

# SUSTAINABILITY REPORT 2024



**MAPS GROUP**  
SHARING KNOWLEDGE



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HIGHLIGHTS



GENDER EQUALITY  
CERTIFICATION



ESTABLISHMENT OF THE  
**INCLUSION AND  
GENDER EQUALITY  
COMMITTEE**



SCS  
SOFTWARE & COMPUTER SYSTEMS

SCS COMPUTERS S.R.L.  
APPOINTS THE  
**SUPERVISORY BODY**



ADOPTION OF THE  
**EVALUATION  
PROCEDURE RELATING  
TO THE INDEPENDENCE  
OF INDEPENDENT  
DIRECTORS**

NEW **DOUBLE MATERIALITY ANALYSIS**: INVOLVEMENT OF INTERNAL AND EXTERNAL  
STAKEHOLDERS AND THE IDENTIFICATION OF IMPACTS, RISKS AND MATERIAL  
OPPORTUNITIES RELATED TO THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE  
DIMENSIONS WITH GREATER PRECISION



CERTIFICATION BY **ACN ("NATIONAL CYBERSECURITY AGENCY")** OF  
SEVERAL TECHNOLOGICAL SOLUTIONS OF MAPS GROUPS SUCH AS  
GZOOM®, ROSE AND ZEROCODA®



**97%**  
PERMANENT  
EMPLOYEES



**+28%**  
EDUCATION  
CONTRIBUTION  
FOR CHILDREN



**TRAINING ON SUSTAINABILITY ISSUES**, INVOLVING THE SENIOR  
MANAGEMENT AND THE HIGHEST GOVERNANCE BODIES



**WELFARE CHAMPION  
GENERALI**



**BEST ESG IDENTITY  
ASSONEXT**

RESEARCH AND DEVELOPMENT  
EXPENDITURE AS % OF REVENUES



**10,3%** ← **9,7%**  
IN 2024 IN 2023

CARBON FOOTPRINT

SCOPE 1  
**155 tCO<sub>2</sub>eq**

SCOPE 2  
**73 tCO<sub>2</sub>eq**  
(Market Based)

SCOPE 3  
**131 tCO<sub>2</sub>eq**

**99 tCO<sub>2</sub>eq**  
(Location Based)

TOTAL ENERGY CONSUMPTION

YoY  
**-14%**

2024  
**~1.100.000 kWh**  
CAR FLEET: ~ 700.000 kWh  
ENERGY: ~ 400.000 kWh

2023  
**~ 1.300.000 kWh**  
CAR FLEET: ~ 900.000 kWh  
ENERGY: ~ 400.000 kWh

ENERGY FROM RENEWABLE SOURCES

YoY  
**+390%**

2024  
**170.000 kWh**  
(43% of total energy)

2023  
**41.000 kWh**  
(11% of total energy)

TCO<sub>2</sub>EQ AVOIDED THANKS TO THE MAPS HABITAT PROJECT

YoY  
**+24%**

2024  
**477 tCO<sub>2</sub>eq**

2023  
**384 tCO<sub>2</sub>eq**

ECONOMIC VALUE GENERATED



**33,2 Mln** ← **30,4 Mln**  
IN 2024 IN 2023

DISTRIBUTED ECONOMIC VALUE



**83%** ← **85%**  
IN 2024 IN 2023

MIGRATION TO MORE MODERN  
AND **ENERGY-EFFICIENT  
BUILDINGS**



**MILAN ROME**

EUROPEAN TAXONOMY

	TURNOVER	CAPEX	OPEX
% TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES	<b>31%</b>	<b>26%</b>	<b>34%</b>





## LETTER TO STAKEHOLDERS

“Dear Stakeholders,

We are pleased to share with **you the fourth edition of the Sustainability Report of Maps Group**.

2024 has been a year of consolidation and excellent economic performance, confirming the quality of our solutions and the strength of the markets in which we operate. In line with our principles, this growth has been accompanied by a strengthening of our sustainable corporate culture, attentive to the environment and the social context in which we operate.

On the reporting side, in addition to continuing the integration of the European Taxonomy—already introduced in the previous Report—we have aligned with the requirements of the Corporate Sustainability Reporting Directive (“CSRD”) and are therefore presenting the first edition of the Sustainability Report with information disclosed in accordance with the **ESRS (“European Sustainability Reporting Standards”)**, in both Italian and English, to ensure transparency and accessibility of information for all.

This year we carried out a new, more in-depth **double materiality analysis**, actively engaging all the Group’s internal and external stakeholders. This process allowed us to identify with greater accuracy the most significant impacts, as well as the risks and opportunities for Maps Group. The entire data collection process was accompanied by a training and awareness-raising programme on sustainability issues, involving the management and the highest governing bodies of Maps Group.

Although sustainability regulations are evolving rapidly, and the scope of reporting obligations for companies like ours is not yet fully defined, we have charted a course that we intend to follow. This means not only a concrete focus on sustainability issues, but also the implementation of an increasingly efficient, transparent, and timely organisational and reporting system. The well-being of our people remains a priority. We have intensified efforts to enhance our human capital, ensuring them a stable yet dynamic working environment.

In this regard, another important milestone comes from Artexe S.p.A., the Group company that encompasses our healthcare business, which in 2024 **obtained the UNI/PdR 125:2022 (Guidelines of the management system for gender equality)**. This certification attests to the company’s commitment to promoting gender equality in the workplace.

This recognition, based on excellence standards in the management of equality and inclusion policies, represents a significant achievement for all of us.

The first indicator of this certification concerns the integration of gender equality into corporate culture and strategy. In this respect, Artexe has formalised and implemented a strategic plan that fosters the development of an inclusive work environment, with corporate values consistent with a culture based on inclusion.

It has also organised a series of internal initiatives to raise employee awareness, such as diversity training courses, internal perception analyses on these topics, and communication campaigns focused on the value of equality and mutual respect.

An internal Committee dedicated to Inclusion and Equity has been established with the aim of periodically assessing progress and proposing new strategies, while the involvement of top management in decisions regarding gender policies ensures a unified vision across the entire organisation.

Looking ahead, our intention is to place greater emphasis on gender equality issues, continuing to monitor progress through specific KPIs. The best practices developed by Artexe will be extended to the entire Group. We firmly believe that only through consistent and concrete daily commitment will it be possible to promote and achieve a corporate culture that respects everyone.

Our focus on people and sustainability has also been recognised by two awards we received in 2024: the **Welfare Champion by Generali and the Best ESG Identity by AssoNEXT**.

The *Welfare Champion* jury once again considered our *Maps Habitat* project — created to help employees balance work and family life — a tangible measure for employee well-being.

The *Best ESG Identity* award recognised our distinctive approach to ESG (Environmental, Social, and Governance), particularly the transparency of information, clear communication, and concrete commitment to sustainability, which is considered deeply embedded in Maps Group’s corporate culture.

This commitment influences every aspect of our operations, from strategy to day-to-day activities.



From an environmental perspective, we continue our commitment to closely monitoring consumption and reducing environmental impact. The results achieved in 2024 confirm the effectiveness of the actions undertaken: the increased use of certified renewable electricity, the progressive improvement of the company vehicle fleet with lower-emission vehicles, and the significant reduction in commuting between home and the workplace — facilitated by the *Maps Habitat* project and the closure of offices on Fridays — have all contributed to a substantial improvement in our carbon footprint.

Looking ahead, we have already laid the foundations to further enhance our sustainable growth: we have initiated a reorganisation of our organisation and the offices in which we operate, in order to optimise time, space, and functions. Supporting us in this process is the awareness that we can address the challenges ahead — in the markets and in societal evolution — with transparency and expertise.

We trust you will find this report informative and engaging

**Marco Ciscato**

*Executive Chairman*



## 1. INTRODUCTION

### 1.1 OUR VALUES

Maps S.p.A. is the parent company of a group of enterprises headquartered in Parma, with a widespread presence across the national territory through 11 operational offices. In addition, Maps Group operates in compliance with the highest ethical standards, promoting an inclusive working environment that values diversity, which is regarded as a fundamental asset for the company's success and for sustainable growth in the short, medium, and long term.

Below are the core principles on which the Group's operations are based:



LEGALITY



TRANSPARENCY AND  
BUSINESS ETHICS



DATA SECURITY AND  
CONFIDENTIALITY



CENTRALITY, DEVELOPMENT AND  
ENHANCEMENT OF HUMAN RESOURCES



NON-DISCRIMINATION  
AND PROTECTION OF DIVERSITY



INNOVATION



SUSTAINABLE GROWTH

Our founding values come from the teachings of men and women of the past, who have not only respected them but have put them into practice concretely, during their lives and professional experience:



ADRIANO OLIVETTI



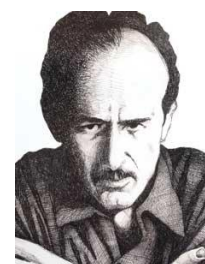
ITALO CALVINO



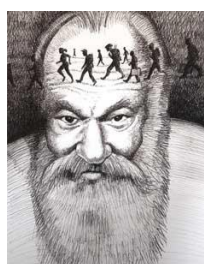
EDGAR MORIN



ADA LOVELACE



GIORGIO AMBROSOLI



TIZIANO TERZANI



LORIS MALAGUZZI



ALAN TURING

### 1.2 OUR HISTORY

2002

The company's journey began **in 2002: Maps was born as a software house** with a strong inclination towards the most current development methodologies and technologies.

2007

The first turning point came as early as **2007**. With a new shareholder structure and a renewed management team, the focus shifted to **strategic services addressing complex operational environments**, represented by major service providers and Public Administrations.

2011

#### FROM THE COMPANY TO THE GROUP

**In 2011, Maps focused on new assets in the healthcare market.** The development, which led the company to become a Group, continued with the acquisition and creation of a network of specialised companies: IG Consulting, Memelabs, and Artexe — where new products were developed for performance assessment and management control in public entities (particularly healthcare organisations) — and Roialty, with its tools for advanced customer profiling and digital loyalty.

2014

Since **2014, through Rose**, an intelligent energy management platform, Maps Group has **supported key trends in the energy transition**, fostering the emergence of new business models based on flexibility, such as Energy Communities.

2011-2019

**From 2011 to 2019**, the company experienced steady, incremental growth. Over eight years, **Maps Group evolved into a well-established enterprise**, with **a turnover of approximately €17 million and more than 180 employees** distributed across five offices in Italy, located in Parma, Milan, Modena, Prato, and Genoa.

2016

In **2016, new objectives were set: to strengthen the Research and Development sector** with solutions consistently focused on understanding and responding to user needs, and to **enhance** the user experience through technology







## 2018

In **2018**, **Artexe** became part of the Group. A benchmark in the eHealth sector, its primary objective is **the digitalisation of interactions between patients and public and private healthcare facilities**. It develops innovative technological solutions for the **patient experience** and is a market leader in **providing phygital solutions for waiting and reception areas** in healthcare facilities.



## 2019

## LISTING ON THE STOCK EXCHANGE

In **2019**, a new corporate development plan was launched, beginning with **the company's listing on the Italian Stock Exchange in the AIM segment**. Access to the financial market represented an opportunity for Maps Group to further accelerate its growth plans and, above all, to strengthen the culture of transparency, ethics, and sustainability that characterises a modern public company.



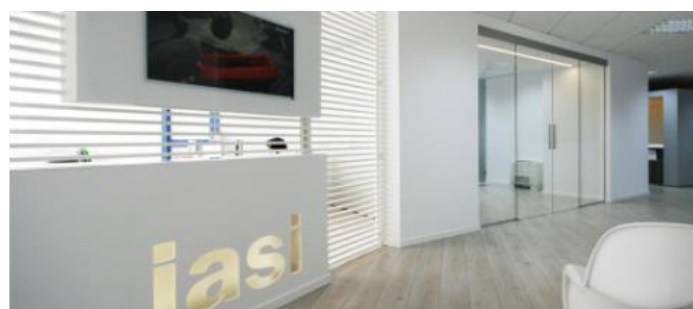
## 2020

In **2020**, Maps Group streamlined its corporate structure through the merger by incorporation of *Roialty S.r.l.* and *Memelabs S.r.l.* into *Maps S.p.A.*, and of *IG Consulting S.r.l.* into *Artexe S.p.A.* **It also signed the definitive agreement for the acquisition of 100% of SCS Computers S.r.l.**, a company operating in the computerisation of analysis laboratories (LIS). Maps Group **continued its strategy of identifying and integrating cutting-edge solutions with the acquisition of a 70% stake — later increased to 100% — in Micuro S.r.l.**, an innovative start-up active in the **insurtech sector**, with the goal of innovating personal services within the insurance industry. The Group achieved a turnover of €18 million and approximately 200 employees.



## 2021

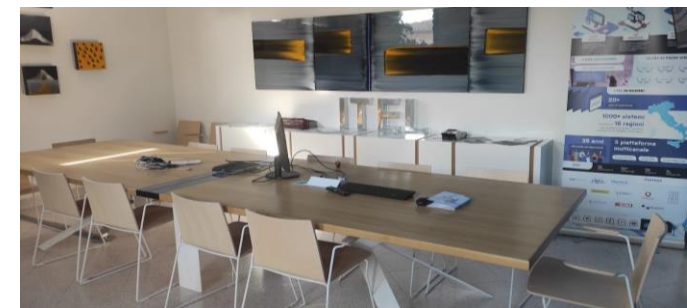
In **2021** Maps Group, through its subsidiary Artexe S.p.A., signed an agreement for the **acquisition of 100% of the share capital of IASI S.r.l.**, a company that offers consulting solutions and services for healthcare and hospital organizations, and for the management of their Human Resources.



## 2022

## THE GROUP CONTINUOUS GROWTH

In **2022**, the Group continued to grow, first with the **acquisition of a 70% stake in I-Tel S.r.l.**, an Innovative SME and Benefit Corporation (Società Benefit) that develops technology platforms to simplify life and work through multichannel interaction; and subsequently with the **acquisition of a 50% stake in Energenius S.r.l.**, an innovative start-up operating in the energy efficiency market.



## 2023

In **2023**, the **acquisition of 100% of Energenius S.r.l.** was completed. **The company has developed GEM (Genius Energy Manager), a proprietary platform** for advanced analysis and optimisation of energy consumption — also through predictive models — targeted at companies in the industrial and retail sectors.



## 2025

In **2025**, Maps Group streamlined its corporate structure through the **merger by incorporation of SCS Computers S.r.l. into Artexe S.p.A.** In June, **Maps Group acquired 51% of the share capital of Ellysse S.r.l.**, a company specialised in the design and development of virtual assistance and omnichannel solutions, supported by artificial intelligence.







## HIGHLIGHTS

## 2. GENERAL DISCLOSURES



**ADOPTION OF THE EVALUATION  
PROCEDURE RELATING TO THE  
INDEPENDENCE OF INDEPENDENT  
DIRECTORS**

**NEW DOUBLE MATERIALITY ANALYSIS:** ENGAGEMENT OF MAPS GROUP'S INTERNAL AND EXTERNAL STAKEHOLDERS, AND THE IDENTIFICATION OF MATERIAL IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO THE ENVIRONMENTAL, SOCIAL, AND GOVERNANCE DIMENSIONS, WITH GREATER ACCURACY AND A CLEAR, TRANSPARENT **EVALUATION SYSTEM**



**TRAINING ON SUSTAINABILITY ISSUES, WHICH INVOLVED MAPS GROUP'S  
MANAGEMENT AND TOP GOVERNING BODIES**



**ISO:27001 CERTIFICATION  
EXTENSION WITH 27017 AND 27018**

### 2.1 BASIS OF PREPARATION

#### BP-1 GENERAL BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENTS

This document represents the Sustainability Report of Maps Group, prepared on a voluntary basis. The purpose of the Report is to disclose and communicate the Group's economic, environmental, and social sustainability performance and results achieved in 2024 (from 1 January to 31 December).

For the preparation of the Sustainability Report, the contents subject to disclosure have been developed in accordance with the Corporate Sustainability Reporting Directive (commonly referred to as "CSRD") and the European Sustainability Reporting Standards (hereinafter also "ESRS"). These contents have been selected based on the results of the double materiality analysis, which identified the relevant — or "material" — aspects for Maps Group and its stakeholders. Further details are provided in the section **"SBM-3 – Material Impacts, Risks, and Opportunities and their Interaction with the Strategy and Business Model"** of this document.

The scope of reporting for economic and financial data and information is consistent with that of the Consolidated Financial Statements of Maps Group as of 31 December 2024. Any restatements of previously published comparative data are clearly indicated as such within the text.

The Sustainability Report is structured into four main sections, as set out in ESRS 1 – General Requirements: 1) General information; 2) Environmental information (including disclosures relating to the European Taxonomy – Regulation 852/2020); 3) Social information; 4) Governance information. Each section presents the disclosures required for the topics identified as material for Maps Group, covering policies, actions, targets, and metrics. In addition, the document includes two additional sections: *"Entity-specific Information"*, dedicated to communication on the material topics specific to the entity in terms of policies, actions, targets, and metrics; and *"Economic Information"*, which provides economic and financial data.

To facilitate the identification of contents within the document, a Content Index has been prepared, listing the ESRS disclosure requirements associated with the sustainability topics assessed as material for Maps Group. For further details, please refer to the section **"IRO-2 – ESRS Disclosure Requirements Covered by the Sustainability Statement"**.

To ensure comparability of data over time, comparisons with 2023 data are provided where available.

This Sustainability Report was presented to and approved by the Board of Directors on the 1<sup>st</sup> of August 2025.

The contents of this Report are not subject to external assurance and will be published on the Maps Group website [www.mapsgroup.it](http://www.mapsgroup.it). For further information, please contact: [sostenibilita@mapsgroup.it](mailto:sostenibilita@mapsgroup.it).



## BP-2 DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

### **Sources of estimation and outcome uncertainty in Sustainability statements**

To ensure the reliability of the data, the use of estimates has been limited as much as possible. Where present, such estimates are duly indicated and are based on the best methodologies available.

Below is a summary of estimates applied in this Sustainability Report:

- **Electricity Consumption (E1-5 – ENERGY CONSUMPTION AND MIX):** as indicated in the Environmental Information section, despite the presence of 10 offices across the national territory, energy consumption reporting for the 2024 reporting year was only possible for offices where the supply contracts are held — directly or indirectly — by one of the Group's companies, or where shared building consumption can be allocated consistently with actual usage, enabling a reliable and traceable estimate of attributable consumption. For certain offices, it was not possible to obtain sufficiently disaggregated or reliably attributable data due to the shared nature of utilities or the absence of objective allocation criteria. The offices excluded from reporting for these reasons are Milan, Rovereto, Genoa, and Prato. For further details, refer to the section **"E1-5 – ENERGY CONSUMPTION AND ENERGY MIX"** Energy consumption per employee was calculated by dividing total energy consumption values by the number of employees.
- **E1-6 – GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS:** The calculation of Scope 1 and Scope 2 emissions was carried out using emission factors sourced from internationally recognised databases, such as the DEFRA Conversion Factors and AIB Residual Mixes. Specifically, for Scope 2 emissions, the emission factors were updated to ensure greater methodological consistency and alignment with market best practices. Scope 3 emissions were calculated in accordance with the GHG Protocol guidelines. The data used were extracted from corporate systems, applying emission factors sourced from internationally recognised databases. For further details, refer to the section E1-6 – GROSS GHG EMISSIONS (SCOPE 1, SCOPE 2, SCOPE 3) AND TOTAL GREENHOUSE GAS EMISSIONS and to the *"Methodological Note"*.
- **"tCO<sub>2</sub>eq Saved through the Maps Habitat Project" (E1-3 – ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES):** The savings were determined through a detailed analysis based on statements provided by 292 employees regarding their commuting methods and the distances travelled. The information was collected via a dedicated survey, with the data subsequently integrated with records of the actual working arrangements adopted by each employee under the initiative. To quantify the environmental impact in terms of avoided CO<sub>2</sub> emissions, the data were processed using the emission factors described in the *"Emission Factors"* section, presented in the following pages.

