

A close-up photograph of a highly reflective, metallic beetle, possibly a scarab, resting on a vibrant yellow flower. The beetle's body is polished and captures the surrounding light, creating bright highlights and colorful reflections. The flower's petals are a rich, warm yellow, and its center shows delicate pinkish-red stamens. The background is dark and filled with out-of-focus bokeh lights in shades of blue, purple, and orange, suggesting a night scene with distant lights or a festive atmosphere. The overall composition is artistic and visually striking.

DNF 2022 MEMO RANDUM

LETTER TO STAKE HOLDE RS

Our world is changing rapidly, and megatrends such as digitalisation, the climate crisis, demographic change and urbanisation are constantly challenging us to rethink the way we live, work and produce in order to ensure long-term sustainable development. At the same time, tensions such as the war between Russia and Ukraine and the aftermath of the Covid-19 pandemic are hampering progress on climate change, as is the global energy crisis and rapidly rising inflation.

At Reply, we believe in technology as part of the solution to create a sustainable future: by connecting the real and digital worlds, we can better face the challenges of our time. We continue to promote **sustainability** in what we offer our customers, investing and using new technologies in our projects with the aim of **always making a positive contribution**. We firmly believe that a **widespread cooperative approach** contributes to bringing about fair and sustainable change by “making a difference” for all of us. In this context, we aim to contribute to the **creation of value** for all our stakeholders, from our business partners to the communities to which we belong, in line with our strategy and values. Internally, the **Sustainability Committee** set up in 2021 is now active and fully supports the implementation of our strategy, monitoring the effectiveness of the defined actions.

On the market, sustainability is increasingly an integral part of our work through two main strands: the **development of IT solutions that are inherently sustainable** (green tech) and the **development of sustainable projects through the use of IT solutions** (e.g. artificial intelligence-based solutions for achieving sustainability goals). We also set up a User Group on IT sustainability to share knowledge and experience in order to benefit from the expertise developed by participants and best-in-class approaches and to define, test, implement and propose new methodologies. Reply continues to develop the **Green Approach**, defined in 2021, with its challenging targets of **Carbon Neutrality in 2025** and **net zero emissions by 2030**. At the operational

level, we are working to reduce emissions from our facilities through significant investments in new offices and renovations, which also improve employees’ well-being, and emissions caused by business travel and commuting; we started to involve our supply chain and our improvements were reflected in our ratings (e.g. CDP, Vigeo Eiris, Ecovadis).

Reply maintains its commitment to human rights, diversity and inclusion internally and in its relations with the supply chain.

We are a network of highly specialised companies, implementing innovative solutions and drawing on a wide range of experience and expertise. Reply strives for excellence in everything it offers and the diversity of backgrounds and capabilities drives us even further in creating value. By our very nature, we like to work in diverse teams and we value each other’s points of view: when we combine these factors in the right way, we **win together**. We have reaffirmed our support for the Sustainable Development Goals in the way we conduct our business and manage our operations, and we report in line with the United Nations Global Compact (UNGC) through the Communication on Progress (COP), the Global Reporting Initiative (GRI) standards for more comprehensive and transparent reporting, and the CDP (formerly the Carbon Disclosure Project).

With this document, we share the **progress made during 2022 on key environmental, social and governance aspects**. Finally, I would like to thank all the colleagues and independent contractors who share their commitment to sustainability every day, from participation in internal and charitable initiatives to continuous innovation to improve as a company and to face the challenges of transition together with our stakeholders.

Tatiana Rizzante
CEO Reply S.p.A.



REPLY: CERTIFICATIONS AND RATINGS

Communication on progress

From 2021, Reply has adhered to the United Nations Global Compact committing to support the Ten Principles on Human Rights, Labour, Environment and Anti-Corruption promoted by the initiative, and to contribute to the achievement of the Sustainable Development Goals. In line with the requirements of the Global Compact, Reply reports on the specific digital platform (UN Global Compact CoP Digital Platform) on the actions undertaken and the results achieved thanks to the integration of the Ten Principles of the United Nations Global Compact in its business strategies and operations, qualifying its commitment to support the achievement of the Sustainable Development Goals.



ESG rating

The validity of Reply's Corporate Social Responsibility management model is recognised by rating agencies and by ESG indices, which guarantee transparency in communication to investors and comparability with peers, as well as increasing the Group's visibility on financial market.

