



R.S.I. (Social Responsibility) Policy Report d'Impresa) of ISG Italia S.p.A.



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Reviews

Version	Description	Date
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References

- [01] UN Agenda 2030
- [02] Directive 2014/95/EU
- [03] D. Legislative Decree No. 254/2016
- [04] D. Legislative Decree No. 231/2001

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1 Purpose of the document

The purpose of this document is to describe a set of principles, values and objectives that guide the company's actions and decisions to integrate social, environmental and ethical concerns into its business operations and interactions with stakeholders, and to provide a framework for its commitment to social responsibility and sustainability.

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Foreword

Paradigm shift from 'way of saying' to 'way of doing' and to 'way of being'

Information Services Group Italia S.p.A. a socio unico (ISG Italia) is the Italian country of the American multinational ISG Inc. listed on NASDAQ III (<https://www.isg-one.com/>) specialising in digital transformation and in strategic and operational consulting in the ICT field.

ISG Italia has chosen to adopt and integrate the principles of sustainability in its organisation and oriented its institutional commitment towards the concrete implementation of actions aimed at improving its performance in environmental, social and corporate governance terms, with the active involvement of Personnel, Managers and other Stakeholders in the consistent implementation of the defined policy and the continuous monitoring of the results and progress achieved.

ISG Italia believes that the adoption and implementation of standards and practices that promote sustainability represent fundamental values of civilisation and culture.

ISG Italia maintains an active international dialogue with all the company's countries around the world to address sustainability issues in a collaborative and highly integrated manner in order to take advantage of any good/best practices deriving from diversified experiences.

3 ISG Italy CSR Policy

ISG Italia, also under its previous company name of C.T. Partners S.p.A., has always paid particular attention to pursuing a responsible and transparent policy aimed not only at the company's best performance, but also at enhancing the company's image and reputation with its market and all its stakeholders. In overall terms, ISG Italia's policy is expressed in its commitment:

- towards stakeholders such as employees, customers, local communities, suppliers and investors in engaging and listening to them to understand and address their needs and concerns.
- reduce the environmental impact of its operations by adopting sustainable natural resource management practices, reducing greenhouse gas emissions, promoting energy efficiency and managing waste and water resources responsibly.
- conduct its business in an ethical and transparent manner, respecting the principles of integrity, fairness and regulatory compliance. This may include anti-corruption policies, accurate disclosure of financial information and respect for human rights;
- promote an inclusive and diverse work environment, where people of all genders, ethnicities, sexual orientations, abilities and socio-economic backgrounds are respected and valued. This includes fair recruitment policies, diversity training programmes and professional development opportunities for all employees;
- to contribute positively to the communities in which it operates, through employee volunteering programmes, philanthropic donations, partnerships with non-profit organisations and local development initiatives;
- ensure that their suppliers adhere to ethical and sustainable standards in their operations, through supply chain assessments and monitoring, and collaboration to improve sustainable practices.

Currently, these principles of Corporate Social Responsibility have embarked on a path of formal integration into ISG Italia's corporate culture and strategies through transparent communication to all stakeholders and a commitment to monitor the achievement of established objectives and the adequacy of implemented practices.

This Report is published on the parent company's corporate website (<https://www.isg-one.com/>) **Other Policies | ISG ([isg-one.com](https://www.isg-one.com/))**.

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Objectives of ISG Italy's CSR policy

With the integration of sustainability principles into its operating model, ISG Italia wants to prepare for the future preparation of a Sustainability Report addressed to all stakeholders of the company in order to start a communication path on the commitments undertaken in the field of Corporate Social Responsibility. Thus ISG Italia intends to:

- a) obtain a competitive advantage in participating in competitive procedures organised by the public administration;
- b) act in accordance with environmental legislation and implement an efficient water and energy management;
- c) Improve the analysis of non-financial risks, cyber risks, social risks, other potential risks and their mitigation;
- d) ensure data security and adequate management of cyber risks;
- e) contribute to the development of a sustainable supply chain and value creation process by involving customers and suppliers;
- f) acting in full legality, respecting human rights, privacy and diversity management;
- g) create a safe, equal and rights-compliant working environment that attracts and retains young talent;
- h) enhancing one's *brand reputation*.

