and 21 were women (12 per cent). Given the different methodology adopted in the two financial years, the trend for this KPI can be assessed from 2026 onwards.

	2025					2024				
Number of senior management members:	**Men**	**Women**	**Other**	**Not disclosed**	**Total**	**Men**	**Women**	**Other**	**Not disclosed**	**Total**
Senior Management (headcount)	26.00	5.00	0.00	0.00	31	150.00	21.00	0.00	0.00	171
Senior Management (percentage)	84%	16%	0%	0%	100%	88%	12%	0%	0%	100%

3.6 Disclosure requirement S1-10 – Fair wages

During the two-year period 2024–2025, all employees received an adequate wage, in line with the principles set out in Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union. Furthermore, remuneration was in line with the minimum levels set out in the national collective agreements applied by the Group.

During the two-year period 2024–2025, all Group employees received adequate remuneration in relation to the applicable benchmarks in each country in which the Group operates.

For staff employed in European Union/EEA Member States, the benchmark is based on the principles set out in Directive (EU) 2022/2041 on adequate minimum wages, as well as the minimum levels provided for in the applicable national collective agreements.

For staff employed in non-EU countries, including those working in Albania, Switzerland and China, the benchmark is the minimum wage established by national legislation or by locally applicable collective bargaining agreements.

3.7 Disclosure Requirement S1-11 – Social l Protection

The Lutech Group guarantees all its employees an adequate level of social protection, in accordance with the provisions of the applicable National Collective Labour Agreements (CCNL) and current legislation on social security and welfare.

In 2025, all the Group's employees, totalling 5,597, were covered by social protection, with a coverage rate of 100 per cent. The same level of coverage was also recorded in the 2024 financial year, confirming the full continuity of the safeguards offered to workers over the two-year period in question.

All contracts applied by the Group provide social protection safeguards, including the wage supplementation scheme in the event of a sudden decline in production and unemployment benefit in the event of redundancy or cessation of business. The national collective labour agreements (CCNL) applied also

provide for the social security and pension cover s required by law, by virtue of which Lutech Group employees are covered by social protection in respect of:

- sickness;
- unemployment;
- accidents at work and acquired disability;
- parental leave;
- retirement.

3.8 Disclosure Requirement S1-12 – People with disabilities

The Lutech Group promotes an inclusive working environment, guaranteeing equal opportunities for access and professional development regardless of individual characteristics. Attention is paid to the inclusion of people with disabilities in the workplace, facilitating their placement in roles consistent with their skills and ensuring, where necessary, appropriate forms of support.

The Group operates in compliance with current legislation on targeted recruitment, particularly Law No. 68/1999, for Italian companies subject to the relevant obligations.

In 2025, the Group had 176 employees with disabilities, a slight increase compared with the 174 in 2024 (+1.1 per cent), due to changes in the workforce and the consolidation of the scope of the Group during the financial year.

The breakdown by gender shows a predominance of men (112 people in 2025), whilst there were 64 female employees with disabilities, up from 62 in 2024; the number of men remained unchanged.

People with disabilities account for approximately 3.1 per cent of the total workforce (3.5 per cent in 2024): the decrease is due to the increase in the Group's overall workforce, which reduces the relative proportion despite an absolute increase.

Among non-permanent staff, in 2025 the Group recorded 5 people with disabilities, mainly comprising external resources supporting operational and project activities.

In 2025, as in 2024, there were no legal restrictions on the collection of information on disability within the reporting scope. The data are collected via the Group's HR information systems and the relevant departments of the companies included in the reporting scope, and are based on information available, without the use of estimates.

To support the inclusion in the workplace of people with disabilities and protected categories, the Group has established structured partnerships with social cooperatives specialising in the employment of disadvantaged people.

Since 1 July 2021 (under a contract running until 30 June 2027, renewed annually), a partnership has been in place for the outsourcing of document digitisation and administrative support activities, including the acquisition and indexing of documents, data entry and archive reorganisation, with the option to activate additional services in the event of operational peaks. The service is managed by a dedicated team of four operational staff members, one of whom acts as the on-site manager, supported by an external mentor who

supervises the integration into the workplace, manages any critical issues and ensures continuous learning tailored to the tasks carried out. The partnership also forms part of the measures provided for under Article 14 of Law No. 68 of 12 March 1999, concerning the right to work for people with disabilities, contributing to the Group's objectives of compliance, operational efficiency and ESG impact.

Since 2018, a second collaboration has been in place with a social cooperative, which has introduced two operational roles on renewable annual contracts: a back-office role, active since 28 December 2018, dedicated to document collection, verification and archiving, as well as the management of personal records and administrative procedures; and a receptionist/back-office role, in place since 27 March 2023, dedicated to access management, communication with internal contacts, and logistical and reception support.

In parallel, since 2022 the Group has developed an inclusion model dedicated to neurodivergent talent in the ICT sector, structured in five phases – context analysis, skills assessment, preparatory training, supported integration and team engagement – with the aim of building sustainable, tailor-made pathways. The model provides for ongoing individual coaching and regular reviews to monitor the integration process. Between 2022 and 2026, the programme has led to four professional placements in the ICT sector (two in 2022, one in 2025, one in 2026), with personalised training provided in two out of the four cases.

3.9 Disclosure Requirement S1-13 – Training and development metrics for skills

The Lutech Group promotes the continuous development of its workforce's skills through training programmes aimed at strengthening technical, specialist and soft skills, as well as providing updates on compliance and health and safety at work. These initiatives are integrated into performance management and professional development processes, with the aim of supporting staff growth and the evolution of the skills required by the business.

In 2025, 4,714 employees took part in periodic performance and career development reviews, compared with 4,223 in 2024, representing an increase of 491 people (+11.6%). This growth applies to both female employees, whose numbers rose from 1,124 to 1,253 (+11.5%), and male employees, whose numbers increased from 3,099 to 3,461 (+11.7%). This trend reflects the gradual expansion of the workforce involved in performance management processes and confirms the Group's commitment to ensuring structured opportunities for dialogue and professional development.

About training activities, in 2025 employees received an average of 12.32 hours of training in soft and hard skills for men and 12.16 hours for women. The substantial parity in these figures across genders highlights balanced access to skills development opportunities.

As regards health and safety training in accordance with Legislative Decree 81/2008, the average number of hours provided was 7.38 hours for men and 7.33 hours for women, confirming a consistent level of training coverage in this area as well.

Compliance training averaged 5.10 hours per employee; it should be noted that this figure is available only at a consolidated level and is not broken down by gender. In the next reporting cycle, the Lutech Group will endeavour to provide this data as required by the regulations.

As 2025 marks the first reporting year for metrics relating to average training hours in accordance with the requirements of ESRS S1-13, no comparative data for 2024 is available for this indicator. Comparisons over time are therefore limited to information relating to participation in periodic performance and career development reviews.

Number of employees who participated in periodic performance and career development reviews, by gender	2025	2024
Women	1,253	1,124
Men	3,461	3,099
Other	0	0
Not stated	0	0
Total	4,714	4,223

2,025				
Average number of training hours	**Men**	**Women**	**Other**	**Not stated**
Average hours by gender for soft/hard skills training	12.32	12.16	0	0
Average hours of compliance training	5.10*	0	0	0
Average hours of HSE training under Legislative Decree 81/08	7.38	7.33	0	0

3.10 Disclosure requirement S1-14 – Health and safety metrics

The Lutech Group regards the protection of its employees' health and safety as a management priority, adopting management systems that comply with applicable legislation, including Legislative Decree 81/2008, as well as, where relevant, internationally recognised standards and guidelines. In 2025, 100 per cent of the Group's workforce was covered by a health and safety management system based on regulatory requirements and/or recognised standards. The same level of coverage was also ensured in 2024.

In 2025, the Group recorded 9 reportable workplace accidents, down from the 10 recorded in 2024 (-10%). Consequently, the workplace accident rate fell from 1.56 in 2024 to 1.09 in 2025 (-30.1 per cent), highlighting an improvement in health and safety performance. In both financial years, there were no fatalities attributable to work-related accidents or illnesses, nor were any cases of occupational diseases recorded.

In 2025, the total number of working days lost due to workplace accidents stood at 217, compared with 426 recorded in 2024, representing a reduction of 49.1 per cent. In both financial years, there were no working days lost attributable to occupational diseases, nor were there any deaths resulting from work-related accidents or illnesses.

	2025	2024
Number of deaths due to work-related injuries and illnesses	0	0
Number of recordable workplace accidents	9	10
Workplace accident rate[8]	1.09	1.56
Number of cases relating to work-related illnesses	0	0

3.11 Disclosure requirement S1-15 – Metrics on work- -life balance

The Lutech Group recognises the right of all employees, regardless of gender, to take leave for family reasons, in accordance with the provisions of applicable national legislation and National Collective Labour Agreements and similar agreements.

In 2025, 100 per cent of the Group's employees were entitled to take family leave: specifically, 4,109 men and 1,488 women were eligible, out of a total workforce of 4,109 men and 1,488 women. This same entitlement

8 The workplace accident rate, in line with ESRS standards, is calculated by dividing the number of workplace accidents by the total number of hours worked and multiplying by 1,000,000.

was also granted to 100 per cent of the workforce in 2024, comprising 3,674 men, 1,305 women and 1 employee whose gender was not disclosed.

Regarding the actual take-up of this entitlement, in 2025, 137 male employees and 173 female employees took family leave, representing 3.33 per cent and 11.63 per cent, respectively, of the relevant eligible workforce. In 2024, 202 male employees and 180 female employees took family leave, representing 4.1 per cent and 3.6 per cent, respectively, of the relevant eligible workforce.

The figures confirm that the right to family leave was guaranteed to the entire workforce of the Group in both financial years under review, with the take-up rate for female employees remaining higher than that for male employees in 2025.

		2025				2024			
Employees who took leave for family reasons	**U.M.**	**Men**	**Women**	**Other**	**Not disclosed**	**Men**	**Women**	**Other**	**Not disclosed**
Employees entitled to take leave for family reasons	No.	4,109	1,488	0	0	3,674	1,305	0	1
Employees who have taken leave for family reasons	No.	137	173	0	0	202	180	0	0
Total number of employees	No.	4,109	1,488	0	0	3,674	1,305	0	1
Percentage of employees entitled to take leave for family reasons	%	100	100	0	0	100	100	0	100
Percentage of employees who have taken leave for family reasons	%	3.33	11.63	0	0	4.1	3.6	0	0

3.12 Disclosure requirement S1-16 – Remuneration metrics (pay gap and total remuneration)

The Lutech Group monitors its remuneration metrics to promote principles of internal equity and ensure a transparent approach to the management of remuneration policies. As part of its reporting in accordance with ESRS S1-16, the Group provides information on the gender pay gap and total remuneration, as well as the ratio between the total annual remuneration of the highest-paid individual and the median total annual remuneration of employees.

In 2025, the overall gender pay gap, calculated by considering both basic pay and variable or supplementary components, stood at 34.51 per cent, compared with 23.60 per cent recorded in 2024, showing a slight increase of 10.91 percentage points. This indicator reflects the difference between the average gross hourly pay received by men and that received by women within the Group.

More specifically, in 2025 the average gross hourly pay for men was €23.44, up from €21.48 in 2024 (+9.1 per cent), whilst the average gross hourly pay for women fell slightly from €16.41 in 2024 to €15.35 in 2025 (-6.5 per cent).

About the total annual remuneration ratio, in 2025 the total annual remuneration of the highest-paid individual in the Group was €800,000.12, a slight decrease from €808,005.12 in 2024 (-1.0%). The median total annual remuneration of employees, calculated excluding the highest-paid individual, fell from €43,211.80 in 2024 to €36,557.33 in 2025 (-15.4%).

Gender pay gap	2024	2025
	Total (Basic salary and variable or supplementary components)	Total (Basic salary and variable or supplementary components)
Gender pay gap	23.60	34.51
Average gross hourly pay – Men	*21.48*	*23.44*
Average gross hourly pay – Women	*16.41*	*15.35*

As a result of these trends, the total annual pay ratio (the ratio of the highest-paid individual's total annual pay to the median total annual pay of employees) rose from 18.70 in 2024 to 21.88 in 2025, marking a slight increase of 3.18 points. This change is mainly attributable to the reduction in the median pay of the workforce relative to the level of the maximum pay.

Total remuneration ratio	2024	2025
Total annual remuneration ratio	*18.70*	*21.88*

3.13 Disclosure requirement S1-17 – Incidents, complaints and significant impacts relating t n and human rights

The Lutech Group promotes an inclusive working environment, based on the principles of mutual respect, equal opportunities and the protection of fundamental human rights. These principles are formalised through the Code of Ethics, the company's policies on social responsibility and diversity and inclusion, as well as through specific reporting channels designed to ensure that employees and stakeholders can report any behaviour inconsistent with the Group's values.

During 2025, a total of 6 reports were received via the whistleblowing channel relating to potential issues linked to discriminatory or non-compliant behaviour. Of these, 2 reports were found to be partially associated with possible cases of discrimination and were handled in accordance with the process set out in the SA8000 social responsibility management system, under the coordination of the Social Performance Team.