### **Disclosures stemming from other legislation or generally accepted sustainability reporting frameworks**

In the 2024 Sustainability Report, Maps also discloses entity-specific indicators representing material topics and the related IROs. This reporting of entity-specific material topics has been carried out in accordance with the *Global Sustainability Reporting Standards* established by the GRI. Specifically, these include: GRI 201-1 – *Direct Economic Value Generated and Distributed*, under the topic of Economic Performance; GRI 205-3 – *Confirmed Incidents of Corruption and Actions Taken*, under the topic of Anti-corruption; GRI 206-1 – *Anti-competitive Behaviour*, under the topic of Anti-competitive Practices; GRI 418-1 – *Substantiated Complaints Concerning Breaches of Customer Privacy and Loss of Customer Data*, under the topic of Privacy.

The reporting scope for the above data and information is, in this case as well, consistent with that of the Consolidated Financial Statements of Maps Group as of 31 December 2024.

### **USE OF PHASE-IN \* PROVISIONS**

Phase-in measures have also been applied for the material topics covered by ESRS E5 – Resource Use and the Circular Economy and ESRS S4 – Consumers and End-users. For further details, please refer to the respective sections.

\*The term *"phase-in measure"* refers to a temporary exemption granted to certain companies to defer full reporting on specific requirements during the initial years of applying the standards.

### **TIME HORIZONS**

The short-, medium-, and long-term horizons considered by Maps Group in the assessment of impacts, risks, and opportunities are consistent with those defined by the ESRS, namely: short term < 1 year, medium term 1–5 years, and long term > 5 years.





EMISSION FACTORS

The main emission factors used to calculate energy consumption and GHG emissions (Scope 1, Scope 2 and Scope 3) are shown below. For more information on the methodologies applied, please refer to the following sections: [BP-2 Disclosures in relation to specific circumstances](#), [EI-5 Energy consumption and mix](#) and [EI-6 – Gross Scopes 1, 2, 3 and Total GHG emissions](#)

2024			
Petrol	Emission factor	Unit	Source
	0,17048	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00017048	tCO2e/km	
Diesel	Emission factor	Unit	Source
	0,17082	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00017082	tCO2e/km	
GPL	Emission factor	Unit	Source
	0,19775	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00019775	tCO2e/km	
Hybrid	Emission factor	Unit	Source
	0,12004	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00012004	tCO2e/km	
Natural Gas	Emission factor	Unit	Source
	0,19775000	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00019775	tCO2e/km	
Motorcycles	Emission factor	Unit	Source
	0,11355000	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00011355	tCO2e/km	
Bus	Emission factor	Unit	Source
	0,09650000	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00009650	tCO2e/km	
Train	Emission factor	Unit	Source
	0,03549	kgCO2e/km	DEFRA Green house gas reporting - conversion factors 2022
	0,00003549	tCO2e/km	

Base unit	Unit	2024	2023	Source
1 Kwh of electricity purchased	tCO2eq	0,0004	0,0005*	AIB 2024 e 2023
1 Smc of natural gas for heating/production	tCO2eq	0,0020	0,0020	DEFRA 2022
1 l of heating/production oil	tCO2eq	0,0028	0,0028	DEFRA 2022

\*This emission factor is shown for completeness but has only been used for the calculation of the values shown in parentheses in the Carbon Footprint table at page 36.

2.2 GOVERNANCE

SHAREHOLDERS

As of 31 December 2024, the share capital of Maps S.p.A., fully subscribed and paid in, amounts to €1,536,891.68 and is composed of 13,282,191 ordinary shares with no par value. With regards to shareholding, the Issuer provides timely and appropriate disclosure in the event of threshold crossings and must promptly communicate and make available to the public any Material Change notified by Significant Shareholders concerning the ownership structure. As established under the Euronext Growth Milan Issuers' Regulations, any party holding at least 5% of a category of financial instruments issued by Maps S.p.A. qualifies as a Significant Shareholder. A Significant Shareholder also includes any party that has contributed its shares to a shareholders' agreement (*patto parasociale*) which, as a whole, holds a stake exceeding the thresholds set by the Transparency Regulations.

Below is the table of shareholders as of 31 December 2024, in accordance with the regulations indicated above.

[LINK](#) ➔

Name and Surname	No. of ordinary shares admitted to trading	% of share capital	% of voting rights
Marco Ciscato	1.954.341	14,71%	14,71%
Maurizio Pontremoli	1.647.201	12,40%	12,40%
Domenico Miglietta	1.183.001	8,91%	8,91%
Paolo Ciscato	790.966	5,96%	5,96%
Gian Luca Cattani	740.913	5,58%	5,58%
Giorgio Ciscato	189.000	1,42%	1,42%
Fabrizio Biotti	101.610	0,77%	0,77%
Andrea Gherardi	27.330	0,21%	0,21%
Cristiano Colaluca	36.330	0,27%	0,27%
Luigi Ambrosini	40.459	0,30%	0,30%
Maurizio Bonatti	40.459	0,30%	0,30%
Eiffel Investment Group	1.215.631	9,15%	9,15%





GOV-1 THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Corporate Governance is a highly material topic for Maps Group, which has established, within the Issuer and its subsidiaries, a clear governance system inspired by best practices. Its main objectives are transparency, compliance with procedures, the professionalism of appointed individuals, and the involvement of key managers in the executive bodies of the subsidiaries.

The Parent Company, Maps S.p.A., adopts a traditional governance model, which provides for a Board of Directors with administrative functions and a Board of Statutory Auditors responsible for accounting and legal oversight. These bodies, appointed by the Shareholders’ Meeting, are composed of individuals with strong professional expertise and seniority, selected in line with the values of the Maps Group and in compliance with the Articles of Association and the Corporate Governance Code, as well as with Legislative Decree 148, Article 3 of the Consolidated Law on Finance (TUF), and the Issuers’ Regulations. The statutory audit is entrusted to an independent auditing firm.

Name and Surname	Gender	Age Group	Education	Date of appointment	End of tenure	Role	Other board appointments
Gian Luca Cattani	M	>50	Bachelor's Degree in Mathematics	24/04/2025	Approval of the 2027 Financial Statements	Executive Director, Maps S.p.A	
Marco Ciscato	M	>50	Bachelor of Science in Computer Engineering	24/04/2025	Approval of the 2027 Financial Statements	Chairman and Chief Executive Officer, Maps S.p.A	<ul style="list-style-type: none"><li>• Executive Chairman Artexe</li><li>• Executive Chairman IASI</li><li>• Sole Director SCS Computers</li><li>• Sole Director I-Tel</li><li>•Sole Director Energenius</li></ul>
Paolo Pietrogrande	M	>50	Bachelor of Science in Chemical Engineering	24/04/2025	Approval of the 2027 Financial Statements	Independent Director	<ul style="list-style-type: none"><li>• Director Trasporti Romagna</li><li>• Director Gasdotti Italia S.p.A.</li><li>• CEO of EGEA Energia e Ambiente</li><li>• Board Member Rubicon S.r.l.</li><li>• Director Edera Impresa Sociale S.r.l.</li><li>• Director Sofinter Group</li></ul>
Maurizio Pontremoli	M	>50	Master's Degree in Physics	24/04/2025	Approval of the 2027 Financial Statements	Chief Executive Officer	<ul style="list-style-type: none"><li>• Sole Director Energenius</li><li>• CEO Artexe</li></ul>
Rosa Grimaldi	F	>50	Beachelor's Degree in Management Engineering	24/04/2025	Approval of the 2027 Financial Statements	Independent Director	<ul style="list-style-type: none"><li>• Independent Director at Bologna Fiere S.p.A.</li><li>Professor at the University of Bologna</li></ul>

THE BOARD OF DIRECTORS



Marco Ciscato



Maurizio Pontremoli



Rosa Grimaldi



Gian Luca Cattani



Paolo Pietrogrande

The Board of Directors is the executive body responsible for the ordinary and extraordinary management of the Company, and it defines the Group's strategic direction and organisational structure. The mechanisms for the appointment and replacement of the Board of Directors are set out in the Articles of Association.

The Board of Directors of Maps S.p.A. is composed of five members, including two Independent Directors, appointed for a term not exceeding three financial years and eligible for re-election. All directors must meet the eligibility, professional, and integrity requirements set out in Article 147-fifth of the Consolidated Law on Finance (TUF). The Board is chaired by the Executive Chairman, who holds delegated powers in administration, finance and control, human resources, compliance, **sustainability**, and legal affairs. The Executive Chairman has also been granted authority over procurement related to the company's operating activities, as well as investor relations. Director Maurizio Pontremoli has been delegated responsibility for commercial matters relating to the sale of solutions and services, external communications and marketing, and — regarding research and development (R&D) — for products and services within the scope of the company's corporate purpose. The Executive Director, Gian Luca Cattani, is responsible for and coordinates the Delivery areas.

The Executive Directors hold the power to sub-delegate, which they exercise by granting specific powers of attorney to the heads of Sales and Business Units. **In 2024, a clear and detailed system of powers of attorney was formalised for designated individuals within the company and its subsidiaries.** During the 2024 financial year, the Board of Directors met eight times, with Directors' attendance at meetings recorded at 100%.

The Board also includes members with specific expertise in sustainability. This expertise encompasses: extensive experience in renewable energy, sustainability, holding a university-level teaching position in Finance for Sustainability, and serving on the Editorial Board of the Journal of Management and Governance.

Within the Board of Directors, the **Related Parties Committee** is also established, composed of the Independent Directors. This Committee is convened on an ad hoc basis, when necessary, to review and provide opinions on related-party transactions proposed by the Company's Directors.

The Board of Directors of Maps S.p.A. is not subject to a structured annual self-assessment process carried out by external consultants. However, the **Board conducts an annual review to verify that Directors continue to meet the independence requirements and to assess any changes that could result in potential incompatibilities among members, in accordance with the Procedure approved by the Board in 2024.**





## BOARD MEMBERS NOMINATION POLICY

The Articles of Association stipulate that, in the case of a five-member Board of Directors, at least one Independent Director must be appointed, with this number increasing proportionally to the size of the executive body. The principles of **diversity** and **gender balance** are duly taken into account in the nomination process, in line with the recommendations of the Corporate Governance Code.

The Board of Directors is appointed by the Shareholders' Meeting based on lists of candidates submitted by shareholders. Shareholders holding ordinary shares who, at the time of submission, individually or jointly own at least 2.5% of the total number of ordinary shares issued, may submit a list of candidates for the appointment of Directors. Such lists, accompanied by the documentation required under the Articles of Association, must be filed at the Company's registered office no later than 1:00 p.m. on the seventh day prior to the date of the first (or only) call of the meeting convened to resolve on the appointment of Directors. Detailed provisions governing the nomination process are set out in the Company's Articles of Association.

[LINK](#) →

## BOARD OF STATUTORY AUDITORS

The Board of Statutory Auditors is the corporate body that supervises proper administration, in particular compliance with the law and the Articles of Association. The Board of Statutory Auditors is composed of three Standing Auditors and two Alternate Auditors who meet the requirements of integrity and professionalism provided for by law. The Body must meet at least every ninety days and is obliged to file the report referred to in art. 2429 of the Italian Civil Code.

The Table below shows the members of the Board of Statutory Auditors in office during the 2024 financial year:

Name and Surname	Gender	Age group	Education	Date of appointment	End of tenure
<b>Federico Albini</b>	M	40-59	Bachelor's degree in Economics and Commerce	24/04/2025	Approval of the 2027 Financial Statements
<b>Roberto Barontini</b>	M	40-59	Bachelor's degree in Economics and Commerce	24/04/2025	Approval of the 2027 Financial Statements
<b>Pierluigi Pipolo</b>	M	40-59	Bachelor of Science in International Trade Economics	24/04/2025	Approval of the 2027 Financial Statements
<b>Mirco Diotalevi</b>	M	40-59	Bachelor's degree in Economics and Commerce	24/04/2025	Approval of the 2027 Financial Statements
<b>Giuseppe Salamini</b>	M	60-75	Commercial Technical Institute	24/04/2025	Approval of the 2027 Financial Statements

## INDEPENDENT AUDITORS

The statutory audit of the Company's accounts is carried out by an independent audit firm registered in the specific register established under Legislative Decree No. 39/2010, appointed by the Shareholders' Meeting in accordance with applicable regulations.

At the Shareholders' Meeting held on 29 April 2024, and, on the basis of a reasoned proposal from the Board of Statutory Auditors, the statutory audit engagement for the 2024–2026 three-year period was awarded to Deloitte Italy S.p.A., until the approval of the financial statements as of 31 December 2026. The Shareholders' Meeting entrusted the audit firm with the statutory audit of the separate financial statements, the consolidated financial statements, and the limited review of the half-year financial report.

The Audit Firm's reports are available in the *Financial Statements and Reports* page of the *Investors* section of the Maps Group website.



## SUPERVISORY BODY

The Supervisory Board (*Organismo di Vigilanza*, or "OdV") is responsible for monitoring of the functioning of, and compliance with, the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 ("Model 231"), the related procedures, and the Code of Ethics.

In particular, the Supervisory Board is tasked with:

- Reporting to the Board of Directors, for the adoption of appropriate measures, of any notifications received regarding violations of Model 231 and the Code of Ethics, following any investigations conducted;
- Providing opinions on the revision of the most significant policies and procedures, in order to ensure their consistency with the Code of Ethics;
- Promoting the periodic review of the Code of Ethics. To this end, the Supervisory Board makes appropriate proposals to the Board of Directors, which evaluates, and where appropriate, approves and formalises them;
- Verifying and monitoring the adequacy and updating of the Model 231 documents adopted by Group companies, and recommending any necessary amendments or adjustments.

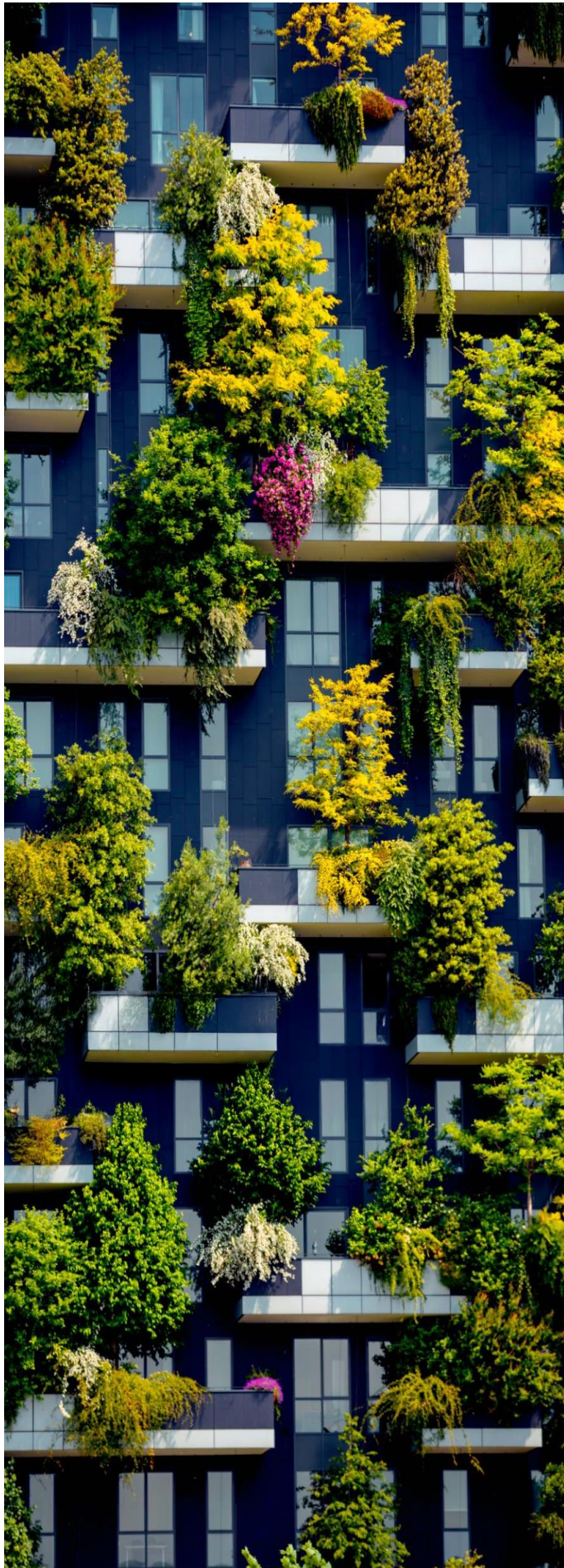
The Supervisory Board of Maps Group is a collegial body with the required autonomy and independence. It was appointed on the 15<sup>th</sup> of April 2024 for a three-year term. The previous Supervisory Board, appointed on the 7<sup>th</sup> of December 2021 for a two-year term, continued to perform its duties until the new appointment under a period of *prorogatio*.

The current Supervisory Board is composed of Chairman Avv. Giovanni Catellani, Avv. Federico Sartore, and internal member Dott. Marco Marocci, who is part of the Group Compliance function.

The members of the Supervisory Board were appointed following a thorough selection process that took into account their professional qualifications and extensive experience in matters relating to Legislative Decree 231/2001. In addition, the selected profiles possess specific expertise in the Group's key risk areas, ensuring rigorous and continuous oversight of operational activities.

In the course of 2024, no significant issues were reported to the Board of Directors.





## GOV-2 INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Sustainability matters are regularly submitted to the Board of Directors by the Executive Chairman, either as information updates or, in the case of particularly significant matters, as proposals for resolution. This approach ensures that sustainability is fully integrated into the organisation's strategic decision-making processes. The Board actively contributes through proposals and suggestions for the implementation of sustainability projects. Finally, the executive body reviews and approves the annual sustainability reporting, providing any recommendations for improvements to the Report.

All members of the Board of Directors and the Board of Statutory Auditors participated in a dedicated training session focused on the impacts of the Corporate Sustainability Reporting Directive (CSRD) on Maps Group. The training addressed, in particular, the implications for the sustainability reporting as well as the duties and responsibilities of the corporate bodies.

The Board also played an active role in the double materiality assessment process, contributing to the identification and evaluation of the material impacts — both positive and negative — generated or experienced by the organisation, as well as to the identification of ESG-related financial risks and opportunities.

Lastly, the Board of Directors played an active and central role by approving the results of this analysis.