5 Information of character not financial ISG Italy's CSR Policy: Actions and Results

In this section, non-financial information concerning the process of integrating sustainability into the company's organisational model is provided *to the extent necessary to ensure an understanding of the company's business, its performance, results and impact.*

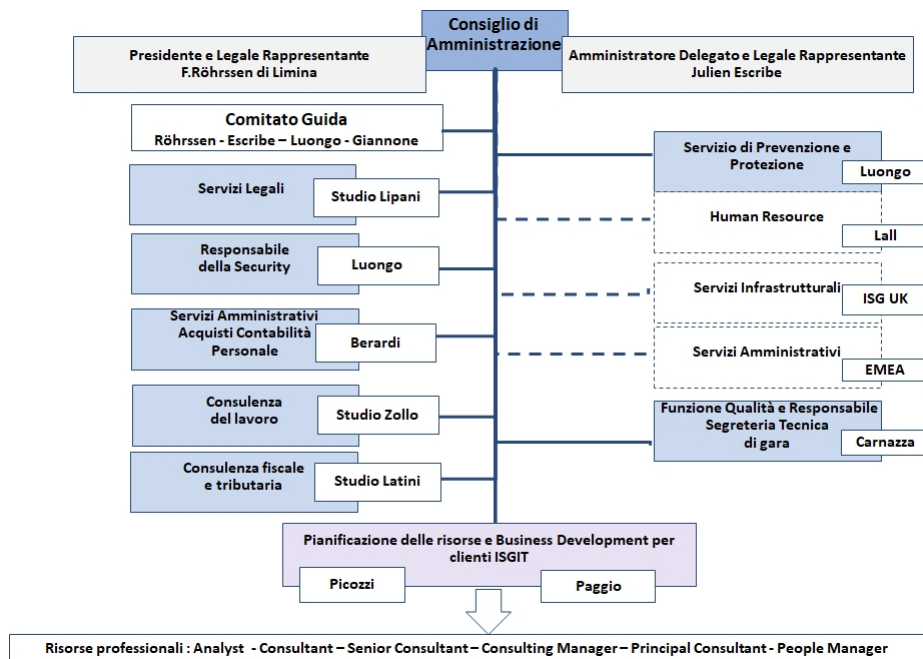
As indicated in the 'References', and as far as applicable to ISG Italia's company size, a compliant report is provided below:

- to Directive 2014/95/EU, transposed into Italian law by D. Lgs. 254/16,
- the indications pursuant to Legislative Decree 231/2001;
- the *Sustainable Development Goals (SDGs)* of the UN 2030 Agenda.

5.1 Company management and organisation model

It should be pointed out that the parent company ISG Inc., sole shareholder of ISG Italia S.p.A., has already started the sustainability rating process with ECOVADIS and has, therefore, prepared documentation and policies pertaining to this initiative and valid, as far as applicable to the company and territorial specificity, also for our company.

The figure below depicts the company organisational chart showing the various functions on which the company's organisational structure is based in its components of strategic top management; middle management; technical structure and support staff.



As can be seen, the functioning of the company requires a diversified contribution of services and professional skills expressed by the numerous staff functions that refer to the Board of Directors and the two Legal Representatives of the company; the technical structure is entrusted to the responsibility of a Partner and a Director who act as People Manager for the professional resources entrusted to them. The Board of Directors is flanked by the Board of Auditors and the Auditor.

Each Professional Resource is, therefore, under the hierarchical responsibility of its People Manager. The organisational units outlined concern centralised services performed by specialised structures of the ISG Group.

Staffing the Board of Directors is the established Steering Committee for Gender Equality, which has co-opted both the Chairman and the CEO of the company.

The technical structure, composed of Professional Resources with delivery function, presents a *flat* dimension where there are no intermediate hierarchical levels. In the operational conduct of activities, each Employee, while maintaining the hierarchical link with the People Manager of reference, may be assigned to projects placed under the responsibility of other Referents of ISG Italia or of the Group and, in the latter case, the Professional Resource, while continuing to maintain hierarchical dependence on its People Manager, responds functionally - for the activities carried out on the individual project or Customer - to such Referent.

Personnel management is entrusted exclusively to the Administrator Delegate.

In addition, the election of the Workers' Safety Representative (RLS) was completed on 23 September 2024.