The remaining four reports were assessed as inadmissible or irrelevant, as they did not fall within the scope of the reporting channel used or relate to the issues covered by the ESRS S1-17 reporting requirements.

In 2025, there were no recorded cases of convictions, sanctions or serious incidents relating to human rights within the workforce, nor were there any incidents that had a significant impact on workers' fundamental rights. The Group therefore continues to monitor any risks related to discrimination, harassment and human rights violations through structured processes for managing reports and initiatives aimed at strengthening a corporate culture based on inclusion, fairness and respect for people.

ESRS S2 – WORKERS IN THE VALUE CHAIN



List of references

Disclosure requirement	Reference
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model	General Information Section ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model

1. Strategy

1.1 Disclosure requirement relating to ESRS 2 SBM-2 – Stakeholders' interests and views

Workers within the Lutech Group's value chain, primarily comprising employees of suppliers and business partners, represent a key stakeholder group given their contribution to the continuity and quality of the services provided by the Group.

The Group considers the interests, views and rights of workers throughout the value chain, about respect for human rights, the safeguarding of fair and transparent working conditions, and the promotion of business practices based on fairness and mutual cooperation.

Potential negative impacts on workers in the value chain could arise if imbalances in bargaining power or inadequately monitored commercial practices were to result in excessive cost pressures, unsustainable operational demands or conditions likely to adversely affect workers' rights, including human rights. Similarly, any supplier selection processes based primarily on cost-cutting considerations, without considering additional quality and regulatory compliance factors, could increase the risk of indirect negative effects along the value chain.

However, this scenario is inconsistent with the relationship model adopted by the Lutech Group, which bases its commercial relationships on principles of fairness, transparency and collaboration, recognising the quality of service, reliability and the strength of relationships with partners as distinctive features of its business model.

The Group's supplier ecosystem comprises companies of varying sizes, with whom relationships are established with a view to long-term continuity and collaboration. As at the reporting date, no direct or indirect suppliers have been identified as being exposed to significant risks of human rights violations, as described in the following paragraphs of this chapter.

The interests and views of workers within the value chain are considered by Group companies primarily through the standard procedures for managing and monitoring supplier relationships, including periodic contract updates and reviews. These opportunities for dialogue also allow for consideration of aspects beyond the mere provision of the service, such as operational flexibility, problem-solving ability, clarity in communication and a collaborative approach.

Where applicable, the requests, feedback and needs that emerge during the relationship with suppliers may contribute to the updating of the vendor rating systems adopted by Group companies or the parent company and guide the management of commercial relationships, influencing the processes for the qualification, monitoring and assessment of commercial partners.

As at the reporting date, the Group had not adopted formalised and systematic stakeholder engagement processes specifically dedicated to workers in the value chain; however, their interests and concerns are considered as part of the ordinary management of commercial relationships and supplier quality monitoring processes.

2. Management of impacts, risks and opportunities

2.1 Disclosure requirement S2-1 – Policies relating to workers in the value chain

The Lutech Group ensures the sustainability of its supply chain through its Sustainable and Responsible Procurement Policy (POL-940), a key tool for integrating ESG criteria into procurement processes and promoting responsible commercial relationships with suppliers, subcontractors and business partners. The policy forms part of a broader commitment to upholding human rights throughout the entire supply chain – including labour and workers' rights, their involvement in the value chain and the existence of remedial mechanisms in the event of adverse impacts – in line with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The Group's supplier base is predominantly Italian and European, which ensures the application of some of the most advanced regulatory frameworks regarding the protection of human and labour rights.

Nevertheless, the Group has strengthened its control system through a structured supplier vetting process, which requires suppliers to certify that there are no human rights violations in their production processes. This verification makes use of the mechanisms provided for by Legislative Decree 231/2001 and, where applicable, SA8000 certification. The supplier assessment – comprising pre-qualification, qualification and periodic monitoring stages – combines the automated analysis of held certifications with questionnaires evaluated by the Procurement, Ethical Risk and CSR departments. The Code of Ethics shared with suppliers and the Code of Conduct for Suppliers and Partners (POL-941), extended to the entire Group in May 2024, complete the ethical and behavioural framework. The Group's Code of Ethics devotes specific articles to the protection of workers throughout the value chain. Article 8 enshrines the protection of the individual in all its forms, whilst Article 9 sets out the principle of fairness on two levels: in external contractual relationships, prohibiting any exploitation of counterparties' ignorance, incapacity, weakness or dependence; and in industrial relations, promoting the values of fair competition and transparency towards all market operators. Article 6 reaffirms the absolute prohibition of all forms of discrimination, whilst Articles 22 et seq. commit the Group to drawing up contracts with its suppliers in a fair, comprehensive and transparent manner, with an explicit commitment not to exploit situations of dependence or weakness on the part of the other party, even in the event of unforeseen circumstances.

In 2025, no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises were recorded, nor were there any reports of human rights violations or potential risks of such violations along the value chain.

Cross-cutting policies

Sustainability Policy (POL-900) – Lutech Group

POL-900, approved by the CFO and Chief Executive Officer of the Board of Directors of Lutech S.p.A. and applicable to the entire Group, identifies suppliers as key stakeholders in its sustainability strategy, recognising the importance of ongoing dialogue with the supply chain for the creation of mutual value. The Policy is also made available to suppliers via the supplier qualification tool, ensuring that the Group's principles are disseminated throughout the value chain.

About workers in the value chain, Lutech is committed to conducting its business in full respect of human and labour rights as recognised by relevant conventions and declarations at national and international level, and condemns all forms of child labour, forced labour and discrimination. These principles also guide the Group's sustainable procurement policies, through which it gives preference to suppliers selected based on their performance in the areas of environmental and social sustainability, as well as cost-effectiveness and efficiency, as a means of indirectly promoting decent working conditions throughout the entire supply chain.

Social Responsibility Policy (POL-960) – Lutech Group

POL-960 sets out management's commitments in accordance with the SA8000 standard: workers' rights, working conditions, continuous improvement and grievance channels. The Social Responsibility Policy (POL-960), approved by the Chief Executive Officer of Lutech S.p.A. and applicable to the entire Lutech Group, extends not only to the Group's employees and contractors, but also to suppliers, subcontractors and other business partners operating throughout the value chain. The policy, developed in accordance with the SA8000:2014 standard and supplemented by the principles of UNI/PdR 125:2022 on gender equality, is the main tool through which the Group promotes respect for human rights and workers' rights amongst its business partners.

As part of value chain management, the policy requires compliance with principles relating to the prohibition of child labour and forced labour, the protection of health and safety, freedom of association, non-discrimination, the proper management of working hours and the guarantee of remuneration conditions in accordance with applicable legislation. The Group is also committed to raising suppliers' awareness of the requirements of the SA8000 standard and to promoting behaviour consistent with the principles of social responsibility set out in the policy.

Implementation of the policy is supported by monitoring and verification activities, including second-party audits designed to assess compliance with social requirements throughout the supply chain and to implement, where necessary, corrective and improvement measures. The policy also provides for the availability of specific reporting channels accessible to external stakeholders, including suppliers and workers in the value chain.

Thematic policies

Policy on Sustainable and Responsible Procurement (POL-940) – Lutech Group

POL-940, approved by the Chief Corporate Operations Officer and applicable to the entire Lutech Group – including direct suppliers, subcontractors and all business partners – integrates ESG criteria into procurement and supplier management, promoting the development of a responsible and sustainable

supply chain. Drafted in accordance with the ISO 20400:2017 standard on sustainable procurement and with reference to the SA8000 standards, the ILO Tripartite Declaration on Multinational Enterprises and the ETI Base Code, the policy is publicly available on the company's website in the 'Responsibility' section and is distributed directly to all the company's suppliers.

The policy adopts a holistic approach that strengthens the resilience of processes and relationships throughout the entire supply chain, structured around four levels of fundamental principles. At the management level, it provides for the active involvement of suppliers in the commitment to sustainability, the continuous monitoring of ESG and health and safety standards, the verification of suppliers' certifications, and the systematic measurement of socio-environmental performance throughout the entire procurement cycle. From an economic perspective, it promotes the assessment of the full life-cycle costs of products or services and the adoption of circular economy practices. From an environmental perspective, it considers the principles of eco-design, the carbon and water footprints of materials, the use of local supplies, and the presence of environmental risk management systems. On the social front, it requires suppliers to protect workers' health and safety, ensure the absence of child labour and forced labour, respect freedom of association, guarantee fair pay and promote welfare, diversity and inclusion policies. Finally, the policy stipulates that suppliers' ESG performance constitutes evaluation and qualification criteria on a par with economic criteria, in line with the objectives of the ISO 14001:2015-certified Environmental Management System and the Group's broader commitment to social responsibility.

Code of Conduct for Suppliers and Partners (POL-941) – Lutech Group

The Code of Conduct for Suppliers and Partners (POL-941), approved by Lutech's Group Chief Executive Officer and applicable to all suppliers, subcontractors, business partners, distributors, retailers and other business associates of the Group, sets out the ethical, social, environmental and governance principles that form an integral and essential part of the contractual relationship with the Group. The policy is classified as a public document and is made available to suppliers and partners as part of the qualification and management processes for commercial relationships.

Through this Code, the Group promotes respect for human rights and workers' rights throughout its value chain, requiring business partners to operate in accordance with the principles of the United Nations Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the standards referenced by the management systems adopted by the Group.

With regard to workers in the value chain, the Code requires suppliers and partners to ensure that child labour and forced labour are prohibited, that freedom of association and collective bargaining are respected, that decent working conditions are provided, and that wages and working hours comply with applicable legislation, as well as to prevent all forms of discrimination, harassment or behaviour that undermines people's dignity. The document also requires the adoption of appropriate measures to protect workers' health and safety and to prevent occupational risks.

The policy also governs aspects relating to corporate integrity, the prevention of corruption, fair competition, the management of conflicts of interest, the protection of personal data and privacy, as well as environmental protection, requiring partners to contribute to the Group's sustainability and decarbonisation objectives.

Compliance with the principles set out in the Code is assessed as part of the supply chain risk management processes and the monitoring of suppliers' ESG performance. Any breaches may result in corrective action being taken and, in the most serious cases, the termination of the contractual relationship. The Group's whistleblowing scheme is also available for reporting potential breaches and is accessible to external stakeholders as well.

2.2 Disclosure Requirement S2-2 – Processes for engaging workers in the value chain regarding impacts

The engagement of workers in the value chain is a priority for the Lutech Group, which has always maintained an open dialogue with its partners and suppliers. It should be noted, however, that as these are parties external to the organisation, the level of engagement is always determined by the wishes of their owners or management.

The Group has channels for exchange and dialogue that go beyond a mere commercial relationship. On this basis, the most significant suppliers have been involved in the development and updating of the Materiality Matrix, with a view to gathering their assessments regarding material impacts. This process has become an integral part of the ESG due diligence conducted by the Group about this specific group of stakeholders, including workers' representatives within the value chain.

As in the previous year, this engagement is structured around four distinct stages, involving all available forms of representation, facilitated by the owners, company management or their respective representatives:

- During commercial or research collaboration, through active dialogue with workers in the value chain aimed at identifying any material impacts linked, for example, to delivery times, payment terms and the use of subcontractors, as well as the environmental and social impacts of supplies. These interactions – primarily gathered during the qualification phase and updated annually – take place both through formal channels (emails and on-site meetings) and through established relationships of mutual respect between workers and buyers, enabling the Group to gain further insight into working conditions within the supply chain.
- During the supplier qualification process, workers in the value chain are asked to complete a questionnaire containing specific questions on respect for human rights and on the environmental and social impacts of their production processes.
- During the stakeholder engagement process for Double Materiality, in which a representative selection of suppliers – including disadvantaged or more vulnerable groups – is involved in identifying the relevant issues that determine the impacts, risks and opportunities linked to the Group's activities and its business model.

These processes are managed jointly by the Procurement and CSR functions, in constant dialogue with the internal contacts at each Group company. From 2025 onwards, the annual monitoring of engagement processes linked to the Due Diligence and Materiality framework will be established as a structured practice, with the aim of progressively improving the results achieved. The effectiveness of these processes is measured in terms of the duration of partnerships with suppliers and the absence of incidents relating to human rights violations within the value chain.

During 2025, the Lutech Group did not enter into any global framework agreements regarding respect for workers' human rights within the value chain, nor did it develop specific measures dedicated to particularly vulnerable workers within its supplier base – an aspect that remains a focus of attention as part of the continuous improvement process.

2.3 Disclosure requirement S2-3 – Processes for addressing adverse impacts and channels enabling workers in the value chain to raise concerns

The Lutech Group promotes dialogue with workers in the value chain through consultation and reporting mechanisms accessible to suppliers and, through them, to workers involved in the Group's commercial relationships. Any issues or adverse impacts, including those related to environmental, social or governance (ESG) matters, may be raised through channels for direct discussion with the relevant company representatives.

