

## Safety21 2021 Sustainability Report

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## **Letter to Stakeholders**

INTRODUCTION

Dear stakeholders, although there is no specific legislation in force that requires it, we are delighted to present you with our first Sustainability Report. We readily assume the responsibility of giving feedback and expressing our company's commitment to environmental, social, and economic matters.

For a young company like Safety21, which is just ten years old, all this is a source of pride and prestige but, at the same time, it demonstrates the company's willingness to commit itself to a future based on sustainability, taking on board the values of human relationships, respect for the environment, social commitment. In other words, "moving from passive to active". The Covid-19 pandemic made 2020 a year that changed the world, and the priorities of everyone in it, even while it was going through the process known as globalisation. Thanks, in part, to the vaccination roll-out, 2021 was the year in which everyone was able to review past choices and put them at the centre of their daily agenda.

Taking all this into account, a new vision for the health of the nation was born. This new approach required an acceleration of the country's process of digitalisation, a turbulent re-boot of the economic fabric, a dramatic change away from the traditional way of working, a focus of attention on the environment (something that can no longer be postponed), a duty of commitment, and an unprecedented acceptance of social responsibility.

The dizzying growth of our company and our continued infiltration into the market has not gone unnoticed and has attracted the attention of the Bregal Investment Fund, an authoritative entity that is attentive to the emerging dynamics in the Italian economy. Our success has laid the foundations for development that, extending beyond Italy, intends to confront and measure itself against every other European enterprise.

These new responsibilities do not intimidate us. On the contrary, they encourage us to continue on our original path and to supply the services, products, technological solutions and, above all, the support that local authorities with need to simplify their administrative operations. This goal is still far in the future, but is increasingly perceived as being absolutely necessary.

Although constantly propelled forward by the rapid advance of technology, our Company will never lose sight of its core **mission**, assisting public bodies to tackle the problems they have to deal with on a daily basis, namely, road safety and sustainable mobility issues, with the aim of "reducing the economic, social, and environmental cost of vehicular traffic and to improve the quality of life of the public", as Article 1 of the Highway Code has encouraged us to do since 1992.

The expansion of the Company is not only outward-looking. It is also focused inward, where the effort to extract the most value from our human resources is on time and on target. A professional career path is available for all those who contribute to the company on a daily basis, and safeguards are in place to protect the health and safety and well-being of everyone in the workplace.

The numerous certifications obtained, as well as those in the process of being finalised, the Legality Rating awarded at the highest possible level, our Code of Ethics, the Code of Conduct and Management Model 231, are an accurate reflection of the reputation that the Company has built up for itself, and have given it the confidence to negotiate with third parties in full transparency. In conclusion, with this first Sustainability Report, the Company is embarking on a journey on which it will become increasingly sensitive to the environment, considering this to be a stimulus and challenge for continuous improvement.

In this process, we intend to involve everyone who has dealings with the Company: shareholders, contractors, partners, suppliers, and customers, so that they can share the responsibility of achieving environmental sustainability across the board and make it a shared objective for all of us. Safety21 is now convinced that in this new approach, dictated by the principles of ESG, innovation and change will give us the skills we need to interpret the needs of our society and those who depend on the Company.



R.I. Carp

PRESIDENT

MANAGING DIRECTOR

## Note on methodology

INTRODUCTION

This document, the first Sustainability Report of Safety21 (also referred to as "the Company"), has been drawn up to provide information, in a transparent manner, on the company's sustainability strategies. The Financial Statements show the results achieved by Safety21 in the field of environmental, social, and governance sustainability for the 2021 financial year (from 1 January to 31 December).

The Sustainability Report, that will be published on an annual basis, has been prepared using information from a selection of indicators from the GRI Sustainability Reporting Standards as defined by the Global Reporting Initiative ("GRI"), and as listed in the "GRI Content Index" table.

The data reporting scope is relative to Safety21. In order to make it possible to compare the data over time and evaluate Safety21's progress, a comparison year has been included, where available.

In order to provide an accurate picture of the performance of Safety21, directly measurable quantities have been included within the data and the use of estimates has been avoided, as far as possible, and when used are indicated as such.

The indicators measured in the report were selected based on an initial investigation carried out by Safety21 during 2021, which identified the material issues for Safety21, as described in the paragraph "The Material Issues of Safety21" in this document.

This document contains environmental and personnel data related exclusively to Safety21.

This document has not been subject to a conformity assessment.

For more information and suggestions regarding Safety21's Sustainability Report, please email info@safety21.it. This document is also available on the company website www.safety21.it.

# 2021 Highlights **INTRODUCTION**











2021 Sustainability Report

## 01 The Company SAFETY21 S.p.A.

In recent years, our lifestyle has been changing thanks to a growing awareness of environmental issues and the use of different methods of transport for moving around cities and regions. Safety21 is also contributing to this change. It supplies local authorities with hi-tech solutions to improve road safety standards and to promote Smart Mobility.

Founded in 2011, Safety21 provides the most advanced technological solutions available to help public institutions implement a policy that moves towards the adoption of Smart Mobility to ensure that the public enjoys sustainable urban mobility while safeguarding the environment.

By providing advanced technology and scalable and innovative outsourcing solutions, the Company can satisfy the many and diverse requirements of public institutions and police forces that need to monitor the environment and reduce the number of road accidents. The company also sponsors road safety campaigns to raise awareness of the issue of road accidents, aimed at the young generation.

The Company's strategic objective is to support the institutions committed to safeguarding public safety and to reduce the social and economic damage caused by road accidents, by providing them with safety technology, monitoring systems, and systems to enforce the regulations of the Highway Code.

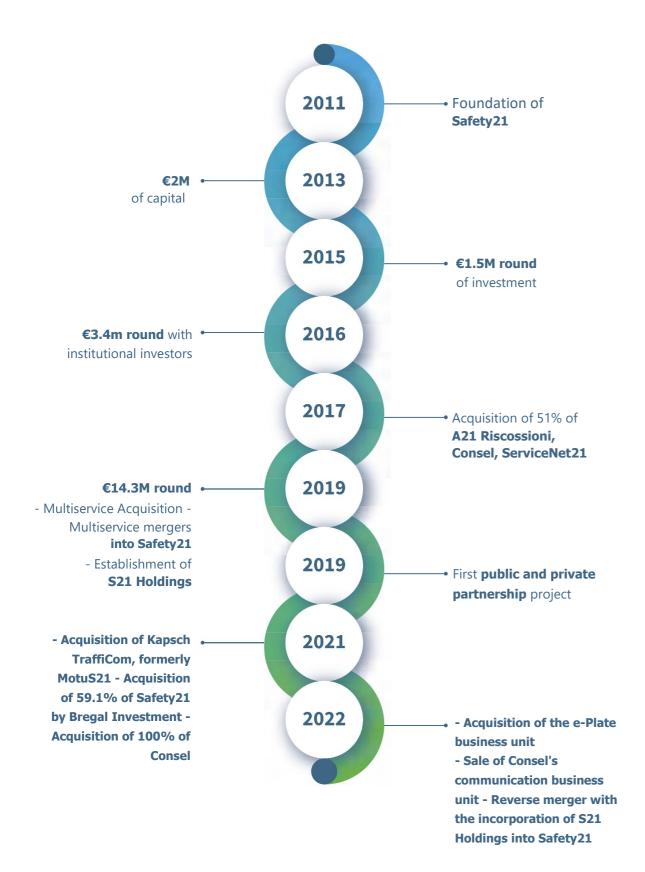
# Safety21SpA

THE COMPANY
 OUR HISTORY

- MISSION STATEMENT AND VALUES
- ACTIVITIES AND PRODUCTS
- BOARD OF DIRECTORS AND BOARD OF AUDITORS
- MODEL 231/2001
- THE SUPERVISORY BOARD
- CODE OF ETHICS
- REMUNERATION COMMITTEE
- CERTIFICATIONS AND QUALIFICATIONS
- VALUE CREATED BY SAFETY21
- THE RELATIONSHIP WITH SHAREHOLDERS









Safety21 aims to make sure its own employees and principle stakeholders are fully aware of its core values, with particular reference to the local authorities and companies with which it collaborates to achieve a common objective.

> "THESE VALUES ARE THE FOUNDATION ON WHICH OUR COMPANY IS BASED. THEY ARE THE INSPIRATION THAT GUIDES OUR EVERY STEP AND THE PROMISES THAT WE MAKE. WE ARE COMMITTED TO KEEPING THEM RELEVANT, TO CREATE THE RIGHT BALANCE BETWEEN THE NEEDS OF OUR CUSTOMERS AND THE SOLUTIONS WE PROVIDE FOR THEM"

#### The principle Safety21 values are:



## **Our mission statement and values**

The responsibility for and excellence of teamwork

**Activities and products** 

SAFETY21 SpA

#### Customers

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Today, the Company, with its products, technologies, and services, has a presence in more than 300 of the 8,000 Italian municipalities. These include some of the largest cities in Italy, along with some of the smaller municipalities. The company is also continuing to develop its relationship with other large Italian public bodies and international institutes. Safety21 currently collaborates with the authorities in Milan, Rome, Turin, Florence, and Bologna and in the future the Company plan is for further expansion and an increasingly widespread presence in the country. As can be seen in the figure below, Safety21 operates in almost every part of Italy (highlighted in green).



#### Products

Safety21's flagship product is the TITAN<sup>1</sup> software platform, which it owns. This software makes it possible to remotely manage and monitor the operation of all the surveillance devices currently installed in Italy, used by the local police forces, with which the company works closely. Thanks to its interconnected modules, this scalable web-based platform handles all aspects of managing violations of the Highway Code, from the detection of the infraction itself to management of the entire administrative process of issuing fines, in full compliance with the deadlines and procedures regulated by current legislation. The TITAN platform is continuous updated and modifies its IT processes in real time to conform to changes in the legislation. It is fully compliant with the legislation on the protection of personal data and privacy.



For more information, please refer to the "Titan" chapter on page 46.





# **Board of Directors and Board of Auditors**

The Safety21 Board of Directors is the body entrusted with the management of the company. It authorises the Chief Executive Officer to do whatever they deem necessary, useful, and strategically advantageous to the development of the Company's business, whether these are routine or extraordinary administrative tasks. The Safety21 Board of Directors consists of seven members, six men and one woman, appointed on 30 September 2021 and who will remain in office until 31 December 2023.