ISG Italia is a certified company for Quality Management System ISO 9001:2015 (IAF 33. 34. 35); ISO/IEC 27001:2013 for Information Security Management and for Gender Equality UNI/PDR 125:2022.

The company also obtained two stars ★★ in the AGCM's 'Legality Rating'. With the legality rating, the public administration has introduced a bonus, which also produces effects under the procurement code, for those companies that have chosen to voluntarily introduce actions in the field of sustainability and social responsibility.



*Autorevolezza
della Conoscenza e del Mercato*

Rif. R12735

Spett.le
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COMUNICAZIONE VIA PEC

Oggetto: richiesta di attribuzione del Rating di legalità, ai sensi dell'art. 2, comma 1, del Regolamento adottato dall'Autorità Garante della Concorrenza e del Mercato con delibera n. 23361 del 28 luglio 2020 (di seguito, Regolamento).

Si comunica che l'Autorità, nella sua seduta del giorno 19 giugno 2023, ha esaminato la domanda per l'attribuzione del Rating di legalità da Voi depositata in data 11 maggio 2023.

In base alle dichiarazioni rese, nonché all'esito delle valutazioni effettuate, l'Autorità ha deliberato di attribuire a INFORMATION SERVICES GROUP ITALIA S.p.A. (C.F. 12727500154) il Rating di legalità con il seguente punteggio: ★★.

L'impresa sarà inserita nell'elenco previsto dall'art. 8 del Regolamento. Ai sensi dell'art. 6, comma 1, del Regolamento, il Rating di legalità ha durata di due anni dal rilascio ed è rinnovabile su richiesta.

Si rammenta, infine, che ai sensi dell'art. 7, comma 1, del Regolamento, l'impresa è tenuta a comunicare all'Autorità gli eventi che incidono sul possesso dei requisiti obbligatori, la perdita di requisiti premiali e le variazioni dei dati riportati nei propri certificati concernenti i requisiti per il rilascio del Rating. La violazione di tali obblighi comporta l'applicazione dell'art. 7, comma 2 e 3, del Regolamento.

Distinti saluti.

IL SEGRETARIO GENERALE
Guido Stazi

Guido Stazi
DIRETTORE GENERALE



Certificate No.	Registered Activities
TS 050502	
Location	Registered Activities
ISG (Group Services) Ltd High House Milton Keynes MK14 6JF United Kingdom	The management of information security production, client data, and internal systems, in accordance with the Statement of Applicability v3.3 dated 23/10/2023.
Information Services Group Germany GmbH The Square 12 Parsdorf 02449 Germany	The management of information security production, client data, and internal systems, in accordance with the Statement of Applicability v3.3 dated 23/10/2023.
Information Services Group Italia S.p.A. Via Ferrara, 120 Brescia (BS) 22106 Italy	The management of information security production, client data, and internal systems, in accordance with the Statement of Applicability v3.3 dated 23/10/2023.
Information Services Group Europe Ltd 11th Floor Millbank London WC2A 0LP United Kingdom	The management of information security production, client data, and internal systems, in accordance with the Statement of Applicability v3.3 dated 23/10/2023.
IT4 Advisory Services Italia Private Unit 11, Heritage Centre Council House and East View Heritage Road Barnstaple Devon EX16 6LS United Kingdom	The management of information security production, client data, and internal systems, in accordance with the Statement of Applicability v3.3 dated 23/10/2023.

Original Registration Date: 2023-10-17
Latest Review Date: 2025-10-17

Effective Date: 2023-10-17
Expiry Date: 2025-10-17

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This certificate is issued to the company named above and is valid for the period of two years from the date of issue. The certificate holder must ensure that the system remains compliant with the requirements of the standard to which it is certified. The certificate holder must also ensure that the system remains compliant with the requirements of the standard to which it is certified. The certificate holder must also ensure that the system remains compliant with the requirements of the standard to which it is certified.

The company size does not make the adoption of an organisational model pursuant to Legislative Decree 231/2001 and the appointment of a Supervisory Board (SB) mandatory. Currently, the functions of the SB are entrusted to the Steering Committee. During the current year, an assessment with the company's legal department is planned with a view to the voluntary adoption of a model pursuant to Legislative Decree 231/2001.

5.2 Fighting corruption

The Company has its own Group-wide Code of Ethics and has also adhered to the Assoconsult Code of Ethics, which is the trade association of management consulting companies that belongs to Confindustria.