Each Group company provides complaint mechanisms and contact channels dedicated to managing relations with suppliers, including the email addresses of the designated contact persons. These tools are designed to facilitate the prompt collection of reports, comments or requests for further information regarding potential impacts on workers in the value chain.

The Group also engages its relevant stakeholders – including workers in the value chain and their representatives, where applicable – on an annual basis in the process of identifying material issues to support the preparation of its sustainability report. As part of this process, participants may express needs, concerns or expectations regarding the actual or potential impacts generated by the Group's activities.

Lutech promotes awareness of and access to these mechanisms through a variety of channels, including meetings with suppliers, operational and commercial discussions, contractual documentation and corporate communication tools. References to the available channels and the principles of conduct adopted by the Group are also set out in the Code of Ethics and in the sustainability, documentation made publicly available.

Should reports emerge regarding significant negative impacts on workers within the value chain, the Group initiates an internal assessment process involving the relevant departments and the contact persons for the process in question, to analyse the nature, severity, extent and potential irreversibility of the reported impact. Where situations are deemed significant, the Group defines and implements corrective and mitigating measures, which may include organisational or technical interventions, in-depth investigations, awareness-raising and training, with the aim of preventing the recurrence of similar situations. Where required and applicable, the Group also assesses the adoption of remedial measures consistent with the current regulatory framework.

The effectiveness of the mechanisms for listening, reporting and managing impacts is monitored periodically, with the involvement of the relevant corporate functions, including the Sustainability/CSR department and the Procurement function.

Whilst committed to ensuring the widest possible dissemination of information regarding these tools throughout the value chain, the Group recognises that, due to the indirect nature of its relationships with

some of the workers involved, it is not always possible to ensure a uniform level of awareness of and access to the available mechanisms at all levels of the supply chain. In this context, Lutech continues to promote the dissemination and effective accessibility of these tools amongst its Suppliers.

The Group has also adopted specific measures to protect individuals who use the reporting or complaints mechanisms, in accordance with applicable legislation and the internal whistleblowing procedure, including the Policy for the management of reports of potential unlawful acts pursuant to Legislative Decree 24/2023.

2.4 Disclosure Requirement S2-4 – Actions addressing material impacts on workers in the value chain and approaches to managing material risks and realising material opportunities for workers in the value chain, as well as the effectiveness of such actions

In line with the integrated policy framework described in the previous paragraph, the Lutech Group has defined and consolidated a set of measures dedicated to the responsible management of its value chain, with the aim of ensuring decent working conditions throughout the entire supply chain, safeguarding respect for human rights and promoting ethical and social standards consistent with those adopted internally.

The processes for identifying and managing responses to a significant negative impact – for example, in the event of excessive pressure regarding delivery times or critical issues relating to suppliers' working conditions – follow a structured procedure comprising: the submission of a request by workers within the value chain; an internal assessment of the impact based on its severity, scope and irreversibility; the implementation of an immediate corrective measure, selected from a range of alternatives based on criteria of cost-effectiveness and short-term feasibility. In extreme cases, termination of the business relationship with the supplier may be considered. Following the corrective action, the supplier is involved in a phase to verify the effectiveness of the new terms of the relationship. The Group ensures that these processes are institutionalised, both procedurally and through the allocation of a dedicated budget for corrective measures.

About the procurement, sale and use of data, the Group adopts specific privacy procedures and policies aimed at defining the principles and information flows governing relations with suppliers, establishing operational procedures for the management of orders, non-conformities and shared personal data.

In 2025, no serious human rights issues or incidents were reported in relation to the upstream and downstream value chains. The Group has not signed any global framework agreements regarding respect for workers' human rights within the value chain, nor has it developed specific measures for workers who are particularly vulnerable within its supplier base – an aspect that remains a focus of attention as part of its continuous improvement process.

The actions described below are organised around the main supply chain management levers adopted by the Group and relate to the 2025 reporting year, distinguishing between ongoing actions, completed actions and those planned for the next two years.

Action 1 – Supply chain monitoring and social responsibility audits

Applicable to Lutech S.p.A., Eustema S.p.A. and Consulthink S.p.A., which are certified to the SA8000 standard, this ongoing action aims to promote respect for human rights and workers' rights throughout the value chain, through monitoring, verification and continuous improvement of suppliers' social performance.

Throughout 2025, the Group continued its efforts to raise awareness within the supply chain regarding the principles of corporate social responsibility and the standards set out in the SA8000 standard, complementing these with periodic checks and second-party audits targeting suppliers most exposed to social risks. Monitoring activities focused on compliance with requirements relating to workers' rights, working conditions, health and safety, and the ethical principles applicable to the supply chain.

This initiative is supported by the monitoring of the SA8000 Management System indicators, training and awareness-raising activities, and the implementation of any corrective and improvement measures identified during the audits.

Action 2 – Integration of ESG criteria into supplier qualification and assessment processes

Applicable to the Group's entire supply chain, this ongoing initiative aims to systematically integrate environmental, social and governance (ESG) criteria into supplier selection, qualification, monitoring and evaluation processes, with a view to strengthening the management of sustainability risks throughout the value chain.

During 2025, the Group consolidated its supplier qualification process, which involves the collection and analysis of information relating to respect for human rights, working conditions, ethical aspects and environmental impacts associated with the activities of business partners. The information gathered forms part of the assessment criteria integrated into decision-making processes alongside traditional economic and quality criteria.

The process is coordinated by the Procurement, Ethical Risk and Corporate Social Responsibility functions and, within the Group's main companies, utilises profiling and assessment tools designed to identify suppliers' level of exposure to ESG risks and to support the identification of improvement measures.

3. Metrics and targets

3.1 Disclosure requirement S2-5 – Targets relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities

Objective – Development of the supplier ESG qualification and assessment process

During 2025, the supplier qualification and assessment process did not undergo any substantial changes compared with 2024 and was managed using the tools and operational procedures already in place. In this context, the Lutech Group has set as its objective for the two-year period 2026–2027 the evolution of the supply chain management process, through the introduction of new tools to support the qualification, validation and analysis of suppliers according to sustainability criteria.

The new approach will aim to make the process more structured, traceable and consistent with the Group's ESG priorities, enabling the gradual integration of environmental, social and governance aspects into supplier assessments. Any quantitative targets may be defined once the new tools are fully operational and the relevant assessment methodology has been consolidated.

To support the planned development programme for the two-year period 2026–2027, the Group intends to monitor the progress of the new process through dedicated metrics, including the implementation status of the new digital tool, the proportion of active suppliers progressively registered in the tool, the percentage of priority suppliers subject to the new qualification and validation process, the proportion of suppliers assessed according to ESG criteria, and the number of any follow-up actions initiated following the assessments carried out.

These indicators will be progressively consolidated as the new process becomes fully operational and as data collected via the new tool becomes available.

ESRS S4 – CONSUMERS AND END-USERS



List of references

Disclosure requirements	Reference
ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with the strategy and business model	General Information Section ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and the business model

1. Strategy

1.1 Disclosure requirement relating to ESRS 2 SBM-2 – Stakeholders' interests and views

The consumers and end-users potentially interested in these products and services are the same as the Lutech Group's customers, in both the B2B and B2C sectors, predominantly large and medium-sized enterprises and public administrations operating in highly regulated sectors such as telecommunications, media, energy and utilities, transport, financial services, healthcare, manufacturing and public administration. The Group's products and services are designed to improve clients' operational efficiency, cyber resilience and the quality of their digital processes, supporting their technological transformation and helping them achieve their innovation and sustainability objectives.

Consumers' interests, opinions and rights have played a central role in defining the Lutech Group's Business Model and strategy for 2025, steering the company towards a customer-centric approach that aims to create bespoke, high-value-added technological solutions. Throughout the financial year, Lutech consistently incorporated customer feedback into its decision-making processes, developing services that effectively meet the market's demands for security, innovation and sustainability. Respect for consumer rights has translated into a particular focus on transparency, the protection of personal data and the quality of the service provided – elements that strengthen customer trust and loyalty.

The business model provides for a range of information and communication channels open to the public, both online (the corporate website https://lutech.group/it) and offline (dedicated telephone numbers, contact details – telephone and email – of sales representatives available to customers and partners, and dedicated events). These channels are also supported by internal processes relating to quality and safety controls, which involve specialised functions such as HSE, Audit & Reporting, Corporate Social Responsibility, Ethical Risk Management, Data Privacy, Security Office, ES and QSS Management Systems, and Bid Risk Management – functions centralised within the parent company with the aim of integrating and standardising, where possible, processes, procedures and policies. Furthermore, all products used by the Lutech Group comply with national and European regulations on consumer health and safety and bear the mandatory CE marking, as well as Energy Star and/or TCO certifications where required.

These aspects have shaped the Group's strategy and business model for 2025, as they stem from an approach reinforced by certifications that encompass consumer protection considerations.

2. Management of impacts, risks and opportunities

2.1 Disclosure Requirement S4-1 – Policies relating to consumers and end- s

Customers and end-users are the primary focus of the Lutech Group's activities, which is why the protection of their rights, the quality of the services provided, and the protection of their data are strategic priorities for the organisation. The Group is committed to providing reliable and innovative services, handling personal data with the utmost rigour, developing and adopting artificial intelligence technologies in an ethical and responsible manner, and ensuring effective channels for listening, transparency and redress. The policies adopted to manage significant impacts and risks on consumers and end users focus primarily on issues relating to the protection of personal data, information security, the responsible use of artificial intelligence and respect for human rights throughout the downstream value chain.

The management of these aspects is governed by an integrated system of Group policies, supplemented where necessary by specific procedures adopted by individual companies in accordance with local regulations or specific organisational requirements. These tools apply to the entire organisation and define the principles, responsibilities and standards of conduct expected in relation to consumers and end users.

For further details regarding the general principles of conduct, please refer to **Chapter G1 – Business Conduct,** in which the Group Code of Ethics is described in greater depth.

About human rights, the Group operates in compliance with applicable legislation and in line with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

In 2025, no breaches of these principles or of the UN Global Compact were identified in relation to consumers and end-users.

Cross-cutting policies

Sustainability Policy (POL-900) – Lutech Group

POL-900, approved by the CFO and Chief Executive Officer of the Board of Directors of Lutech S.p.A. and applicable to the entire Group, identifies customers as key stakeholders throughout the entire value chain, committing to reducing the impacts generated by its activities on them and to maintaining an ongoing and transparent dialogue with them. The Policy also reaffirms Lutech's commitment to conducting its business in accordance with high ethical standards and applicable regulations, promoting transparent, responsible and fair conduct towards all stakeholders, including those in the market.

At an operational level, Lutech is committed to maintaining and obtaining certifications that attest to the compliance and transparency of its processes, thereby strengthening the trust placed by customers in the

company's operations, and to reporting annually in its Sustainability Report on the direct and indirect impacts of its activities, thus ensuring an adequate level of accountability towards the end users of its services as well.

Social Responsibility Policy (POL-960) – Lutech Group

The Social Responsibility Policy (POL-960), approved by the Chief Executive Officer of Lutech S.p.A. and applicable to the entire Lutech Group, identifies customers as stakeholders in its social responsibility strategy, committing to identify and meet their expectations through transparent methods and systems consistent with the principles of the SA8000 standard. The policy is made publicly available to customers via the company's website, demonstrating the commitment to ensuring maximum transparency, including towards the end users of the Group's services.

At an operational level, the commitment to customers is primarily reflected in a commitment to ethical conduct, which is also enshrined in the disciplinary procedures designed to uphold standards of proper conduct towards customers, colleagues and management. Furthermore, all stakeholders, including customers, have the option to report any issues via the Lutech Group's Whistleblowing Portal.

Policy on Responsible Artificial Intelligence (POL-980) – Lutech Group

POL-980, approved by the Chief Executive Officer and applicable to the entire Lutech Group organisation, sets out the principles and objectives for the ethical, secure, transparent and compliant development and use of artificial intelligence systems, with particular attention to 'privacy by design' requirements and the protection of personal data (GDPR). The policy is public and accessible to all stakeholders and integrates with the Lutech BrAIn framework for the responsible adoption of AI solutions to benefit processes, governance and the customer experience. It serves as the fundamental reference point for ensuring that the Group's technological innovation develops whilst respecting the rights of end users and in line with the European regulatory framework on artificial intelligence.

Thematic policies

Personal Data Protection Policy (POL-600) – Lutech Group

POL-600, approved by the Chief Executive Officer and applicable to the Lutech Group (excluding Lutech Balkans Sh.p.k., Lutech ICT Solutions S.A. (Switzerland) and CDM Consulting Shanghai Co. Ltd), sets out the principles and governance framework for the protection of personal data through the Personal Data Protection Management System (PDPMS), in accordance with EU Regulation 2016/679 (GDPR). The policy is publicly available and serves as the primary reference for ensuring that the data of consumers and end users is processed fairly, transparently and in accordance with their rights. This is complemented by the internal procedure (PSQ-605) 'Personal Data Processing and Retention Policy – SGPDP', approved by the Executive Chairman and updated to include the requirements of the Binding Corporate Rules, which sets out the operational rules on the processing and retention of personal data within the framework of the SGPDP.