#### NAME

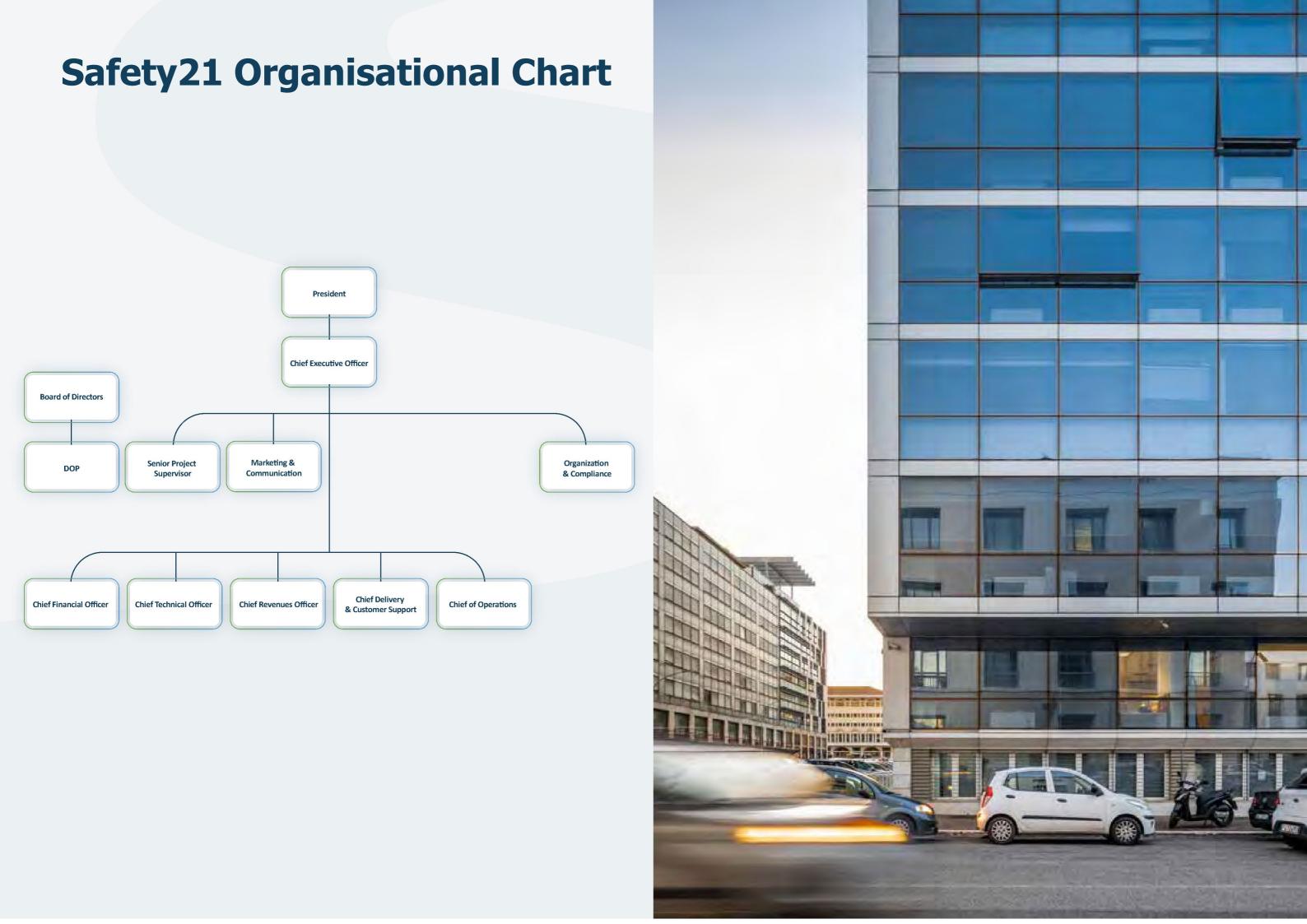
Campisi Roberto
Longo Gianluca
Asscher Laurent Benjamin
Castiglioni Ignazio
Fanelli Germano
Pippolo Valentina

Romeo Edoardo Francesco Maria

In addition to identifying and defining the Company's business strategy, the Board of Directors, acting as the main corporate body, monitors compliance with it and the other organisational procedures the company has adopted. The Board of Statutory Auditors consists of three acting auditors and two deputy auditors.

Below is the company's organisational chart, updated on 15 April 2022, showing Gianluca Longo as the current CEO of Safety21.

ROLE	
President	
Chief Executive Officer	
Director	
Director	
Director	_
Director	_
Director	





To ensure the proper and transparent management of the company and to protect its position and image, the expectations of its shareholders, and the work of its employees, Safety21 has adopted its own management, organisational, and control model, pursuant to Legislative Decree 231/01, updated in December 2021.

Safety21's adoption of an Organisational Model, in accordance with the provisions of the Legislative Decree, together with the publication of its Code of Ethics, was a choice made in the belief that this initiative could be used to raise awareness among all parties involved, so that they would carry out their duties with integrity and transparency, and avoid the risk of committing offences that could damage the Company's reputation.

More specifically, the Model aims to:

- prepare a structured and organic system of prevention and control, aimed at reducing the risk of offences being committed related to the company's business and preventing or bringing to light any illegal behaviour.
- make all those who work in, or on behalf of, the Company, especially in the "areas of the business at risk", aware that violating any of the provisions reported therein, may make them liable to sanctions, possibly even criminal proceedings, and that this may also result in the Company being penalised.
- make all those who work in, or on behalf of, the Company, that any violation of the provisions in the Model, to which they are required to comply, will result in the application of appropriate 9 sanctions and, in the most serious cases, termination of the contractual relationship.
- · reiterate that the Company will not tolerate unlawful conduct of any kind, regardless of the motivation for such conduct, even if the Company were in a position to benefit from it. Such illegal activity would be contrary to the company's ethical principles.

The Organisational Model adopted by the Company is aimed at defining a system to monitor compliance. This is primarily intended to develop the formation and implementation of the Company's approach to the risks and potential offences to be avoided and consists of:

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- the Code of Ethics, which sets out the core values that the Company intends to base its business society.
- an up-to-date, formalised, and transparent organisational system, which ensures a cohesive allocation of tasks and a workable division of duties.

- processes.
- an unambiguous assignment of powers to those authorised to act on behalf of, and sign on
- behalf of, the company, consistent with their organisational and managerial responsibilities.
- control systems that can detect alleged offences and provide timely reporting of any particularly serious, or potentially serious, situation.

on and establishes the general guidelines for the way in which the Company interacts with

protocols aimed at regulating the way in which business is conducted, with particular regard to high-risk processes, incorporating the necessary monitoring points, as well as the adequate separation of tasks between those who carry out crucial phases or tasks in the context of these

## **Supervisory Board**

SAFETY21 SpA

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The Safety21 Board of Directors, implementing the provisions of Legislative Decree 231/01, has set up the Supervisory and Control Body, which is entrusted with the task of supervising the business and its compliance with the Organisational Model, as well as ensuring that the Model is kept up to date.

Therefore, the Supervisory Body of Safety21 is responsible, sitting as a unified bench, for the supervisory and monitoring activities provided for by the Model itself.

From time to time, the Supervisory Body, together with the managers of the company departments concerned, checks the effectiveness and suitability of the Organisational Model in preventing the offences referred to in the Legislative Decree.

The Model also requires that any reports of alleged irregularities are sent directly to the Supervisory Body, using their exclusive email address.



As of 2013, Safety21 has adopted its own Code of Ethics, which was last updated on 23 December 2021.

The Code of Ethics is an integral and substantial part of the Organisational Model which summarises the principles, directives, and fundamental rules of conduct that all those who establish a working relationship with the Group, whether directly or indirectly, permanently or temporarily, and for any reason, must adhere to when conducting business and managing company activities.

Safety21's suppliers, brokers, and business partners will receive copies of the Code, so that they can feel involved and work in compliance with it. The principles and provisions of the Code set out the obligations of integrity, loyalty, and diligence, which must be observed in the working relationship with Stakeholders and in the workplace.

Below are the Ethical Principles adopted by Safety21<sup>2</sup>



2 For more information, please refer to the Code of Ethics at https://www.safety21.it/wp-content/uploads/2022/01/Codice-Etico-23-dicembre-2021.pdf



2021 Sustainability Report



At the beginning of 2022, the Board of Directors sought to establish the Comitato di Remunerazione (Remuneration Committee), to define the principles and guidelines of the company's pay and incentive policy. The Remuneration Committee now has three members: the Chief Executive Officer and two members of the Board of Directors.

In addition to formulating proposals relating to pay and the incentive policy, and notifying the Board of Directors of them in advance, the Corporate Body has the task of identifying, attracting, and keeping the best professionals and strategic employees, and drawing up the annual and longterm incentive plans.





Safety21 has always pursued excellence in its services and business by obtaining qualifications and certifications that ensure the compliance of all its systems, processes, and services. These qualifications and certifications act as a guarantee to the public entities that Safety21 supplies that the company's processes and services are in compliance with the highest standards.

AgiD (Agency for Digital Italy) certification The AgiD certification obtained for the TITAN<sup>®</sup> proprietary platform guarantees that it is in compliance with the organisational requirements for public entities, including: • a structured customer support service capable of covering the operational needs that may arise when providing the services • guarantee of a proven and reliable process that ensures continuous software updates for the solutions provided as SaaS (Software as a Service) - the adoption of industry 'best practices' in the development, configuration, and maintenance of software used to deliver the company's services • a guaranteed service uptime of 99.9%





#### Legality Rating

L'Autorità Garante della Concorrenza e del Mercato (The Italian Competition Authority) has awarded Safety21 a Legality Rating of three stars, the highest score a company can achieve.

### Safety21 has acquired numerous other certifications over the years<sup>3</sup>:



With a view to its continuous improvement, the Company has also decided to begin the process of obtaining, by the end of 2022, the following certifications:





ISO 45001 - Occupational Health and Safety Management System

<sup>3</sup> Among the Safety21 certifications, the following were acquired in 2021: SA800, Legality Rating, ISO 27701.

#### - SA 8000 Certification

To confirm its commitment to developing an increasingly socially responsible business, and in compliance with the international and national regulatory framework, Safety21 has obtained certification of their management system pursuant to the SA8000:2014 Standard.

#### **Quality Management Systems**

To demonstrate its ability to consistently provide products and services that satisfy customers and satisfy all legal and regulatory requirements, Safety21 has obtained ISO 9001:2015 certification.

#### Environmental Management Systems Certification ISO 14001:2015

Safety21 is committed to maintaining an environmental management system aimed at improving its environmental performance, fulfilling its compliance obligations, and achieving environmental objectives, that complies with the ISO 14001:2015 standard, thereby demonstrating its commitment to sustainability.

#### **IT Services Certification**

Safety21 holds ISO 20000-1:2018 certification that certifies the quality of the company's IT services management systems and their ability to meet the demands and expectations of customers.

#### Information Security Management System (ISMS)

By adopting UNI CEI ISO/IEC 27001:2017, Safety21 is able to systematically and continuously monitor the processes that concern the security of all company information assets, not only from an IT point of view but above all from a management and organisational point of view. In addition, it guarantees security controls for its Cloud services through the implementation of a Cloud computing information security management system, certified by the ISO/IEC 27017:2015 Standard. To demonstrate that Safety21 is able to manage the security of its data, employee data, and information entrusted to it by third parties, it has also obtained ISO/IEC 27018:27019 certification.

#### **GDPR Compliance Management System**

To confirm its commitment to reducing the risk to an organisation's and individual's right to privacy through the implementation of effective systems to support compliance with the GDPR and other privacy regulations, Safety21 has obtained ISO/IEC 27701:2019 certification.



01 SAFETY21 SpA

The prospects for sustainable development for Safety21 are shaped by a variety of internal and external influences, the most important of which are the regulatory environment, the availability of technologies and solutions, and the commercial opportunities offered to the most sustainable companies on the market.

Therefore, the growth objectives identified by Safety21 are based on multiple sources, such as the strategic perspective on the sector's sustainable growth potential.

THE EXTERNAL CONTEXT	DESCRIPTION	LEVEL
Regulatory Pressure	The extent to which regulations push market dynamics towards a sustainable state	Medium
Transition Potential	The extent to which solutions are available in the market for the transition to sustainability	High
Commercial Leverage	The extent to which adopting a sustainable position provides a competitive advantage	Medium

Information technology companies such as Safety21 can contribute a lot to the community, helping the public bodies apply the law through the use of integrated "end-to-end" services installed on the road network to reduce the number of accidents.

In a world where the industry at large faces security and privacy risks, Safety21 has already adopted best practices in data management.