## GOV-3 INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

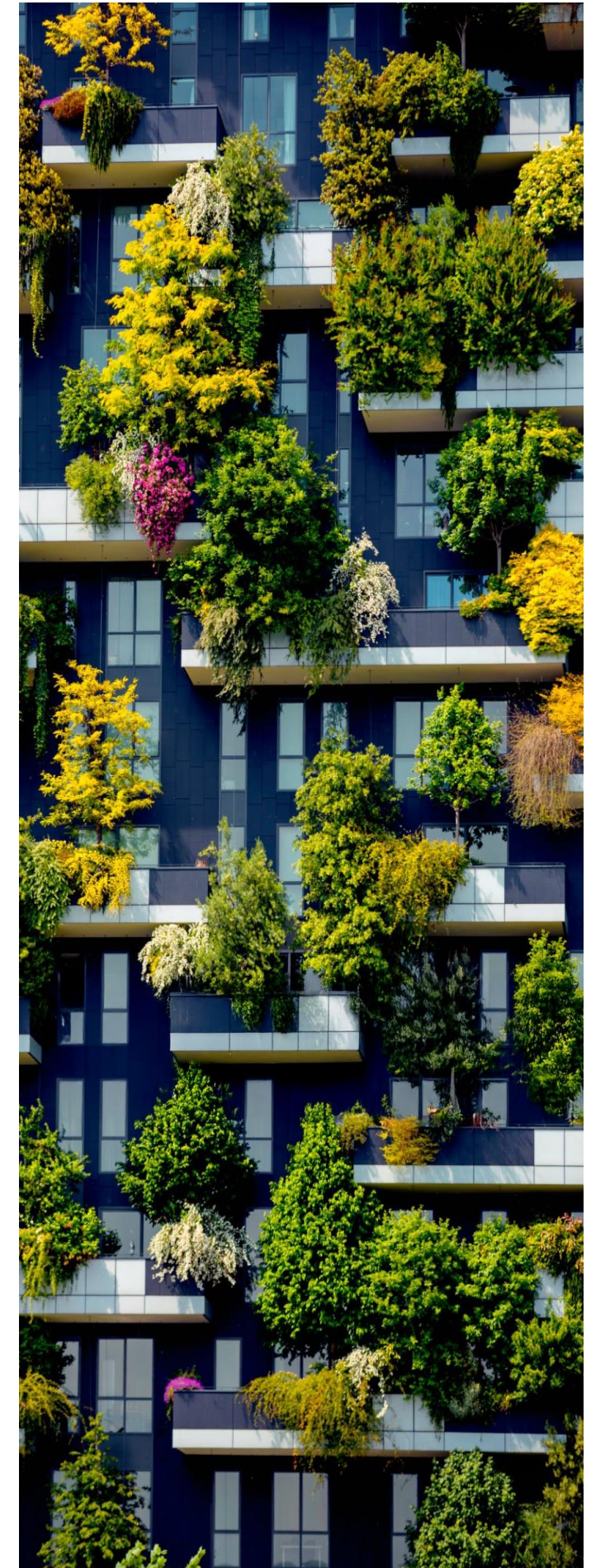
Currently, the performance of the governance bodies and corporate management is not assessed in relation to sustainability matters. However, the Group is committed to ensuring a remuneration system that supports the development of Maps Group, also from a sustainability perspective.

## REMUNERATION OF THE BOARD OF DIRECTORS

At the time of appointing the highest governing body, the Shareholders' Meeting also approved a gross annual remuneration pool to be allocated to the entire Board of Directors, to be distributed in accordance with the determinations of the executive body. The Executive Directors receive both fixed and variable remuneration, the latter being awarded based on the achievement of quantitative and measurable objectives defined by the Board. Variable remuneration includes both short-term incentives and long-term incentives; the latter category comprises of stock options and stock grants. For the entire duration of their term of office, the Chief Executive Officers are also entitled to health insurance contributions and end-of-service indemnities.

In July 2022, the Ordinary Shareholders' Meeting, having obtained the opinion of the Independent Directors, approved the 2022–2024 Remuneration and Incentive Policy, which sets out the guidelines and criteria for the remuneration and incentive system the Company intends to apply to members of the Board of Directors and Top Management.

[LINK](#) ➔







GOV-4 STATEMENT ON DUE DILIGENCE

In 2024, Maps Group carried out an in-depth double materiality assessment aimed at identifying and evaluating negative impacts — both actual and potential — associated with its activities, as well as across the entire value chain, both upstream and downstream.

This process has enabled the Group to initiate the development of a due diligence framework designed to prevent, manage, and mitigate such impacts related to the sustainability topics most relevant to Maps Group.

Below is the mapping of the information contained in this Sustainability Report relating to the *due diligence processes* implemented during the year.

Core elements of due diligence	Paragraphs in the sustainability statement
1. Embedding due diligence in governance, strategy and business model	SBM-1 "Strategy, Value Chain and Business Model" and "Governance" Paragraph
2. Engaging with affected stakeholders in all key steps of the due diligence	SBM-2 "Interests and views of stakeholders" (pag. 16, 32, 39)
3. Identifying and assessing adverse impacts	Paragraphs relating to Negative Impacts(pag. 41, 43, 53)
4. Taking actions to address those adverse impacts	Paragraphs relating to ACTIONS
5. Tracking the effectiveness of these efforts and communicating	Paragraphs relating to ACTIONS

In addition, Maps Group recognizes the importance of operating ethically, responsibly and in compliance with current due diligence regulations, promoting sustainable behavior throughout the value chain. With this in mind, the Group is committed to implementing, in the near future, a [structured due diligence process](#), in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

GOV-5 RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

Maps Group has not yet developed an integrated internal control and risk management system specifically dedicated to sustainability, in line with the requirements of EU Regulation 2022/2464 (Corporate Sustainability Reporting Directive – CSRD). However, the Group intends to implement such a system in the near future, based on three levels of control — operational, supervisory, and internal audit — and integrated with the internal control system for financial reporting, in order to ensure the consistency and reliability of reported data.

In the meantime, standardised procedures for the collection, validation, and monitoring of non-financial data have already been established. The Company adopts a risk-based approach, which involves assessing the likelihood of occurrence of impacts.

For further details, refer to the section “*Risk Management and Business Continuity (Entity-Specific)*”.

The Board of Directors reviews and approves the annual sustainability reporting, which includes a dedicated section on risks and their management. The results are also communicated to stakeholders through the Sustainability Report, which is published annually.

COMPLIANCE

Transparency is one of the guiding principles of Maps Group’s operations and, as such, forms a cornerstone of its sustainable growth strategy.

The Group has established an independent and skilled **COMPLIANCE** function, reporting directly to the Group General Counsel. This function, recently integrated into the Group, is responsible, inter alia, for managing certifications, ensuring that the Company meets the standards required to obtain and maintain the certifications relevant to its sector. This entails managing compliance audits, preparing the necessary documentation, and liaising with certification bodies and clients for the audits required.

Another key responsibility of the function is to work with the relevant corporate functions and managers to identify business risks, develop and implement corporate policies and procedures to mitigate such risks, and provide employee training on ethical and compliance practices.

CERTIFICATIONS AND MANAGEMENT SYSTEM

Maps Group has set a key objective of the continuous improvement and attainment of internationally recognised standards. In recent years, the Group has embarked on a certification journey that has resulted in the proven achievement of ISO 9001 and ISO 27001 standards.

Maps S.p.A., along with its subsidiaries Artexe, SCS Computers, and I-Tel, have obtained certifications specific to the control of information stored on cloud services and to privacy-related information management. In 2024, the Group extended ISO 27001 certification to Iasi and, at the same time, completed the process for extending ISO 27017 and ISO 27018. In addition, Artexe obtained gender equality certification as part of its ongoing commitment to inclusion and equity in the workplace.

For further information, refer to the [ENTITY-SPECIFIC](#) sections on Risk Management and Privacy.

Specific certifications have also been obtained for the Group’s medical technology solutions; for further details, refer to the section [“Risk management and business continuity \(ENTITY-SPECIFIC\)”](#).

A long-term objective is to complete the process of unifying the ISO 9001 and ISO 27001 management systems, a process already initiated for certain Group companies through corporate certification, so that these systems are interconnected and managed in a coordinated manner.



Maps S.p.A.  
Artexe S.p.A.  
Iasi S.r.l.  
I-Tel S.r.l.  
SCS Computers S.r.l.



Maps S.p.A.  
Artexe S.p.A.  
Iasi S.r.l.  
I-Tel S.r.l.  
SCS Computers S.r.l.





## 2.3 STRATEGY

### SBM-1 STRATEGY, BUSINESS MODEL AND VALUE CHAIN

#### THE LINK BETWEEN THE STRATEGY AND THE SUSTAINABILITY

Maps Group operates with the objective of transforming data into knowledge, through software solutions that support public and private clients in their decision-making processes. Sustainability is an integral part of the Group's strategy — not only with regards to its direct environmental impact, but also due to the very nature of the products developed, which promote more efficient, inclusive, and responsible operating models.

This approach is consistent with the Group's mission to create sustainable value for stakeholders and supports alignment with several United Nations Sustainable Development Goals (SDGs), in particular: SDG 3 – Good Health and Well-being, SDG 4 – Quality Education, SDG 5 – Gender Equality, SDG 7 – Affordable and Clean Energy, SDG 8 – Decent Work and Economic Growth, SDG 9 – Industry, Innovation and Infrastructure, SDG 12 – Responsible Consumption and Production, SDG 13 – Climate Action, SDG 16 – Peace, Justice and Strong Institutions, and SDG 17 – Partnerships for the Goals.

#### BUSINESS MODEL AND ORGANIZATIONAL STRUCTURE

Maps Group's activities are organised into four operational Business Units — Healthcare, Energy, ESG, and MapsLab — supplemented by two internal units: Corporate Governance and Research & Innovation.

Each Business Unit specialises in a specific technological or market area and enhances its offering through advanced digital solutions: from energy efficiency to Energy Communities, from public sector governance to patient experience services.

This structure enables the Group to operate effectively in key market segments while fostering cross-functional synergies between areas of expertise.



Through **Maps Healthcare** the Group oversees the innovative trends of Patient Experience, Telemedicine and Data Driven Governance, while providing Diagnostic and Hospital Information Systems to public and private customers



Leading phygital platform in Italy for the management of reception and waiting times in the healthcare sector. The result of over 20 years of experience, it is characterized by being scalable and modular with multitouch points (with multifunction kiosks, information monitors and applications).



Portal that allows users to book access to reception services in the desired health facility selecting the time slots that guarantee the reduction of waiting time for the provision of health services.



Healthcare Analytics Platform specifically designed for the healthcare world, which integrates with management platforms and acts as a data aggregator. It is designed to extract data from different information silos, even through the semantic interpretation of documentation written in natural language



With Maps Energy, the Group supports the market transformation for the energy transition, first and foremost those of flexibility and Energy Communities, as well as energy efficiency.

#### BUILDING SUSTAINABILITY

An Energy Data Platform to improve the sustainability rating and manage the risks of real estate assets.

#### ENERGY COMMUNITIES

An agile and complete platform dedicated to utilities and energy operators and certified for the Public Administration.

#### ENERGY EFFICIENCY

Data-driven efficiency and intelligent plant management to reduce consumption.

#### PREDICTIVE MAINTENANCE

Data quality and predictive models to improve the resilience and flexibility of power grids.



Through **Maps ESG** the Group offers solutions that measure the achievement of corporate and personnel objectives, manage risks, and communicate non-financial performance



An open-source strategic planning tool designed to guide public administrations in creating sustainable value, aimed at generating a virtuous cycle of social, environmental, and economic benefits for the community



The proprietary HR Value People® solution dedicated to managing the employee's working life, and thanks to the multi-channel approach (App, Voicebot and Chatbot), it improves interaction with the company. In the public sector, in particular, this solution plays a strategic role in the development of human capital.



Through **MapsLab**, the Group operates in a context of Open Innovation, to respond to the specific needs of large companies through tailor-made products or solutions.



Cloud solution provided in SaaS mode, designed to reduce the risk of non-compliance for the company operating on large construction orders, tracking and making each document step more efficient. An accurate control of the master data, accompanied by the operational management of each phase of the process, allows the management of every aspect of the Legality Protocols. Ease of use, online accessibility from any device, flexibility, security and a high level of configuration of master data and use make L&T a reliable platform that can be integrated with any other company system.



VALUE CHAIN

Maps Group’s value chain is strongly oriented towards the digital services sector and is structured into primary and support processes.

Primary processes include:

- Inbound logistics: procurement of cloud services, electricity, and equipment for offices and premises (e.g., data centres or coworking spaces).
- Operations: software development, quality testing, database management, and R&D.
- Outbound logistics: order management, installation, and distribution of products, predominantly digital but also physical.
- Marketing & sales: promotion, communication, and market positioning of services.
- Customer service: technical assistance, maintenance, updates, and training.

Support processes include human resources management, corporate infrastructure, procurement, and technological research and innovation.

Upstream in the value chain, Maps Group works with technology, energy, and cloud service providers. Downstream, the Group serves public and private clients through both direct and indirect channels, acting as a strategic supplier in the healthcare, energy, and ESG sectors. This central role in the value chain translates into the ability to actively influence the efficiency and digitalisation of the entire client ecosystem.

COMMITMENT TO SUSTAINABILITY AND PRINCIPAL ADVERSE IMPACTS

In pursuing a sustainable business model, Maps Group analyses and mitigates the main negative impacts generated along its value chain, in line with **the PAI (Principal Adverse Impacts)** indicators that are reported below:

Principal Adverse Impacts (PAIs)	2024
GHG emissions (Greenhouse gas) in t CO <sub>2</sub> e	Scope 1: 155 tCO <sub>2</sub> eq Scope 2 – Market based: 73 tCO <sub>2</sub> eq Scope 2 - Location based: 99 tCO <sub>2</sub> eq Scope 3: 131 tCO <sub>2</sub> eq
Carbon Footprint	- Location Based: 359 Ton - Market Based: 385 Ton
GHG Intensity	12 Ton CO <sub>2</sub> / Mln€
Exposure to companies active in the fossil fuel sector	Maps Group is not active in the fossil fuel industry
Share of non-renewable energy consumption and production	85%
Energy consumption intensity per high impact climate sector	Based on our NACE code, MAPS is not active in a "high climate impact sector"
Activities negatively affecting biodiversity-sensitive areas	None
Emissions to water (m <sup>3</sup> )	None
Hazardous waste in tons	~ 0
Violations of UN Global Compact (UNGC) principles and OECD Guidelines for Multinational Enterprises	None
Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises	No
Unadjusted gender pay gap	The company is currently calculating the unadjusted gender pay gap. This data will be available in 2025
Board gender diversity	- 20% Female - 80% Male
Exposure to controversial weapons	Maps Group is not involved in the manufacture or sale of weapons of any kind





## 2.4 MATERIALITY ASSESSMENT

### SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

For Maps Group, the interests and perspectives of stakeholders play a central role in shaping the company's strategy and business model, helping to ensure that corporate decisions are consistent with the economic, environmental, and social expectations of the context in which the company operates.

### IDENTIFICATION AND INVOLVEMENT OF STAKEHOLDERS

The company has identified its key stakeholders through a structured mapping process, which includes, among others: employees, customers, suppliers, investors, institutions, local communities, and industrial partners. Engagement takes place through a variety of channels and methods, including:



These tools enable continuous and transparent dialogue, aimed at gathering feedback and suggestions useful for improving corporate performance and strategic decision-making.

Engagement activities are regularly planned for different purposes: from collecting opinions on material topics to sharing the results achieved.

The outcomes of stakeholder dialogue are analysed and integrated into decision-making processes. In particular, they contribute to defining strategic objectives, sustainability policies, and continuous improvement programmes across various areas.

### DOUBLE MATERIALITY ASSESSMENT PROCESS AND DUE DILIGENCE

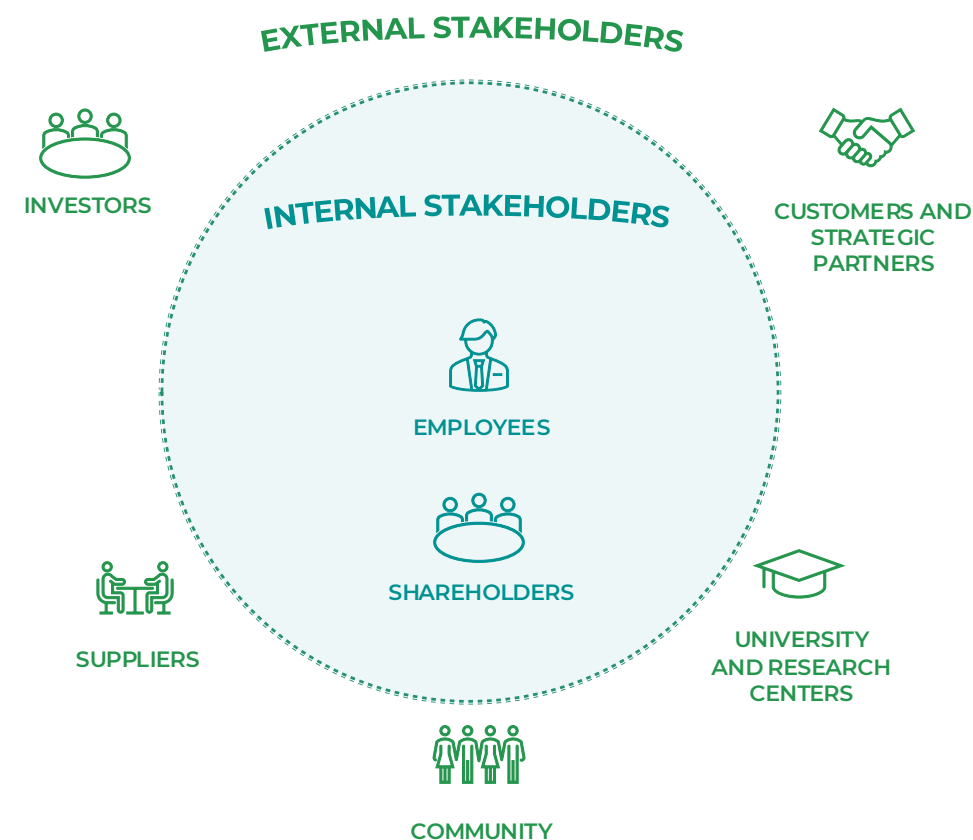
During the double materiality assessment process — which considers both the company's impact on the environment and society, and the influence of ESG factors on the company's economic performance — **targeted and structured stakeholder involvement was involved.**



In particular, the corporate bodies and management were involved through function-specific meetings, organised not only to deliver targeted training on the subject but also through the administration of an internal survey. A selected sample of employees, stratified by corporate function, was actively engaged via dedicated emails containing detailed guidelines on the assessment process and the meaning of the double materiality.

External stakeholders — including customers, investors, suppliers, and universities—were also involved in this process through surveys.

The results collected were subsequently analysed to identify the material and priority topics to be incorporated into the corporate strategy. The outcomes of stakeholder engagement and the findings of the double materiality assessment were regularly presented to the governing, management, and control bodies to secure their approval and to ensure full awareness and alignment between governance and sustainable strategy.





## SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The materiality analysis focuses on assessing the importance of the topics to be reported in the Sustainability Report, based on the degree of significance perceived by both the company and its internal and external stakeholders. A sustainability matter is considered material from an impact materiality perspective when it is linked to significant impacts — negative or positive, actual or potential — of the organisation on the economy, the environment, society, and human rights (the so-called “material topics” or “material variables”) relating to environmental, social, and governance issues. This means that the organisation has a significant impact on the economy, the environment, and/or on people and human rights.

However, a sustainability matter is also considered relevant from a financial materiality perspective if it causes, or is reasonably likely to cause, significant financial effects, generating risks and opportunities.

The identification of material topics determines what information must be included in this Report, focusing on the most critical aspects for advancing towards a more sustainable and socially responsible business model, and thereby developing a monitoring and intervention strategy.