Information Security Management System Policy (MSI-POL) – Lutech S.p.A.

The MSI-POL, approved by Lutech's Management and applicable to the design, development and delivery of software/IT products and consultancy services, sets out the principles and governance framework for the protection of the company's information assets through the Information Security Management System (SGSI), modelled on the ISO/IEC 27001:2022 standard. The policy is public and serves as the primary reference

for ensuring the confidentiality, integrity and availability of information – including data relating to customers, suppliers and other stakeholders – by maintaining a constant balance between the accepted level of risk and the required level of protection. It also incorporates the ISO/IEC 27017 and ISO/IEC 27018 guidelines, ensuring comprehensive coverage of cloud services and the protection of personally identifiable information (PII). From March 2026, this policy will be extended to the entire Lutech Group, merging into POL-400, which incorporates its fundamental principles whilst broadening its scope of application across the Group.

2.2 Disclosure Requirement S4-2 – Processes for engaging consumers and end-users regarding impacts

The Group offers integrated and cross-functional expertise across the entire ICT services value chain, from strategic consultancy and advisory services through to the design, implementation, operational management and maintenance of digital solutions and services. Through an end-to-end approach, the Group supports clients on their digital transformation journeys, providing specialist expertise in infrastructure, applications, cloud, cybersecurity, data & AI and managed services.

Dialogue with clients is ensured through a structured system of engagement and consultation, involving the sales function at all organisational levels, support and after-sales services, as well as regular feedback collection tools designed to monitor the quality of the relationship, the level of satisfaction and the expectations of stakeholders.

Furthermore, the Group adopts management and control systems designed to ensure the proper conduct of commercial activities and interactions with the market, in accordance with internal policies, procedures and safeguards.

Customers are involved in feedback processes through various engagement tools. In particular, the Group's ESG function conducts an annual Double Materiality survey targeting a sample that is both economically and numerically representative of the customer portfolio, with the aim of gathering perspectives, priorities and assessment criteria regarding sustainability issues relevant to the Group and its stakeholders.

In parallel, the Group conducts an annual Customer Satisfaction Survey (CSAT), coordinated by the sales function and governed by the internal 'Customer Satisfaction' procedure (PSQ-024), designed to monitor customer satisfaction levels and identify opportunities for improvement in the quality of services provided and in commercial relations. From 2024 onwards, and confirmed in the 2025 survey cycle, the survey includes a specific question designed to measure customer stakeholders' perceptions of Lutech's focus and commitment to integrating ESG principles into its activities.

For strategic clients, identified on the basis of criteria such as economic significance, market strategic importance and development potential, the consultation process also includes opportunities for direct dialogue with senior executives (e.g. CEO, CIO, Head of Procurement, Head of Innovation), through structured interviews designed to explore expectations, critical issues, development priorities and opportunities for collaboration.

In 2025, the scope of the CSAT survey included 62 clients (51 in 2024), grouped by parent company; the survey was actually carried out for 52 clients, with a completion rate of 84 per cent, broadly in line with the figure recorded in 2024 (84 per cent), although this result was influenced by the fact that the survey was not carried out for some strategic clients. The process was completed in full (internal and external questionnaires) for

46 clients (74 per cent) and partially completed – limited to the external questionnaire – for a further 6 clients (10 per cent). Among those surveyed, 52 per cent held a C-level role, confirming the direct involvement of executives in the feedback process.

The results of the 2025 survey confirm an overall high level of satisfaction, with particularly positive scores for Loyalty (NPS 9.1), User Experience (CES 9.2), Customer Expectations (9.2) and Governance (9.4), as well as for Overall Customer Satisfaction (9.1). With specific reference to sustainability issues, customers gave an average score of 8.8 in response to the question regarding the Group's focus on ESG issues. The area of innovation (8.6) was identified as the main area for improvement, consequently guiding the Group's priorities for action in the next cycle.

The results of these feedback initiatives are consolidated, shared and analysed with the relevant business functions – including the Go To Market, Sales, Delivery and ESG departments – in order to identify improvement measures, monitor any emerging issues and guide the development of services and customer engagement approaches.

In addition to structured feedback processes, the Group maintains an ongoing dialogue with its commercial target audiences, both B2B and B2B2C, through direct commercial relationships, dedicated meetings, scheduled video calls, participation in industry events, proprietary initiatives and dedicated contact channels, including email addresses managed by internal representatives responsible for customer and consumer relations.

LUTECH EVENTS

Events organised by Lutech and aimed at both internal stakeholders across the entire Group (primarily the Sales department) and external stakeholders (customers, technology partners, representatives of the public administration and institutions, and representatives of the academic and local communities).

Many of the events organised by the Lutech Group's Communications department are carried out in partnership with vendors. In 2025, customers and end consumers were involved in the following initiatives:

- **Lutech** and **TEHA** (The European House – Ambrosetti) collaborate on strategic research, in this case focusing on the impact of artificial intelligence and human capital. Their joint work analyses the digital transition and skills development in Italy. Presented to the CNEL, the study entitled *"The Italian Path to Artificial Intelligence Learning"* analyses the importance of digital platforms and artificial intelligence for skills and competitiveness, in the presence of representatives from businesses, institutions and universities.
- Events in partnership with vendors: vendor initiatives and customer relationship activities, with a predominantly technological focus.
- Coffee & Learn: in-house themed events dedicated to exploring Lutech's portfolio in greater depth, during which Lutech teams, together with partners, present business cases and innovative offerings.
- Kick-off Meeting: an annual event dedicated to presenting results, sharing best practices, key deals, and the strategy and objectives for the coming year; the first part, ' ', involves the participation of clients (CEOs, CIOs, CTOs) for a discussion on strategic positioning.

- **Industry events**: events dedicated to a specific market sector, such as trade fairs, congresses and conferences, which represent an important marketing tool for promoting the brand, developing customer relationships and generating new business opportunities.

The consumers' perspective is subsequently considered in the decision-making process through discussions between Sales Managers and the other departments involved, primarily Operations, Finance and Compliance. Generally, the roles involved in this process are Sales Managers, Delivery Managers and Service Managers specific to the client and the contract, supported by the Finance, Compliance and CSR departments.

The perspective of consumers and end-users guides business decisions through engagement processes structured in specific phases:

- **Phase 1** – Initiation of collaboration: definition of contracts and necessary requirements, including the activities required for the client's ESG compliance.
- **Phase 2** – Monitoring (SAL): regular review meetings to assess project implementation.
- **Phase 3** – Satisfaction survey (CSAT): direct interviews with clients' CXOs, featuring quantitative assessments (1–10 ranking) and open-ended qualitative feedback. The results are compiled into a summary report presented to the Sales Management (Go To Market) team to define corrective actions, responsible parties and timelines (Due Dates).
- **Phase 4** – Double Materiality: engagement with stakeholders to define material issues for the Sustainability Report.

These processes are triggered at the start of new projects or in the event of regulatory updates and reporting deadlines. Oversight is managed by Sales Excellence and the 'Go To Market' function, in coordination with the Compliance Office and, where necessary, with the support of specialist legal counsel. The Management retains direct responsibility for these activities, recognising their value in terms of transparency, brand reputation and customer loyalty.

Focus on Accessibility and Vulnerable Users

For projects aimed at vulnerable user groups (such as the elderly, minors or people with disabilities), the Lutech Group adopts bespoke processes coordinated by a dedicated office responsible for the application of Human-Centred Design (HCD). Although the business is predominantly B2B and rarely involves direct interaction with such individuals, the Group ensures compliance with accessibility standards such as WCAG 2.0 and WAI guidelines where required. These measures integrate internal policies with specific client requirements and are based on:

- (PSQ-405) Secure Development Policy: a procedure ensuring security and privacy by design in system design.
- (OSWAP standards – LG-400) Guidelines for the secure development of web applications: international standards for inclusive management and digital accessibility.
- AGID standards: technical requirements for the accessibility and interoperability of digital services, with a particular focus on the public sector.

The effectiveness of these technical analyses is measured by the ability to translate the feedback and suggestions received into concrete improvement processes.

The Evolution of Responsible Artificial Intelligence

Following the introduction in 2024 of the Policy on Responsible Artificial Intelligence (POL-980), the Group has consolidated its alignment with its Code of Ethics, incorporating specific sections dedicated to AI to guide every project in accordance with principles of ethics and responsibility.

ETHICAL AND RESPONSIBLE AI

The ethics of Artificial Intelligence concern the analysis of the moral, social and legal implications associated with the design, development and use of AI-based technologies. In a context where such solutions are playing an increasingly significant role in business processes and everyday life, it is essential to ensure their fair, transparent, secure and responsible use, whilst preventing potential risks linked to algorithmic bias, discrimination, privacy breaches or negative impacts on individuals and society.

One of the most important aspects is the prevention of bias and discrimination. Systems trained on data that is not sufficiently representative or influenced by bias can, in fact, contribute to replicating or amplifying existing inequalities. For this reason, the transparency and explainability of decision-making processes take on a central role: understanding the criteria underpinning AI-supported decisions is essential for identifying any errors, correctly assigning responsibility and strengthening the trust of users and stakeholders involved.

In response to the challenges posed by technological evolution, guiding principles have been progressively established to promote the use of AI based on transparency, fairness, accountability, security, reliability, inclusion and privacy protection. These principles require that Artificial Intelligence systems be designed and used in a way that is understandable to people, non-discriminatory towards individuals or groups, and aimed at preventing accidental or intentional harm.

In line with this approach, in 2025 the Lutech Group strengthened its commitment to the responsible adoption of artificial intelligence solutions, including through **its formal endorsement of the Rome Call for AI Ethics**. This endorsement confirms the Group's commitment to promoting the development and use of ethical, transparent technologies designed to generate a positive impact on society, in line with the principles set out by the initiative: transparency, inclusion, accountability, impartiality, reliability, security and privacy protection.

The Group therefore promotes a people-centred model of innovation, based on human oversight of key decisions, the prevention of bias and discrimination, the protection of personal data and awareness in the use of digital tools. Within this framework, the adoption of AI in organisational processes is geared towards combining efficiency, inclusivity, sustainability and respect for human dignity, contributing to the development of internal skills consistent with responsible digital transformation.

The Lutech Group recognises the potential of Artificial Intelligence as a driver of innovation and competitiveness and promotes its responsible development, guided by the Asilomar Principles and applicable national and international regulations. In its projects, the Group adopts three key principles: transparency regarding the use of AI, human supervision based on a human-in-the-loop approach, and non-discriminatory algorithms. These elements, together with the values of transparency, inclusion,

accountability, impartiality, reliability, security and privacy protection, guide the use of AI towards solutions that are reliable, inclusive and consistent with the rights and expectations of the people involved.

2.3 Disclosure Requirement S4-3 – Processes to address adverse impacts and channels enabling consumers and end-users to raise concerns

At Group level, the mechanisms put in place to prevent, mitigate and remedy any adverse impacts on customers and consumers are based on an integrated system of governance covering quality, security, compliance and commercial relationship management, supported by organisational controls, certified systems and structured channels for feedback and reporting.

In particular, the Group maintains a comprehensive system of certifications designed to ensure high standards of reliability, safety and quality in the provision of its products and services. The Group's Compliance function centrally oversees the monitoring of the certification status of subsidiaries, whilst allowing individual companies operational autonomy in managing their respective systems, maintenance processes, and renewal and monitoring activities, with support from the parent company where required. As part of corporate integration processes, including any mergers by incorporation, the scope of the certified systems is progressively updated and extended to new entities and organisational resources.

The certifications adopted by the Group provide a significant safeguard against potential negative impacts on customers and consumers, helping to ensure:

- the security of information and data, and the protection of personal data, through management systems compliant with international standards on information security and data protection;
- the quality, continuity and reliability of the services provided, through management systems focused on performance monitoring, process control and continuous improvement;
- adherence to the principles of fairness, transparency and integrity in relations with all stakeholders, including through the adoption of Codes of Ethics and codes of conduct that are progressively harmonised across the Group.

At the same time, the Group provides customers with a range of direct and accessible channels for submitting reports, complaints, support requests and feedback, with a view to fostering ongoing and timely dialogue throughout all stages of the commercial and operational relationship. These channels include, amongst others, direct commercial relationships, structured customer engagement activities (such as CSAT and Sales Relationship), dedicated email addresses and contractually defined points of contact.

Within the Group's operating model, clients have access to dedicated points of contact – including Sales Managers, Client Executives, Client Managers and specialist delivery staff – who act as key points of contact for managing any issues, ensuring internal coordination with the relevant departments and facilitating the prompt handling of reports received.

To support the quality of service delivery and the management of potential negative impacts, the Group has, over time, further strengthened its operational controls through roles dedicated to supervising delivery and

client relations, with responsibilities for monitoring service performance, managing risks, overseeing KPIs, managing client expectations and implementing corrective or improvement measures where necessary.