5.3 Main risks and management modes

As part of its Management System, in compliance with the requirements of UNI EN ISO 9001, ISO/IEC 27001 and PdR 125:2022, the Company has developed and maintains an active risk and opportunity assessment system, based on the analysis of the context in which it operates, the relevant factors and the requirements of the stakeholders. This activity is complemented by an ongoing activity of organisational and operational process innovation.

ISG Italia carries out ongoing activities:

- to consolidate the level of awareness of its staff and the corporate culture towards issues of safety, inclusion, the gender equality and sustainability;
- for customer satisfaction and personal data protection through the information security management system certificate defining the operational standards for services provided that have an impact on data confidentiality;
- for the careful evaluation and monitoring of suppliers, through a selection also based on respect for working conditions, for the human rights and environmental impact, and by raising supplier awareness of Social Responsibility issues, and by introducing contractual clauses on Social Responsibility issues.

ISG Italy is part of ISG's 'Modern Slavery Risk Management Framework', a subset of ISG's 'Enterprise Risk Management Framework', which is the backbone of our commitment to modern slavery risk management and the elimination of enterprise-related human exploitation.

ISG has zero tolerance for retaliation of any kind. This policy applies to all employees, officers and contractors. There is currently a procedure

of complaint concerning sexual harassment, which provides for reporting either directly (via a dedicated certified mailbox) or anonymously to a traditional mail address.

Similarly, ISG's suppliers may in a confidential, independent and discreet manner directly raise concerns, misconduct or doubts about the company's or an individual's behaviour that may give rise to the suspicion of a violation of ISG's policies and procedures or, more generally, of human rights, safety, the environment, financial reporting, fraud or corporate integrity.

5.4 Impact on the environment

Although the company does not have a formally certified Environmental Management System, it has always paid attention to environmental aspects and their impacts with reference to its business activities, which are exclusively intellectual in nature.

ISG Italia is completely *server free* as it has completely decommissioned the previous micro data centre, used mainly for local administrative applications (IPSOA), migrating entirely to the suppliers' *cloud* architecture; for all other aspects concerning information systems it uses the services provided centrally by ISG UK and uses, also for these, *cloud* services for the storage of its files and normal operations.

In 2023, the company replaced all the controllers and *fancoil* probes of the air-conditioning system in the offices and connected them in a serial line with a concentrator that allows for the individual monitoring and management of each device installed in the various rooms. This makes it possible to set the basic temperature set point independent of that of the entire building and to programme on an hourly, daily and seasonal basis the automatic switching on and off of the system divided by zones. The concentrator is also connected to the technical network switch that allows access, even remotely, to customised graphic pages to manage the system's operating parameters.

The described intervention saves an average of 180KWh less electricity per month; considering the equivalent in CO₂ (source 'ENEL *ghg-inventory-2021_en*'), about 40Kg of carbon dioxide was avoided in the atmosphere every month.

The company has long paid attention to paper consumption, which is reduced to a minimum and limited only to documents related to tax obligations, as all documents are processed digitally and thus exchanged with customers and suppliers, with digital signatures (where applicable), via PEC or institutional e-mail. Comparing the last order placed (2023) with the average of the previous three years shows a paper saving of approx. 65%.

Almost all work meetings, both internal and with external stakeholders, are conducted remotely through the Microsoft Teams tool integrated in the individual productivity tools provided to all employees. The massive use of videoconferencing has also drastically reduced the need for staff to travel within Italy and abroad. The introduction of smart working has also helped to limit staff travel within the Rome metropolitan area.

ISG Italia has adopted an internal 'Clear Desk' policy that regulates the use of staff workstations that are not assigned by name and that must be left free of all objects and/or documents at the end of each working day. In this way, based on the daily presence of staff in the office, each employee is required to occupy, until saturation, the free desks of each of the two *open spaces* present in the offices, with the exception - for confidentiality reasons - of the Secretariat/Administration and the offices reserved for company management.

The adoption of this policy allows the optimisation of lighting and air conditioning systems, avoiding the use of company spaces in 'leopard spots' and related energy wastage.