In the 2023 Sustainability Report, Maps Group began the process of aligning with European Directive 2022/2464 (“CSRD” – Corporate Sustainability Reporting Directive), with a focus on developing and enhancing the materiality analysis, in continuity with the improvements made the previous year. The materiality process was supplemented by an additional assessment **in full compliance with the principle of double materiality as set out by both the GRI and the CSRD, and thus by the ESRS.**

Specifically, by introducing the concept of double materiality in the 2023 Report, the assessment was carried out from two perspectives: financial materiality and impact materiality.

### IMPACT MATERIALITY

Impact materiality means an analysis of the impacts generated by the company on the economy, the environment, people and human rights, deriving from the Group's business.<sup>2</sup>

### FINANCIAL MATERIALITY

Financial materiality, on the other hand, examines the risks and opportunities deriving from external factors such as the environment (i.e. climate), human resources (i.e. employee turnover), etc., for the organization that affect or could affect the company's financial position, economic result and cash flows<sup>3</sup>.

<sup>2</sup> More precisely, “A sustainability issue is relevant from the point of view of impact when it concerns the significant impacts of the company, negative or positive, actual or potential, on people or the environment in the short, medium or long term. Impacts include those related to the company's own operations and upstream and downstream value chain, including through its products and services and its business relationships. Business relationships include those located in the company's value chain, upstream and downstream, and are not limited to direct contractual relationships. In this context, impacts on people or the environment include impacts related to environmental, social and governance issues.” (ESRS 1, § 43-44)

<sup>3</sup> More precisely, “A sustainability issue is financially relevant if it involves or can reasonably be expected to have material financial effects on the company. This occurs when a sustainability issue generates risks or opportunities that have or can reasonably be expected to have a material influence on the development of the company, its financial position, economic performance, cash flows, access to finance or cost of capital in the short, medium or long term. Risks and opportunities can arise from past or future events. The financial materiality of a sustainability matter is not limited to the matters under the firm's control but includes information on material risks and opportunities attributable to business relationships that do not fall within the scope of consolidation used in the preparation of the financial statements.” (ESRS 1 § 49)

The separate analysis of financial materiality and impact materiality is essential to understanding the value of sustainability and to redefining corporate strategies and business models. Financial materiality concerns the risks and opportunities for the company, including climate-related risks. This perspective — known as the “outside-in” view — considers how risks and opportunities originating from the external environment can affect the company, potentially resulting in financial consequences and influencing strategic governance decisions.

By contrast, impact materiality focuses on how the organisation's activities affect the external environment, the economy, and people. This perspective — known as the “inside-out” view — considers the impacts the organisation has externally, including those linked to its operations, value chain, products and services, and business relationships.

The distinction between these two types of materiality provides a comprehensive understanding of the implications of sustainability for an organisation. It enables companies to assess both the impacts of their activities on the environment and society, and how these impacts, in turn, can influence their financial stability and ability to achieve their objectives. This approach supports the development of more effective and sustainable strategies.

## WHAT IS DOUBLE MATERIALITY?

ESRS 1 and ESRS 2 describe the process to be followed for the materiality analysis aimed at identifying “sustainability impacts, risks and opportunities”, introducing the concept of double materiality.

Double Materiality is the union of impact materiality and financial materiality. A sustainability topic or information meets therefore the criteria of double materiality if it is material from the impact perspective or from the financial perspective or from both perspectives (ESRS 1).

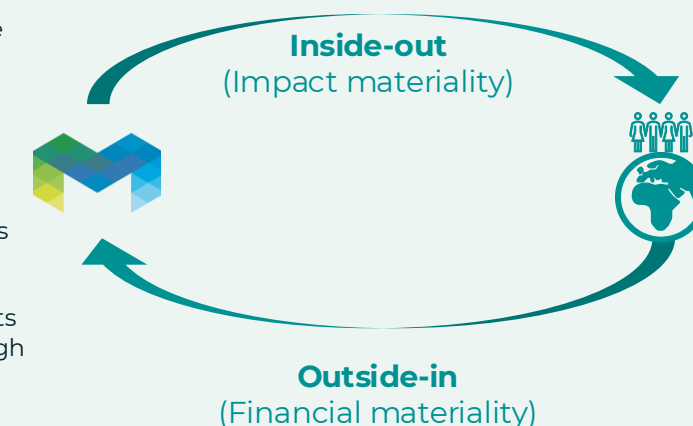
### IMPACT MATERIALITY

Impacts from an **inside-out perspective**, thus, actual or potential, positive or negative impacts on people or the environment over the short, medium and long- term.

Impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships **(ESRS 1, paragraph 43).**

### FINANCIAL MATERIALITY

Impacts from an **outside-in perspective**, thus, risks or opportunities that have a material influence or could reasonably be expected to have a material influence on the undertaking's development, financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium and long-term **(ESRS 1 paragraph 49).**







The table below outlines the **key impacts, risks, and opportunities** identified through Maps Group’s double materiality analysis. For each item, it specifies the nature of the impact (positive/negative, current/potential), the relevant time horizon (short term: less than 1 year; medium term: 1–5 years; long term: more than 5 years), and the area in which it arises (own operations, upstream value chain, downstream value chain).

ENVIRONMENT					
ESRS TOPIC	TOPIC/ SUB-TOPIC	IRO	IRO DESCRIPTION	PLACE OF OCCURRENCE	TIME HORIZON
ENVIRONMENT (E1)	CLIMATE CHANGE MITIGATION AND ENERGY	ACTUAL NEGATIVE IMPACT	Contribution to climate change due to greenhouse gas (GHG) emissions (Scope 3) along Maps Group's upstream value chain (including Cloud suppliers).	Upstream	Short, Medium and Long-term
		ACTUAL NEGATIVE IMPACT	Contribution to climate change due to greenhouse gas (GHG) emissions (Scope 3) along Maps Group's downstream value chain, generated by the energy consumed by Maps Group's clients.	Downstream	Short, Medium and Long-term
		ACTUAL NEGATIVE IMPACT	Contribution to climate change due to greenhouse gas (GHG) emissions (Scope 1 and 2) generated either directly or indirectly by Maps Group's operations.	Own Operations	Short, Medium and Long-term
		OPPORTUNITY	Business opportunities deriving from changes in national and international regulatory frameworks concerning climate change mitigation and energy requirements.	Own Operations	Medium and Long-term
	CLIMATE CHANGE ADAPTATION	OPPORTUNITY	Climate-change adaptation measures, such as providing consultancy services for the development of IT systems and resilient infrastructure (e.g., Superbonus 100%, Energy Report, Rose Energy Community Solution), may lead to better energy costs management and strengthened business resilience.	Own Operations	Medium and Long-term
	RESOURCE INFLOWS, INCLUDING RESOURCE USE	ACTUAL NEGATIVE IMPACT	Contribution to resource depletion stemming from the need of sourcing rare metals for own IT equipment and infrastructure and for the IT infrastructure of cloud providers.	Upstream and Own Operations	Short, Medium and Long-term
RESOURCE USE AND CIRCULAR ECONOMY (E5)	WASTE	ACTUAL NEGATIVE IMPACT	Negative impact on the environment and on people's health due to waste generation and/or mismanagement of waste deriving from Maps Group's IT equipment.	Own Operations	Short, Medium and Long-term
		ACTUAL NEGATIVE IMPACT	Waste generation in the downstream value chain from the disposal of the IT and electronic equipment needed to exploit Maps Group's services/ software (e.g., Kiosk), adversely affecting the environment and people's health.	Downstream	Short, Medium and Long-term
		ACTUAL NEGATIVE IMPACT	Electronic waste generated along the upstream value chain, due to the disposal of IT equipment of cloud providers.	Upstream	Short, Medium and Long-term

SOCIAL					
ESRS TOPIC	TOPIC/ SUB-TOPIC	IRO	IRO DESCRIPTION	PLACE OF OCCURRENCE	TIME HORIZON
OWN WORKFORCE (S1)	WORKING CONDITIONS	ACTUAL POSITIVE IMPACT	Maps Group guarantees occupational health and safety thanks to the promotion of a safe working environment, also through health and safety training and the implementation of adequate professional risk prevention measures	Own Operations	Short, Medium and Long-term
		ACTUAL POSITIVE IMPACT	Contribution to employees' wellbeing and prosperity through the offering of secure employment, work-life balance and adequate working conditions (e.g., working time, wages, remote working and flexible working hours).	Own Operations	Short, Medium and Long-term
		ACTUAL POSITIVE IMPACT	Positive impacts on staff motivation deriving from the provision of welfare initiatives, such as non-monetary benefits, parental leave, health insurance, meal vouchers	Own Operations	Short, Medium and Long-term
		OPPORTUNITY	Strengthened employee retention and productivity, thanks to Maps Group's commitment to providing secure employment, fair wages, work-life balance and welfare initiatives to its workforce. This could potentially bring about long-term economic savings for the Group (e.g., reduced absenteeism, lower turnover costs and recruitment/ training costs), new business opportunities and enhanced corporate reputation.	Own Operations	Medium and Long-term
	TALENT ACQUISITION	ACTUAL POSITIVE IMPACT	Contribution to the well-being and professional development of Maps Group's workforce through sharing of expertise of new talents.	Own Operations	Short, Medium and Long-term
	EQUAL TREATMENT AND OPPORTUNITIES FOR ALL	ACTUAL POSITIVE IMPACT	Positive impact on the workforce, thanks to the promotion of gender equality and equal employment opportunities for both male and female employees and for people with disabilities and/or with other difficulties of access to employment and to the protection against harassment of underrepresented/ fragile groups (e.g., gender, ethnic, social or religious groups)	Own Operations	Short, Medium and Long-term
		ACTUAL POSITIVE IMPACT	Contribution to employees' personal and professional development through the provision of training opportunities (e.g., Annual Training Plan), aimed at enhancing and investing in their skills and competences	Own Operations	Short, Medium and Long-term
		RISK	The failure to ensure equal opportunities or employment access to individuals with disabilities resulting in discriminatory episodes and/or non-compliance with laws on diversity and equality could trigger legal repercussions.	Own Operations	Short, Medium-term
		OPPORTUNITY	The creation of a skilled and talented workforce through adapted training programs could result in increased employee satisfaction and retention and higher staff productivity. This may ultimately yield economic benefits for Maps Group, such as reduced turnover costs and increased business productivity.	Own Operations	Medium and Long-term
	INFORMATION-RELATED IMPACTS FOR CONSUMERS AND END-USERS	OPPORTUNITY	Enhanced corporate reputation thanks to Maps Group's efforts in securing personal and sensitive data of customers.	Own Operations	Medium and Long-term
CONSUMERS AND END-USERS (S4)	CUSTOMER SATISFACTION	POTENTIAL POSITIVE IMPACT	Increase in client satisfaction thanks to a product/service offering that constantly meets clients' needs and to the provision of innovative services.	Own Operations	Short, Medium and Long-term
		RISK	Risk of diminished client satisfaction, due to an obsolete/outdated product/ service offering and lack of investments in innovation.	Own Operations	Medium and Long-term
	INNOVATION AND DIGITALISATION	POTENTIAL POSITIVE IMPACT	Positive impact on customer satisfaction thanks to R&D activities and investments, aimed at developing and designing innovative solutions, also with a view to sustainability.	Own Operations	Medium and Long-term
		OPPORTUNITY	A proactive customer dialogue can lead to more innovative and appealing product/service offering.	Own Operations	Medium and Long-term



GOVERNANCE

ESRS TOPIC	TOPIC/ SUB-TOPIC	IRO	IRO DESCRIPTION	PLACE OF OCCURRENCE	TIME HORIZON
BUSINESS CONDUCT (G1)	CCORPORATE CULTURE	ACTUAL POSITIVE IMPACT	Promotion of ethical and fair business practices thanks to a robust and diversified governance structure, including also a sustainability governance system and the adoption of ethical policies (e.g., Code of Ethics and 231 Model).	Own Operations	Short, Medium and Long-term
		OPPORTUNITY	The implementation of ethical business practices and governance systems, thanks to the Group's Code of Ethics, Code of Conduct and 231 Model and other procedures can lead to enhanced corporate reputation, increased market value and business opportunities.	Own Operations	Medium and Long-term
	PROTECTION OF WHISTLEBLOWE RS	ACTUAL POSITIVE IMPACT	Positive impact, deriving from the implementation of a whistleblowing procedure, that safeguards the identify and confidentiality of whistleblowers.	Own Operations	Short, Medium and Long-term
		OPPORTUNITY	Enhanced trust from stakeholders and from the market, with consequent reputational benefits, thanks to a transparent governance system, including a robust whistleblowing mechanism.	Own Operations	Medium and Long-term
	CORRUPTION AND BRIBERY	RISK	Incidents of corruption and/or bribery and instances of non-compliance with regulatory frameworks on anti-corruption may have serious repercussions for Maps Group. <i>These may entail the risk of losing business, as stakeholders may be unwilling to partner up with a Company involved in unethical practices and substantial financial and legal costs related to legal proceedings and sanctions.</i>	Own Operations	Medium and Long-term
ENTITY- SPECIFIC	ECONOMIC VALUE CREATION AND DISTRIBUTION	ACTUAL POSITIVE IMPACT	Active contribution to shared value creation and distribution for all Maps Group's stakeholders, thanks to a sound economic performance and financial stability, also with a view to sustainable growth.	Own Operations	Short, Medium and Long-term
		OPPORTUNITY	Enhancement of corporate reputation resulting from the distribution of the value generated to all Group stakeholders.	Own Operations	Medium and Long-term
	INTELLECTUAL PROPERTY AND COMPETITIVE BEHAVIOUR	RISK	The absence of investments in R&D could have considerable financial implications on Maps Group, including the potential loss of competitive advantage and business opportunities.	Own Operations	Medium and Long-term
		OPPORTUNITY	Opportunity to benefit from extra revenue streams (e.g., royalties, licensing) and to gain a competitive edge in the market thanks to the Group's efforts towards intellectual property protection and intellectual property rights.	Own Operations	Medium and Long-term
	RISK MANAGEMENT AND BUSINESS CONTINUITY	RISK	An inadequate or absent risk management system can jeopardize Maps Group's business.	Own Operations	Medium and Long-term
		OPPORTUNITY	Having a robust risk management system, which covers also sustainability-related risks, can benefit Maps Group by ensuring strong financial performance, economic viability and protection against potential disruptions.	Own Operations	Medium and Long-term
	DATA PRIVACY, DATA SECURITY AND CYBERSECURITY	RISK	Risk of increased financial and legal costs due to non-compliance with legislative, regulatory and contractual requirements related to data privacy and protection. <i>This may result in significant sanctions and lawsuits raised by affected parties, as well as increased operational costs deriving from disruptions to business activities in the case of data breaches or IT systems malfunctioning.</i>	Own Operations	Medium and Long-term
		OPPORTUNITY	By proactively addressing data protection and strengthening cybersecurity measures, also thanks to the adoption ISO 27001 Policy (Policy on the information security), Maps Group can achieve economic benefits. <i>These may include greater financial stability, corporate growth, a competitive advantage and access to new business opportunities.</i>	Own Operations	Medium and Long-term

2.5 IMPACT, RISK AND OPPORTUNITY MANAGEMENT

IRO-1 DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IROS

Compared with the previous reporting period, the Group has completely revised its materiality assessment process. For further details on the materiality process, refer to section: [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#)

The process followed by Maps to identify impacts, risks, and opportunities (hereinafter “IROs”) consisted of two main phases::

- Mapping of topics, sub-topics, and sub-sub-topics from the ESRS standards that are potentially relevant to the Group, to its business model, operational activities, and value chain. For each potentially material topic, the related IROs were identified, specifying: the type of impact (whether positive or negative, current or potential); the area in which it occurs (within own operations, or in the value chain — upstream or downstream); the time horizon (short term < 1 year, medium term 1–5 years, or long term > 5 years); the stakeholder groups involved (internal or external); and the risks and opportunities arising from impacts and dependencies. For each of these, the time horizon, the potential financial effects on economic performance (in terms of revenues, costs, and access to/cost of capital), and the origin (inaction or proactive engagement) were also indicated.

The impact materiality assessment, aimed at identifying, evaluating, and prioritising the Group's actual and potential impacts on people and the environment, was carried out in the following phases::

- Identification of potentially material impacts by the Sustainability Team (expert function), based on sector analyses, value chain mapping, and previous materiality assessments.
- Evaluation of impacts by internal stakeholders (e.g., employees, top management, Board of Directors, Board of Statutory Auditors) and external stakeholders (e.g., suppliers, clients, business partners), conducted through workshops and surveys. Each identified impact was assigned a score, using a dedicated scoring methodology, by assessing both its magnitude and likelihood of occurrence.
- Application of a predetermined materiality threshold to the results.
- Finalisation of the list of material impacts and the related ESRS topical standards.
- Final validation of the double materiality results by the Board of Directors.

In the process of identifying impacts, factors that could increase the risk of negative impacts (severity, scale, and likelihood) were also considered, such as the Group's geographical location or the presence of workers belonging to vulnerable categories (e.g., persons with disabilities).

The impacts were linked both to the direct activities of Maps Group and to business relationships along the value chain. For each impact, the place of occurrence was indicated (own operations, upstream value chain, or downstream value chain).





An impact assessment survey sent to various stakeholder categories, asked them to assign a score to all impacts (positive and negative, current and potential) based on their likelihood and severity (scale, scope, and irremediability — the latter applying only to negative impacts). In addition, interviews were conducted with internal stakeholders, including employees, unit managers, the Board of Directors, and the Board of Statutory Auditors.

The impacts were assessed from a dual perspective, using the following scoring methodologies:

- **Likelihood of occurrence**, for potential impacts, a score from 0 (highly unlikely) to 5 (certain) was assigned. For actual impacts, the likelihood was automatically set at 5 (certain, 100%).
- **Severity of the impact**, evaluated in terms of:
  - Scale — how severe or beneficial the impact is;
  - Scope — how widespread it is;
  - Irremediability — the extent to which a negative impact can be remedied -

Scores could range from 0 (none/fully remediable) to 5 (irremediable or with a very high impact).

Maps Group also carried out a financial materiality assessment, aimed at identifying, evaluating, and prioritising sustainability-related risks and opportunities that could affect the Group's financial performance.

The risks and opportunities were initially identified by the Sustainability Team, based on the business model, dependencies, and previous risk analyses. They were then evaluated and prioritised by internal experts (Finance and Compliance functions) according to their potential financial effects. The identification process also considered links to sustainability-related impacts, dependencies, and developments, such as extreme weather events or new climate change mitigation regulations.

The identified risks and opportunities were assessed from two perspectives: the likelihood of occurrence and the magnitude of the financial effect, in terms of revenues, costs, access to credit, or cost of capital. The scoring system — ranging from 0 (none) to 5 (increase/reduction greater than 5% in revenues, costs, cost of capital, or access to credit) — was reviewed by the Finance Department and defined on the basis of Maps Group's financial statements. The scoring results, together with the materiality threshold, produced the final list of risks and opportunities exceeding the predetermined threshold.

Previous risk analyses carried out by Maps Group's **COMPLIANCE** function were also used to define and identify sustainability-related risks.