#### **CHALLENGED**

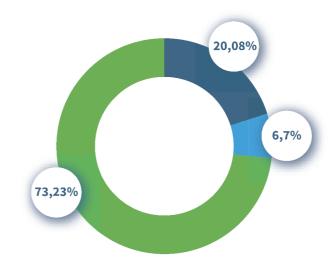
Industry is not aligned with a sustainable future and faces serious obstacles to transition

#### **CONDITIONAL**

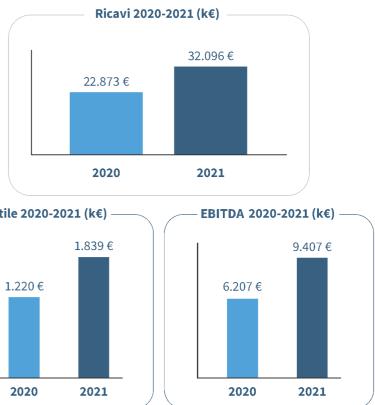
Industry is not currently aligned with a sustainable future, but is in transition

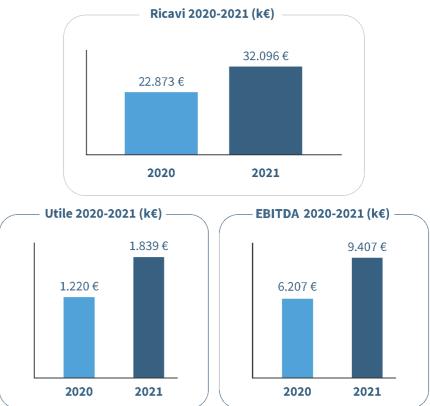
UNCHALLENGED ESG challenges in the industry are limited

POSITIVE Fully aligned with a sustainable future The Safety21 shareholding structure includes institutional investors, professional investors, and management:



Below are the main financial highlights of Safety21. For further information, please refer to the Consolidated Financial Statements.





## **The Relationship with Shareholders**



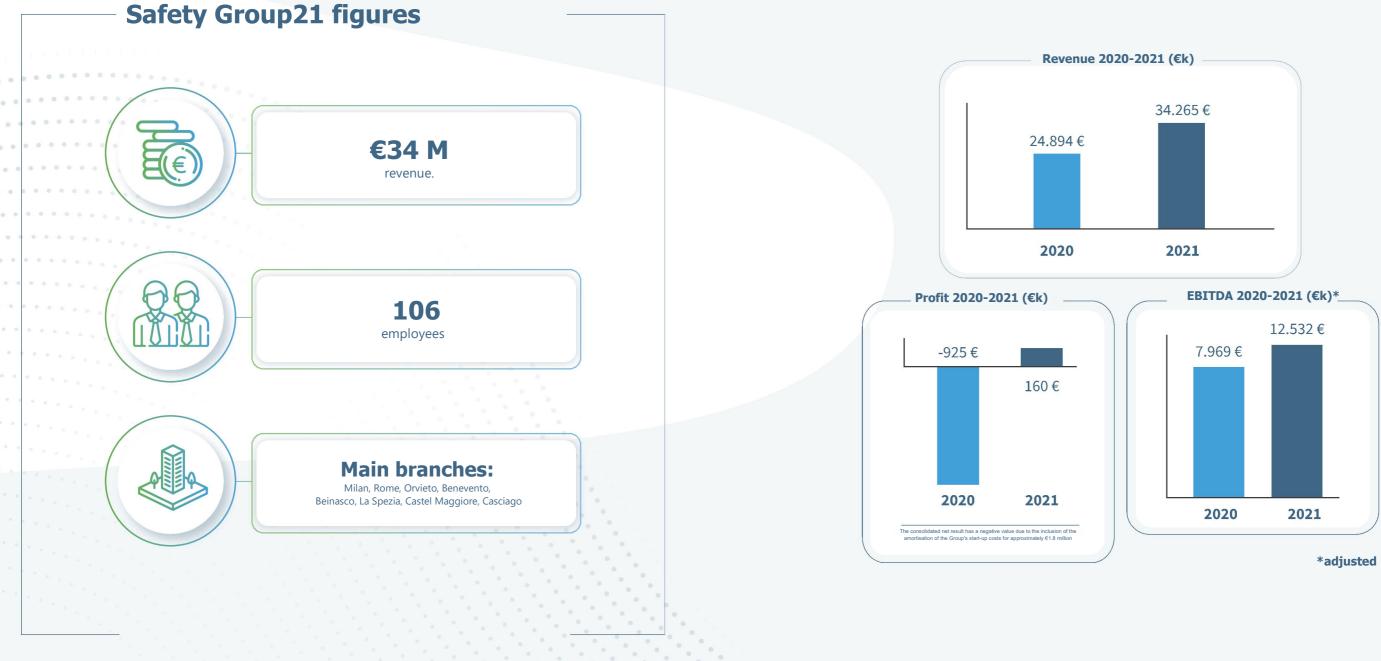
Sustainability Report 2021

#### Safety21 Group

The Safety21 group includes, in addition to Safety21 S.p.A, the subsidiaries A21 Riscossioni S.r.l., ServiceNet21 S.r.l., MotuS21 S.r.l. and Consel S.r.l. Public & Private.

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to the Group's Consolidated Financial Statements.



The relationship with shareholders



#### Economic value generated

#### The analysis of the economic value generated and distributed by Safety21 in 2021 shows that:

In order to clearly show the economic value that its business has generated and that has been distributed to some of the more important categories of stakeholder, Safety21 uses the parameter of direct economic value generated and distributed.

This value represents the wealth produced by the Company and redistributed among its stakeholders. In its creation and distribution, through a reclassification of the income statement, information is provided on how Safety21 has created wealth for its stakeholders, highlighting the economic effect that business management has had on the main categories of stakeholders.

In 2021, the economic value generated by the Company was about 34 million euros, compared to about 25 million euros in 2020. Over the same period, the economic value distributed increased from approximately 19 to approximately 27 million euros in 2021.

Below is information on how the economic value created was distributed by Safety21:

DISTRIBUTION OF ECONOMIC VALUE STATEMENT (€)	2020	2021
Production costs	€12,416,110	€19,363,319
Remuneration of employees and contractors	€4,437,038	€4,940,802
Public Sector payments <sup>4</sup>	€1,575,493	€1,372,346
Remuneration to Shareholders	€0	€0
Remuneration to the community <sup>5</sup>	€39,925	€60,299
Remuneration to financial backers <sup>6</sup>	€628,077	€1,249,514
DISTRIBUTION OF ECONOMIC VALUE STATEMENT (€)	€19,096,643	€26,986,279
DISTRIBUTION OF ECONOMIC VALUE STATEMENT (€)	€5,783,551	€7,228,213



4 Item consisting of taxes relating to previous years and current taxes.5 Item relating to membership fees and contributions to public bodies and associations.6 Item relating to interest and other financial charges.

More than 19 million euros were attributed to production costs, 72% of the total economic value generated by the Company in 2021, which is typical for the type of business carried out by Safety21. The item "production costs" shows total operating costs, including the supply of raw materials and services.

The proportion allocated to employees and non-employees is 4.9 million euros, or 18%.

The share contributed to local authorities was approximately 1.4 million euros, or about 5%.

Banks and other lenders received €1.2million, or about 5%.

The quota assigned to membership fees and contributions to public bodies and associations was approximately 60,000 euros, approximately 0.5% of the total.



# **Sustainability for** Safety21 S.p.A.



Road safety and smart mobility solutions and services are the core business of Safety21, working in total transparency and in full compliance with the regulations. Safety21 carries out its business in full compliance with the three ESG (Environmental, Social, Governance) factors of value creation for everyone involved with the company, whether they are customers, employees, shareholders, partners, or suppliers. Safety21 contributes to the 2030 Agenda, a program launched in 2015, in which 17 Global Sustainable Development Goals (SDGs) were identified, with 169 specific targets to be achieved by 2030 by countries, organisations, and individuals through targeted strategies and initiatives. Safety21, fully aware of its responsibilities to the local community, has committed itself to operating according to the principles of social responsibility:



developing its human resources and respecting the rights and the furtherance of the **well-being** of all its employees

employee satisfaction



supporting human rights promoting **transparency** in its dealings with

MATERIAL ISSUES

02



promoting fairness, transparency, and respect for the law in all its relationships with suppliers





In July 2021, management drafted and adopted the "Social Responsibility Policy", the primary expression of the principles of the SA8000 Standard, a reference model for the adoption of a company management system aimed at ensuring the development and consolidation of the principles of social responsibility in the company.

Safety21 has devised a series of innovative projects to support the digitisation of the public bodies to help them protect the community, take care of the environment, and help in the fight against crimes such as the dumping of waste, especially in parking spaces, and to improve road safety. All these measures will be explained in this document.

To publicise the company's commitment to sustainability, an ESG section has been included on the Safety21<sup>7</sup> website. This gives details about the sustainable approach taken by the company, including projects and business initiatives on the topic.

An ESG policy is being prepared that formalises the quality indicators and Strategic Sustainability Objectives of Safety21.



As sustainability is an integral part of its principles and its business, Safety21 has embarked on a path to define the most relevant issues for the Company and its Stakeholders.

Following a study of the main industry benchmarks and a comparison with businesses in other European countries, it emerged that the issues of greatest interest in the field of transport infrastructure and IT services are: the environmental impact of the products and services offered (energy use, greenhouse gas emissions, public health risks, supply chain management, and customer satisfaction) and the management of human resources, with particular attention being paid to the involvement and satisfaction of employees and their safety, including the creation of a safe and inclusive working environment. Safety21 fully adheres to these principles, which it includes among its material issues.

At the conclusion of this benchmark analysis, Safety21 found itself to be in line with its peers, if not at the forefront of attention to safety and sustainability.

In 2021, to demonstrate its commitment to innovation and a more sustainable future, Safety21 carried out an investigation of the ESG (Environmental, Social and Governance) issues that would potentially have, or currently already have, an impact on the organisation and its stakeholders. The two issues investigated that were considered to be of fundamental importance for the success and well-being of the Company's customers were: data and customer security (for risk prevention and privacy) and the integration of the principles of 360° sustainability into company policies.

The result of the research led to the definition of five main themes.

<sup>7</sup> Please refer to: https://www.safety21.it/en/esg-eng/





Below is a description of the issues that came to light and which will guide the Safety21 strategy and the projects to be implemented in the coming years.

#### SUBJECT



Environmental Impact Management of the environmental impact of the organisation's activities by reducing energy consumption and introducing energy efficiency initiatives. Projects to reduce the energy impact of the company. Monitoring systems for parking spaces to prevent the illegal dumping of waste.

\*{}}\* 89898

Employee development and management

Professional growth through employee development and training, aimed at expanding the skills of employees and consolidating the professionalism required by the positions they hold. Policies and actions aimed at improving the well-being of employees, responding to their needs, and managing their work-life balance.



Impact of products

The Company needs to be able to ensure high levels of product quality and safety that comply with regulatory requirements **and** that meet the needs of customers and serve the public interest. Certifications attesting to excellent product quality and safety levels.



Customer data security

The adoption of measures to prevent data from being lost, stolen, or altered, through the use of systems, processes, and procedures that ensure maximum data protection.



Integration of principles of sustainability

The need to include strategic sustainability objectives within the company, to create a competitive advantage, including the implementation of policies related to ESG issues, procedures, and certification.

#### DESCRIPTION

#### The Role of the Business in Society 03 SAFETY21 S.p.A. PRODUCTS AND SERVICES

SAFETY21 SUPPLIES INNOVATIVE HIGH-TECH PRODUCTS TO MAKE THE ROADS SAFER, ENFORCE THE LAW, AND PROTECT THE ENVIRONMENT

Safety21 is classified as a service provider of excellence, specialised in producing technological services and advanced platforms for local authorities to assist them in improving road safety and adopting Smart Mobility systems.

Safety21 has a very significant impact on road safety with the products and services it provides to local authorities and the community. It contributes to reducing the number of road accidents through the use of innovative technology and awareness-raising initiatives, aimed especially at young people.

Safety21 products and services help local authorities to streamline their administrative process through digitisation, increasing the efficiency and quality of public services, as required by the Piano Nazionale di Ripresa e Resilienza (National Recovery and Resilience Plan - PNNR). In this way, Safety21 is helping to meet the Sustainable Development Goals (SDGs) of the UN's 2030 Agenda for Sustainable Development, helping to make infrastructure and the production system more sustainable, through the promotion of greater efficiency of the resources used and the adoption of clean and environmentally friendly technologies that support development and innovation.