Any issues reported are analysed by the relevant commercial and operational departments in relation to the specific customer or contract, to assess their nature, significance and possible remedial actions. In the event of recurring anomalies or significant increases in the number of reports, Group companies initiate specific in-depth investigation and internal control processes aimed at identifying the causes and implementing corrective measures.

The reporting channels are accessible free of charge to customers and users of the Group's products and services and are publicised in contractual documentation and through routine commercial interactions. The Group considers these tools to be effective for the continuous improvement of service quality and the strengthening of customer relationships, not least because of the level of awareness and use of these channels by the relevant stakeholders.

During 2025, no complaints were received regarding significant impacts related to ESG issues falling within the scope of ESRS S4.

The Group regards dialogue with customers and end-users as an essential element of its continuous improvement model, promoting collaborative relationships aimed at the prevention and timely management of any critical issues, as well as the responsible development of its services and solutions.

2.4 Disclosure requirement S4-4 – Actions taken to address material impacts on consumers and end-users, and approaches to managing material risks and realising material opportunities in relation to consumers and end-users, as well as the effectiveness of such actions

In line with the integrated policy framework described in the previous paragraph, the Lutech Group has defined and consolidated a set of measures dedicated to the responsible management of its relationships with consumers and end-users, with the aim of guaranteeing high-quality services, protecting users' digital rights and privacy, promoting responsible innovation, and ensuring effective channels for listening to feedback and resolving issues. The actions described below relate to the 2025 reporting year, distinguishing between ongoing actions, those currently under development and those planned for the next two years.

Action 1 – Defining the principles of responsible AI and disseminating them across the Group

Applicable to the entire Lutech Group and of an ongoing nature, this action aims to ensure that the development and adoption of artificial intelligence solutions take place in accordance with principles of ethics, transparency and the protection of end users, in line with the European regulatory framework on AI and the Group's social responsibility commitments.

During 2025, the Group defined the founding principles of responsible AI, launched operational implementation measures and ensured that all Group companies were made aware of and had taken note of them. These principles are integrated with the Lutech BrAIn framework, designed to maximise the return on investment in AI and achieve a tangible impact on processes, governance and customer experience, whilst ensuring the protection of end users from risks associated with the incorrect or non-transparent use of technologies.

Action 2 – Integrated management of the Personal Data Protection System (SGPDP) and the Information Security Management System (SGSI)

Applicable across the entire Lutech Group and of an ongoing nature, this action provides integrated oversight of personal data protection and information security, ensuring compliance with the GDPR and applicable legislation on information security, as well as the continuous improvement of the relevant management systems.

During 2025, the Group continued to strengthen and maintain the Personal Data Protection Management System (SGPDP) and the Information Security Management System (SGSI), ensuring the definition and updating of roles and responsibilities, the structured management of data processing and protection processes, and the monitoring of privacy and cyber risks in line with the company's integrated risk management system.

In this context, procedure PSQ-603 "Risk Management – SGPDP" and the Information Security Management System framework serve as the operational guidelines for managing data protection and IT risks

respectively, integrating with procedure PSQ-028 Risk Management and with the Group's overall risk management system.

The Group has also continued its training activities, internal communication and the dissemination of security guidelines to companies not yet certified, as well as work on defining data retention criteria and consolidating privacy and security governance at Group level.

The system is supported by a structured programme of periodic third-party audits for surveillance and recertification (ISO/IEC 27001:2022, ISO 9001:2015, ISO/IEC 20000-1:2018 and ISO 37001:2016, where applicable), which ensures the effectiveness of controls is verified and that management systems are continuously improved.

Action 3 – Maintenance and continuous improvement of the integrated management systems (Quality, IT Services, Information Security and Personal Data Protection)

Applicable to certain companies within the Lutech Group (Abex Italia S.r.l., CDM Consulting Shanghai Co. Ltd, Consulthink S.p.A., Eustema S.p.A., Lutech CDM S.p.A., Kronotech S.r.l., Sapim S.A., Softjam S.p.A., Stain S.r.l., Lutech ICT Solutions S.A. (Switzerland)). As an ongoing initiative, this measure ensures the maintenance, updating and continuous improvement of the management systems adopted by the Group, in accordance with the UNI ISO 9001:2015 standard (Quality Management System), ISO/IEC 20000-1:2018 (IT Service Management) and ISO/IEC 27001:2022 (Information Security), as well as current legislation on the protection of personal data (GDPR), including through the oversight of the Data Protection Officer (DPO) and the use of tools dedicated to privacy compliance management.

During 2025, the Group ensured the operation and strengthening of the certified management systems implemented across the various companies within its scope, guaranteeing the proper management of processes, the assessment and management of risks, as well as the monitoring of performance and compliance with applicable regulatory requirements and international standards.

Activities also include the conduct of internal and external audits, periodic surveillance and recertification checks, the dissemination of procedures and operational guidelines, and support for the gradual extension of management systems to Group companies, in line with developments in the organisational and regulatory scope.

Action 4 – Engagement with consumers and end-users and monitoring of satisfaction

Applicable to the entire Lutech Group and of an ongoing nature, this action aims to ensure a structured and continuous dialogue with B2B and B2B2C customers, gathering feedback useful for improving services and the timely identification of any critical issues.

During 2025, the Group confirmed and strengthened its direct channels for listening to and addressing customer concerns – including CSAT surveys, Sales Relationship initiatives and channels dedicated to handling complaints and reports – progressively extending this involvement to companies that joined the Group in the second half of 2024. The CSAT, structured as a face-to-face interview with CXOs of strategic clients, has been further enhanced with elements relating to ESG aspects, enabling a more in-depth

dialogue on sustainability issues. The results are analysed periodically with the Go To Market Department and the relevant corporate functions' , fuelling cycles of continuous improvement. The effectiveness of these measures is measured using KPIs relating to the number of complaints received, the ratio of penalty costs to total revenue, and the NPS (Net Promoter Score) and CES (Customer Effort Score) indicators. For further details regarding the CSAT survey, please refer to the section 'Disclosure Requirement S4-2 – Processes for engaging consumers and end-users regarding impacts'

Action 5 – Renewal of ESG ratings and participation in client certification programmes

Applicable to the entire Lutech Group and of an ongoing nature, this action safeguards the Group's ESG reputation with its customers, ensuring that the required ratings are maintained and that the Group actively participates in all sustainability programmes promoted by its customers.

During 2025, the Group continued its annual activities to update ESG ratings and participate in programmes to qualify as a sustainable supplier, drawing on a team dedicated to ESG issues. At the same time, proactive efforts continued to engage with customers on sustainability issues and to share the Group's key ESG policies – (POL-900) Sustainability Policy, (POL-960) Social Responsibility Policy, (POL-940) Sustainable and Responsible Procurement Policy – with all external stakeholders.

3. Metrics and targets

3.1 Disclosure requirement S4-5 – Targets relating to the management of material adverse impacts, the enhancement of positive impacts, and the management of material risks and opportunities

To date, the Lutech Group has not set specific, quantitative, time-bound and results-oriented targets about consumers and end-users.

The only target currently monitored by the Group in this area is the maintenance of zero significant non-conformities within the certified management systems and the controls in place, where applicable, including:

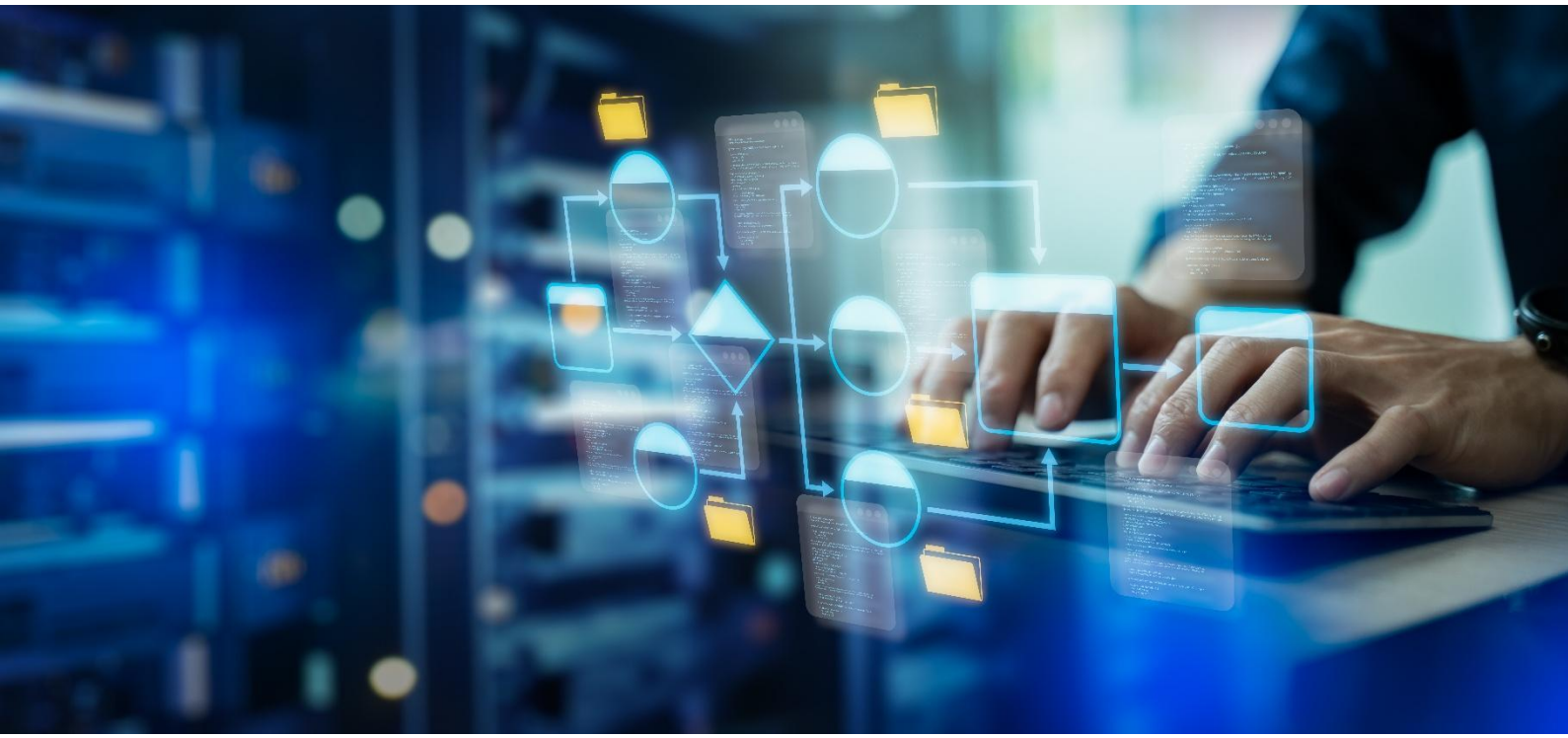
- UNI EN ISO 9001:2015 (Quality Management System);
- UNI CEI EN ISO/IEC 27001:2017 (Information Security Management System);
- ISO/IEC 20000-1:2018 (IT Service Management System);
- the GDPR, through the role of the Data Protection Officer (DPO) and the relevant tools for managing the processing of personal data.

By its very nature, this objective is not expressed in terms of progressive quantitative targets (e.g. a year-on-year percentage improvement), but rather as the maintenance of an achieved standard, namely the absence of any significant non-conformities identified during the internal and external audits conducted on the management systems listed above.

In future reporting cycles, the Group will assess the advisability of supplementing this framework with more structured, quantitative and time-bound objectives, specifically relating to its relationship with consumers and end-users, not least in light of developments in existing feedback processes and satisfaction surveys.

GOVERNANCE

ESRS G1 – CORPORATE CONDUCT



List of references

Disclosure requirements	Reference
IRO-1 – Description of the processes for identifying and assessing material impacts, risks and opportunities	ESRS 2 – Impacts, risks and opportunities: interaction with corporate strategy and double materiality analysis
ESRS 2 GOV-1 – Role of the administrative, management and supervisory bodies	ESRS 2 – Role of the administrative, management and supervisory bodies.

1. Governance

1.1 Disclosure requirements relating to ESRS 2 GOV-1 – Role of the administrative, management and supervisory bodies

Within the Lutech Group, the bodies responsible for administration, management and control (ADC) play a central role in promoting and safeguarding business ethics and corporate conduct. These bodies ensure the adoption of and compliance with the Code of Ethics, oversee the Organisational Model 231 and monitor information and decision-making flows with a view to transparency and integrity. The ADC bodies ensure the proper functioning of anti-corruption safeguards, whistleblowing mechanisms and ethical due diligence in procurement processes. Through internal audits, compliance checks and targeted training, they help to foster a culture of legality within the organisation. They also assess reputational risks and define policies consistent with ESG principles, with specific reference to social and governance aspects. In summary, the ADC bodies play a key role in ensuring that ethics is not merely a set of rules, but a guiding principle for business decisions.