- ▶ Since 2012 part of the **CDP** (formerly the Carbon Disclosure Project), obtaining Level B in 2022.
- ▶ Confirmed as "low risk" in the **Sustainalytics** index.
- ▶ Included in the **ESG Mib Index**, which identifies

the major Italian listed issuers with the best ESG practices.

- ▶ 54/100 in the **Vigeo Eiris** analysis of ESG criteria, improving the performance compared to 2021 and getting a "robust" rating.
- ▶ In May 2022 rated A by **MSCI**, a leading international company in the provision of information tools to support the investment decisions of global investors.
- ▶ In 2022 silver medal in the **Ecovadis** assessment with a score of 62/100, an improvement on the previous year.

Certifications

Reply is **ISO 9001** certified for its Group-wide **quality management system**.

Reply S.p.A. is **ISO 45001** certified for its **occupational health and safety management system** through which it provides such services to Group companies.

ISO 14001 environmental management system certification is held by Reply S.p.A., Reply Ltd., Reply Deutschland SE, the Reply Public Sector Consortium and all the consortium companies. All major European locations are included in the scope of certification.

ISO 14064 certification is held by the Reply Public Sector Consortium.

ISO/IEC 27001 Information Security Management certification is held by Group companies and is therefore relevant to the services provided.



ENVIRONMENT: THE PATH TO NET ZERO

Following the 2015 Paris Climate Agreement, many companies have stepped up their efforts to tackle climate change.

Reply has made a full commitment to environmental sustainability, and for this reason it is committed to achieving:



Net Zero
with respect to its
value chain (overall
direct and indirect
activities) by
2030



Carbon Neutrality
for its activities
(Scope 1 and 2 by
2025

To achieve the Net Zero target, Reply is working on its emission reduction programme and has a series of actions to optimise the company's energy consumption. The main measures implemented by Reply to reduce emissions are as follows:

Transition to 50% electricity from renewable sources in all countries by 2025.

- ▶ In 2022, half of the countries where Reply is present were supplied with energy from renewable sources for more than 50% of their total consumption. When compared to the total electricity consumption of the entire Group, 82% of it comes from renewable energy sources.

Evolution towards a green fleet, with a target of 30% hybrid/electric vehicles in 2025.

- ▶ In 2022, the Reply fleet reached 17% of hybrid/

electric vehicles, the use of which is supported by the presence of special charging stations, both publicly available near the offices and, for some of the main offices, installed for the use of Reply employees.

Adoption of Environmental Policy guidelines to reduce and monitor the environmental impact of the company's activities in offices not owned by the company, and implement energy efficiency improvements in all offices by 2030 (in Italy).

- ▶ In 2022, various measures were taken to improve the energy efficiency of offices, including reducing office opening hours in line with working needs and local instructions issued by some countries to manage the energy crisis caused by the conflict between Russia and Ukraine. In addition, re-lamping measures were taken to replace traditional lighting with low-consumption equipment and replace boilers with more efficient models.
- ▶ At the same time, office refurbishment projects are analysing the opportunity to move forward with voluntary certifications of energy efficiency and environmental footprint of buildings (e.g. LEED, BREEAM), which are already available for some of the offices used by the Group.

Establishment of the Reply Forest to absorb tonnes of CO2 and support reforestation.

- ▶ The Reply Forest grew by 60% in 2022. At the end of 2022 Reply and its companies own more than 1,600 trees: the Reply Forest, together with the forests of the Reply companies, is currently capable of absorbing 510.51 tonnes of CO2 per year.

Implementation of the offsetting programme to achieve Carbon Neutrality in 2025 and Net Zero in 2030 for CO2 equivalent emissions.

- ▶ The relative analysis was started and a compensation measure plan was defined through certified offsetting projects.