The products and services offered by Safety21 respond to the need to contribute to three of the UN SDG-related sustainable development macro-objectives, listed below.



# Safety21 **Products and Services**

• THE SOCIAL ROLE OF THE BUSINESS OF SAFETY21 MAIN SERVICES OFFERED

- THE TITAN ECOSYSTEM
- THE QUALITY OF SERVICES PROVIDED CYBERSECURITY AND IT SERVICES

SINCE ITS INCEPTION, THE COMPANY HAS CARRIED OUT RESEARCH CONTINUOUS RESEARCH TO CONTRIBUTE TO THE CREATION OF A SAFER, MONITORED, INTERCONNECTED, AND GREEN INFRASTRUCTURE. SAFETY21 HIGHLIGHTS THAT ON SUCH AN IMPORTANT ISSUE AS ROAD TRAFFIC, PRIVATE COMPANIES, WORKING IN CLOSE COLLABORATION WITH THE LOCAL AUTHORITIES, CAN PLAY AN IMPORTANT ROLE.

#### Digitisation of the public infrastructure

The solutions provided by Safety21 are in line with the objectives of the PNNR (The Italian National Recovery and Resilience Plan): they improve the digital infrastructure of the local authorities, promote the use of Cloud services, and improve the access to services by the public over the Internet.

#### • Preventing damage to the environment

The services offered by Safety21 aim at lowering CO2 emissions, reducing downtime, and improving traffic flow, as well as reducing damage to the local environment.

These are solutions that make it possible for local authorities to optimally manage road traffic, which results in a reduction in noise pollution, CO2 emissions, and less damage to the environment.

In addition, the solutions we offer allow municipalities to detect illegal dumping by the roadside, contributing to a reduction in air, water, and soil pollution.

#### Improving road safety

The technological solutions of Safety21 and the installation of an extensive network of IoT devices, helps to raise awareness and educate road users on developing good driving habits. Those who follow the Highway Code drive at a speed that reduces the risk of serious or fatal accidents, noise pollution, and damage to the environmental.

To protect the most vulnerable road users (pedestrians), Safety21 recommends other preventive measures, including the installation of innovative pedestrian crossing monitoring devices.

Great care is given to the choice of qualified suppliers and the use of innovative products and components. These detection systems include the option of mounting them on passively safe, shock-absorbing poles that can absorb the kinetic energy of vehicles in the event of an impact, without the need for guard rails to protect the poles themselves.

Safety21's commitment is not limited to the solutions and products they sell, but it also helps local authorities run awareness and education campaigns to increase the public's awareness of the risks related to road accidents and to promote compliance with road safety regulations.

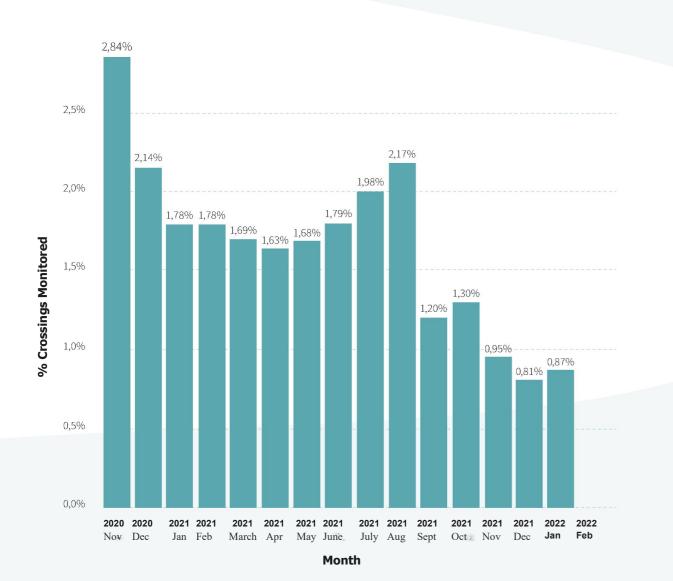
ACCIDENTS ARE A PROBLEM THAT AFFECTS EVERYONE INTIMATELY. ROAD ACCIDENTS ARE THE NINTH CAUSE OF DEATH IN THE WORLD FOR ADULTS, THE FIRST FOR YOUNG PEOPLE BETWEEN 15 AND 19, AND THE SECOND FOR BOYS BETWEEN 10 AND 14 AND 20 AND 24. AS WELL AS THE HUMAN COST, THE SOCIAL COSTS OF ROAD ACCIDENTS ALSO HAS TO BE TAKEN INTO ACCOUNT. THEY INCLUDE THE COST OF HEALTH CARE, DAMAGE TO PROPERTY, LOSS OF PRODUCTIVITY, AND LEGAL EXPENSES. IN ITALY, IT IS ESTIMATED THAT THIS IS AROUND 28 BILLION EUROS A YEAR, ABOUT 2% OF THE NATIONAL GDP.



## **Real-world examples**

From a study carried out (on S.P. exit S.S. 412) in Val Tidone, Landriano, after the introduction of the Safety21 monitoring systems, over a period of 6 months the percentage of infringements dropped from 2.84% to 1.63% and then fell even further to 0.87% in January 2022. This is equal to a decrease of 70%. This is evidence that the drivers of the vehicles had taken the message on board and reduced their speed. Better driving habits have a positive impact on air and noise pollution and, in the event of an accident, the damage done to people and property is reduced, resulting in reduced healthcare costs.

Safety21's solutions are divided into three main categories:





Solutions for infringements of the Highway Code

#### Technologically advanced solutions for an interconnected city

## The Rules of the Road

The Titan<sup>®</sup> Safety21 Ecosystem assists the police in carrying out and simplifying the administrative procedures required to manage infringements of the Highway Code, freeing up resources for other local policing duties. Titan handles the entire process of managing Highway Code violations and has a management mode that guarantees the process is secure and rapid. The end-to-end management process of the penalty cycle includes:



Digitisation solutions for local authorities

2021 Sustainability Report

#### **Management of National Traffic Penalty Notices** Administrative support for document management, preparation and printing of penalty notices for Italians and foreigners.

#### **Rental of IoT enforcement** solutions

Hire of monitoring systems and centralised image and data management solutions





Management of appeals against conviction A patented engine for providing counterarguments for legal proceedings



01

#### **Management of Foreign Traffic Penalty Notices**

Management software for notifying offenders residing outside Italy of legal proceedings against them





**International Debt** Collection Safety21 offers an International Debt Collection service for local authorities

Support for debt recovery The service assists the local authority recover payments relating to infringements of the **Highway Code** 

**Smart Mobility Solutions** 

Safety21 has been running an innovative "Smart Mobility" integrated road safety project for a few years that is based on a range of activities that involve the entire community. The aim is to instil a road safety culture that takes the relevant social, environmental, and economic risks into account. The project consists of a "Security Infrastructure" that includes IoT tools that can be managed through the Titan<sup>®</sup> Ecosystem. Using the Internet of Things, it is possible to design cities that are more technologically advanced, more efficient, more inclusive, and more environmentally friendly. A Smart City is fitted with a network of sensors, generating large amounts of data that can be used to provide advanced, real-time services and enable local authorities to manage these services more efficiently.

The Project, financed by a public-private partnership, is aimed at helping local authorities protect their citizens and to encourage people, especially young people, to pay more attention to road-use education and promotes good behaviour in all road users.

## **Services for Local Authorities 2.0**

Safety21 also offers administrative management services to help local authorities digitise their procedures, improving efficiency and the relationship with the public, including:

- Back-up storage of administrative documents for Public Bodies.
- A service to help local authorities collect unpaid fines

A Portal has been set up for the public that allows users to view the details of the infringement they have committed. On the portal you can find answers to the most frequently asked questions, contact the police for information on how to pay your fine, check the surveillance device locations, have access to the current regulations and check the system compliance, download all the forms you need to send messages or draft appeals, and more.



Titan<sup>®</sup> is the proprietary software platform through which Safety21 provides public bodies and police forces with scalable outsourcing services for Smart Mobility and IoT management, including the entire sanctions cycle for Highway Code violations. The main features of Titan<sup>®</sup> are:

Titan<sup>®</sup> tracks each step in the process and produces a digitally signed certificate each time an operation is started or completed. The Titan® Ecosystem also allows you to remotely activate, deactivate, and schedule updates for all devices installed. The Titan<sup>®</sup> Ecosystem consists of three modules:



Titan VDS<sup>®</sup> is the Titan<sup>®</sup> Ecosystem module designed for video surveillance and the control of Smart City devices.

To improve road safety, the Titan® Ecosystem has a specially-designed video surveillance module, Titan VDS<sup>®</sup>, which runs 24 hours a day and is connected to the control centre by a 4G/5G network. Using intelligent scene analysis software, it is now possible to identify and punish those who break the law, endanger public health and safety, and damage the urban environment by, for example, dumping waste in lay-bys.



Titan UP<sup>®</sup> is the mobile application for the detection and recording of violations of the Highway Code. Titan UP® is fully integrated with the Titan<sup>®</sup> ecosystem that makes it easier for the police to detect and report traffic offences. The Titan UP® automated compilation tools minimises the amount of data that has to be entered and allows the officer to carry out comprehensive checks by connecting to the MCTC vehicle database.



Titan-E<sup>®</sup> is the module of the Titan<sup>®</sup> Ecosystem dedicated to the management of violations committed by offenders residing abroad. Its main features are:

Flexibility Security Compatibility Transparency

## An innovative SaaS platform, AgID qualified (Agency for Digital Italy)

Services offered on a pay-per-use basis

Compatible with existing detection tools used by the authority

Innovative technology developed in a Microsoft environment



Advanced and scalable IoT management system and processes for scalable detection, traffic management and video surveillance systems

**Powerful Business Intelligence engine using the** Power BI app

Stability Expandability Clarity

**The Quality of Services Provided** 03 SAFETY21 S.p.A. PRODUCTS AND SERVICES

The quality and reliability of products and services depend directly on the ability of Safety21 to necessary IT security measures are in place. security and privacy of its stakeholders.

> IN 2021, SAFETY21 OBTAINED ISO 27001 CERTIFICATION AND HAVE ALSO CERTIFIED ITS CURRENT IT MANAGEMENT SYSTEM IN ACCORDANCE WITH ISO20000, ITS CLOUD SECURITY MANAGEMENT SYSTEM IN ACCORDANCE WITH ISO 27017, AND THE PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION IN PUBLIC CLOUDS IN ACCORDANCE WITH ISO 27018.

Data processing and privacy

03

In the current climate of growing business globalisation, there has been a proliferation of channels and methods of access to information, as well as an increase in the volume and types of data that has to be managed. Safety21 is addressing the issues related to data management, ranging from adapting to recent industry regulations and defending against potential threats, to the confidentiality, integrity, and availability of information. In addition, the European General Data Protection Regulation (GDPR), which came into force in May 2018, has become one of the main references for companies wishing to make a renewed commitment to data protection, with a particular focus on safeguarding personal data. In the exercise of its business, Safety21 processes data that is required to bring charges against drivers who are in violation of the Highway Code, guaranteeing its customers' compliance with current regulations.

adopt the technologies and processes required to build the innovative solutions they provide to customers. As evidence of the primary importance that Safety21 attaches to quality within company development strategies, all the production processes that contribute to the design, development, and implementation of a product or service are mapped onto the quality management systems, that all comply with the ISO 9001:2015 standard. These systems, documented and updated, make sure that the company's products and services meet the expectations of their customers and the mandatory legal requirements, as well as allowing continuous improvements in performance, increasing the company's competitiveness in the market. The systems are an essential tool for defining the regulations and constraints that are applicable to quality control at all levels. The main operations are regulated by procedures and practices that implement standards and rules to maximise the quality of each product and process.