The remit of these bodies is as follows:

At **board level**:

- approval of the (PSQ-500) Anti-Corruption Policy and verification of its alignment with corporate strategy;
- collection, from senior management and the compliance function responsible for corruption prevention, and review at scheduled intervals, of information concerning the content and operation of the anti-corruption management system (ISO 37001:2016), where applicable;
- requesting the adequate and appropriate resources necessary for the effective operation of the anti-corruption management system;
- exercising reasonable oversight of the implementation of the ISO 37001:2016 anti-bribery management system by senior management and of its effectiveness (where applicable);
- promoting and continuously improving the anti-bribery management system (ISO 37001:2016), where applicable.

Lutech Group Senior Management:

- ensures that the ISO 37001:2016 anti-bribery management system, where in place, is established, implemented, maintained and reviewed, to adequately address the risks of bribery;
- ensures that the requirements of the ISO 37001:2016 anti-bribery management system are integrated into business processes, where applicable, and into company policies where not already included;
- ensures that adequate and appropriate resources are allocated for the effective operation of the ISO 37001:2016 anti-bribery management system, where applicable.

The **Board of Statutory Auditors**:

- verifies compliance with the law and the Articles of Association;

- verifies compliance with the principles of sound administration;
- verifies the adequacy of the organisational, administrative and accounting structure adopted by the company and its effective operation.

The Supervisory Body pursuant to Legislative Decree 231/2001:

- verifies the efficiency and effectiveness of the Model, including in terms of compliance between the operational procedures adopted and the protocols formally set out in the Model itself;
- promotes the updating of the 231 Model;
- promptly reports to the Board of Directors, for appropriate action, any established breaches of the Model that may give rise to liability on the part of the Company;
- promotes initiatives to disseminate the Model, as well as to train and raise staff awareness of compliance with the principles contained therein;
- organises communication and training initiatives on the contents of Legislative Decree 231/2001, on the impact of the legislation on the Company's activities, and on the rules of conduct;
- provides clarification regarding the meaning and application of the provisions contained in the Model;
- verifies, within the scope of its remit, the internal communication and reporting channels for breaches under Legislative Decree 231, ensuring the protection and confidentiality of the whistleblower in accordance with Legislative Decree 24/2023 (whistleblowing);
- draws up and submits for approval by the Board of Directors the budget required for the proper performance of the assigned tasks;
- has unrestricted access, in accordance with current legislation, to any company department to request information, documentation and data deemed necessary for the performance of its duties;
- requests relevant information from external consultants and collaborators, however they may be designated;
- initiates any disciplinary proceedings following identified breaches of the Code.

The **Anti-Corruption Compliance Function** (FCPC), where one exists:

- oversees the design and implementation of the ISO 37001:2016 anti-bribery management system;
- provides guidance to staff on the anti-corruption system and on matters relating to corruption in general;
- ensures that the anti-bribery management system complies with the requirements of ISO 37001:2016;
- reports on the performance of the anti-bribery management system, as well as on any critical issues relating to acts of bribery or breaches of the system itself, to the Governing Body and Senior Management.

The FCPC also acts as a point of reference within the Lutech Group in the field of anti-corruption.

The work of these bodies ensures a constant flow of information and useful guidance for the Group's direction and management, which the central Board of Directors monitors and approves. The Board, being adequately informed, can in turn promote the policies, actions and investments necessary for the improvement of the management of all operations, taking as a reference the sustainability issues that emerge from the work of the various functions.

This Sustainability Report is reviewed by the Group's highest governing body as part of an accountability process based on structured reporting, considering the relevant regulatory framework for sustainability

reporting. This includes Legislative Decree No. 254 of 30 December 2016, as amended and supplemented by Legislative Decree No. 125 of 6 September 2024, transposing Directive (EU) 2022/2464 (Corporate Sustainability Reporting Directive – CSRD).

The Group CEO and his senior management team – to whom strategic decisions and the approval of policies for the other Group companies are referred – approve the Group's strategies, policies, operational plans and Sustainability Report. The functional organisation is defined at the level of the CEO of Lutech S.p.A. and his or her direct reports; at the level of individual Group companies, there may be further hierarchical structures.

For further information regarding the role of the Board of Directors, Management and Supervisory bodies, with particular reference to the composition, characteristics, diversity, expertise and ESG experience of these bodies, as well as the information provided to them and the sustainability issues they address, please refer to the sections "Disclosure Requirement GOV-1 – The role of the Board of Directors, Management and Supervisory bodies" and "Disclosure requirement GOV-2 – Information provided to the Board of Directors, Management and Supervisory bodies and sustainability issues addressed by them" in the "General Information" section.

1.2 Disclosure requirement G1-1 – Policies on corporate culture and business conduct

Corporate culture represents the set of principles, values, procedures and behaviours that shape the Lutech Group's day-to-day operations and guide its relations with internal and external stakeholders. The policies adopted by the Group aim to promote corporate conduct based on integrity, transparency, fairness and accountability, whilst preventing and mitigating the main risks associated with corporate conduct, including instances of active and passive corruption, breaches of the Code of Ethics, irresponsible use of emerging technologies and, more generally, behaviour inconsistent with corporate principles.

Addressing these issues is of strategic importance to the Group, as any breaches of the principles of integrity and compliance could have reputational, financial and organisational consequences.

Among the key policies adopted by the Lutech Group to define, develop and promote its corporate culture are:

PSQ-500 – Anti-Corruption Policy

The Anti-Corruption Policy, drawn up by the Compliance Function for the Prevention of Corruption, stems from the application of Model 231 and is based on the UNI ISO 37001:2016 standard. Updated in 2025, it has been extended to most of the companies within the Lutech Group, including Abex Italia S.r.l., Consulthink S.p.A., Know-How S.r.l., Kronotech S.r.l., Lutech CDM S.p.A., Lutech Digital Airport S.r.l., Lutech Sinergetica S.r.l., Lutech S.p.A., Pivotal Italia S.r.l., Softjam S.p.A., Stain S.r.l. and Tenenigen S.r.l.

Eustema S.p.A. and Lutech ICT Solutions S.A. (Switzerland), on the other hand, have adopted their own independent policy, following a process of gradual adoption and implementation within their respective documentation systems.

The Policy enshrines the principle of zero tolerance towards all forms of corruption, whether public or private, active or passive, and sets out the principles and rules of conduct aimed at preventing, identifying and managing corruption risks, in line with relevant international standards, including the principles of the United Nations Convention against Corruption (UNCAC).

The document governs, amongst other aspects, dealings with public officials, commercial bribery between private individuals, the engagement of agents and consultants (subject to prior anti-corruption due diligence), mergers and acquisitions, dealings with business partners and associates, the prohibition on maintaining relations with individuals included on international sanctions lists, and political contributions.

The Policy also refers to the whistleblowing system as a means of reporting any attempted, alleged or actual incidents of corruption.

Updated in 2025, the Anti-Corruption Policy was approved by the Lutech Group's Board of Directors.

PSQ-501 – Whistleblowing Policy

The Whistleblowing Policy (PSQ-501), updated in 2025 and approved by the Board of Directors, governs the reporting system adopted by the companies of the Lutech Group that have implemented this procedure, defining the operational procedures, roles and responsibilities for handling reports falling within the scope of Legislative Decree 231/2001 and Legislative Decree 24/2023. The Policy also governs the measures to protect whistleblowers provided for by current legislation on the protection of whistleblowers, ensuring the confidentiality of the whistleblower's identity and providing specific safeguards against any acts of retaliation. Some Group companies have their own independent reporting systems: in particular, Eustema S.p.A. and other companies that implement specific local controls have their own procedures and tools consistent with the principles defined by the Group.

The mechanisms adopted by the Group to identify and report concerns regarding unlawful conduct and to carry out the relevant investigations apply both to reports from internal stakeholders, such as employees and contractors, and to those from external parties who have dealings with the Group, such as suppliers, customers, business partners, consultants, trainees, shareholders and other individuals holding administrative, managerial, supervisory, oversight or representative roles.

For most companies within the Lutech Group, the reporting system is available via the dedicated channel "lutech.integrityline.com", whilst Eustema S.p.A., Lutech ICT Solutions S.A. (Switzerland) and Softjam S.p.A. have their own internal reporting management systems. About the subsidiary Sapim S.A., it should also be noted that it has its own independent whistleblowing policy, which is distinct and separate from that adopted by the parent company.

In general, the reporting channel allows communications to be sent digitally and, using encryption tools, guarantees the confidentiality of the identity of the whistleblower, the person involved or otherwise mentioned in the report, as well as the content of the report and the related documentation.

The scope of reports includes:

- breaches of national law, including unlawful conduct relevant under Legislative Decree 231/2001 and breaches of the Organisation, Management and Control Model adopted pursuant to that decree;

- breaches of European Union law pursuant to Legislative Decree 24/2023, including breaches of European legislation referred to in the applicable regulations, acts or omissions detrimental to the financial interests of the European Union, and breaches relating to the internal market, competition, State aid and mechanisms designed to obtain undue tax advantages.

Any reports concerning information falling outside the scope described above are treated as “ordinary reports” and forwarded to the relevant company departments (the Social Performance Team for matters relating to SA8000, the Gender Equality Committee for issues relating to UNI/PdR 125:2022, and the Compliance Department for any other reports not covered by the aforementioned areas), with the provisions of Legislative Decree 24/2023 not applying.

In 2025, these cases were governed by PSQ-501; the Group plans to formalise this process, from 2026 onwards, through a dedicated procedure (PO-501 – Management of Ordinary Reports), specifically designed to handle reports relating to SA8000 and UNI/PdR 125:2022.

The whistleblowing system prohibits any form of retaliation against the whistleblower for reasons directly or indirectly linked to a report made in good faith. This principle is also set out in the Group’s Code of Ethics and in internal procedures, which provide for specific measures to protect whistleblowers.

The Group ensures that information regarding the reporting channels is disseminated through the Code of Ethics, internal policies and dedicated corporate tools, informing employees about how to use the system and the safeguards provided for by the applicable legislation.

The handling of reports is entrusted to departments identified based on the subject matter of the report:

- the Supervisory Body, where one exists, for reports relevant under Legislative Decree 231/2001;
- the Social Performance Team for matters relating to SA8000, where applicable;
- the Gender Equality Committee for matters relating to UNI/PdR 125:2022, where applicable;
- the Compliance Department for any other reports not falling within the above areas.

Those responsible for receiving and handling reports operate in accordance with the principles of independence, impartiality and confidentiality, and are trained in report-handling procedures and the applicable regulations.

Upon receipt of a report, the Group applies a structured process of analysis and investigation aimed at promptly ascertaining the facts reported. Investigations are conducted in accordance with the principles of independence, objectivity and confidentiality and may also concern instances of active and passive corruption. The operational procedures for managing investigations are further described in Disclosure G1-3 – Prevention and Detection of Active and Passive Corruption.

Code of Ethics

The Code of Ethics serves as the reference document setting out the values for those Group companies that have adopted it, namely Eustema S.p.A., Know-How S.r.l., Kronotech S.r.l., Lutech CDM S.p.A., Lutech Digital Airport S.r.l., Lutech Sinergetica S.r.l., Pivotal Italia S.r.l., Softjam S.p.A., Stain S.r.l. and Tenenigen S.r.l. The Code applies to directors, employees, external collaborators, shareholders and, more generally, to stakeholders who have dealings with the Group.

This document, in conjunction with the Organisation, Management and Control adopted pursuant to Legislative Decree 231/2001, sets out the principles and rules of conduct aimed at preventing the commission of predicate offences and promoting a corporate culture based on respect for human rights, non-discrimination, integrity and fairness in internal and external relations, the protection of confidential information, health and safety at work, and the responsible use of technology.

The most recent version of the Code of Ethics also incorporates specific principles relating to the responsible use of Artificial Intelligence, in line with the provisions of the Policy on Responsible Artificial Intelligence adopted by the Group.

Finally, it should be noted that the subsidiaries Eustema S.p.A. and Softjam S.p.A. have their own independent Code of Ethics, which refers to and aligns with the Parent Company's Code of Ethics

POL-980 – Policy on Responsible Artificial Intelligence

The Policy on Responsible Artificial Intelligence, drawn up by the Data Privacy Manager and the Data Analytics Practice Manager and approved by the CEO, governs the responsible use of Artificial Intelligence tools throughout the Lutech Group.

The Policy identifies as fundamental principles the transparency of AI use, the maintenance of human control over relevant decisions ('human in the loop'), the prevention of algorithmic discrimination, and adherence to the principles of transparency, inclusion, accountability, impartiality, reliability and security/privacy by design.

The document also identifies the applications of Artificial Intelligence that the Group undertakes not to pursue, including those that are potentially harmful or incompatible with ethical principles and the protection of fundamental rights, and provides for specific training activities aimed at the teams involved.

Training on business conduct and roles most exposed to the risk of active and passive corruption

The Lutech Group promotes a culture of responsible conduct through training initiatives aimed at employees, tailored according to their role and level of exposure to business ethics and anti-corruption risks.

