



HUMAN RIGHTS STATEMENT NEXI GROUP

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1 PRINCIPLES PROMOTED BY NEXI GROUP

Nexi Group (hereinafter also "Group" or "Nexi") declares its commitment to the respect and protection of Human Rights in all the countries in which it operates and commits to identify, mitigate and, whenever possible, prevent potential Human Rights violations related to its activities and throughout its supply chain.

In particular:

- **non-discrimination**, Nexi fights all forms of discrimination, whether based on sex, color, language, ethnicity, disability, sexual orientation and gender identity, economic status, religion, political opinion, or any other personal characteristic
- **sexual harassment**, Nexi fights, with no exception, all forms of sexual harassment in the workplace
- **fair and equitable working conditions**, Nexi operates in accordance with minimum wage requirements and ensures the payment of overtime fees, where applicable, in accordance with local laws. Nexi does not tolerate the use of forced or compulsory labor
- **equal pay and gender equality**, as part of the provisions of its remuneration and incentive Policies, Nexi commits to offer equal remuneration by guaranteeing the application of the principle of equal opportunities and promoting policies to combat the gender gap
- **respect of the minimum working age**, Nexi does not tolerate any form of child labour. The Group does not employ people below the minimum age required by local laws
- **health and safety in the workplace**, Nexi is committed to protecting the health and safety of its employees and all persons with whom it interacts at the Group offices
- **freedom of association and union representation**, Nexi recognizes and respects the right of workers to be represented in accordance with applicable local laws and practices
- **privacy and freedom of opinion**, Nexi respects the privacy and freedom of opinion of its employees, suppliers, collaborators and business partners.

2 INTERNATIONAL PROVISIONS

- Universal Declaration of Human Rights adopted by the General Assembly of the United Nations
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- The United Nations Convention on the Rights of the Child (UNCRC)
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- ILO Declaration on Social Justice for a Fair Globalization
- United Nations Guiding Principles on Business and Human Rights
- The European Framework Directive on Safety and Health at Work (Directive 89/391 EEC)
- United Nations Agenda 2030 with the related 17 Sustainable Development Goals (SDGs) for the promotion sustainable development.

3 AREAS OF APPLICATION

Nexi identifies internal reference structures and adopts appropriate procedures to verify the respect for Human Rights and alignment with the principles promoted by the Group in all its activities, including the supply chain, as described below. Verification of compliance with the principles promoted by the Group on the subject of Human Rights is included in the responsibilities of the relevant appointed structures.

3.1 RESPECT FOR HUMAN RIGHTS WITH REFERENCE TO GROUP EMPLOYEES

Nexi is committed to promoting the respect of Human Rights of all employees in all processes in which they are involved, especially in the phases of personnel selection, annual performance evaluation and some specific operational activities. The implementation and actual realization of the protection of Human Rights is verified by monitoring specific quantitative indicators¹.

3.1.1 Relations with Trade Unions

Nexi carries out its activities within an advanced regulatory framework, in full compliance with the provisions of the National Collective Bargaining Agreement (CCNL) or any other relevant national regulation adopted in the countries where the Group operates, as well as of the Company-level supplementary agreements (CIA). Trade union organizations are periodically involved on the issues as indicated by the regulations in force and whenever the need or opportunity arises in relation to company events.

Non-ordinary operations

When dealing with non-ordinary operations, Nexi engages with the trade unions in full respect of Human and Workers' Rights and of the regulations in force. In particular, in these contexts, Nexi follows the principles below:

- **transparency** in informing trade unions of the needs and objectives of said non-ordinary operations
- **openness** to dialogue with the counterparties with the aim of reaching shared understandings
- **flexibility** in exploring the best solutions for harmonizing the contracts applied to Group employees.

3.1.2 Recruitment of employees

The Group hires its employees on the basis of their qualities and competences and is committed to providing equal opportunities to all employees, both in the workplace and in terms of career advancement. In line with the principles promoted by the Group, as part of its recruitment activities, the Human Resources function sets a target of at least two female candidates for all new job positions.

3.1.3 Performance evaluation

Nexi has defined structured processes, subject to various degrees of review, for evaluating the performance of employees, in order to ensure the application of the principle of equal opportunities, and to counter any bias in evaluations as well as discriminatory situations linked to gender, level of seniority or other considerations not related to performance parameters.

In order to ensure the objectivity of the assessment process, one team of the Human Resources takes part in all *Pre Calibration Meetings and Calibration Meetings*² with a guiding and guarantor role to ensure a coherent and homogeneous assessment criteria.

Once the Human Resources function receives the performance evaluations, it monitors the statistical distribution of evaluations by gender and relevant organization layer in order to confirm actual coherence and homogeneity.

3.1.4 Health and Safety

The management of the health and safety of Group personnel takes place through the implementation of risk assessments aimed at identifying, preventing and reducing actual and potential risks to the health and safety of all Group workers.