ENVIRONMENT: THE PATH TO NET ZERO

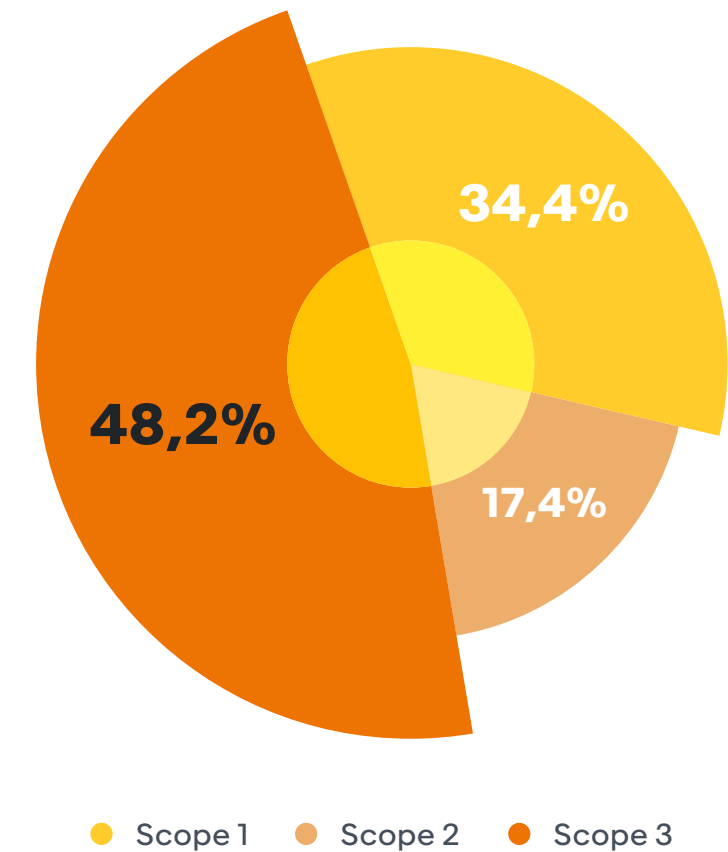
No opportunity is wasted

Reply is committed to achieving zero-waste status by 2030 with the aim of reusing and recycling where opportunities exist in e-waste. To achieve this goal, Reply will donate, reuse or recycle 100% of electronic waste such as computers and servers.

In 2022 in Italy there were several initiatives where Reply was involved in donating electronic equipment, both internally to employees who requested it and externally to various charities, for a total of 846 laptops that were put to new uses.

Reply also demonstrates its focus on the environment by reusing promotional materials, such as roll-ups, which are 80% recycled to create limited edition gifts distributed to employees who have actively contributed to the initiatives.

Emissions CO₂e by Scope



2022 - Emissions CO₂e by Scope

SCOPE	UNIT OF MEASURE	2022
Direct emissions (Scope 1)	tonCO ₂ e	5,400 (-14%)
Electricity indirect GHG emissions (Scope2) LOCATION-BASED	tonCO ₂ e	4,757 (+22%)
Electricity indirect GHG emissions (Scope2) MARKET-BASED	tonCO ₂ e	2,738 (+13%)
Other indirect GHG emissions (Scope3)	tonCO ₂ e	7,578 (+152%)



SOCIAL: OUR PEOPLE

How Reply achieves management and optimisation of the human capital:

- ▶ Integrating and respecting equal opportunities and diversities.
- ▶ Representing essential assets for idea and process innovation.
- ▶ Addressing and managing market challenges in the best way.
- ▶ Following a **Code of Ethics** that defines Reply's relationship with its stakeholders.
- ▶ Safeguarding employment stability (in 2022 **99% of women and 99% of men are employed on permanent contracts**).

In addition, Reply established the **Human Rights & Labour Policy** which rejects child labour and forced labour and protects freedom of association and collective bargaining throughout the Group, and issued the Modern Slavery Policy against modern forms of slavery.

The injury rate

R1 for men is 0.19, while for women it is 0.51
R2 for men is 0, while for women it is 1.99
R3 for men is 0, while for women it is 0

The lost day rate

R1 is 0.03 for men and 0.02 for women
R2 is 0.02 for men and 0.13 for women
R3 is 0.01 for men and 0 for women



The presence of women increased to **29% of the total workforce (3,763 employees)**, compared with 2,891 in 2021 and 2,549 in 2020): a percentage in line with that of university faculties (STEM), which are the Group's main area of recruitment. There was 100% **pay equity** on the minimum wage and 94% on the average wage in all countries.



Provided to **improve employee retention and general well-being**, they vary from country to country in relation to local legislation. In Italy, for example, there are a number of concessionary agreements for employees in the areas of health, well-being, personal care and mobility. However, there is no Region in which Reply operates with a significant difference in allocation of benefits for different types of contract (permanent, temporary, part-time).