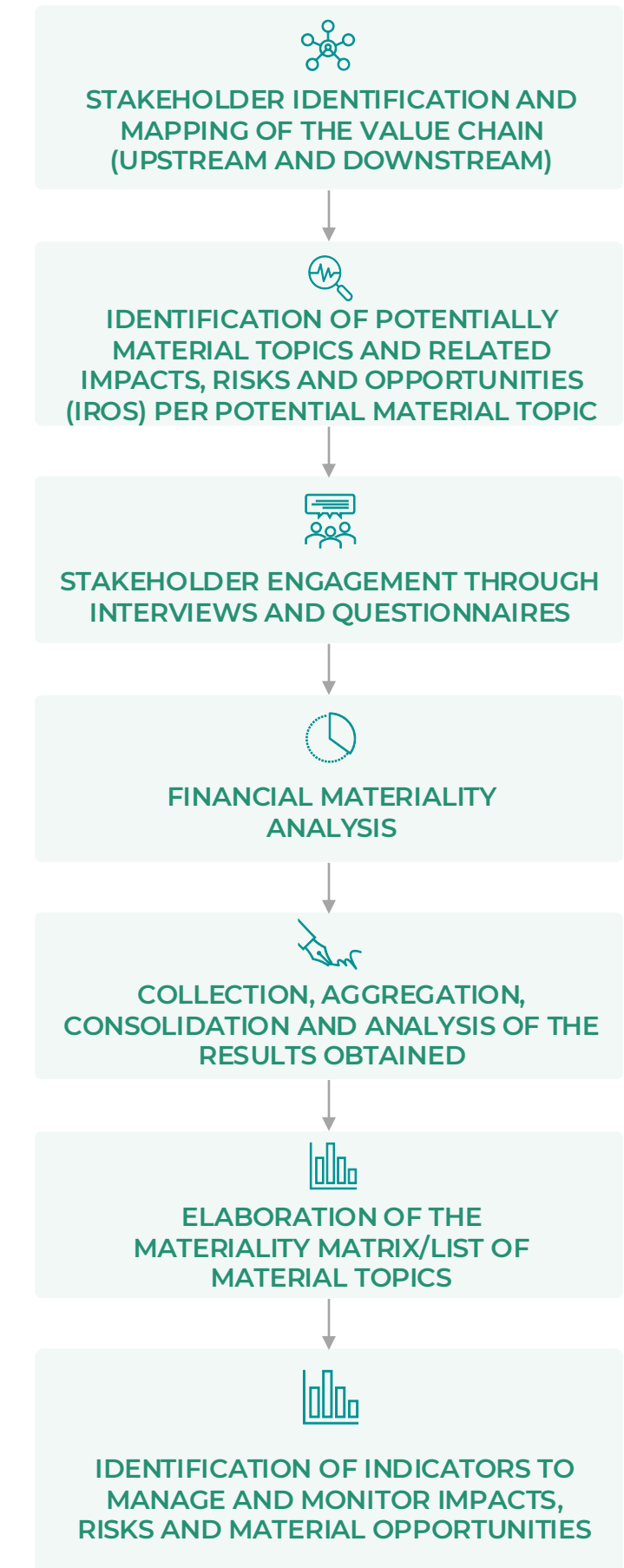
**The Sustainability Team managed the entire double materiality process**, in collaboration with external consultants and internal corporate functions, where necessary. The Finance and Management Control functions were involved in applying the scoring systems and financial materiality thresholds, to ensure consistency with the criteria generally used to assess financial risks and opportunities. The Board of Directors participated in the management and evaluation of IROs through a dedicated workshop. The results of the double materiality assessment were presented to the **Board of Directors** to ensure their integration into decision-making processes.

Since the material risks and opportunities are closely linked to the Group's core activities, their management process will be integrated into existing governance frameworks and processes.

The input parameters used in the double materiality process included **all relevant documentation, previous materiality assessments, interviews, and surveys**.

Once the impacts, risks, and opportunities had been identified and analysed, they were submitted to **an evaluation and validation process by the stakeholders involved**.

**The final list of material IROs forms the basis for this reporting content.**





2.6 REPORTED INFORMATION

In preparing this Sustainability Report, Maps Group has identified a comprehensive list of disclosure requirements, relating to the material IROs (Impacts, Risks and Opportunities), as described in the previous paragraphs, and has mapped the relevant disclosure requirements.

In addition to the cross-cutting standards, Maps Group has applied the following ESRS thematic standards:

- **ESRS E1 Climate Change (including phase-in);**
- **ESRS E5 Circular Economy and use of ressources (including phase-in);**
- **ESRS S1 Own workforce;**
- **ESRS S4 Consumers and End Users (including phase-in);**
- **ESRS G1 Business Conduct.**

For a detailed list of disclosure obligations that Maps Group has fulfilled in its sustainability statement, please refer to the ESRS Table of Contents below.

DISCLOSURE REQUIREMENT	REFERENCE
ESRS 2 – GENERAL INFORMATION	
Disclosure Requirement BP-1 – General basis for preparation of sustainability statements	page. 7
Disclosure Requirement BP-2 – Disclosures in relation to specific circumstances	page. 7-8
Disclosure Requirement GOV-1 – The role of the administrative, management and supervisory bodies	page. 9-10-11
Disclosure Requirement GOV-2 – Information provided to, and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	page. 12
Disclosure Requirement GOV-3 - Integration of sustainability-related performance in incentive schemes	page. 12
Disclosure Requirement GOV-4 - Statement on due diligence	page. 13
Disclosure Requirement GOV-5 - Risk management and internal controls over sustainability reporting	page. 13
Disclosure Requirement SBM-1 – Strategy, business model and value chain	pages. 14-15
Disclosure Requirement SBM-2 – Interests and views of stakeholders	page. 17
Disclosure Requirement SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	pages. 18-19
Disclosure Requirement IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	page. 19-20
Disclosure Requirement IRO-2 – Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	page. 21

ESRS E1 – CLIMATE CHANGE (including phase-in)	
Disclosure requirement related to ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	Phase-in
Disclosure Requirement E1-1 – Transition plan for climate change mitigation	page. 31
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	page. 38
Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities	page. 31
Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation	page. 31
Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies	page. 31
Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation	page. 34
Disclosure Requirement E1-5 – Energy consumption and mix	page. 33
Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	page. 35

ESRS E5 – RESOUCE USE AND CIRCULAR ECONOMY (including phase-in);	
Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	page. 37
Disclosure Requirement E5-1 – Policies related to resource use and circular economy	page. 37
Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy	page. 37
Disclosure Requirement E5-3 – Targets related to resource use and circular economy	page. 38
Disclosure Requirement E5-5 – Resource outflows	page. 38





DISCLOSURE REQUIREMENT	REFERENCE
ESRS S1 – OWN WORKFORCE	
Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	page. 39
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	page. 39
Disclosure Requirement S1-1 – Policies related to own workforce	page. 40
Disclosure Requirement S1-2 – Processes for engaging with own workers and workers’ representatives about impacts	page. 40
Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns	page. 40
Disclosure Requirement S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	page. 41
Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	page. 42
Disclosure Requirement S1-6 – Characteristics of the undertaking’s employees	page. 42
Disclosure Requirement S1-7 – Characteristics of non-employee workers in the undertaking’s own workforce	page. 43
Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue	page. 44
Disclosure Requirement S1-9 – Diversity metrics	pages. 43-44
Disclosure Requirement S1-10 – Adequate wages	page 45
Disclosure Requirement S1-11 – Social protection	page. 45
Disclosure Requirement S1-12– Persons with disabilities	page. 45
Disclosure Requirement S1-13 – Training and skills development metrics	page. 46
Disclosure Requirement S1-14 – Health and safety metrics	page. 49
Disclosure Requirement S1-15 – Work-life balance metrics	page. 50-51
Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts	page. 51

DISCLOSURE REQUIREMENT	REFERENCE
ESRS S4 CONSUMERS AND END USERS	
Disclosure Requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	page. 32
Disclosure Requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business mode	page. 40
Disclosure Requirement S4-1 – Policies related to consumers and end-users	page. 53
Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts	Phase-in
Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	page. 53
Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	page. 53
ESRS G1 BUSINESS CONDUCT	
Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies	pages. 10-11
Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	page. 54
Disclosure Requirement G1-1– Corporate culture and Business conduct policies and corporate culture	page. 55
Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	page. 55
Disclosure Requirement G1-4 – Confirmed incidents of corruption or bribery	page. 55



For the information elements of ESRS 2 and thematic ESRS stemming from other EU legislation, please refer to the table below:

List of information elements referred to in the cross-cutting and thematic principles stemming from other EU legislation:

Disclosure requirement	SFDR <sup>(23)</sup> reference	Pillar 3 <sup>(24)</sup> reference	Benchmark Regulation <sup>(25)</sup> reference	EU Climate Law <sup>(26)</sup>	Page number / paragraph
ESRS 2 GOV-1 Board's gender diversity	✓		✓		page. 10
ESRS 2 GOV-1 Percentage of board members who are independent			✓		page. 10
ESRS 2 GOV-4 Statement on due diligence	✓				page. 13
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities	✓	✓	✓		N/A
ESRS 2 SBM-1 Involvement in activities related to chemical production	✓		✓		N/A
ESRS 2 SBM-1 Involvement in activities related to controversial weapons	✓		✓		N/A
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco			✓		N/A
ESRS E1-1 Transition plan to reach climate neutrality by 2050				✓	page. 31
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks		✓	✓		page. 31
ESRS E1-4 GHG emission reduction targets	✓	✓	✓		page. 33
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	✓				page. 33
ESRS E1-5 Energy consumption and mix	✓				page. 34
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors	✓				page. 34
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	✓	✓	✓		page. 35
ESRS E1-6 Gross GHG emissions intensity	✓	✓	✓		page. 35
ESRS E5-5 GHG removals and carbon credits	✓				page. 38
ESRS 2 – SBM3 – S1 Exposure of the benchmark portfolio to climate-related physical risks	✓				N/A

Disclosure requirement	SFDR <sup>(23)</sup> reference	Pillar 3 <sup>(24)</sup> reference	Benchmark Regulation <sup>(25)</sup> reference	EU Climate Law <sup>(26)</sup>	Page number / paragraph
ESRS 2 – SBM3 – S1 Risk of incidents of child labour	✓				N/A
ESRS S1-1 Human rights policy commitments	✓				-
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			✓		-
ESRS S1-1 Processes and measures for preventing trafficking in human beings	✓				N/A
ESRS S1-1 Workplace accident prevention policy or management system	✓				pages. 48-49
ESRS S1-3 Grievance/ complaints handling mechanisms	✓				page. 39
ESRS S1-14 Number of fatalities and number and rate of work-related accidents	✓		✓		page. 49
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness	✓				page. 49
ESRS S1-17 Incidents of discrimination	✓				page. 51
ESR S1-17 Non-respect of UNGPs on Business and Human Rights and OECD	✓		✓		-
ESRS S4-1 Policies related to consumers and end-users	✓				page. 53
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines	✓		✓		N/A
ESRS S4-4 Human rights issues and incidents	✓				N/A
ESRS G1-1 United Nations Convention against Corruption	✓				-
ESRS G1-1 Protection of whistle- blowers	✓				page. 39
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws	✓		✓		pages. 54-55
ESRS G1-4 Standards of anti- corruption and anti- bribery	✓				pages. 54-55





HIGHLIGHTS

# 3. ECONOMIC PERFORMANCE

## TOTAL VALUE GENERATED



**33,2 Mln**  
2024

**30,4 Mln**  
2023

## ECONOMIC VALUE DISTRIBUTED



**83%**  
2024

**85%**  
2023

**+6%** SHARE CAPITAL  
MAPS S.P.A.

**+7%** N° ORDINARY SHARES

**+4,67%**

NET WORTH  
MAPS S.P.A.

## EUROPEAN TAXONOMY

	TURNOVER	CAPEX	OPEX
ACTIVITIES ELIGIBLE TO EU TAXONOMY (in percentage)	<b>31%</b>	<b>26%</b>	<b>34%</b>



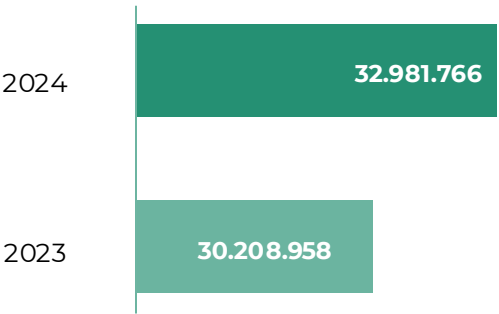
### 3.1 ECONOMIC VALUE GENERATION

In 2024, in line with the sustainable growth strategy adopted by the Group, Maps Group continued to invest in the development and the enhancement of its proprietary software products, strengthening a distinctive, resilient business model focused on creating long-term value.

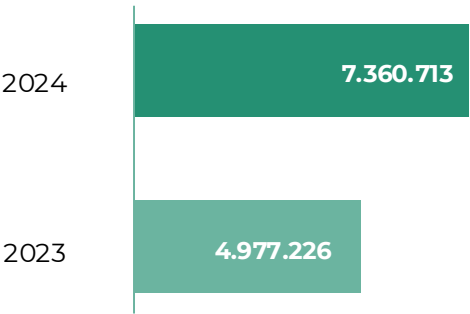
The Group's approach differs significantly from the traditional IT sector model, which remains largely based on the provision of custom solutions or specialised consultancy. By contrast, Maps Group has built a model centred on:

- Scalability of its products;
- Sustainable profitability and greater operational efficiency;
- Recurring components (SaaS, subscription fees, and ongoing services) capable of generating stability and predictability in cash flow).

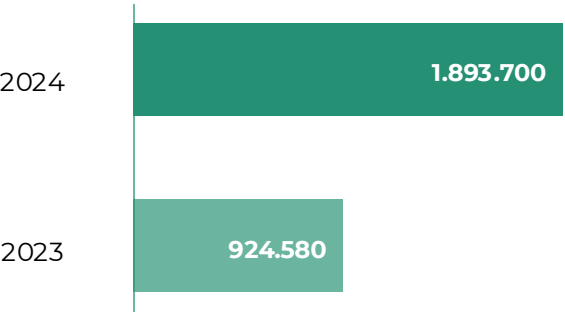
VALUE OF PRODUCTION(€)



EBITDA (€)

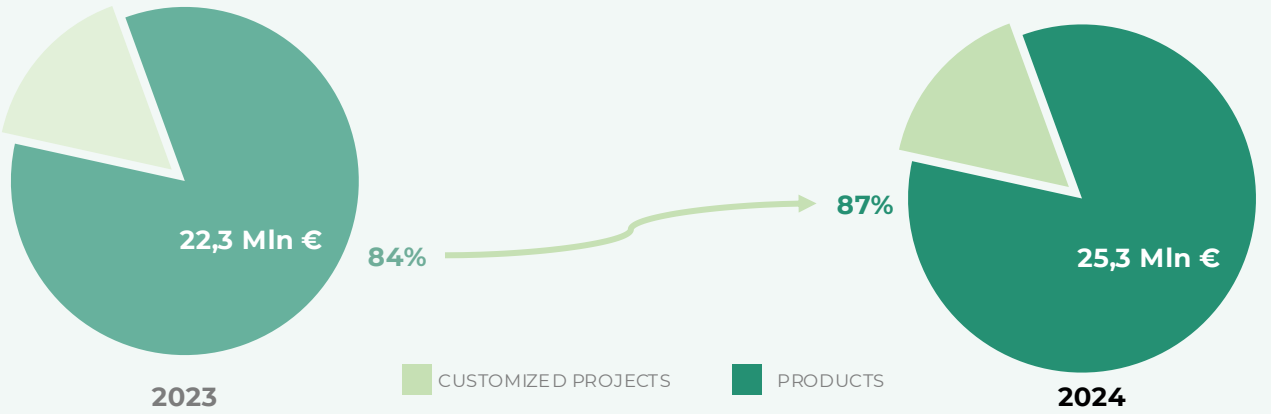


NET PROFIT(€)



This business model has enabled the Group to increase the share of economic value generated by software products in relation to total revenues, enhancing the quality of results, strengthening its competitive market positioning, and further expanding the recurring revenue component.

SOFTWARE RELATED REVENUES



RECURRING FEES



In 2024, the share capital of Maps S.p.A. increased from €1,447,227.48 to €1,536,891.68. This increase was mainly driven by the exercise of warrants during the most recent, ninth conversion window.

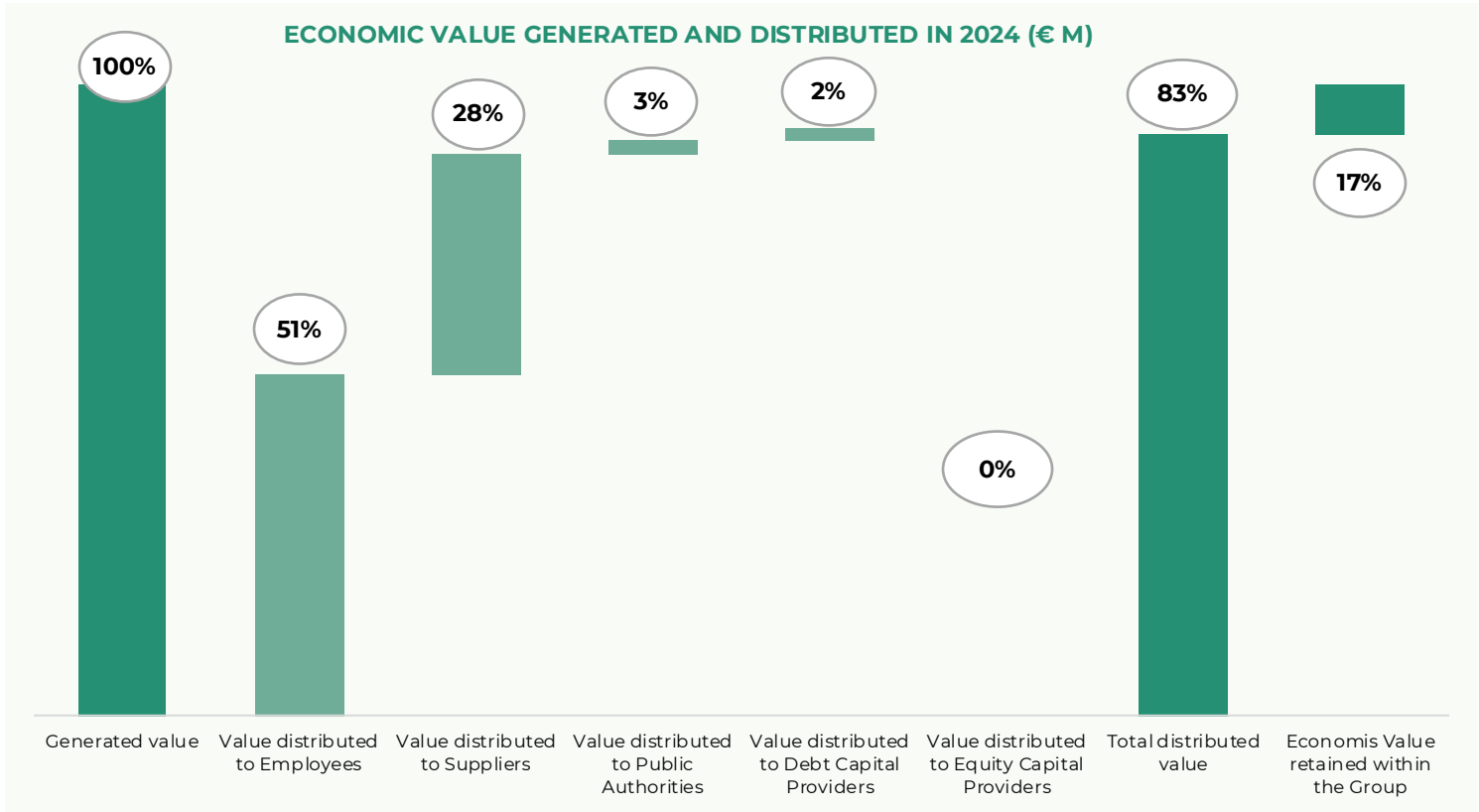
As a result, the number of ordinary shares in circulation rose from 12,385,549 to 13,282,191 (+7%). The Group's equity, calculated in accordance with IFRS, grew from €22,322,802 to €25,730,880 (+15%)





### 3.2 DISTRIBUTION OF THE ECONOMIC VALUE GENERATED

The distribution of the Economic Value Generated by category of stakeholders is shown below:



In 2024, Maps Group generated total economic value of €33 million, an increase compared to €30 million in the previous year. As shown in the table, the majority of the value generated was redistributed to the main stakeholders involved in the Group's activities.