## **Cybersecurity and IT services**

SAFETY21 S.p.A. PRODUCTS AND SERVICES

As described in the previous paragraphs, data and information management is one of the core issues for Safety21. For this reason, strategies have been adopted to ensure the security and privacy of the public's data, and a procedural system has been adopted, aimed at ensuring the

In particular, Safety21 has obtained numerous certifications aimed precisely at guaranteeing the

In addition, in compliance with the rules on privacy and data security, when they start working for us, every employee receives a copy of the document "Instructions for the processing of personal data" and is simultaneously authorised to process such data.

Safety21 controls access to its IT platforms using various security systems, to prevent the loss or misdelivery of sensitive information. The control systems concern:

- The use of personal passwords, using an encrypted system and a high-performance IT infrastructure.
- Sensitive data is stored in the Cloud.

- Antivirus software is installed on every device.
- Every employee has a private password for their workstation.
- Cloud backup of data and periodic audits and assessments are carried out by Data Controllers, that have already been appointed, pursuant to Article 28 of the GDP.

The main risks that Safety21 is exposed to are:



To mitigate the risks Safety21 is exposed to, a strong system of controls of logical accesses based on the auditing and assessment of external data controllers is in place. This also ensures the longterm and secure storage of the company's data and information.

#### Prevention and of protection against cyberattacks

Safety21 uses external consultants to test the strength and resilience of the company's IT systems and infrastructure. For example, in the first few months of 2022, a penetration test was carried out on the Titan system. The test assessment report identified 15 vulnerabilities in the system. However, only one of these was considered to be a high-level risk. Following the analysis, the Company has promptly drawn up a plan to remedy the problems identified by the report.

#### Centralising servers and using Cloud systems

Safety21 has always run its processes in the Cloud, saving energy and ensuring a high level of security for the information and data in its possession. Safety21 servers run on a centralised operating logic that reduces the amount of storage required, with the consequent energy savings and cost reduction.



2021 Sustainability Report

#### **Initiatives and Partnerships** 04 RELATIONSHIP WITH THE LOCAL AUTHORITIES AND THE COMMUNITY

Safety21 has a very close relationship with the regions in which it operates. It maintains a close relationship with all its stakeholders based on trust, quality, ethics, competitiveness, professionalism, and respect for the regulations. Safety21 is careful to establish working relationships only with those who enjoy a good reputation, who are engaged in lawful activities, and whose corporate ethics are in line with those of the Company, carefully checking the information available on the potential partners in advance. To add further value to its relationship with the local communities in Italy, Safety21 promotes a range of initiatives and sponsorships aimed at raising awareness of its operation.

Safety21 has devised a series of innovative projects to help protect local inhabitants by protecting the environment, preventing environmental crimes, such as the dumping of waste in parking lots and lay-bys, and improving road safety.

Below are some of the campaigns Safety21 has supported over the last few years.

#### The Metropolitan Milan Safety Project

Safety21 is a major contributor to "Smart City", one of the largest public-private partnerships in Europe. This is an initiative aimed at reducing road accidents and making roads safer for pedestrians and cyclists.

Among the main objectives of the Smart City project is the conservation and protection of the environment and the fight against environmental crimes such as the dumping of waste. These ambitious objectives for the protection of the city's environment are achieved through the use of innovative video surveillance systems and smart applications. A key role was played by the personnel of the local police force, who offered their experience on the dynamics and problems of the urban and extra-urban road networks within their jurisdiction.

An environmental and security monitoring system

Using video surveillance, and the monitoring of parking places and traffic flow.

The security of citizens

Pedestrian crossing control systems

# Relationships with local authorities

INITIATIVES AND PARTNERSHIPS WITH THE LOCAL AUTHORITIES AND THE COMMUNITY



With a view to safeguarding the most vulnerable road users, the project involves the installation of 90 systems on pedestrian crossings by the Metropolitan City of Milan on the road network within its jurisdiction. Specifically, these innovative devices monitor pedestrian crossings without traffic lights. They have four high-visibility flashing LEDs installed next to the pedestrian crossing and two more external sensors, which are activated when the pedestrian starts to cross, alerting vehicles approaching the crossing and solving the problem of poor visibility either during the day or at night. The system is equipped with cameras that record an area of 360°. They capture everything that happens in the area of the pedestrian crossing and upload it to the Cloud 24 hours a day, ensuring that the video recordings are always available to the authorities in the event of an accident.

The environmental and social value of the Milano City of Milan Safety Project was demonstrated in the Dubai Expo 2021, the World Expo hosted in Dubai, in the United Arab Emirates. During a day dedicated to Smart Cities, "Dependable technologies for a changing world", Safety21 presented the project to an international audience with a particular focus on issues related to urban mobility, road safety, and the protection of the environment.





Festa di Ringraziamento della Protezione Civile Safety21 was one of the sponsors of the day dedicated to thanking all the civic volunteers (Ringraziamento dei volontari di Protezione Civile) for their hard work, initiated by the Metropolitan City of Milan on 19 September 2021.



The Milan Metropolitan City Building the Future Award On 7 June, a press conference was held to present the fifth 'Premio Costruiamo il Futuro Milano Citta Metropolitana' (Building the Future Milan Metropolitan City Award) ceremony. This initiative was created to provide real support for sports association projects in Milan and its provinces, work that is dedicated to creating positive environments in which children and young people can be educated through sport. Safety21 is supporting the event for the second year, as it has always believed in and supported projects that generate value for the community, for sport, and for the region. Since the initiative was launched in 2003, over 600 clubs have received support. €950,000 has been donated to projects and over 2,500 associations have been involved.



The "Ti Voglio Bene" Campaign In association with the Department of Psychology at "La Sapienza" University in Rome, Safety21 has set up the educational project "Ti Voglio Bene - Progetto integrato di legalità" (I Love You - Integrated law project), aimed at secondary school students. The initiative's aim is to teach young people good driving habits, raising awareness of the risks associated with road traffic and instilling in them a sense of responsibility. The courses were developed with the support of professionals from the sector, who created a range of tailor-made materials for the occasion (exercises, simulations, and videos), and of the local authorities, who strongly endorsed the theme of road safety education for young people.

Local and traffic police also played a major role, offering their expertise on the features and problems of urban and suburban road network management.



#### Campagna Quattordici ventuno (Campaign Fourteen Twenty-one)

Safety21 believes that a culture of safety is the key to responsible and truly sustainable mobility. During the campaign, there was a competition in which young people were invited to suggest slogans for the next road safety campaign. In collaboration with the ASAPS Foundation, a project was launched to promote a collective culture of good road usage for young people, with the aim of teaching them about good driving habits, raising their awareness of the risks associated with making mistakes on the road and the consequences.

## The Professional Development and Training of Employees

05

SAFETY21 EMPLOYEES
MANAGEMENT OF HUMAN CA

- MANAGEMENT OF HUMAN CAPITAL AND EMPLOYEE DEVELOPMENT
- INCENTIVE SYSTEM
- SOCIAL WELFARE BENEFITS
- TRAINING AND DEVELOPMENT

THE COMPANY'S OBJECTIVE IS TO CREATE VALUE FOR ITS EMPLOYEES, ENSURING THEIR WELL-BEING AND PROMOTING THEIR PROFESSIONAL GROWTH AND SKILL DEVELOPMENT

During the two-year period 2020-2021, dominated by the persistence of the Covid19 pandemic, Safety21 committed itself to protecting the well-being and health and safety of its employees, putting in place all the measures ordered by the government while adapting them to the different stages of the crisis.

The company immediately adopted its own Covid-19 protocol, in compliance with all government and national protocols. It was possible to integrate these into the behaviour of all its employees, contributing to the creation of a responsible and vigilant working environment.

#### **Covid-19 protocol**

This document provides information about the safety provisions in place to all its employees and anyone entering the site. Informative brochures and infographics were posted at the entrance and at prominent locations in the company premises. The document included information on: the obligation to stay at home in case of a fever (over 37.5°) or other flu-like symptoms and to call a GP and notify their health authority. •the health authority the awareness and acceptance of the fact that no one should come to work or remain on site, and must promptly notify the company, even after arriving at work, of any warning signs such as flu-like symptoms, a high temperature, or if they were coming from any area at high-risk or have had contact with people who tested positive for the virus in the previous 14 days, etc. •the commitment to comply with all the measures put in place by the authorities and the employer when entering company premises, in particular, keeping a safe distance from others, observing the rules of hand hygiene, and maintaining a high level of personal hygiene. •the commitment to promptly inform their employer of any flu-like symptoms that develop while at work, while taking care to remain at a suitable distance from other people.

The premises are cleaned and sanitised regularly. To prevent the spread of the virus, the Company has provided its employees with the certificates and guidelines issued by the health authority as well as surgical masks, disinfectant gel, disposable latex or nitrile gloves, and masks with visors where necessary.



The rapid and effective response to the situation and the measures introduced by Safety21 kept its employees safe and made it possible for them to continue working for the company as normal. Infections were also kept to a minimum through the adoption of smart-working, a practice still in use today, for a maximum of two days a week.

The Company also provided additional Covid-19 health insurance coverage, to support its employees financially through 2021, which also covers the employee's immediate family. This clearly demonstrates the commitment that Safety21 has to the well-being of its employees. During this period of global crisis, the Company never resorted to taking advantage of any social welfare safety nets or labour cost reduction plans, while continuing to provide a safe working environment for its employees.

Safety21 believes that its employees are the key to the long-term success of the company. For this reason, the Company conducts its business with the utmost respect for its employees and subcontractors. It is a company that promotes diversity and equal opportunities, where everyone is encouraged to develop to the best of their ability. The improved management of resources is one of the most significant issues for the Company. It is one of the fundamental parts of the business on which it intends to concentrate, setting targets for the next few years in line with the SA8000 guidelines. This will also make the company more attractive in the marketplace. As of 31 December 2021, Safety21 has 93 employees, all based in Italy. 81 are full-time employees and the remaining 12 are on contract. The total is largely unchanged compared to the previous year.

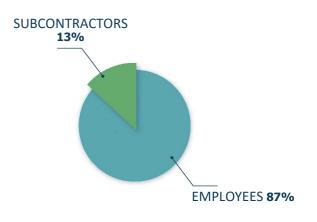




93 PEOPLE 81 Employees **12 Subcontractors** 

**81 EMPLOYEES** 4 on fixed-term contract 77 on permanent contract

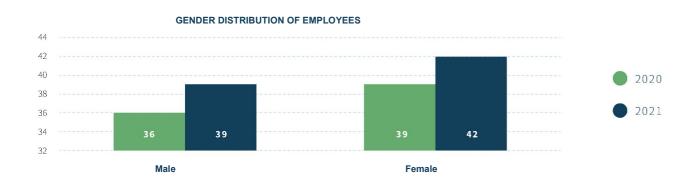
TOTAL LABOUR FORCE										
	31 D	ecember 2020		31 Dec	cember 2021					
PERSONNEL	Male	Female	Total	Male	Female	Total				
Employees	37	39	76	39	42	81				
Subcontractors	8	11	19	4	8	12				
Total	44	50	95	43	50	93				



8 The category of subcontractors includes contracts with consultants and other workers, including contract staff.

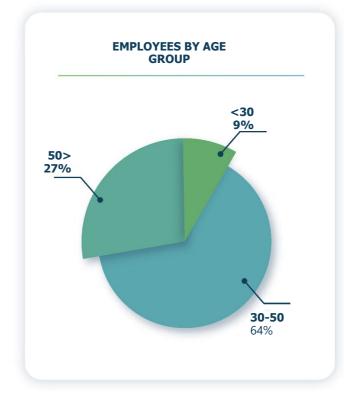
During 2021, Safety21 concentrated human resources in-house, continuing the policy of loyalty to our staff and investment in personnel. The number of employees increased to 81, compared to 76 in 2020, and the number of temporary staff, dropped from 19 to 12.