In all companies operating in Italy is guaranteed through the application of the health and safety model managed by the parent company Reply Spa, certified ISO 45001. An active **health surveillance protocol** is in place for employees and independent contractors, with ongoing collaboration, which includes preventive visits at the beginning of the employment relationship and periodic appointments. With reference to personnel health and safety, there were no occupational diseases or deaths following workplace accidents during 2022 in any Region. The main type of accident is those that take place while commuting.



SOCIAL: WELLNESS AND DIVERSITY



REPLY WELLNESS

At the same time, the **Reply Wellness** programme was launched in 2018, with various activities divided into three main areas:

- ▶ diet
- ▶ fitness
- ▶ prevention

For each of these categories, there are both annual programmes and specific activities linked to global campaigns or particular events.



MENTION *for* PREVENTION

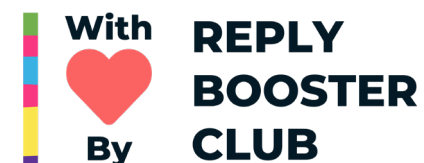
In particular, The **Mention for Prevention** programme brings together wellness and prevention initiatives to reinforce the importance of a healthy and active lifestyle. The programme is developed with a Learn-Care-Prevent approach. In 2022, the programme saw more than 200 wellness-related events and conferences, with a total of 2,700 participants worldwide.

Within Reply, the Social Network function, whose objectives include facilitating growth and knowledge sharing and creating opportunities for networking, supports access to services and opportunities for all Replyers in a fair and equitable manner, regardless of gender, status, origin or position.



The **Reply All - Uniquely Diverse** programme aims to create a community that gives space and visibility to diversity, inclusion and accessibility, leveraging on the intrinsic nature of Reply: a network of companies that celebrate differences.

In 2022, the panels on women and the LGBTQIA+ community involved more than 300 unique Replyers from 10 different countries.



To facilitate and strengthen this connection, the international **Booster Club** programme has also been launched, which involves the creation of teams to engage the employee community in each of the Group's offices, with the aim of encouraging knowledge sharing and participation in #LifeAtReply events. The aim of the Booster Clubs is to offer similar opportunities throughout the Reply network and to listen to the voices of all Replyers, regardless of the size of their offices. The very nature of the Booster programme, in 2022 made up of 40 different teams present in 14 countries (in 2021 there were 38 teams in 12 countries), allows for a wide variety of 35 initiatives, both at particular local events and in the organisation of events and broader initiatives involving several Reply offices. In 2022, Booster events saw more than 6,200 attendees globally.



SOCIAL: LIFE LONG TRAINING



Training and professional development are promoted regularly with ongoing education activities. Consequently, in 2022, Reply invested in programmes for professional skill and career development, including induction and onboarding courses, specialisation and technical refresher courses, and soft skill workshops.

In particular, the Group provides **optional training activities that are open to all employees.**



The Human Resources department manages specific internal training programmes for new managers and executives (**Reply Management Programme**), covering team and people management, business development, internal company processes, management skills and continuing education activities in collaboration with internationally recognised business schools.

**Learn.
Share.
REMIX.**



Furthermore, the Social Network function acts as an enabler for internal training through skills improvement courses. In particular, the training programme with user-generated content (**Learn.Share.Remix**) allows Reply employees to act as lecturers and speakers on current topics of interest to the company, through interactive sessions and workshops. As part of the Learn.Share.Remix programme, 137 events were organised in 2022 with over 4300 global participants from 15 different countries.

REPLY CHALLENGES

In 2022, Reply organised four **Reply Challenges** throughout the year, each of which bringing together groups of experienced Repliers in a single location to hone their skills, innovate and develop a problem for participants to solve. In 2022, more than 1,400 Repliers participated in challenges on areas such as: coding, cybersecurity, investments and creativity. Repliers can use their skills and innovation skills to reach the top of the rankings and win the prizes up for grabs.



SOCIAL: REPLY FOR STUDE NTS

Reply believes and invests in the development of talent and skills. This attitude is encouraged and applied not only within the employee community, but also externally to students and professionals who participate in a variety of employee-focused activities. Reply acquires the best talents through established relationships with several Italian and European universities and research centres, so as to enrich its workforce with high-profile personnel. Reply invests in the development of talent and skills, promoting the importance of lifelong learning as an integral part of career paths.