In particular, total economic value distributed amounted to €28 million, corresponding to approximately 83% of the value generated. The main allocations were as follows:

- Employees received 51% of the generated value (€17 million), confirming the strategic importance attributed to human capital;
- Suppliers received around 28% (€9 million), covering cost of goods sold, services, and operating expenses;
- Public administration benefited from approximately €1 million, equivalent to almost 3% of the total, marking a significant increase compared to 2023, in line with growth in profit and the tax base;
- Providers of the debt capital received around 2% (€0.7 million) in the form of financial charges.

As in previous years, in 2024 the Group chose not to distribute profits to shareholders, opting instead to retain resources within the company to support future investments and consolidate its growth model.

The economic value retained by the Group amounted to €5.6 million, representing 17% of the value generated, and included net profit (€1.89 million) and depreciation (€3.7 million), both allocated to strengthening the equity and developing the strategic intangible assets.

Overall, more than 80% of the value generated was redistributed to internal and external stakeholders who actively contribute to its creation, while the remaining portion was reinvested to support the sustainable evolution of the Group.

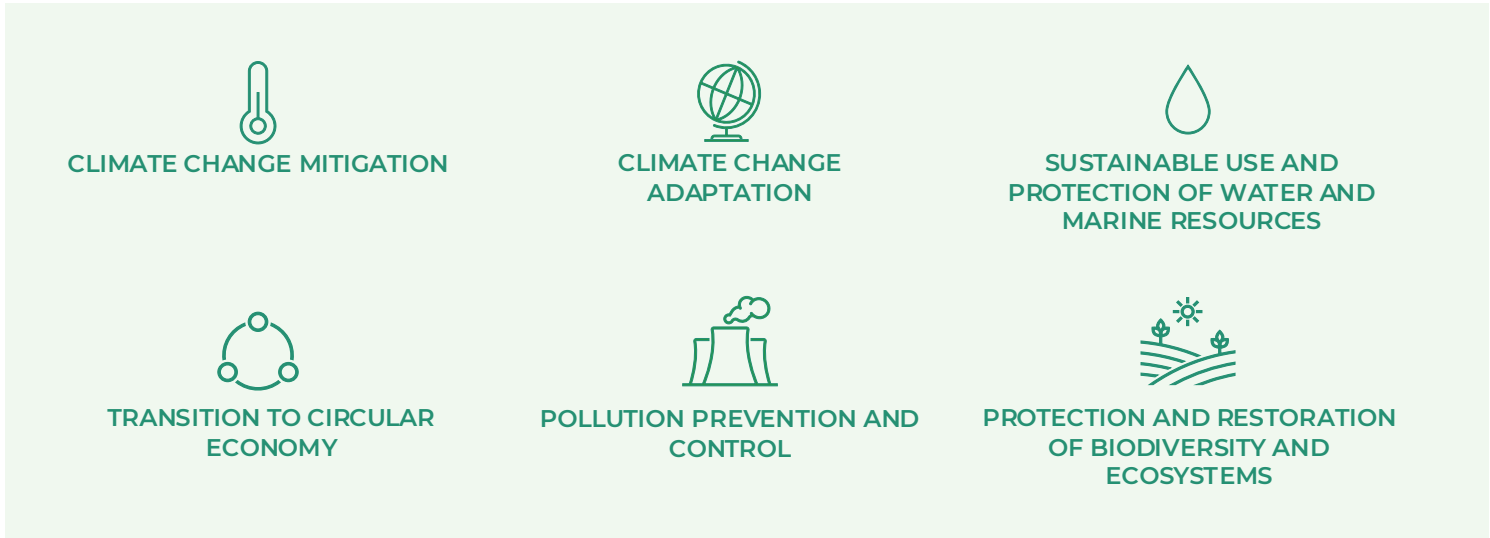
Value generated and distributed	2024	2023
<b>Economic value generated</b>	<b>33.172.876 €</b>	<b>30.401.460 €</b>
Revenue from sales and services	25.924.904 €	27.793.407 €
Other revenues	702.167 €	810.859 €
Variation in work in progress on contracts	3.209.481 €	- 1.057.975 €
Financial income	191.110 €	192.501 €
Increase of internally generated assets	3.145.214 €	2.662.668 €
<b>Total economic value distributed</b>	<b>27.574.723 €</b>	<b>25.960.959 €</b>
<b>Economic value distributed to suppliers</b>	<b>9.213.880 €</b>	<b>9.383.554 €</b>
Cost of goods sold	1.464.612 €	1.913.150 €
Service fees	6.506.112 €	6.387.629 €
Fixed operating costs	910.560 €	989.456 €
Non-recurring costs	332.597 €	93.319 €
<b>Value distributed to staff</b>	<b>16.739.769 €</b>	<b>15.941.499 €</b>
Personnel costs	16.739.769 €	15.941.499 €
<b>Value distributed to credit capital providers</b>	<b>714.345 €</b>	<b>583.949 €</b>
Financial charges	714.345 €	583.949 €
<b>Value distributed to investment capital providers</b>	<b>- €</b>	<b>- €</b>
Distribution of profits for the year	- €	- €
<b>Value distributed to the public administration</b>	<b>906.728 €</b>	<b>51.957 €</b>
Operating taxes	906.728 €	51.957 €
<b>Value distributed to the community</b>	<b>5.598.153 €</b>	<b>4.440.503 €</b>
Net profit for the year	1.893.700 €	924.580 €
Amortisation/ Depreciation	3.704.453 €	3.515.923 €



### 3.3 EUROPEAN TAXONOMY

The European Taxonomy is a classification system established by Regulation (EU) 2020/852, aimed at identifying economic activities that can be considered sustainable. It is a key regulatory tool for guiding the European financial system towards genuinely sustainable investments, promoting transparency, comparability between companies, and combating greenwashing.

The Regulation, which entered into force in June 2020, sets out the technical criteria for determining whether an economic activity can be considered environmentally sustainable, based on its ability to make a **substantial contribution to at least one of the six identified environmental objectives**:



Furthermore, for an economic activity to be considered sustainable under the EU Taxonomy, it is not sufficient for it to make a substantial contribution to one of the environmental objectives: it must also do no significant harm to the other environmental objectives, in accordance with the *Do No Significant Harm* (DNSH) principle, and it must comply with minimum social safeguards, which refer to the fundamental principles recognised by the United Nations and the International Labour Organization.

In this context, non-financial companies are required to report annually on three key performance indicators (KPIs):

- the **share of turnover** generated by activities deemed eligible and aligned with the Taxonomy;
- the **share of capital expenditure (CapEx)** invested in such activities;
- and **the share of operating expenditure (OpEx)** related to them.

### THE MAPS GROUP APPROACH

Maps Group continues to closely monitor developments in European regulations and is committed to progressively strengthening its reporting system in line with the regulatory requirements and ESG best practices.

For the 2024 financial year, the Group continued the analysis and reporting of **eligible economic activities**, in continuity with the approach initiated in last year's financial statements. The methodology used to calculate the main economic-financial indicators (turnover, CapEx, OpEx) is based on data extracted from the Consolidated Financial Statements and internal accounting records.

### IDENTIFICATION OF ECONOMIC ACTIVITIES ELIGIBLE FOR TAXONOMY

**The process for identifying** eligible activities involved several phases. First, a preliminary assessment of the Group's activities was carried out to verify their alignment with at least one of the six environmental objectives set out in the EU Taxonomy. Subsequently, a systematic mapping of Maps Group's activities was conducted for the sectors covered by the regulation, including a detailed analysis of the business processes, projects, and expenditures, in order to assess their consistency with the technical criteria established by the European Commission.

The analysis was applied across all relevant dimensions and made it possible to identify activities linked to three specific objectives: **climate change mitigation, climate change adaptation, and the transition to a circular economy**.

EU TAXONOMY OBJECTIVE	MAPS GROUP ACTIVITIES	KPI
<b>Climate change mitigation</b>	MCC 8.1) Data processing, hosting and related activities	Turnover, OpEx, CapEx
<b>Adaptation to climate change</b>	ACC 8.2) Computer programming, consulting and related activities	Turnover, OpEx
<b>Transition to a circular economy</b>	TEC 4.1) Delivering data-driven IT/OT (information technology/operational technology) solutions TEC 5.2) Sale of spare parts	Turnover, OpEx





## CLIMATE CHANGE MITIGATION

The activities related to this environmental objective are primarily carried out within the scope of the Energy Business Unit. Maps Group contributes to climate change mitigation **through the processing and intelligent management of energy data**, enabling clients to improve the efficiency of their facilities. **The software solutions developed** — including the monitoring and the optimization of energy consumption — **support the sustainable management of the energy generated from renewable sources**.



These activities generate eligible turnover and give rise to eligible operating expenditure (OpEx) related to the configuration, installation, and servicing of software, as well as eligible capital expenditure (CapEx) for research and development aimed at advancing technologies for energy monitoring and efficiency improvement. The scope also includes the developments of the proprietary platform for the management of Energy Communities, designed to support Renewable Energy Communities and collective self-consumption groups.



## CLIMATE CHANGE ADAPTATION

In relation to this environmental objective, the eligible activities include initiatives that enhance the resilience of corporate facilities and processes to the effects of climate change. Through its subsidiary Energenius S.r.l., Maps Group delivered technical energy consulting services, including the preparation of the Energy Reports (pursuant to Law 10/1991), issuance of Energy Performance Certificates (EPC), advisory support for the “Superbonus 110%” incentive scheme, and the submission of ENEA declarations.

These activities generate eligible turnover and give rise to eligible operating expenditure (OpEx) and capital expenditure (CapEx) related to technological development, thereby reinforcing **clients’ ability to manage and respond to climate-related risks**. In addition to consulting services, eligible OpEx also includes the maintenance and technical support of installed software, as well as the operational management of Energy Communities through proprietary platforms.



## TRANSITION TO A CIRCULAR ECONOMY

Finally, Maps Group contributes to the circular economy through a dual approach. On one hand, it **promotes the maintenance and reuse of hardware components, replacing damaged parts** — including with refurbished or recovered elements — thereby reducing material waste and extending the useful life of devices.

On the other hand, **it develops data-driven IT/OT solutions**, particularly in the healthcare sector, enabling the integration of information and operational systems with **the aim of improving resource efficiency and management in public and private healthcare facilities**.

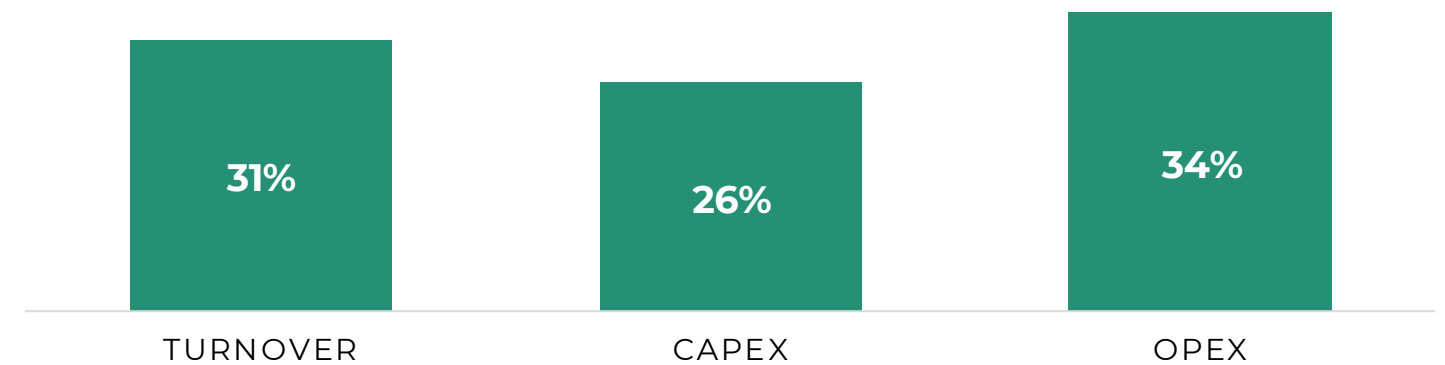
Circular economy-related activities have been identified primarily in projects within the Healthcare Business Unit and, to a lesser extent, in certain SaaS solutions of the Energy Business Unit. The associated expenditures include eligible operating expenditure (OpEx) for platform support and management, as well as eligible turnover generated from the sale of components and related services.

## OVERALL RESULTS

Following the process of analysing and classifying activities in accordance with the criteria established under the EU Taxonomy, Maps Group has determined the percentage shares of turnover, capital expenditure (CapEx), and operating expenditure (OpEx) associated with economic activities considered **eligible**.

Overall, in 2024, 31% of the Group’s turnover was generated from eligible economic activities, while the share of capital expenditure (CapEx) and operating expenditure (OpEx) attributable to aligned activities amounted to 26% and 34% of the respective totals. The remaining portion relates to activities currently not included among those listed in the delegated regulations, although they may encompass initiatives of environmental or social significance that do not formally fall within the scope of the Taxonomy.

### ELIGIBLE ACTIVITIES

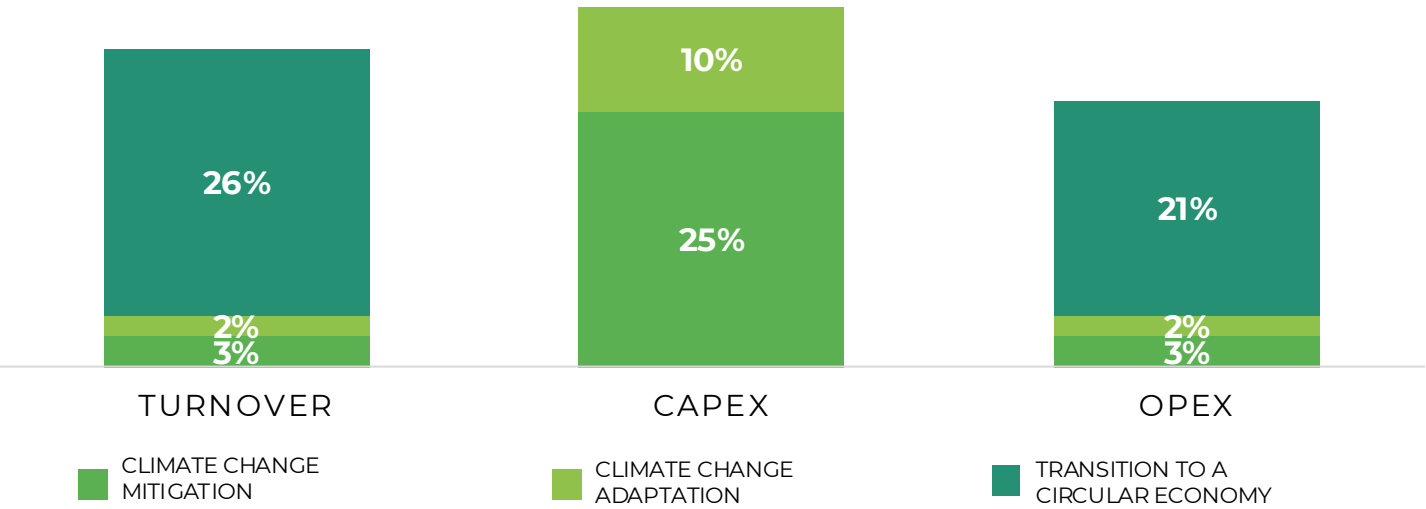


The results achieved reflect the nature of Maps Group’s business model, which is strongly oriented towards the development of digital solutions that contribute to energy efficiency, process dematerialisation, and the ecological transition.



Below are the disclosures required under the EU Regulation, presented for each of the objectives of the economic activities identified as eligible, together with the main related financial figures.

**ELIGIBLE ACTIVITIES OF MAPS GROUP BY EU TAXONOMY OBJECTIVE**



Finally, the following table provides a detailed breakdown of eligible activities, including the values used for the calculations. This information also includes a brief description of the activities and their classification according to the EU Taxonomy codes.

	Turnover	OpEx	CapEx
CE 4.1) Delivering data-driven IT/OT (information technology/operational technology) solutions	7.369.484 €	2.672.048 €	0
CE 5.2) Sale of spare parts	504.367 €	173.524 €	0
ACC 8.2) Computer programming, consulting and related activities	570.542 €	220.049 €	330.950 €
CCM 8.1) Data processing, hosting and related activities	794.037 €	429.860 €	861.832 €
<b>Eligible activities</b>	<b>9.238.430 €</b>	<b>3.495.481 €</b>	<b>1.192.782 €</b>
Total	29.836.552,00 €	13.699.399,00 €	3.463.780,00 €
<b>Eligible assets (%)</b>	<b>31,0%</b>	<b>25,5%</b>	<b>34,4%</b>

It is important to note that the values reported have been prepared on the basis of the prevailing interpretation of the regulations at the time of preparing the financial statements. However, given the ongoing evolution of the regulatory framework, such interpretations may be subject to revision in future reporting periods. The Group will continue to monitor regulatory developments and progressively refine its reporting system, in line with industry best practices

**METHOD OF CALCULATING THE SHARE OF ELIGIBLE ACTIVITIES PER KPI**

The criteria for calculating revenues (Turnover), operating expenses (OpEx) and investments (CapEx) generated by products or services associated with environmentally sustainable activities are described below.

**TURNOVER**

The determination of **the share of turnover eligible** under the EU Taxonomy is based on the ratio between the revenues generated from activities identified as eligible and the Group's total consolidated revenues. The resulting value is expressed as a percentage, in accordance with the provisions of the European sustainable finance framework.

For the **numerator**, revenues from specific business lines within the main business units of Maps Group were taken into account. In particular, for the Healthcare Business Unit, the calculation includes revenues from maintenance and support service fees, as well as revenues related to the supply and management of hardware. For the Energy Business Unit, the calculation considers revenues associated with services contributing to the energy transition, such as monitoring and energy efficiency improvement fees, fees for Energy Communities, and specialised technical consulting services related to regulated practices, including activities pursuant to Law 10/1991, which promotes the efficient use of energy and the development of renewable sources, sets technical requirements for buildings and plants, and serves as a regulatory reference for energy reports in construction projects; the preparation of Energy Performance Certificates (EPC); consultancy services related to the *Superbonus* incentive scheme; the preparation of ENEA declarations, i.e., self-certifications of energy efficiency improvements following specific interventions.

The **denominator** of the calculation corresponds to the Group's total consolidated revenues, comprising all income from the sale of goods and the provision of services.

**OPEX**

The share of operating expenditure eligible under the EU Taxonomy was calculated as the ratio between the costs directly associated with eligible activities and the Group's total operating expenditure incurred during the year. The resulting value is expressed as a percentage, in accordance with the provisions of the European sustainable finance framework.