Safety21 has an equal number of male and female employees (50/50). This is a reflection of one of the company's core business strategies, i.e., promoting diversity and equal opportunity at work.



BREAKDOWN OF STAFF BY	CONTRACT TYPE	(FULL TIME/PA	ART TIME) AN	ND GENDER				
	31 D	ecember 2020	)	31 [	31 December 2021			
EMPLOYEES	Male	Female	Total	Male	Female	Total		
Full Time	32	33	65	34	35	69		
Part Time	5	6	11	5	7	12		
Total	36	39	76	39	42	81		

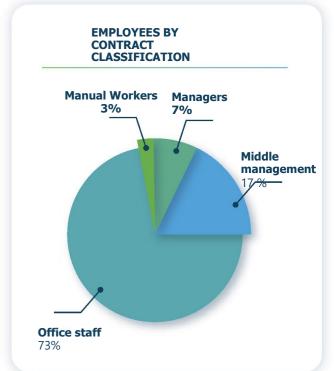
BREAKDOWN OF PERSONNEL	BY CONTRACT D	URATION (PERI	MANENT/TEN	(PORARY) AND (	GENDER					
	31 De	31 December 2020 31 December 2021								
EMPLOYEES	Male	Female	Total	Male	Female	Total				
Fixed-term Contract	3	9	12	1	3	4				
Permanent Contract	34	30	64	38	39	77				
Total	36	39	76	39	42	81				



In line with the Company's wish to promote long-lasting staff relationships and stable employment, the majority of Safety21 employees are on permanent contracts (95%), an increase compared to 2020 (84%). This is clear evidence of the company's strategy of developing and nurturing its human resources.

Most of our employees are in the 30 to 50 age group, graded as white-collar staff (73%).

	PERSONNEL BY	GRADE AND G	ENDER			
	31 D	ecember 2020	)	31 De	ecember 2021	
EMPLOYEES	Male Female   Total			Male	Female	Total
Managers	3	2	5	3	3	6
Middle management	10	5	15	8	6	14
Office staff	23	32	55	27	32	59
Manual workers	1	0	1	1	1	2
Total	37	39	76	39	42	81



	PERS	SONNEL BY C	LASSIFICA	TION AND A	GE GROUP	S			
	:	31 Decembe	r 2020		31 December 2021				
EMPLOYEES	<30	30-50	50>	Total	<30	30-50	50>	Total	
Managers	0	0	5	5	0	0	6	6	
Middle management	0	12	3	15	0	8	6	14	
Office staff	11	39	5	55	7	43	9	59	
Manual workers	0	0	1	1	0	1	1	2	
Total	11	51	14	76	7	52	22	81	

PERSONNEL BY CLASSIFICATION AND AGE GROUPS

With diversity and inclusion at the heart of its corporate culture, and in accordance with the rules and practices required by law, the Company has included within its staff three employees who are female and disabled, as can be seen in the table below.

PROTECTED CATEGORIES										
	31 Dece	ember 2020		31 De	ecember 2021					
EMPLOYEES	Male	Female	Total	Male	Female	Total				
Managers	0	0	0	0	0	0				
Middle management	0	1	1	0	1	1				
Office staff	0	2	2	0	2	2				
Manual workers	0	0	0	0	0	0				
Total	0	3	3	0	3	3				

a positive turnover of 19%. Below is a breakdown of employees that left and joined Safety21.

				RE	VENUES					
			2020					2021		
EMPLOYEES	<30	30-50	50>	Total	Turnover	<30	30-50	50>	Total	Turnover
Male	1	5	2	8	22%	0	5	1	6	15%
Female	1	4	3	8	21%	1	7	1	9	21%
Total	2	9	5	15	21%	1	12	2	15	19%
Turnover %	18%	18%	36%	21%		14%	23%	9%	19%	

OUTGOINGS											
EMPLOYEES			2020								
EMPLOTEES	<30	30-50	50>	Total	Turnover	<	80 1 30-50	50>	Total	Turnover	
Male	0	4	1	5	14%	1	3	0	4	10%	
Female	1	1	1	3	8%	0	6	0	6	14%	
Total	1	5	2	8	11%	1_	9	0	10	12%	
Turnover %	9%	10%	14%	11%		14%	17%	0%	12%		

## During 2021, 10 employees left the Company and 15 joined, mainly in the 30 to 50 year age group,

Human capital management and employee development

THE PROFESSIONAL DEVELOPMENT AND TRAINING OF EMPLOYEES

The Company has drafted and uses internal rules and a Protocol based on the OdV 231 Organisation, Management and Control Model. This sets out, as part of the 231 Model, the behavioural principles, responsibilities, operating methods, and information flows that must be respected in the selection, recruitment, and management of personnel.

This document is the cornerstone of Safety21's employment policy, backed up by SA8000 certification.

Safety21 manages its human resources in accordance with the principles set out in the Code of Ethics, including integrity, dignity and equality, professionalism and a spirit of collaboration. The company pays close attention to its staff at all stages of their career, from recruitment, training and, eventually, management.

The sector in which the Company operates is highly specialised, so it is essential to attract highly qualified employees, especially for certain positions.

To achieve this objective, the selection and recruitment of personnel takes place following the guidelines defined by SA8000 and the "Selection, recruitment and management of Human Resources" protocol, and in strict compliance with the criteria of transparency in the evaluation of applicant's competence and professionalism, skills, and individual potential.

Each stage of the selection process is tracked and documented. In addition, the financial terms and conditions of employment will always be consistent with the position held by the candidate and with the responsibilities/tasks assigned to them.

The recruitment of Safety21 staff takes place mainly in three ways: by advertising positions in the media (e.g. newspaper) and on social media (e.g. LinkedIn), through recruitment agencies and through direct contact with certain professional individuals.

The ongoing professional development of Safety21 employees is one of the strengths of its sustainable growth strategy. The Company considers it essential to develop its employees, following their career paths closely and making sure that their technical skills are periodically updated.

In 2022, the "Social Performance Team" was established, as required by the SA8000 standard. The committee consists of members of management and staff representatives. They meet periodically and supervise and assist in the careful and inclusive management of the company's human resources.

In 2022, in line with the principles of SA8000, Safety21 will conduct its first internal survey on employee satisfaction. This will involve all its employees, and is aimed at highlighting the level of well-being in the work environment and the perception of employees towards it and their further development and training.



05



2021

Female

77,540

41.868

Male

69,458

46.927

Ratio of Males to Females

112%

89%

management	52,805	57,270	/1/0	40,927	41,000	05/0
Office staff	23,814	21,475	90%	26,853	23,042	86%
Manual workers	15,136	0	0%	14,273	12,300	86%
DATI	O OF FEMALE TO					
KAII		J MALE EARNII	NGS .			
		2020			2021	
BASIC SALARY	Male	2020	Ratio of Males to Females	Male	2021 Female	Ratio of Males to Females
	Male 104,999	2020	Ratio of Males to	Male 126,395	1	
Managers Middle		2020 Female	Ratio of Males to Females		Female	Females 106%
Managers Middle management	104,999	2020 Female 111,915	Ratio of Males to Females	126,395	Female 134,145	Females
BASIC SALARY Managers Middle management Office staff Manual workers	104,999 72,232	2020 Female 111,915 43,726	Ratio of Males to Females 107% 61%	126,395 65,504	Female 134,145 59,794	Females 106% 91%

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## Safety21 has devised an Incentive Plan for employees. The plan is intended to be a way to recognise, in an open and transparent way and by awarding bonuses, the contribution of each

THE PROFESSIONAL DEVELOPMENT AND TRAINING OF EMPLOYEES

**Incentive scheme** 

05

**BASIC SALARY** 

Managers

Middle

es the position held. Every company department will be involved in the process. The continuous growth of the Company and the resulting market penetration, along with the ongoing and continuous commitment of our employees, has made it possible for us to reach the

employee to the creation of value for the company.
Company objectives are assigned, common to all employees, together with individual objectives
related to the position held. Every company department will be involved in the process.

assigned targets.

Ratio of Males to Females

115%

71%

**RATIO OF FEMALES TO MALES ON BASIC SALARY** 

2020

Female

79,566

37.278

Male

69,248

52.803

To improve the well-being of employees and their work -life balance, the Company has given every employee the opportunity to work from home, in smart-working mode, for a maximum of two days a week, on the basis of individual agreements.

Safety21 pays all its employees an annual bonus to help with the cost of living (e.g., shopping vouchers, fuel vouchers).

As required by the CCNL Metalmeccanici-Confapi, Safety21 has activated a multichannel digital platform that offers employees numerous products and services, as allowed by the current tax legislation.

Among other initiatives to help employees, Safety21 provides: level employee and in a management position.

• meal vouchers for every day of work carried out on site company cars for managers and middle-managers with specific roles FasiOpen" supplementary health care for permanent employees with the classification of 7th

Covid-19 Healthcare for all employees and a Covid insurance policy.

We would also like to reiterate that, during the Covid-19 emergency, up to 31/03/2022, Safety21 did not resort to the use of any socioeconomic safety nets and posted continued growth, increasing the workforce, as can be seen in the data provided (see the table Revenue for 2020 and 2021).

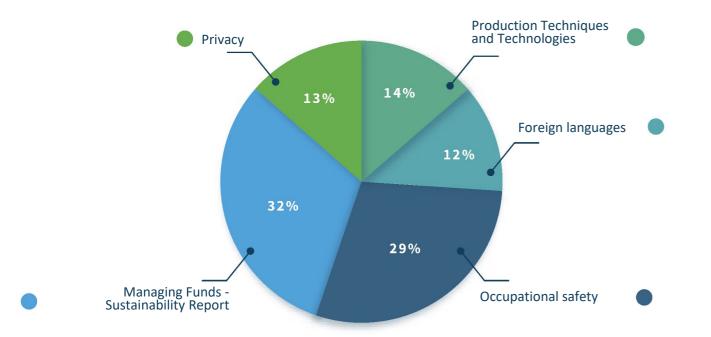
69

	Social	Welfare
05		

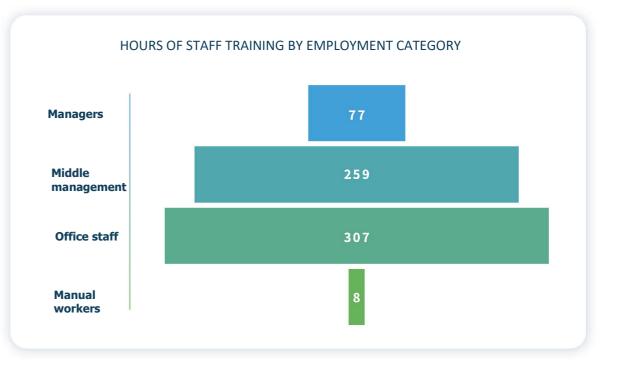
THE PROFESSIONAL DEVELOPMENT AND TRAINING OF EMPLOYEES







During 2021, 651 hours of employee training were provided, an increase of 80% compared to 2020, highlighting the importance of training.



HOURS OF TRAINING PER CAPITA								
	31 DECEN	IBER 2020	31 DECEMBER 2021					
CLASSIFICATION	NO. HOURS	PER CAPITA	NO. HOURS PER CAPITA					
	MALE	FEMALE	MALE	FEMALE				
Managers	2.7	0	1	24.7				
Middle management	4	1.2	11.3	28.2				
Office staff	5.6	4	3.7	6.4				
Manual workers	54	0	0	8				
Total	6.3	3.5	5.0	10.9				

The Company's commitment to training was confirmed in 2022, when the Company implemented an even more robust and structured training programme to improve the skills and prospects of its employees.