Within the scope managed by the Parent Company, training on business ethics and corporate conduct covers, amongst other topics, the administrative liability of legal entities pursuant to Legislative Decree 231/2001, anti-corruption, the GDPR, information security and, where applicable, the ISO 37001:2016 anti-bribery management system.

During the two-year period 2024–2025, Lutech delivered online and face-to-face training courses on the topics of Legislative Decree 231, anti-corruption and responsible conduct, aimed at the relevant groups within the organisation. New employees are also informed, during the onboarding process, about the principles of conduct set out in the Code of Ethics and how to use the reporting channels.

The identification of the functions and roles most exposed to the risk of active and passive corruption is carried out in different ways depending on the corporate scope: for Lutech S.p.A. and for companies that adopt the processes defined by the Parent Company, the assessment is carried out in accordance with the

ISO 37001:2016 anti-bribery management system, where applicable, and with procedure PSQ-028 Risk Management.

Eustema S.p.A., on the other hand, has its own assessment system and independent documentation controls: the identification of those most at risk is carried out through an internal mapping of business processes, consistent with its organisational model and with the criteria for the prevention of corruption risk adopted by the company. In both cases, the assessments consider risk-enabling factors such as:

- the scope and nature of the role held, distinguishing between individuals within and outside the organisation;
- access to relevant or sensitive information;
- level of decision-making discretion;
- the financial significance of the activities managed;
- the existence of spending and/or signing authority;
- any relationships with external public or private entities.

For Lutech S.p.A., the assessment of corruption risk is integrated into the risk management process governed by procedure PSQ-028 Risk Management, which takes into account business processes, transactions, projects, activities and the parties involved, in order to identify the area's most at risk and define any appropriate control and mitigation measures.

For Eustema S.p.A., internal mapping enables the identification of exposed processes and roles, the associated level of risk and the preventive measures adopted, whilst maintaining an independent oversight mechanism distinct from that of the Parent Company, albeit in line with the Group's general principles. Based on the assessments carried out within their respective scopes, the functions most exposed to the risk of active and passive corruption include, in particular, Administration, Finance and Human Resources, Operations and Procurement, Sales, Tenders & Partnerships, the Legal Department and Governance, as well as other roles characterised by significant decision-making, financial or relational powers.

Set out below, for Eustema S.p.A., are the main functions and roles identified as being most exposed to the risk of corruption within the scope of this report; it should be noted that there have been no changes compared with the previous financial year:

Area	Functions / roles most at risk
Management **Administration** **Finance and Human** **Human Resources**	Head of Administration and Finance General Accounting and Financial Statements, Treasury, Administration and Cash Management HR Specialist HR Assistant to the Director of Administration and Finance; General Accounting and Financial Statements; Treasury; Administration and Cash Management; HR Specialist; HR Assistant
Operations Department	Head of Communications, Head of Operations and Procurement Procurement and Health and Safety Manager HR Specialist IT Recruiter Head of Technical Department RdC/KCM
Sales Director	Sales Director, Enterprise & Local Government/Northern Italy Branch Energy & Utilities, Communications & Transport

Area	Functions / roles most at risk
	Financial & PAL Sales Director, Central Government & Welfare MEF & Agencies
Tenders & Partnerships	Head of Tenders & Partnerships Tender Office Specialist / Tender Office Tender & Partnership BID Manager Legal Specialist
Legal Department	Head of the Legal Department
Governance	Chairman of the Board of Directors Chief Executive Director Chair of the Board of Statutory Auditors Auditor
Significant Third Parties	Chief Executive Officer of Softjam S.p.A. (part of the Lutech Group) Chair of the Supervisory Board

The principles of integrity and expected conduct are communicated through the Code of Ethics, the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, and the internal communication tools adopted by the Group.

New employees are made aware of the Code of Ethics upon joining the company, through the handover and signing of the Code, to ensure they are familiar with the principles and rules of conduct to be observed in the performance of their duties.

In this context, the Group also promotes training initiatives aimed at employees, with particular attention paid to those most exposed to the risk of corruption and to those involved in managing control mechanisms. In 2025, training programmes were delivered on the 231 Model, anti-corruption and the Procurement Code, aimed at high-risk functions, managers, administrative, management and control bodies, and other Group employees; for further details, see the section 'Disclosure Requirement G1-3 – Prevention and detection of active and passive corruption'.

1.3 Disclosure requirement G1-2 – Management of relationships with suppliers

The Lutech Group considers the responsible management of the supply chain to be a strategic element for creating sustainable value and for achieving the Group's environmental, social and governance objectives. Suppliers are key partners in the Group's sustainable development journey, and their involvement contributes to the dissemination of ethical, environmental and social principles throughout the entire value chain.

The Procurement departments of the Group's companies, with the support of the Compliance (including Ethical Risk, Data Privacy and CSR), Security and HSE departments, oversee the processes for the qualification, selection and monitoring of suppliers, ensuring compliance with the Group's procurement policies and the requirements defined by the Group for the purchase of goods, services and professional services.

Through structured assessment and qualification processes, the Group selects and monitors suppliers who share the company's values and who operate in accordance with the key regulatory frameworks and standards adopted by the Group, including:

- the Code of Ethics;
- the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001;
- the Anti-Corruption Policy (PSQ-500);
- requirements relating to ethics, personal data protection and information security;
- the principles associated with the ISO 37001:2016 standard;
- the ESG criteria adopted in supplier assessment processes.

For Lutech S.p.A., these elements are also integrated into the vendor rating process, which includes ESG assessment criteria designed to evaluate the environmental, social and governance performance of business partners.

During 2025, the Group continued to strengthen its supply chain management and monitoring processes, with the aim of raising suppliers' awareness of ESG issues and promoting a collaborative model based on continuous improvement. The monitoring activities carried out did not reveal any serious misconduct on the part of suppliers that contravened the ethical and sustainability principles promoted by the Group.

Although the Lutech Group operates through various corporate entities, it continues to progressively harmonise its procurement processes. In 2025, there was still no single centralised procurement function for all Group companies; consequently, operating procedures and the tools used may differ depending on the management systems adopted by individual companies.

The monitoring of suppliers is aimed at:

- promote effective and transparent communication between the Group and its business partners;
- promptly identify any areas for improvement and implement corrective measures;
- develop long-term collaborative relationships, particularly with suppliers characterised by a high capacity for innovation;
- promote a culture focused on quality, performance and sustainability;
- conducting ESG assessments of strategic suppliers.

In 2025, Lutech S.p.A. continued the process of deepening the ESG assessment of its supplier base, which began in 2024, involving suppliers deemed strategic and analysing specific areas of sustainability, including:

- social aspects, with particular reference to respect for human rights, working conditions and relevant international principles;
- health and safety at work, by verifying the adoption of certified management systems, risk prevention measures and compliance with the principles defined by the ILO;

The ESG assessment process for suppliers will be reviewed during 2026, with the aim of progressively expanding the scope of the analysis – including, amongst other things, environmental aspects and the sustainable management of the supply chain, including in relation to sub-suppliers – and of implementing it during 2027.

In 2025, the Group continued to develop its information systems and procurement processes, partly with a view to better structuring the monitoring of its consolidated supplier base.

Supplier screening and due diligence

As part of its preliminary assessment of business partners, Lutech S.p.A. uses screening tools such as Moody's Orbis and Compliance Catalyst, as well as KYC (Know Your Customer) solutions designed to verify suppliers' reputational information, presence on sanctions lists, adverse media coverage and economic and financial profile.

About the anti-corruption due diligence process, Lutech S.p.A. requires its suppliers – with the except for rial occasional suppliers and specific cases assessed according to proportionality criteria – to complete the MOD-506 questionnaire, which is available in the following versions:

- MOD-506A – Self-certification of conflict of interest – Business Partners (Legal Entities);
- MOD-506B – Self-certification of conflict of interest – Business Partners (Natural Persons).

Eustema S.p.A. also continued its due diligence activities on its business partners by completing questionnaire TM033.005 "Business Partners Questionnaire" and signing the document "Anti-corruption undertaking for business partners".

Overall, the verification activities carried out did not reveal any significant issues.

Management of non-compliance and criteria for the exclusion of suppliers

Suppliers whose performance falls short of the requirements defined by the Group are subject to corrective action and, in the most serious cases, may be suspended or excluded from the list of qualified suppliers.

The main circumstances that may lead to corrective action or exclusion include:

- unethical conduct, with reference to forced labour, child labour and human rights violations;
- serious environmental incidents or incidents relating to health and safety at work;
- significant non-conformities identified during audits or inspections;
- failure to maintain the documentation required by the applicable legislation on health and safety at work;
- confirmed irregularities in relation to legal obligations;
- payment practices and compliance with commercial relationships.

The Lutech Group guarantees transparent and fair management of its financial relationships with its Suppliers, ensuring remuneration consistent with market conditions and compliance with signed contractual agreements, including the payment terms set out in purchase orders and contracts, regardless of the Supplier's size.

Payment methods and timelines are governed by the contractual terms applicable to the various types of supply and are reported under the ESRS indicator G1-6 – Payment Practices.

In line with its values and in compliance with current legislation, the Lutech Group does not use suppliers found to have committed breaches relating to undeclared work, child labour, forced labour or failure to respect fundamental human rights.

1.4 Disclosure requirement G1-3 – Prevention and detection of active and passive

In addition to the documents, policies and risk management systems already described in the preceding paragraphs, the Group adopts further governance and compliance tools aimed at strengthening the oversight of corporate conduct, including the prevention and detection of active and passive corruption and the protection of organisational integrity. In particular, the Group promotes a management system structured in accordance with recognised international standards, as a safeguard to support sound and transparent governance. The main certifications adopted by the companies within the Group's scope are as follows:

- ISO/IEC 27001:2022, held by 5 Group companies, is the international standard for information security management, designed to ensure adequate levels of protection, integrity, availability and confidentiality of data and information systems.
- ISO/IEC 20000-1:2018, held by two Group companies, defines the requirements for an IT service management system, ensuring the quality, reliability and continuity of the services provided to customers and stakeholders.
- ISO 37001:2016, implemented in three Group companies, sets out the requirements for an anti-bribery management system, strengthening organisational and control measures designed to prevent corruption.

The widespread adoption of these standards reflects a corporate culture focused on risk management, integrity and transparency towards customers, partners and stakeholders.

Companies within the Lutech Group	ISO 37001:2016	ISO/IEC 20000-1:2018	ISO/IEC 27001:2022	Model 231/01	Code of Ethics (MOG-001)	WHISTLEBLOWING (adoption of the tool and implementation of PSQ-501)	Anti-Corruption Policy (PSQ-500)
Abex Italia S.r.l.					x		x
CDM Consulting Shanghai Co. Ltd					(planned for 2026)		(planned for 2026)
Cimworks S.L.					(planned for 2026)		(planned for 2026)
Consulthink S.p.A.			x		x	x	x
Eustema S.p.A.	x	x	x	x (self-employed)	x	x (self-employed)	x (self-employed)
Know-How S.r.l.				x	x	x	x
Kronotech Ltd				x	x	x	x
Lutech Balkans Sh.p.k.					(planned for 2026)		(planned for 2026)
Lutech CDM S.p.A.				x	x	x	x
Lutech Digital Airport S.r.l.				x	x	x	x
Lutech ICT Solutions S.A. (Switzerland)	x		x		(planned for 2026)	x (self-employed)	x (self-employed)
Lutech Sinergetica S.r.l.				x	x	x	x
Lutech S.p.A.	x	x	x	x	x	x	x
Pivotal Italia S.r.l.				x	x	x	x
Sapim S.A.			x		(planned for 2026)	x (self-employed)	(planned for 2026)
Softjam S.p.A.				x	x	x (self-employed)	X (self-employed)
Stain S.r.l.				x	x	x	x
Tenenigen Ltd.				x	x	x	x

The main documentation system to be referred to for preventative purposes is Model 231 (pursuant to Legislative Decree 231/2001), which is applied in Italy and serves as a model for foreign companies, comprising the Code of Ethics, the General Part of the Model and the Special Part of the Model, supplemented by (PSQ-500) Policy on the Prevention of Corruption and the (PSQ-501) Whistleblowing Policy – management of reports of any unlawful acts pursuant to Legislative Decree 24/2023, adapted for the various Group companies, and by the Management System Manuals for the prevention of corruption where applicable. Eustema S.p.A. and Softjam S.p.A. adopt an independent whistleblowing policy, whilst their Code of Ethics and anti-corruption policy refer to the Parent Company's documents.

The signing of the Code of Ethics and the (PSQ-500) Anti-Corruption Policy by all employees and contractors of the Lutech Group highlights the company's values regarding permitted and prohibited conduct, whilst also specifying the approach to be adopted in situations involving a high risk of corruption.

These procedures are typically promoted during the onboarding process for new recruits, via the Group's intranet, the corporate website and, where applicable, the websites of individual Group companies, on which the Model 231 (general and specific sections) and the Code of Ethics are available.