Specifically, the **numerator** includes costs attributable to activities that meet the eligibility criteria set out in Regulation (EU) 2020/852. For the Healthcare Business Unit, this includes expenses related to maintenance and support service fees, as well as costs associated with managing company hardware through the ticketing system. For the Energy Business Unit, this includes costs related to energy monitoring and efficiency improvement activities, the management of Energy Communities, and specialised technical consulting services. The latter refers to regulated interventions such as activities pursuant to Law 10/1991, aimed at improving energy efficiency in the building sector; the preparation of Energy Performance Certificates (EPC); consultancy services related to the *Superbonus* tax incentive scheme; the preparation of ENEA declarations, which certify energy efficiency improvements.





CAPEX

The share of capital expenditure eligible under the EU Taxonomy is calculated as the ratio between investments made in economic activities classified as eligible and the Group's total capital expenditure incurred during the year, expressed as a percentage.

For the **numerator**, the calculation includes investments in research and development related to projects in the areas of Energy Community management and energy monitoring and efficiency improvement, as these fall within the activities that make a substantial contribution to the environmental objectives defined by the European framework, in particular climate change mitigation and the transition to a low-carbon economy.

The **denominator** corresponds to the total value of capital expenditure incurred in 2024, which includes all increases in tangible and intangible assets recorded before the application of any impairments, depreciation, or revaluations.



HIGHLIGHTS

4. ENVIRONMENT

CARBON FOOTPRINT

SCOPE 1  
155 tCO<sub>2</sub>eq

SCOPE 2  
73 tCO<sub>2</sub>eq  
(Market Based)

99 tCO<sub>2</sub>eq  
(Location Based)

SCOPE 3  
131 tCO<sub>2</sub>eq

TOTAL ENERGY CONSUMPTION

YoY

2024

2023

- 14%

1.100.000 kWh

1.300.000 kWh

CAR FLEET: 700.000 kWh  
ENERGY: 400.000 kWh

CAR FLEET: 900.000 kWh  
ENERGY: 400.000 kWh

ENERGY FROM RENEWABLE SOURCES

YoY

2024

2023

+390%

170.000 kWh  
(43% of total energy)

41.000 kWh  
(11% of total energy)

MAPS HABITAT PROJECT

YoY

2024

2023

+24%

477 tCO<sub>2</sub>eq

384 tCO<sub>2</sub>eq

MIGRATION TO 'GREENER' OFFICES:  
MILANO - ROMA





## 4.1 ESRS E1 CLIMATE CHANGE

### STRATEGY

#### ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Maps Group has adopted a structured assessment process to identify, understand, and proactively manage the impacts, risks, and opportunities related to climate change and other material ESG factors.

During the reporting period, the Group carried out a climate risk assessment based on two main dimensions:

- **Physical risks**, related to extreme events (such as heatwaves, floods, wildfires, and temperature fluctuations) that could indirectly affect business continuity or the availability of resources along the value chain.
- **Transition risks**, stemming from regulatory developments (e.g., the European Green Deal), technological innovations, changes in market expectations, and potential reputational impacts.

The analysis indicated that the Group's exposure to both physical and transition risks is limited, consistent with Maps Group's business profile and the predominantly digital nature of its services.

Nevertheless, the Group remains focused on the continuous monitoring of its climate risk exposure profile and on the gradual adaptation of its management practices in line with regulatory developments and industry best practices.

This approach reflects the Group's commitment to progressively strengthen its capacity to respond and adapt to environmental changes, in alignment with its stated commitments and to its path towards increased compliance with ESRS standards.

### E1-1 – TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

In 2024, Maps Group further strengthened its sustainability strategy, with a specific focus on climate change mitigation and the progressive integration of the requirements set out in the European Sustainability Reporting Standards (ESRS).

In this context, the Group plans to develop a Transition Plan towards a more resilient, responsible, and low-carbon impact business model. This will be a gradual and adaptive approach, taking into account regulatory developments and the evolving expectations of stakeholders.

With this mindset, Maps Group aims to contribute to the European decarbonisation objectives by setting concrete and progressive targets for emissions reduction and the responsible management of resources.

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### E1-2 – POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

In this context, the sustainability is an integral part of the Group's strategic vision — not only in response to regulatory obligations, but also as a driver of innovation, competitiveness, and long-term value creation. **While Maps Group does not yet have a formal, stand-alone policy specifically dedicated to climate change mitigation and adaptation, the topic is already embedded within the Group's strategic approach to sustainability, which has been consolidated over the past years of reporting.**

The actions undertaken to date represent initial, coherent steps that demonstrate the Group's responsible approach to climate-related issues.







The Group will continue to strengthen this approach by adopting additional policies that are consistent with ongoing regulatory developments and the growing environmental expectations of stakeholders.

### EI-3 – ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

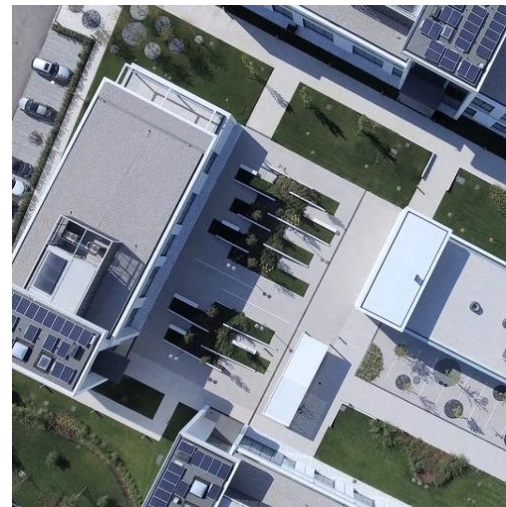
During the year, Maps Group implemented a range of concrete actions in support of its climate and environmental strategy, reinforcing its commitment to more responsible management of resources and environmental impacts.

The main initiatives undertaken include:

#### ■ RATIONALIZATION OF THE OFFICES

In 2024, the Group initiated an assessment process for certain operational sites with the aim of transitioning towards buildings with higher energy performance and enhanced sustainability standards. This process considered not only the energy efficiency of the premises but also employee well-being and space optimisation.

In addition, the **Smart Friday** initiative continued, involving the closure of offices every Friday — except for the executive offices at the Parma headquarters — allowing for the complete shutdown of systems and devices, thereby reducing the energy consumption.



#### ■ AWARENESS AND INTERNAL ENGAGEMENT

In parallel, the Group promoted internal information and training sessions on ESG topics and the environmental impact of day-to-day activities, helping to foster a corporate culture oriented towards more sustainability and behavioural change.

#### ■ ENHANCEMENT OF ENVIRONMENTAL REPORTING AND ENERGY TRANSITION TOWARDS RENEWABLE SOURCES

In 2024, the Group strengthened its internal systems for measuring and monitoring energy consumption, with the aim of ensuring greater accuracy in reporting, in line with the principles of transparency and traceability. This has made it possible to identify areas for improvement and to guide corrective actions more effectively.

For example, starting from the end of December 2023, Maps Group began a process of reviewing its electricity supply contracts, selecting — where technically feasible — only providers of electricity sourced 100% from renewable energy, supported by Guarantees of Origin (GO) certificates.



#### ■ RENEWAL OF THE COMPANY VEHICLE FLEET

Maps Group continues its commitment to transitioning towards more sustainable corporate mobility. For several years, the Group has implemented an internal policy whereby new company vehicles are acquired exclusively in hybrid or electric versions, with the objective of progressively reducing the environmental impact associated with business travel.

Company car fleet	2024	2023
Petrol	2	5
Diesel	18	23
Natural Gas	0	1
Hybrid	58	50
Full Electric	1	1
<b>Total</b>	<b>79</b>	<b>80</b>

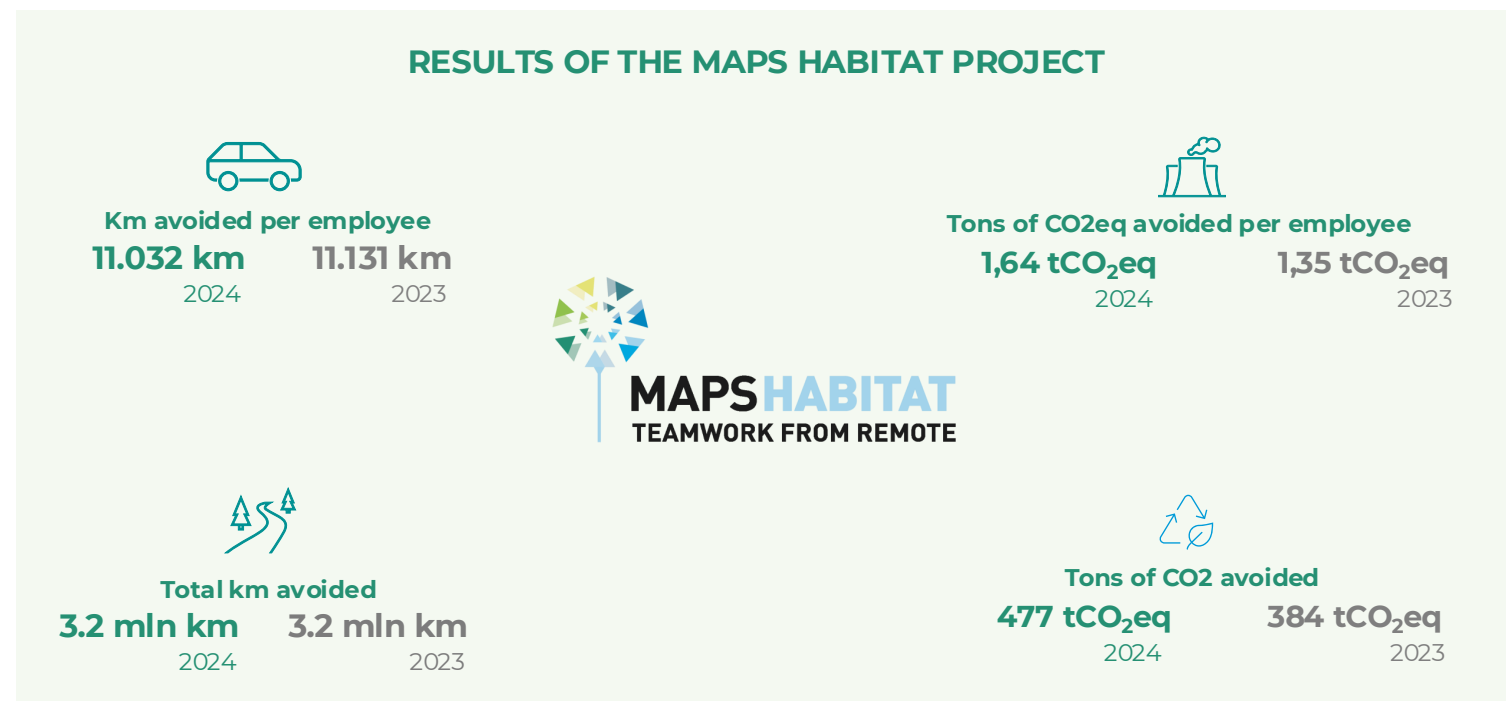


This development confirms the effectiveness of the Group's internal sustainable fleet renewal policy, which has reduced the share of conventional combustion vehicles and increased the share of low-impact vehicles. In particular, the growth in hybrid vehicles represents a concrete step towards the objective of reducing emissions from business travel.

#### ■ SMART WORKING - remote working and flexible hours

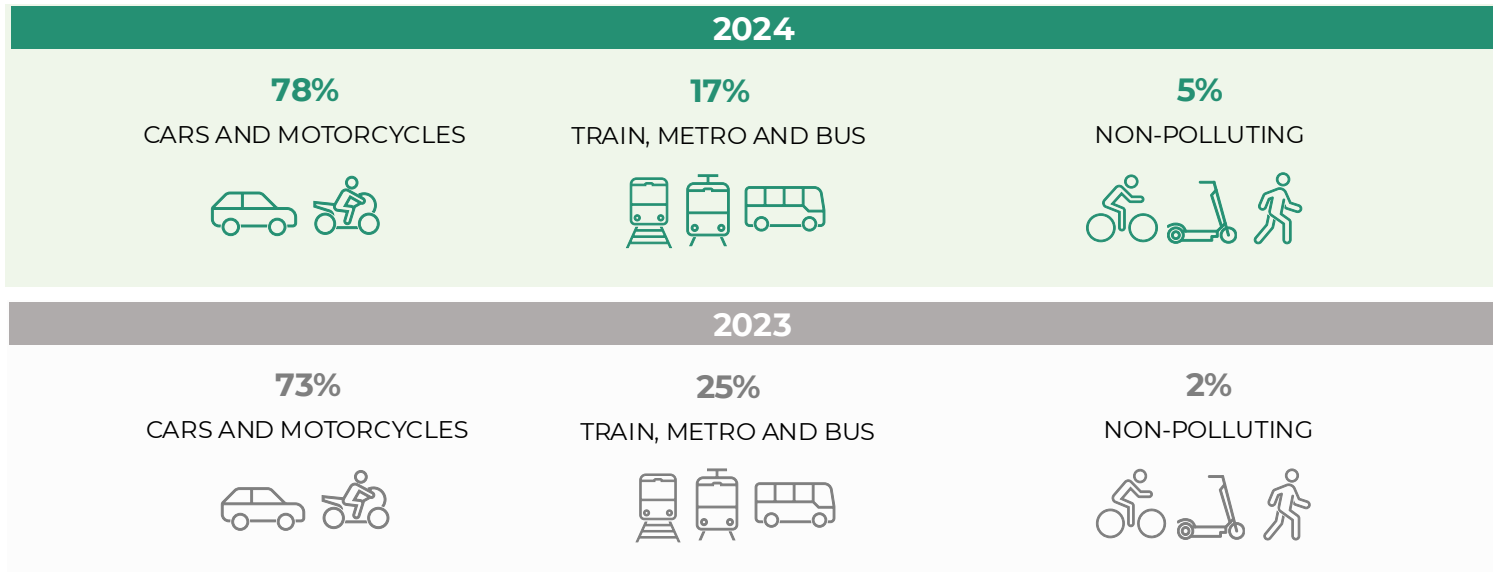
The **Maps Habitat project** has promoted more flexible and sustainable working arrangements, enabling employees to alternate between on-site and remote work, with an average of over three days of remote working per week. This has contributed to reducing home-to-work commuting and optimising the use of company premises.

The main outcomes resulting from the implementation of the project are as follows:





MEANS OF TRANSPORT



The results of the *Maps Habitat* project were obtained through a detailed analysis based on statements provided by 292 employees regarding their home-to-work commuting patterns and the distances travelled. The information was collected via a dedicated survey, and the data were subsequently integrated with the evidence on the actual working arrangements adopted by each employee under the initiative.

To quantify the environmental impact in terms of CO<sub>2</sub> emissions avoided, the data were processed using the emission factors described in the [Emission Factors chapter](#).

METRICS AND TARGETS

EI-4 – TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Maps Group reaffirms its commitment to making a concrete contribution to climate change mitigation, acting both through its direct operational activities and across its value chain. This commitment forms part of a long-term strategic vision aimed at transitioning towards a resilient, low-emission business model.

To support this direction, the Group has initiated a structured process for monitoring and reporting of the greenhouse gas (GHG) emissions, based on a transparent and progressive approach to measuring its carbon footprint. Since 2021, emissions have been quantified annually in accordance with the categories set out by the GHG Protocol.



The periodic analysis of emission trends is a key management, control, and strategic planning tool for Maps Group, enabling the evaluation of the results of actions already implemented and the definition of future priorities. In this regard, in 2024 the Group achieved a significant reduction in Scope 1 and Scope 3 emissions, thanks to measures such as the optimisation of the vehicle fleet, smart working initiatives, and improved thermal efficiency of buildings. At the same time, the substantial increase in the share of certified renewable energy in the energy mix helped to contain Scope 2 emissions calculated on a market-based approach.

Energy consumption monitoring, which is closely linked to the measurement of greenhouse gas emissions, represents another fundamental component of the Group’s strategy. Consumption data, monitored by source and by site, serve as a key lever to identify efficiency opportunities and to guide energy choices increasingly in line with decarbonisation objectives. A detailed analysis is provided in the following section: *EI-5 – Energy consumption and energy mix*.

In the medium term, Maps Group will continue to strengthen its activities for measuring, monitoring, and reporting, with the aim of defining quantitative objectives and formalised reduction targets, consistent with its sustainable development strategy and European regulatory requirements.

EI-5 – ENERGY CONSUMPTION AND MIX

INTRODUCTION

As part of its transition towards a more sustainable business model, Maps Group recognises responsible energy management as a central element of its environmental strategy. Energy is in fact one of the main environmental factors associated with the Group’s operational activities, particularly due to the widespread use of electricity for the operation of offices and digital infrastructure.

In line with climate change mitigation objectives and the principles set out in the European Sustainability Reporting Standards (ESRS), in 2024 the Group strengthened its commitment to the energy efficiency and the transparency in consumption reporting, adopting an increasingly structured and continuous improvement-oriented approach.

This chapter presents the data on energy consumption recorded in 2024, illustrating the effects of initiatives undertaken — such as the use of renewable energy sources, the optimisation of office space, and the adoption of flexible working practices — and provides an updated overview of the Group’s energy performance.

The analysis covers locations for which reliable and attributable data could be collected, in accordance with applicable reporting methodologies, and represents a further step towards more conscious and sustainable resource management.

**Despite operating 10 sites across the national territory, energy consumption reporting for 2024 was possible only for those locations where the supply contracts are held directly or indirectly by one of the Group’s companies, or where shared building consumption can be allocated consistently with actual usage, allowing for a reliable and traceable estimate of attributable consumption.**





For certain sites, however, it was not possible to obtain sufficiently disaggregated or reliably attributable data, due to the shared nature of utilities or the absence of objective allocation criteria. The sites excluded from reporting for these reasons are Milan, Rovereto, Genoa, and Prato.

It should be noted that in particular the Milan site had a significant impact on the Group’s energy consumption in 2023, accounting for approximately 45% of the consolidated total. To ensure data comparability over time, the consumption associated with the former site has been excluded from the comparative data for the 2023 reporting year.

The remaining excluded sites — for which data were also not reported in previous years — are relatively small in size and have a potentially immaterial impact on the Group’s total energy consumption.

	2024	2023	Delta YoY
TOTAL ENERGY CONSUMPTION(KWH)	1.111.49	1.293.329	-14%
Purchased electricity	158.970	258.885	-39%
Natural Gas	64.242	78.056	-17%
Diesel	149.853	335.833	-55%
Petrol	568.480	580.000	-2%
TOTAL FROM NON-RENEWABLE SOURCES	941.972	1.252.774	-25%
%	85%	97%	-13%
Photovoltaic	13.081	22.777	-43%
Certified green energy	156.596	17.778	781%
TOTAL FROM RENEWABLE SOURCES	169.677	40.555	318%
%	15%	3%	387%

In 2024, Maps Group recorded an overall reduction in energy consumption of approximately 14% compared with the previous year. This result reflects the positive effects of the energy efficiency measures implemented. Consumption from fossil sources (natural gas, diesel, petrol) decreased significantly, from 1,252,774 kWh in 2023 to 941,972 kWh in 2024, representing a 25% reduction. At the same time, there was a substantial increase in the share of energy from certified renewable sources, which rose from 3% to 15% of the total, driven primarily by the purchase of certified green energy. Although energy produced from photovoltaic systems recorded a slight decline, it continues to represent a relevant component of the Group’s internal energy mix.