The health and safety of employees and related activities

06

HEALTH AND SAFETY IN THE WORKPLACE

Safety21 is committed to promoting a culture of safety in the workplace by developing an awareness of the risks, promoting responsible behaviour, and taking care of the health and safety of its employees, not only within the Company, but also for those who work for its suppliers, customers, and other companies that work with Safety21.

The Company operates its business in full compliance with the current legislation on the accident prevention and workers' safety and with reference to the latest criteria for environmental protection and energy efficiency, by actively pursuing the improvement of health and safety conditions at work.

To this end, Safety21 has adopted the following technical and organisational measures:



# **Health and Safety** in the Workplace

06

• THE HEALTH AND SAFETY OF EMPLOYEES AND RELATED ACTIVITIES • INFORMATION RELATING TO INJURIES SUSTAINED BY INTERNAL STAFF AND **SUBCONTRACTORS** 

the monitoring and updating of the company's working methodologies

13

The participation and involvement of employees through the provision of a formal Document for the Evaluation of Risks, as provided for by Legislative Decree 81/08

06

2021 Sustainability Report



Information relating to injuries sustained by internal staff and subcontractors

HEALTH AND SAFETY IN THE WORKPLACE

Safety21 believes that the set of training courses, regulations, and procedures are fundamental in the prevention of accidents and in the management of the risks associated with them. For this reason, the Company is very attentive to all the procedures aimed at ensuring the health and safety of its employees.

During 2021 and 2020, as can be seen from the table below, no accidents were recorded. This is proof of the fact that the issue is of central importance to the organisation.

	ACCIDENTS AT WORK	
ACCIDENTS	2020	2021
Number of deaths due to accidents at work	0	0
Number of serious accidents at work (excluding deaths)	0	0
Total number of recordable accidents at work	0	0

	HOURS WORKED	
HOURS/DAYS	2020	2021
WORKING HOURS	122,892	169,173
Coefficients used in the calculations	1,000,000	1,000,000

## Safety first

## Protection

**IS** 

## Danger





SAFETY21 PROVIDES SUSTAINABLE SOLUTIONS AIMED AT REDUCING CO2 EMISSIONS AND SAFEGUARDING THE ENVIRONMENT BY PROVIDING ROADSIDE SURVEILLANCE SERVICES THAT LIMIT THE SPEED OF VEHICLES AND PREVENT THE UNLAWFUL ABANDONMENT OF VEHICLES ON PARKING LOTS

The core business of Safety21 has a positive impact on the community by reducing CO2 emissions (by helping to enforce compliance with speed limits) and through the use of innovative products compatible with sustainability criteria.

Compliance with speed limits contributes to the reduction of both fuel consumption and polluting emissions. The extent of the benefit depends on a number of factors including: improvements in vehicle fuel efficiency, the composition of the fleet, driving style, and traffic congestion.

## **Real-world examples**

Based on a computer simulation, reducing motorway speed limits from 120 to 110 Km/hr would reduce fuel consumption by 2-3% for cars (assuming steady driving and 100% compliance with the speed limits).

The approach adopted, supported by the identification of material issues that are of importance to society, is consistent with the objectives of the Paris Agreement, adopted in 2015. The Agreement aims to improve the response of companies to the threat of climate change, through the use of appropriate capital flows, innovative technology frameworks, and a general improvement in industrial capacity.

This commitment is consolidated by ISO14001 certification, which requires strict compliance with environmental legislation through the adoption of an EMS (Environmental Management System) that supports the organisation in its processes, the creation of it products and services, and in meeting sustainability targets.

# **Environmental** Protection

• ENERGY CONSUMPTION AND EMISSIONS • DIRECT AND INDIRECT EMISSIONS



Even in the Safety21 value chain, the company has always been particular sensitive to the criteria by which they choose their trusted suppliers. Suppliers must be able to provide efficient, highly innovative, high performance products, which have limited impact on the environment. For Safety21, innovation and technological progress are key in the search for lasting solutions to environmental challenges, and it is precisely in this area that the company plays a key role in the market by offering efficient, high-performance tools, which reduce the amount of energy used.

Below are the main initiatives promoted by Safety21 for the protection of the environment.

## • The reorganisation of Safety21and the shift to paperless mode

The company has introduced a paperless work model in its management of business processes. All the company's procedures and business activities make use of IT tools and platforms that do not require paper, standardising and streamlining the production processes.

### Powering IoT devices with renewable sources

The Company has decided to include within its product list some monitoring devices that make use of renewable energy. For example, solar panels were added to a range of devices sold in Italy so that the devices could power themselves with renewable energy. In 2021, Safety21 had 80 monitoring devices that use this system (four more than last year), generating about 21 MWh of renewable energy.

### Cloud platforms and services

Safety21 uses Microsoft's public Cloud computing platform, Microsoft Azure, which provides a range of Cloud services, including computing, analytics, storage, and networking. As well as the advantages this provides in terms of scalability and flexibility and security for data management, the Cloud brings the IT architecture up to date, drastically reducing energy costs. In 2021, the company emitted approximately 39 tons of CO2 using these Cloud services, a reduction in carbon dioxide equivalent (MTCO2e/use) compared to conventional resources. Microsoft Azure has also adopted a policy of reducing consumption and by 2025 100% of the energy it uses will come from renewable sources. This will also have a positive impact on Safety21's operations. (Source: Azure Sustainability - Sustainable Technologies | Microsoft Azure). Safety21 has also started work on an initiative to optimise its software systems, through the adoption of microservices, designed and in development, to reduce the consumption of resources, both in terms of storage space and processing, reducing the energy consumption of the Titan ecosystem.

## Smart City Project - Monitoring systems for parking spaces and traffic

In 2021, in support of the public bodies' goals to improve road safety as part of the broader projects related to the creation of Smart Cities Safety21 joined the "Milan Metropolitan Safety" Project (see the chapter entitled: "Initiatives and partnerships with the local authorities and the community"). This is one of the largest projects within the Smart City and Smart Road in Europe initiative. Its aim is to reduce accidents and protect vulnerable road users and the environment by installing systems to monitor traffic flows and parking spaces. As part of the project, 96 IoT high-tech detection and monitoring devices have already been installed.
 To part of the initiative to protect the environment, numerous video surveillance systems have been installed to monitor parking spaces. These record any suspicious activity and have been very successful in tackling the problem of illegal dumping. This is an example of how, in a Smart City, technology and data become collaborative tools to expand the scope of environmental protection.

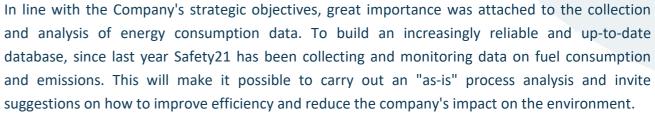
### Digitisation of PA processes

Safety21 has launched three main initiatives that contribute to the digitisation of local authority administrative procedures with a subsequent reduction in environmental impact, in particular:

0



- Dematerialization and paperless processes: the development of a system for sending notifications and warnings to offenders by registered email. This saves money by reducing the amount of paper and energy and fuel used to deliver printed notifications and reminded. In addition, the paper used by Safety21 is FSC certified and, in some cases, biodegradable paper is used.
- Reduced number of journeys: the digitisation of processes has also led to a reduction in journeys made, reducing emissions still further. These reductions were made possible by two systems. The first is PagoPA, an electronic payments system for making payments to Italian public institutions. Paying the fine through the system avoids the need to travel to a payment point. The second is the "Portale dei Cittadini (Citizens' Portal)", a virtual space for the use of the public and businesses. It provides the user with structured templates and all the information they need in a single account that can be used to initiate administrative proceedings by submitting files and paperwork online, without having to leave home.
- Reducing energy consumption by using the Cloud: The use of Cloud services by local authorities results in a considerable reduction in the cost of both server management and energy consumption.



The biggest direct energy consumption of Safety21 is to supply electricity for running the Company's offices, and fuel to run the company's fleet of vehicles.

The table below shows Safety21's energy consumption in 2020 and 2021. In 2021 there has been a 54% increase in energy consumption compared to the previous year. This was due to the resumption of business trips, the return of staff to the company offices, and to the energy consumption of the new offices that were opened during the year.

ENERGY CONSUMPTION <sup>9</sup>				
ТҮРЕ	UNITS	2020	2021	
Automotive diesel	GJ	531	747	
Automotive petrol	GJ	57	157	
Electricity from renewable sources	GJ	153	267	
Total consumption	GJ	761	1,170	

9 For electricity and heating, the conversion coefficient used was 0.0036 GJ/kWh (Source: GRI Sustainability Reporting 2018 - version 2)



## **Energy Consumption and Emissions**

## Guidelines, Version 3.1). For the diesel energy calculations: In 2021 the conversion factors used were 11 = 0.0359 GJ for diesel, 11 = 0.03172 GJ for petrol (source Pergas oil and gasoline: - FIRE: Manager Guida alla nomina degli energy manager

Direct and indirect emissions of Safety21's characteristic business operations

ENVIRONMENTAL PROTECTION

07

To monitor the environmental impact of the business, Safety21 measures the direct or indirect greenhouse gas emissions of its day-to-day business operation. The figures for these direct (Scope 1) and indirect (Scope 2) emissions are given in this document.

The table below shows the emissions for the two-year period 2020-21. The data show an increase in consumption, mainly due to the recovery of business operations in Safety21's sector, following the first phase of the Covid-19 pandemic.

SCOPE ONE EMISSIONS <sup>10</sup>			
ТҮРЕ	UNITS	2020	2021
Diesel	TCO2e	45	52
Petrol	TCO2e	5	11
Total Scope 1 Emissions	TCO2e	50	63

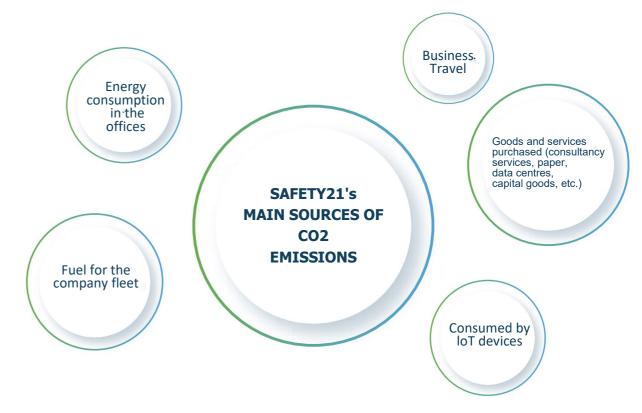
SCOPE 2 EMISSIONS				
ТҮРЕ	UNITS	2020	2021	
Electricity (Market-based)	TCO2e	22	34	
Electricity (Location-based)	TCO2e	13	19	

## Emissions related to the value chain

11

In addition to what is shown in the tables, the majority of Safety21 emissions are generated by indirect sources outside the company, which represent the majority of the total Safety21 carbon footprint.

The company's main sources of CO2 emissions can be seen below. The emissions reported in this document are shown in blue, while those related to its value chain, as measured by the qualitative analyses carried out by the Company, are shown in grey.



10 The emission factors used to calculate the Scope 1 emissions for diesel and petrol are from DEFRA - UK Government GHG Conversion Factors for Company Reporting.

For Scope 2 emissions, the reporting standard used (GRI Sustainability Reporting Standards 2016) has two different calculation methods: "Location-based" and "Market-based". The "Location-based" approach involves the use of average emission factors relating to the specific national energy mixes of electricity production. For 2021, the emission factor used for the electricity produced by Terna in 2019 "International comparisons. The "Market-based" approach involves the use of emission factors based on the contracts signed with electricity suppliers. In the absence of specific contractual agreements between the Group's Companies and the electricity supplier (e.g., Guarantees of Origin), for this approach the emission factor relating to the national "residual mix" was used for both 2021 and 2020 [Source: AIB 2021].