Since 2018, the (PSQ-500) Corruption Prevention Policy has also been available, supplemented operationally from 2023 by the (PSQ-501) Whistleblowing Policy and the associated tool for managing reports. Eustema S.p.A. and Cimworks S.L. have their own independent portals. Softjam S.p.A. uses the Eustema S.p.A. portal.

The investigation process in the event of suspected cases of corruption

The process of investigation, analysis and response in the event of suspected cases of corruption is structured as follows:

- Preliminary assessment of the admissibility of the report and its classification based on content (Significant, Insufficient, Not Significant/Not Relevant)
- Preliminary investigation to assess whether the reported facts are substantiated (merits)
- Feedback to the whistleblower regarding the outcome of the investigation

The preliminary assessment and the response to the whistleblower are the responsibility of the Case Managers (an independent role, not involved in the assessment of the case), whilst the investigation is the responsibility of the Supervisory Board and the FCPC, with the support of internal or external experts where necessary.

In the case of reports relating to SA8000 and/or UNI/PdR 125:2022, the investigation is the responsibility of the Social Performance Team and the Gender Equality Committee, together with the relevant internal departments (e.g. HR).

Should a case of corruption be confirmed, the CEO, the Board of Directors and the Board of Statutory Auditors are to be involved.

Critical issues are communicated to the highest supervisory body via the reports produced by the various relevant company departments (the Supervisory Board and the FCPC, where applicable). For more general ESG issues, there is no standard reporting procedure; reporting takes place only as and when necessary. At Cimworks S.L., verification is the responsibility of senior management.

Management of conflicts of interest

All Group employees, prior to recruitment, and all contractors, at the time of engagement – including members of the Board of Directors – complete a self-declaration form containing a section dedicated to specific questions relating to conflicts of interest. Where conflicts exist, the HR/Procurement, Supervisory Board and FCPC departments (depending on the nature of the conflict) examine the findings and identify measures to mitigate the impacts (non-recruitment/non-engagement, recruitment/engagement with restrictions, recruitment/engagement without restrictions).

Cimworks S.L. has its own system in place which requires new recruits to declare the existence of any conflicts of interest. There are no subsequent periodic checks on existing staff.

Training activities

To complement its risk management activities relating to corporate conduct, during the two-year period 2024–2025 the Group delivered training programmes on business ethics and responsible corporate conduct, with particular reference to compliance with the provisions of Legislative Decree 231/2001, the prevention of corruption, the GDPR, information security and the ISO 37001:2016 anti-bribery management system.

With specific reference to the training programmes dedicated to the 231 Model and anti-corruption, a total of 4,942 people took part in 2024, with a training completion rate of 47.37 per cent for the course on Legislative Decree 231/2001 – Organisation, Management and Control Model – and 47.57 per cent for the anti-corruption course.

In 2025, the Group continued its programme of awareness-raising and training on ethics and the prevention of corruption, adopting an approach more focused on those groups within the organisation most exposed to the risk of corruption. Compared with 2024, face-to-face training was introduced alongside the already established e-learning programme: classroom-based training sessions were held on the 231 Model, anti-corruption and the Procurement Code, aimed at high-risk functions, managers, administrative, management and control bodies, and other Group employees.

It should be noted that the scope of the two training methods differs: face-to-face training does not include Eustema S.p.A. and Softjam S.p.A., which operate their own independently managed training systems, whilst e-learning training covers the entire Group, including Eustema S.p.A. and Softjam S.p.A.

With regard to the face-to-face training delivered in 2025 (Lutech S.p.A., Eustema S.p.A. and Softjam S.p.A.) on the 231 Model, anti-corruption and the Procurement Code, training coverage stood at 58 per cent for high-risk functions (18 participants out of 31 recipients), 51 per cent for managers (79 out of 154), 48 per cent for the Board of Directors, Management and Supervisory bodies (16 out of 33) and 66 per cent for other employees (3,499 out of 5,321).

With regard to e-learning training delivered in 2025 to the Group's Italian companies, excluding Eustema S.p.A. and Softjam S.p.A., training coverage stood at 33 per cent for high-risk functions (8 participants out of 24 target recipients), 52 per cent for managers (78 out of 150), 35 per cent for the Board of Directors, Management and Control bodies (11 out of 31) and 64 per cent for other employees (3,036 out of 4,736). These figures represent a significant increase compared with 2024, when e-learning coverage within the same scope stood at 45 per cent for high-risk roles, 22 per cent for managers, 3 per cent for the Board of Directors, Management and Audit Committee, and 16 per cent for other employees, with a particularly notable increase recorded amongst the Board of Directors, Management and Control bodies (from 3 per cent to 35 per cent) and amongst managers (from 22 per cent to 52 per cent).

2025					
Face-to-face training on the 231 Model, anti-corruption and the 2025 Procurement Code (Lutech S.p.A., Eustema S.p.A. and Softjam S.p.A.)	**Unit of measurement**	**Functions at risk**	**Managers**	**Administrative, Management and Supervisory Bodies**	**Other in-house staff**
Training coverage					
Total number of employees in this category	*n*	31	154	33	5,321
Total number of training participants	*n*	18	79	16	3,499
Training coverage	%	58	51	48	66

2025					
Distance learning (e-learning) on the 231 Model and anti-corruption (Italian companies within the Lutech Group, excluding Eustema S.p.A. and Softjam S.p.A.)	Unit of measurement	Role categories at risk	Managers	Administrative, Management and Supervisory Bodies	Other in-house staff
Training coverage					
Total number of employees in this category	*n*	24	150	31	4,736
Total number of training participants (calculated as the average number of participants)	*n*	8	78	11	3,036
Training coverage	%	33	52	35	64

2024					
Blended learning (e-learning) on the 231 Model, anti-corruption (Italian companies within the Lutech Group, excluding Eustema S.p.A. and Softjam S.p.A.)	**Unit of measurement**	**Role categories at risk**	**Managers**	**Administrative, Management and Supervisory Bodies**	**Other in-house staff**
Training coverage					
Total number of employees in this category	*n*	11	152	31	4,520
Total number of training participants (calculated as the average number of participants)	*n*	5	34	1	702
Training coverage	%	45	22	3	16

Training content on these topics is reviewed on average every two years or whenever significant changes are made to internal processes or the regulatory framework.

The level of maturity of anti-corruption measures varies across the Group's companies. For example, several subsidiaries (including Know-How S.r.l., Tenenigen S.r.l. and Lutech Digital Airport S.r.l.) fully implement the standardised training programmes defined by the Parent Company, delivered via the Group's e-learning platform and subject to the successful completion of a final assessment test. Consulthink S.p.A., whilst not yet having its own procedures in place, is subject to the extension of the Group's Anti-Corruption Policy, pending the completion of the integration process.

Eustema S.p.A., Softjam S.p.A. and Lutech ICT Solutions S.A. (Switzerland) have their own training programmes, structured across several levels depending on role and degree of risk exposure: a basic level of general awareness aimed at all staff, an advanced level dedicated to roles most exposed to risk (procurement, sales, legal and public sector relations) and a specialist level reserved for the compliance function. Lutech ICT Solutions S.A. (Switzerland) also achieved ISO 37001:2016 certification in September 2025.

2. Metrics and objectives

2.1 Disclosure requirement G1-4 – Confirmed cases of active or passiv

The Lutech Group did not identify any instances of active or passive corruption during the two-year period 2024–2025. Consequently, there were no cases of convictions or fines for breaches of the Law against active and passive corruption.

2.2 Disclosure requirement G1-5 – Political influence and lobbying activities

The Lutech Group's activities are not linked to lobbying or matters of public interest. No member of the Board of Directors held a senior position in the public administration during the two years preceding the 2025 reporting period. Furthermore, during those years, no political contributions, whether financial or in kind, were made in the name of or on behalf of the Lutech Group, either directly or through any other entity associated with it.

2.3 Disclosure Requirement G1-6 – Payment and ctices

During 2025, the Lutech Group continued to monitor its payment practices towards suppliers of goods and services, with the aim of ensuring transparent and responsible management of commercial relationships and compliance with contractually agreed terms.

The information provided has been compiled by considering all invoices received from suppliers included within the scope of consolidation, without the use of sampling methods. The analysis was carried out covering the periods 1 January 2024 to 31 December 2024 and 1 January 2025 to 31 December 2025. The calculation of indicators relating to payment punctuality was carried out by considering as 'payments in line with standard payment terms' those made within a tolerance margin of 15 days from the contractually stipulated due date, in line with the methodology defined by the Group for calculating the ESRS G1-6 indicator.

In 2025, the average number of days taken by the Group to pay an invoice, calculated from the start date of the contractual or statutory payment term, was 50 days, compared with 47 days in 2024, representing an increase of 7.35 per cent. This change is mainly attributable to the different composition of the invoices processed during the period and to the different contractual terms applied by suppliers.

During the period under review, the Group processed a total of 52,233 invoices in 2025, compared with 47,406 invoices in 2024, representing an increase of 10.18 per cent. Payments made within the standard terms, considering the tolerance margin indicated above, totalled 25,449 in 2025, compared with 24,322 in 2024, representing an increase of 4.63 per cent. The percentage of payments made in line with standard

terms stood at 49 per cent in 2025, compared with 51 per cent in 2024, representing a decrease of 5.04 per cent.

About pending legal proceedings relating to late payments, in 2025 the Group recorded 24 proceedings, compared with 30 in 2024, representing a reduction of 20.57 per cent. At the time of drafting this document, there are no pending legal proceedings directly attributable to late payments to suppliers, except for a dispute involving Softjam S.p.A. relating to service charges.

Payment terms applied

The payment terms applied by the Lutech Group vary depending on the type of supplier, the nature of the service or supply, and the contractual agreements entered by the individual Group companies.

As regards Lutech S.p.A., the parent company, the main payment terms adopted are as follows:

- professionals (e.g. notaries and solicitors): generally paid by direct bank transfer, usually immediately or within 10 days;
- consultants: terms vary depending on contractual agreements, generally ranging from 30 to 60 days from the end-of-month invoice date, with possible extensions of 10–15 days;
- lease and hire charges: generally settled by direct debit or bank transfer within 30 days of the end-of-month invoice date; for certain specific suppliers, such as Volkswagen and ALD, terms of up to 90 days apply;
- general suppliers of goods and services: normally settled within 30 to 60 days from the end-of-month invoice date, with the possibility of an extension of up to 90–120 days for certain hardware and software purchases made from major distributors.

Company policy provides for the payment of end-of-month invoices normally on the 15th of the following month, in line with the operational model adopted for the administrative management of payments.

Subsidiaries also apply different terms depending on their operational characteristics and the type of suppliers they deal with. In particular:

- some companies apply more uniform standard terms, such as 30 days from the invoice date for all categories of suppliers or terms ranging from 60 to 90 days, depending on contractual agreements;
- for companies with a significant proportion of technology and consultancy services, terms may include conditions such as 60 days from the invoice date at the end of the month, with possible extensions, or differentiated conditions by supplier category (for example, technical consultancy up to 120 days from the invoice date at the end of the month, subcontracts governed by the regulations applicable to the contract, and professional services within 30 days);
- some companies adopt specific terms for certain product categories, such as hardware and software, whilst professional services and general expenses are generally subject to shorter payment terms.

In particular, some subsidiaries have highlighted payment terms linked to the predominant nature of their business: for example, for strategic suppliers who account for the majority of the volume of purchases, specific contractual terms may apply (such as 60 days plus any additional days), whilst different terms may apply to supplies of hardware/software or professional services.

Furthermore, the method of payment varies depending on the type of supplier and the geographical area. The main methods used include bank transfer, Ri.BA., RID and, to a lesser extent, credit cards. Domestic suppliers are generally paid via Ri.BA. or bank transfer, whilst foreign suppliers are predominantly paid via bank transfer or credit card.

The Lutech Group is committed to ensuring that contractually agreed payment terms are met, guaranteeing that deadlines are monitored through internal administrative processes. Payment terms are set out in the purchase orders issued by the Group or formalised within framework agreements, where applicable.

At the time of drafting this document, the Group does not have a single centralised IT tool dedicated to monitoring the timeliness of payments at a consolidated level; however, the information required to calculate the indicator is collected via the administrative systems of the individual Group companies in accordance with the defined methodology.

Lutech Group				
Average number of days taken to settle invoices	**Unit of measurement**	**2024**	**2025**	**% 2025/2024**
Average number of days taken to pay an invoice from the date on which the contractual or statutory payment period begins	number	47	50	*7.35%*
Number of legal proceedings currently pending due to late payments		30	24	*-20.57%*

Lutech Group				
Payments in line with standard payment terms	**Unit of measurement**	**2024**	**2025**	**% 2025/2024**
Number of invoices	number	47,406	52,233	*10.18%*
Number of payments made in accordance with standard payment terms		24,322	25,449	*4.63%*
Percentage of payments in line with standard payment terms	*%*	*51%*	*49%*	*-5.04%*