Indirect environmental aspects for services performed by third-party suppliers must relate to environmentally sustainable activities and be subject to the 'Supplier Code of Conduct' defined by the parent company, which is based on internationally recognised standards, and ISG's Code of Ethics and Business Conduct, which defines the Company's expectations of all suppliers, their subsidiaries and subcontractors. Strict adherence to this Code is a condition for continuing to work or collaborate with the Company.

Municipal waste produced is managed through the facility management company, which guarantees its proper disposal as well as the adoption of environmentally friendly office cleaning products. The disposal of special waste (printer toners) is entrusted to a specialised Cooperative according to the instructions given by the AMA (Azienda Municipalizzata per l'Ambiente) of Rome.

ISG participates in green initiatives.



All staff are sensitised to respect the environment and invited to participate in sustainability initiatives such as adopting electric vehicles.



Still within the spectrum of green initiatives, ISG Italia is also aiming to achieve a specific KPI for the year 2025, namely that of preparing and maintaining a sustainability report in accordance with European regulation 125/2024 (CRSD). In addition, there are actions to be taken and goals to be achieved such as the management of conscious training for all employees, starting with the completion of a safety course through the LinkedIn Learning platform called 'Occupational Safety and Health: Hazard Communication'.

This is also necessary for the maintenance and possible improvement of the obtained sustainability rating of 66/100 with medal, below, silver.



5.5 Impact on occupational health and safety

ISG Italia has a prevention and protection service that ensures a healthy working environment and compliance with occupational health and safety requirements through periodic risk analysis, DVR updating and continuous improvement in the identification, assessment and management of aspects that may affect workers' health and safety.

The company also has a specific '*HS Employees_ Physical and Environmental Safety*' policy that regulates staff behaviour in the event of an emergency. Semi-annual evacuation tests are carried out on the building, according to a plan coordinated with the RSPPs of the various companies that have offices in the building, minutes of which are prepared.

Staff are subjected every two years - irrespective of their age, anticipating the visit even for younger staff for whom a higher frequency would be expected - to a medical examination by the competent doctor.

All personnel have attended the training courses required by Law 81/2008 and the company has identified an emergency team (first aid and fire-fighting) that systematically attends refresher courses. Every six months, evacuation tests are carried out on the building where our company's offices are located in a coordinated manner with the other occupants of the building: minutes are kept of these tests.

Within our company's offices, on the home/work route and at customers' premises, no staff accidents of any kind or severity have ever occurred.

5.6 Social and personnel management aspects, respect for human rights

The Company has set up a Steering Committee with the institutional mission to actively work towards creating and supporting the necessary conditions for the most inclusive and equally represented working environment possible.

ISG Italia obtained Bureau Veritas certification for gender equality according to PdR 125:2022. The assessment of the indicators (KPIs) during the audit obtained the following appreciation: *'The organisation has achieved an excellent level of implementation of the PdR 125 system, reaching a score of 100, the maximum achievable. No deficient points for company size'*.



All employees are the recipients of a continuous training programme on privacy, data security and information systems, health and safety in the workplace, gender equality, welcome and inclusion and sustainability. The courses are delivered through the "Linkedin_learning" or "Informa" platform, which issues certificates of attendance following learning tests for each training module completed.

Examples of staff training certificates:





The certified gender equality system adopts the principle of equality as a founding element of the company's organisational culture and implements a system to monitor and evaluate the effectiveness of actions taken in this regard:

- the prevention and management of harassment at work;
- work/life balance through the protection of their employees' parental responsibilities and parenting experience, including periods of maternity/paternity leave;
- pay equity and career progression of staff;
- the adoption, without formality, of flexible working hours;
- the exclusive use of tools that enable remote working meetings to be held at the most convenient times for the people involved;
- the performance of work in Smart Working mode;
- Corporate Welfare (health insurance) through the signing for all employees and middle managers of the 'GENERASalute RSM' policy with Generali Italia, which reimburses healthcare costs made necessary by illness or accident, independently of and in addition to the SSN.

ISG Italia pursues the prevention and elimination of any discriminatory event in the workplace by applying a 'zero tolerance' approach to any form of sexual or psychological violence or inappropriate behaviour towards employees.

In the case of violent or inappropriate conduct or conduct that does not comply with applicable laws, policies and regulations, the company has put in place a system for handling reports using a dedicated PEC. It is also possible to use a traditional mailbox to make anonymous reports.