For value chain emissions, the activities that produce the majority of the emissions were:



For Safety21, it is clear that the purchase of goods and services has the most impact. The category

is divided into the following sub-categories:

•Advisory services, a major source of indirect emissions

Paper used to print and post the minutes. However, the supplier is particularly attentive to the

materials they use, providing Safety21 with only certified paper<sup>12</sup>.

- Data-centre
- IoT equipment and other capital goods.

In 2021, with the resumption of normal working activities, Safety21 recorded:

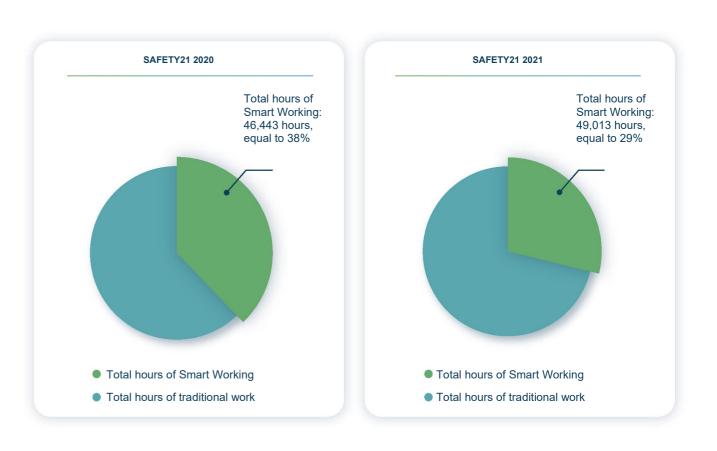




8,120 km Air travel



It should also be noted that Safety21 continued to use Smart Working in 2021, as shown in the graphs below. This resulted in a reduction in the environmental impact of its employees, as they did not have to commute.



12 The supplier provides FSC-C108220 certified paper with a Certificate of Printing and envelopes, letters, blank postcards, letterheaded paper, and cardboard, certified as FSC MIX No. DNV-COC-000428.

Train journeys



229 nights in hotels

## 08 Details of the Supply Chain

Safety21 has always chosen its suppliers with care. Wherever possible, while paying due regard to price and quality, and other possible logistical advantages, it prefers to work with companies that stand out for their positive approach to social and environmental issues.

The supply of services and materials is to Safety21 is already regulated by processes and procedures that aim to ensure they are of the highest standard, but that they also comply with the safety and quality requirements that are a priority for the company.

Safety21 uses suppliers that offer highly specialised services and products that are usually the best in class, and certified.

The Safety21 supplier register consists of approximately 400 suppliers, of which approximately 10% represents 80% of the company's costs. These suppliers are considered by the Company as strategic to the operation of the company's core business and in creating and maintaining the competitive advantage of Safety21.

The Safety21 supply chain consists mostly of the providers of postal services, equipment manufacturers and repairers, and suppliers or sub-suppliers of services.

The Company has plans to create a supplier portal with which it can manage and evaluate suppliers.

• DETAILS OF THE SUPPLY CHAIN • SUPPLIER'S CODE OF CONDUCT

Supply

Chain

**08** 

87



During the first quarter of 2022, Safety21 drafted and adopted the Code of Conduct, a document that sets out the conduct guidelines, as part of the Company's Organisational Model, to which collaborators, brokers, consultants, business partners, suppliers (including temp agencies), contractors and all other external parties working for Safety21 must comply.

All contracts signed between the Company and any third parties must, where possible, contain specific contractual clauses pursuant to Legislative Decree 231/2001, and an explicit reference to the process of recruitment of personnel who, if from abroad, must be in possession of a valid residence permit (to prevent worker exploitation).

Safety21 uses this Code of Conduct to determine which external parties will be allowed to work for the Company, and is a decisive factor in the consolidation of its relationship with its Stakeholders.

Suppliers will also be required to read and agree to comply with the Code of Conduct at the beginning of their assignment, and must undertake to request approval of the document from all their own subcontractors.

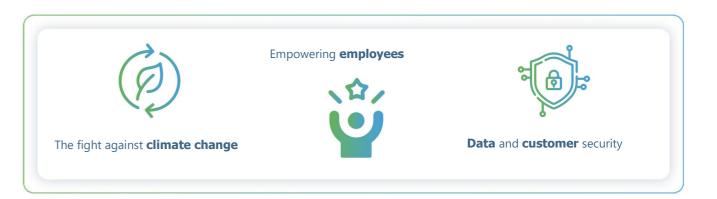


2021 SUSTAINABILITY REPORT

# Safety21's **Sustainability Strategy**

Introduction 09 SAFETY21'S SUSTAINABLE DEVELOPMENT STRATEGY

Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". Sustainability provides companies with the opportunity to evaluate how best to help their business survive within a dynamic system, while guaranteeing the efficiency and quality of their services and, if possible, improving them over the medium and long term. Safety21 has paid particular attention to the issues of sustainability, transparency, compliance, ethics and responsibility. These values are considered to be the basis of the company's valued "intangible" heritage, comprising its reputation, its history, and principles that characterise the way in which a company should conducts business. During 2021, Safety21, to demonstrate that sustainability has been given a central role within the company strategy, defined three strategic pillars, each of which is a response to a specific material issue, and on the basis of which the company will plan its future activities and operations, from 2022.



## The Fight against Climate Change.

Safety21 is aware of the direct and indirect impact the organisation has and, for this reason, considers it necessary to efficiently manage consumption. The energy sourced and purchased should be from renewable sources, to reduce the company's carbon footprint. Safety21 subscribes to the "Science Based Targets" initiative of the Paris Agreement, which is a commitment to reduce CO2 emissions.

The Company is also adopting an internal Car Policy that provides employees with more sustainable choices through the use of hybrid, plug-in hybrid, and all-electric vehicles. In addition, the Company intends to use renewable energy suppliers to supply its offices.

With respect to its relationship with external stakeholders, the Company's is constantly striving to provide high-performance services to its customers while, at the same time, making them less and less damaging to the environment.

### Employee development

Safety21 aims at increasing the value of its employees by encouraging their professional growth and helping them to achieve more at work and improve their quality of life.

Safety21 intends to develop the skills of their employees by offering specific training courses, improving dialogue between workers and management by involving employees in regular meetings to discuss ongoing business strategies and analyse the results, and by opening up direct and indirect communication channels. One of the tools that will be used to achieve this is the pending survey on employee satisfaction.

In general, the aim of Safety21 is to create and promote an engaging work environment for the well-being of its employees and to motivate them to achieve the company's targets.

## Data security management

The Company plans to continue to strengthen the security of its IT network to prevent any illegal attempts at gaining physical or remote access to sensitive information and to safeguard the data of the Company itself, its customers, and the public.

At the beginning of the current year, Safety21 carried out a penetration test on their IT network to identify any weak points and to put counter measures in place to remedy these vulnerabilities.

## • Further measures to be implemented

Sustainability is an integral part of the Company's business ethic. In addition to the projects described above, the Company has decided to identify other short and long term measures that could improve sustainability across the entire business.

Gain new certifications: ISO 45001, ISO 22301 and ISO 37001.

- Measure the positive impact of the Smart Mobility Project
- Include a section on Environmental, Social, and Governance (ESG) issues in offers to tender
- Optimise the storage space on the servers and complete the transition to the Cloud
- separate waste, etc.)
- Add a section dedicated to job vacancies on the website.



Introduce behavioural changes in the workplace (for example, eliminate the use of plastic,

# **Table of GRI Indicators**

Page number in this document and references to other sections of the Management Report or other external documents (Page numbers refer to the paragraph in the balance sheet

Standard Disclosure	Description of indicator	Pa

GRI 101: Reporting standard

GRI 102: General information 2016

## **Organisational profile**

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102-2	Activities, brands, products and services	1
102-3	Location of head office	9
102-4	Place of business	1
102-5	Ownership and legal form	1
102-6	Markets served	1
102-7	Size of the organisation	1
102-8	Information on employees and other workers	6
102-9	Supply chain	8
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102-12	External initiatives	5
102-13	Membership of associations	5
Strategy		
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<b>Ethics and</b>	l integrity
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102-16	Values, principles, standards 13	
102 10	and rules of behaviour	

t that includes the disclosure).		
age number	Omissions	
4-15;4 5-49		
1		
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1		

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## Governance

102-18	The Governance Structure	17-18
Stakeholder er	ngagement	
102-40	List of stakeholder groups	This document is the first Sustainability Report. In the following Safety21 reports, the company will make an effort to identify and list its stakeholders
102-41	Collective bargaining agreements	69
102-42	Identification and selection of stakeholders	This document is the first Sustainability Report. In the following Safety21 reports, the company will make an effort to identify and list its stakeholders
102-43	Ways of involving stakeholders	This document is the first Sustainability Report. In the following Safety21 reports, the company will make an effort to identify and list its stakeholders
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Reporting parameter	ers	
102-45	Parties included in the consolidated financial statements	8
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102-47	List of material issues	39
102-48	Review of information	This document is the first Sustainability Report
102-49	Changes in reporting	This document is the first Sustainability Report
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102-51	Date of the most recent report	This document is the first Sustainability Report
102-52	Reporting frequency	Annual
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102-54	Statement on reporting in accordance with GRI Standards	8
102-55	GRI Table of contents	95 -100
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103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	20-21
103-3	Assessment of the managerial approach	20-21
205-3	Confirmed cases of corruption and measures taken	During the 2021 Fiscal Year, there were no confirmed cases of corruption
GRI 206: Ant	icompetitive Behaviour, 201	6
103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	20-21
103-3	Assessment of the managerial approach	20-21
206-1	Legal action taken for anti- competitive behaviour, antitrust, and monopolistic practices	During the 2021 Fiscal Year, there were no legal actions taken for anti- competitive behaviour, antitrust, or monopolistic practices

## GRI 302: Energy 2016

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103-3	Assessment of the managerial approach	77-81
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GRI 305: Emis	ssions 2016	
103-1	Description of the material issue and the scope of reference	39
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103-3	Assessment of the managerial approach	77-85
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103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	77-81
103-3	Assessment of the managerial approach	77-81
307-1	Non-compliance with environmental laws and regulations	In Fiscal Year 2021, there were no fines or non-monetary sanctions for non-compliance with environmental laws and regulations.

103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	77-81
103-3	Assessment of the managerial approach	77-81
302-1	Energy consumed by the organisation	79
GRI 305: Emis	sions 2016	
103-1	Description of the material issue and the scope of reference	39
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305-2	Indirect GHG emissions from energy consumption (Scope 2)	82
GRI 307: Envii	ronmental compliance 2016	;
103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	77-81
103-3	Assessment of the managerial approach	77-81
307-1	Non-compliance with environmental laws and regulations	In Fiscal Year 2021, there were no fines or non-monetary sanctions for non-compliance with environmental laws and regulations.

103-1	Description of the material issue and the scope of reference	39
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GRI 305: Emissions 2	2016	
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305-1	Direct GHG emissions (Scope 1)	82
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GRI 307: Environme	ntal compliance 2016	5
103-1	Description of the material issue and the scope of reference	39
103-2	The managerial approach and its components	77-81
103-3	Assessment of the managerial approach	77-81
307-1	Non-compliance with environmental laws and regulations	In Fiscal Year 2021, there were no fines or non-monetary sanctions for non-compliance with environmental laws and regulations.



## GRI 401: Employment 2016

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## 403: Health and safety at work 2018

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## GRI 404: Training and education 2016

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## GRI 419: Socio-economic compliance 2016

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103-2	The managerial approach and its components
103-3	Assessment of the managerial approach
419-1	Non-compliance with social and economic laws and regulations

39
20-21
20-21
During the 2021 Fiscal Year, there were no instances of discrimination recorded
6
39
20-21
20-21
During the 2021 Fiscal Year, there were no cases of non-compliance with social and economic laws and regulations





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