The various programmes include: **Student Tech Clash**, a competition between universities to stimulate competition through creativity and the production of innovative projects; the **Reply Challenges**, online competitions for teams on the main themes of innovation; and the **Reply Ambassador Programme**, a team of university students who collaborate with Reply during their academic career.

In 2022, in line with its commitment to promote gender equality, Reply joined the **Girls@PoliMI initiative**, conceived by the Politecnico di Milano to sponsor scholarships for female high school students to attend engineering courses starting in the 2023/2024 academic year. Support for women in STEM training promotes inclusive education, which breaks down stereotypes and helps reduce the gender gap.

Another initiative is a partnership with the **UK charity upReach**, which works to help students from disadvantaged backgrounds get into and stay in top jobs. Reply is collaborating with upReach in several ways during the 2022-2023 academic year. Reply has 12 mentors paired with upReach associates to support them on curriculum-related issues and 8 senior employees who have joined the upReach Social Mobility Network to provide contacts, career advice and guidance, as well as CV guidance and mock interviews. In addition to the Insight Day in November 2022, Reply plans to continue to host a face-to-face Insight Day and participate in

the Tech500 Bootcamp in 2023, which aims to create a new bespoke support programme for 500 students from disadvantaged backgrounds.



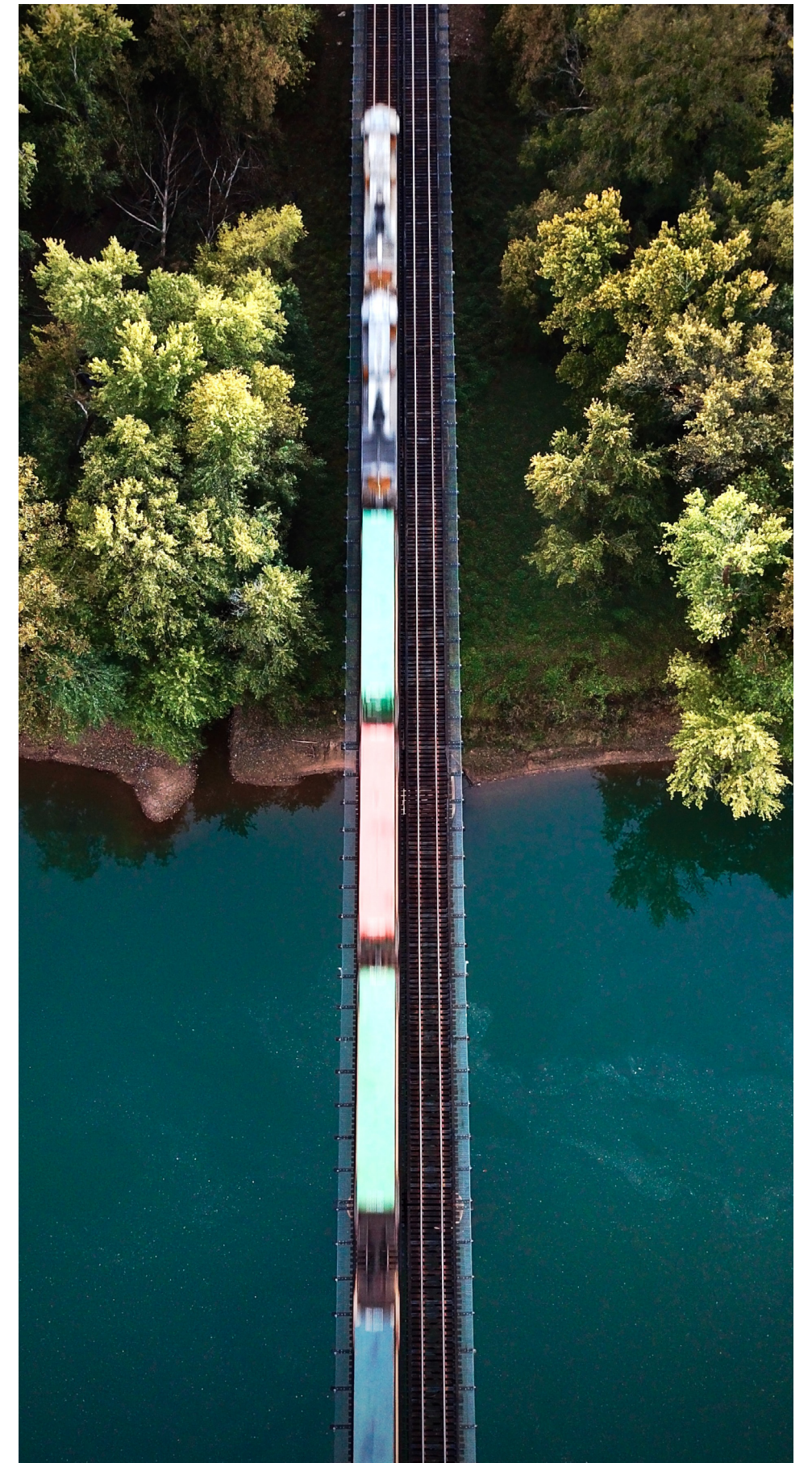
SUPPLY CHAIN

The selection process and the focus on building virtuous, long-lasting relationships with independent contractors is essential to Reply. Independent contractors work both at the Group and customer premises, so they are assessed and managed carefully.

It should be noted that in all contracts entered into by Group companies, independent contractors and suppliers are required to accept and apply the Group's Code of Ethics and from 2022, the Supplier Code of Conduct, which integrates the existing Code of Ethics, also included in the contracts. The purpose of the **Code of Conduct** is to define the standards that must be respected by suppliers and to gather all the issues that Reply considers essential in the relationship with its suppliers: integrity and transparency, focus on the environment, health and safety, protection of people and working conditions.

The 209 suppliers found to meet these criteria were then invited to participate in the initiative, which had an 89% participation rate, with 185 suppliers completing the online questionnaire.

As part of the security measures put in place by the ICT Security function, Multi-Factor Authentication (MFA) was also extended to external independent contractors to access Reply's systems and network.



GOVERNANCE

The Corporate Governance system adopted by Reply adheres to the indications contained in the Corporate Governance Code of Italian listed companies published by Borsa Italiana S.p.A., in the January 2020 version, with the integrations and adjustments consequent to the characteristics of the Group.