In this context, Nexi defines and implements specific training sessions and awareness-raising initiatives aimed at ensuring adequate knowledge for compliance with legal and sector-specific regulations and at creating a safety culture. Finally, all actions are subject to specific monitoring and control activities to ensure full compliance with health and safety regulations.

3.1.5 Specific operational activities

Within the framework of the National Collective Bargaining Agreements applied to all its employees or any other relevant national regulation adopted in the Countries where the Group operates, Nexi identifies solutions aimed at combining the most effective customer management with the protection of its employees, both in respect of Human Rights and the of prerogatives recognized to workers. The

¹ These indicators include, but are not limited to, the breakdown of employee evaluations by gender and band, the proportion and spending of suppliers being investigated based on the activity performed, and the number of non-conformities found.

² Meetings for the assessment of the performances of each single employee with the responsible manager.

Group's call centres represent an area to which the Group has dedicated particular attention, identifying cutting-edge solutions that guarantee these rights, with particular reference to the need to record telephone conversations in support of specific operations³.

3.2 RESPECT FOR HUMAN RIGHTS WITH REFERENCE TO SUPPLY CHAIN

3.2.1 Suppliers selection process

In choosing suppliers, the Group adopts the maximum transparency and efficiency to ensure impartiality at every stage of the purchasing process. The Group intends to ensure equal conditions for all suppliers participating to the selection process, which is based on objective criteria, according to principles of fairness, cost-effectiveness, quality, innovation, continuity and ethicality in line with the Group's Procurement Policy and in compliance with the Codes of Ethics of all Group companies.

In line with the Group's organizational procedure "Qualification, census and evaluation of suppliers", all suppliers involved in the selection process must be qualified to be included in the suppliers' register⁴.

The inclusion in the suppliers' register, requires reading and compliance with the principles contained in the Organization Model, the Code of Ethics and the Group's Sustainability Policy.

Suppliers are therefore qualified on the basis of:

- objective criteria, which include technical requirements, the latest available financial statements, and the presence of certifications where necessary
- the compliance with regulations on the protection of Human Rights and working conditions
- the compliance with environmental regulations and adoption of the most relevant reference standards on the basis of their relevance for each supplier
- the acceptance of specific documentation⁵
- the answers provided to specific proposed questionnaires⁶.

Failure to comply with these requirements will result in the exclusion from the list of previously accredited suppliers. In order to mitigate any possible risk, any recourse to subcontractors is subject to explicit approval and verification by Nexi.

3.2.2 Supplier risk assessment and mitigation

Responsible supply chain management is of strategic importance for Nexi to ensure the high quality of products and services.

Nexi's objective is to ensure full compliance with international principles and standards on ethics, labour, health, safety and environment by suppliers of products and services, and to mitigate reputational and business continuity risks in the Group's supply chain.

The identification of potentially at-risk suppliers is performed on the basis of the information recorded during the qualification phase and refers to the country in which the supplier operates, the product category and the presence of specific activities that may have an environmental or social impact. Suppliers at risk are then subject to in-depth analysis, that includes the completion of a self-assessment questionnaire aimed at obtaining more information on their exposure to environmental, social and governance risks.

The Group applies an assessment grid to assign each supplier its risk level (high, medium or low) and to identify the list of suppliers for which it is necessary to carry out further verifications, including on-site inspections. If a supplier results being non-compliant with the principles of Human Rights, fair and equitable working conditions or other non-conformities, the supplier is excluded from the list of suppliers or is subject to an improvement process aimed at promptly resolving the less critical non-compliances.

4 REPORTING OF POTENTIAL VIOLATIONS

As a further guarantee for all stakeholders, anyone can report potential non-compliance towards the principles or any conduct in violation of rules, regulations and internal procedures included in this Statement. Reports of alleged human rights violations can be made through the channels provided by the Codes of Ethics of Group companies. The reporting parties in good faith are guaranteed against any form of retaliation, discrimination or penalization. In all cases the confidentiality of the identity of the reporting party will be guaranteed, except for legal obligations and the protection of persons accused falsely or in bad faith.

5 TRANSPARENCY AND REPORTING

The Group provides information on the processes applied, the results achieved and the presence of any episodes of violation of Human Rights ascertained through its Non-Financial Statement according to Legislative Decree 254/2016 and Consob Resolution no. 20267 of January 18th, 2018 and subsequent updates. The Non-Financial Statement is distributed according to the methods and relevant institutional public channels, including the Group's website.

6 DIFFUSION

This document is delivered to all internal and external stakeholders who request it and is available on the Group's website.

³ For example, all calls received by the call center to block payment cards are recorded.

⁴ All the suppliers who provide goods or services to the Group must be qualified, with the exception of Institutional Suppliers, who are non-substitutable or whose spending is inferior to €30,000 per annum.

⁵ Such as the Group's Supply General Conditions.

⁶ For example, for verification of data protection requirements.