Reply's Board of Directors is composed of five men, including the Chairman, over 50 years of age and four women, including the CEO, over 50 years of age, as described in the Report on corporate governance and ownership structures. The appointment of directors is governed by the company's Articles of Association, which takes into account the legislation on gender balance.

The Board of Directors established the Sustainability Committee in 2021 to promote the integration of environmental, social and governance factors into corporate strategies in order to achieve sustainable growth and create long-term value for shareholders, taking into account the interests of relevant stakeholders. Reply considers compliance as an indispensable basis for maintaining business relations with public and private entities. In addition to complying with the national laws of the countries in which it operates, the Group pursues sustainable and inclusive growth and operates in accordance with the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO) and the principles promoted by the United Nations Global Compact, to which it is a signatory.

In Italy, Reply has adopted an Organisational, Management and Control Model which represents a structured and organic system of procedures and activities aimed at preventing, as far as possible, the commission of inappropriate conduct, including corruption and conflicts of interest. The Model specifies processes at risk of corruption and they include management of entertainment expenses, gifts, sponsorships, and generic donations.

Specific whistleblowing channels have been set up in all the countries in which the Group operates. In particular,

there is a Whistleblowing Policy, again at Group level, encouraging stakeholders and employees to report any suspected wrongdoing as soon as possible, guaranteeing that any such report will not affect their working conditions.

In the reporting period there were no significant cases of non-compliance with laws and regulations and no fines were paid during the reporting period. There are no pending or closed legal proceedings regarding anti-competitive behaviour and violations of antitrust and antimonopoly laws in which the organisation has been identified as a party.



DATA PROTE CTION

The security of our information systems is a fundamental requirement for ensuring the reliability of the data processed, as well as the effectiveness and efficiency of the services provided by the company, as set out in Reply's Code of Ethics.

Reply's commitment to data protection and the assets that support it is aimed specifically at safeguarding: confidentiality, ensuring that data is only accessible to authorised users and systems; integrity, safeguarding the integrity, completeness and accuracy of the data; availability, ensuring that authorised users and systems have access to data when needed.

To govern information security and privacy aspects in the services provided, the Reply Group has adopted a complex framework.

The GDPR Compliance Programme instead provides for the standardisation of data and privacy protection practices for all Group companies and holdings, and is applied through the definition of a Privacy Management system.

For further information see:
[Consolidated disclosure of non-financial information 2022.](#)