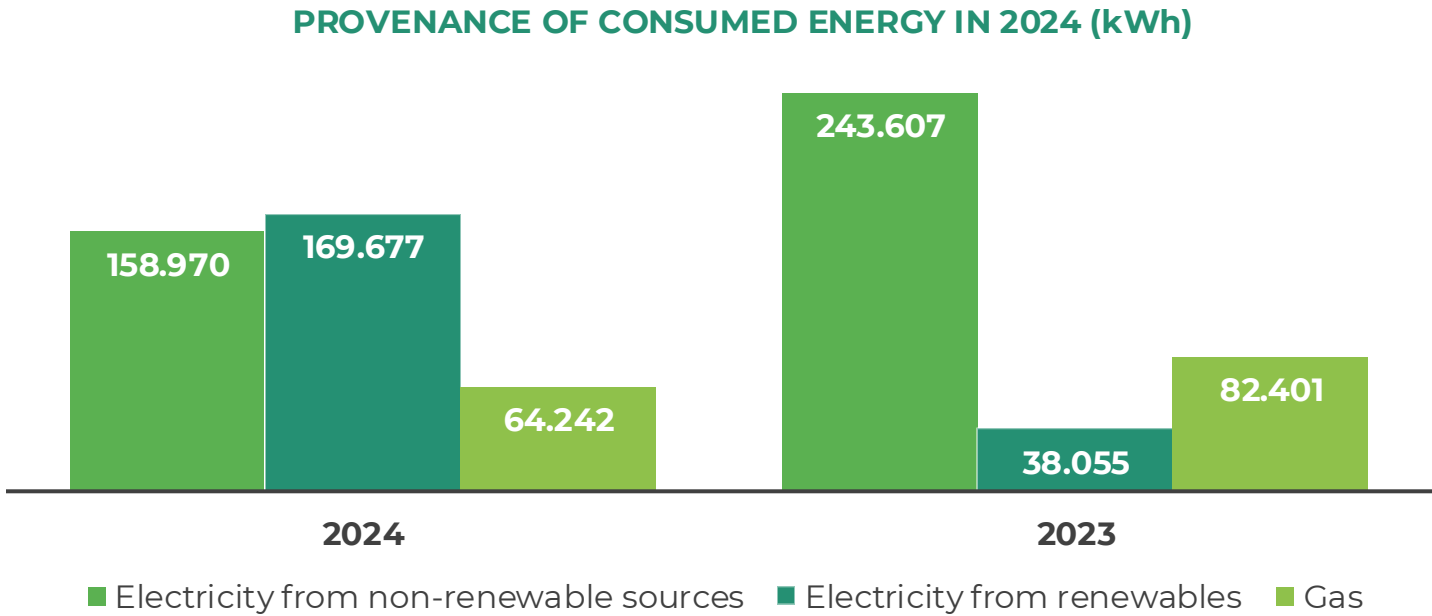
The improvement in the energy mix and the reduction in the use of fossil sources confirm Maps Group’s progress towards more sustainable energy management. The most significant figure is the sharp increase in the green energy share in just one year (15% vs 3%), a tangible sign of the initiated energy transition process.

ENERGY CONSUMPTION OF THE GROUP'S OFFICES

The chart below clearly illustrates the evolution of the Group’s energy mix composition between 2023 and 2024, showing a marked trend towards greater sustainability. The key findings are:

- a significant reduction in electricity from fossil sources, which fell from approximately 260,000 kWh in 2023 to around 159,000 kWh in 2024 — a decrease of more than 35%;
- a notable increase in electricity from renewable sources, which more than quintupled over the same period and, in 2024, exceeded fossil-based electricity consumption for the first time, marking a turning point in the Group’s energy profile;
- a decrease in gas consumption, consistent with the overall reduction in energy demand and the optimisation measures already implemented.

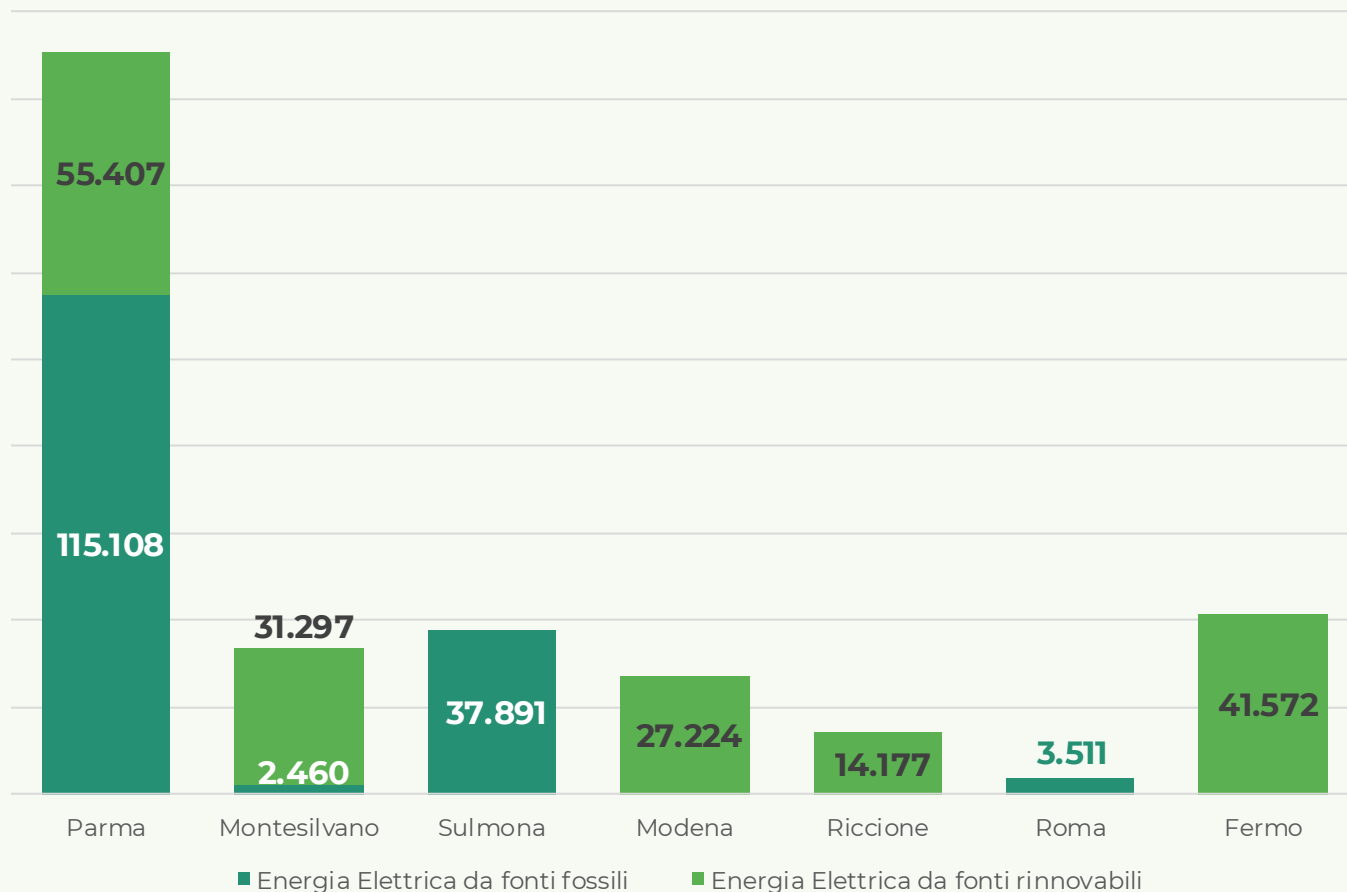
Overall, these data highlight a structural change in the company’s energy mix, consistent with the path undertaken by Maps Group. Although the energy consumption per employee indicator recorded a slight increase, the qualitative analysis of the mix shows a clear improvement in the composition of energy consumed, thanks to the strong growth in the renewable share and the parallel reduction of traditional sources. This trend demonstrates the effectiveness of the measures implemented in 2024 and represents tangible progress towards increasingly efficient and sustainable energy management.



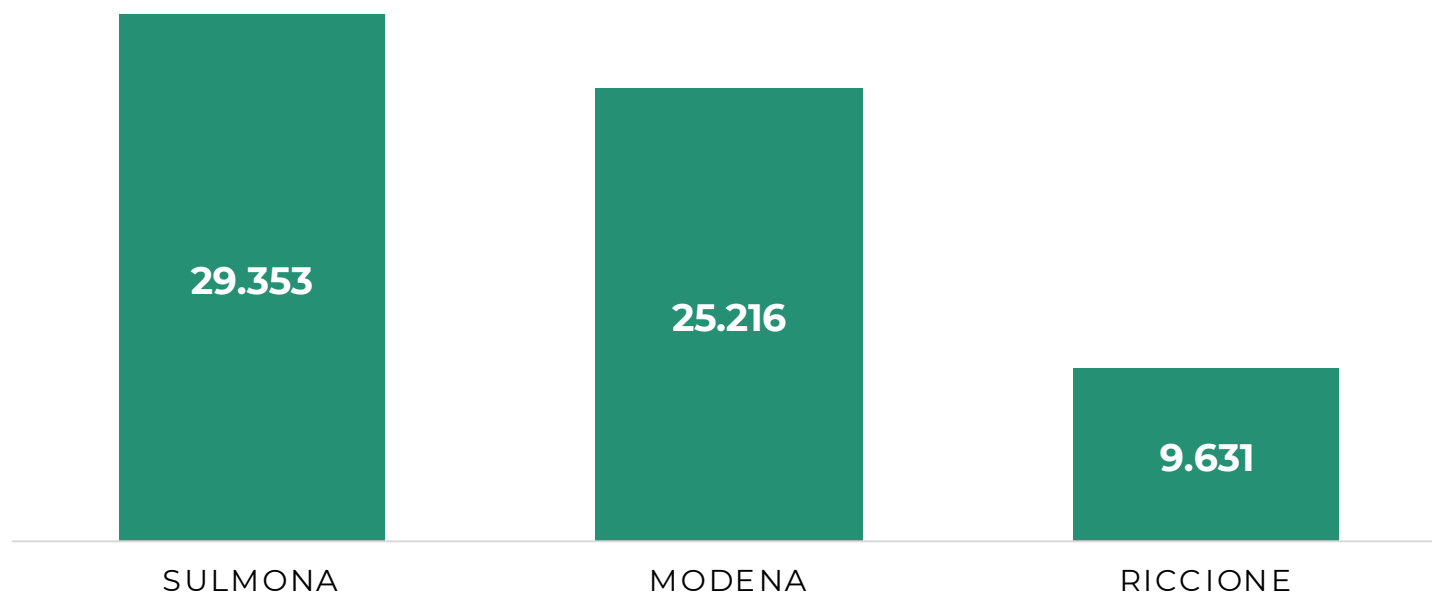
\*The energy consumption associated with the Group’s offices only is considered for this chart. The Petrol component associated with the cars in the company car fleet is therefore excluded.



### ELECTRICITY CONSUMPTION PER SITE (kWh)



### HEATING GAS CONSUMPTION (KWH)

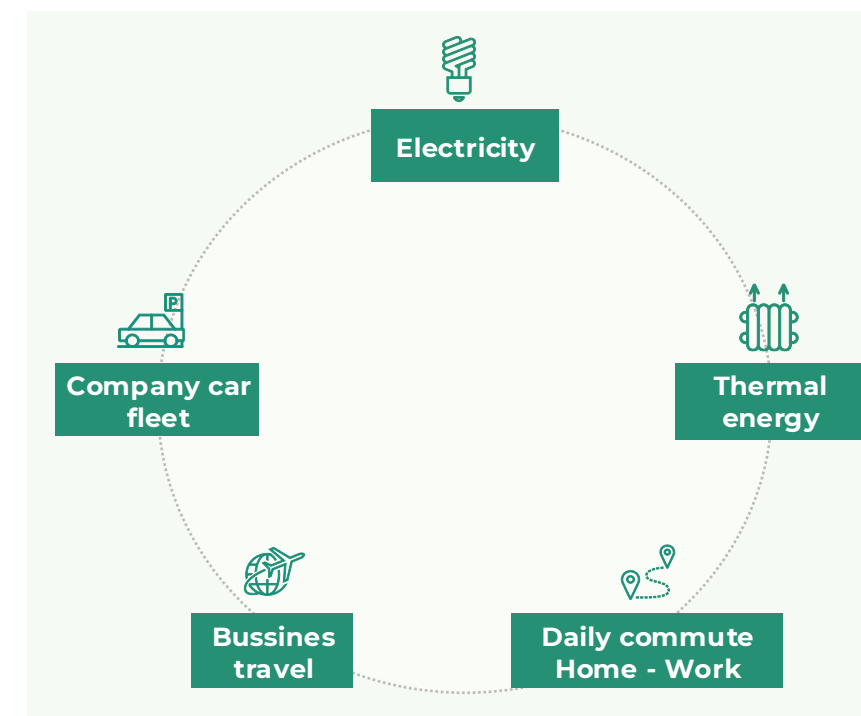


### EI-6 – GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

In 2024, Maps Group continued to monitor its greenhouse gas (GHG) emissions in a structured way, analysing the three categories of the GHG Protocol:

- **Scope 1** (direct emissions)
- **Scope 2** (indirect emissions from purchased energy).
- **Scope 3** (indirect emissions linked to the value chain).

The overall data show a significant improvement in the Group's environmental footprint, thanks to a combination of operational, energy-related, and organizational measures.



### RESTATEMENT

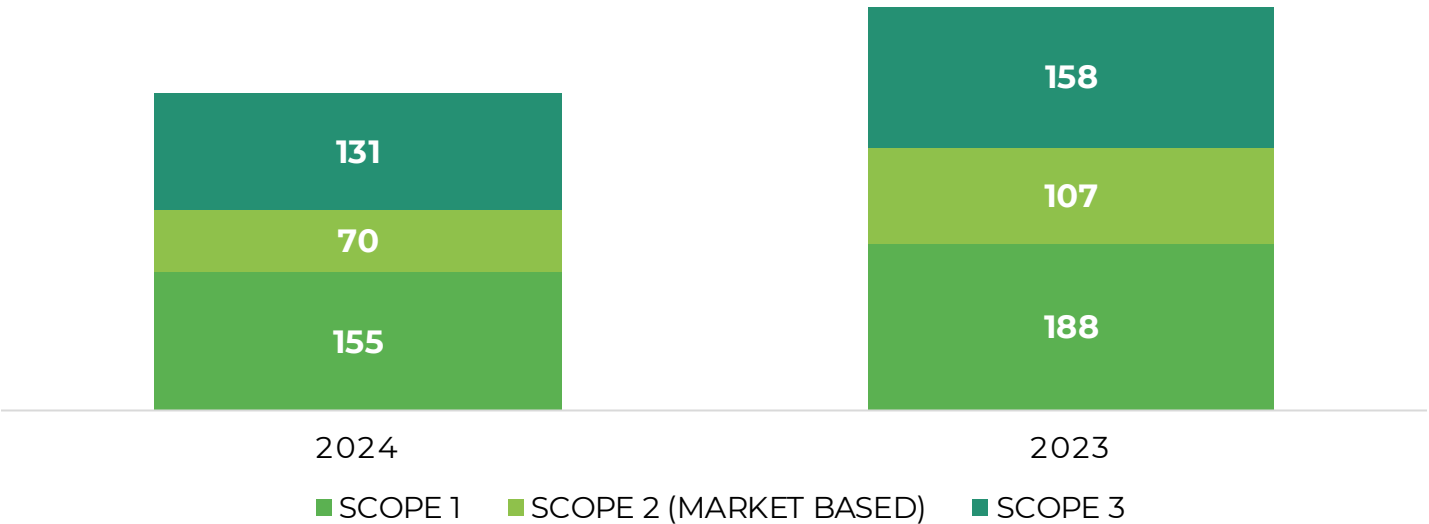
The 2023 results reported in this document differ from those published in last year's Sustainability Report for two main reasons:

- **Exclusion of the Milan site** – Energy consumption associated with the Milan site has been excluded from the comparison following the relocation to a new building. The new premises, located within a co-working space, do not allow for precise tracking of energy consumption directly attributable to the Group, making it necessary to adjust the data set to ensure comparability.
- **Update of Scope 2 emission factors** – To ensure greater methodological consistency and alignment with market best practices, a single reference source — the AIB (Association of Issuing Bodies) Residual Mixes — has been adopted for both the location-based and market-based approaches. Furthermore, emission factors have been updated using the most recent values published by AIB for 2024 (0.0004 tCO<sub>2</sub>eq/kWh), an improvement over those used for 2023 (0.0005 tCO<sub>2</sub>eq/kWh), reflecting the progressive decarbonisation of the national electricity mix. This updated value has also been retroactively applied to the 2023 data to ensure a homogeneous comparison base and to isolate the actual effects of the emissions' reduction actions implemented by Maps Group. To ensure a maximum transparency in interpreting the results, the table in the following section also presents, in brackets, the Scope 2 emissions values calculated using the previous 2023 emission factor, thereby providing the reader with a complete and comparable view of the evolution of the Group's Carbon Footprint.





### CARBON FOOTPRINT (tCO<sub>2</sub>eq)



#### Scope 1 – Direct emissions

In 2024, direct emissions (Scope 1) amounted to 155 tCO<sub>2</sub>eq, representing an 18% decrease compared with 2023 (188 tCO<sub>2</sub>eq). This improvement is primarily attributable to reduced gas consumption for heating and to more efficient management of the company vehicle fleet, in line with policies for optimisation and renewal towards lower-impact vehicles.

#### Scope 2 – Indirect emissions from electricity

The **location-based** emissions, based on the average carbon intensity of the national electricity grid, increased from 114 to 139 tCO<sub>2</sub>eq (+22%). This increase reflects higher electricity consumption due to **the expansion of operational activities**.

Conversely, market-based emissions — which take into account the purchase of renewable energy certified through the Guarantees of Origin (GO) — decreased from 107 to 70 tCO<sub>2</sub>eq, **a 35% reduction**. This confirms the Group's growing commitment to **sustainable energy sourcing**, where technically feasible.

#### Scope 3 – Indirect emissions along the value chain

Emissions from business travel and employee commuting decreased from 158 to 131 tCO<sub>2</sub>eq (**–17%**). Specifically, **emissions from business-related train and air travel increased**, while **commuting-related emissions fell sharply** from 139 to 102 tCO<sub>2</sub>eq, driven by the consolidation of the **Maps Habitat project and the Smart Friday initiative**, which further reduced weekly travel to office locations.

Greenhouse Gas Emissions (GHG) in tCO <sub>2</sub> eq	2024	2023	YoY (%)
<b>Scope 1</b>	155	188	
- Car fleet	- 143	- 174	- 18%
- Fuel combustion	- - 12	- 14	
<b>Scope 2 – Location-based</b>			
The 2023 numbers in brackets were calculated by applying the specific emission factors for the year 2023, "AIB Residual Mixes 2023"	139	114 - (129)	+22%
<b>Scope 2 – Market-based</b>			
The 2023 numbers in parentheses were calculated by applying the specific emission factors for the year 2023, "AIB Residual Mixes 2023"	70	107 - (122)	- 35%
<b>Scope 3</b>			
- Business travel (Train)	131	158 tCO <sub>2</sub> eq	
- Business travel (Air)	- 8	- 6	
- Employees' commute	- 22	- 13	- 17%
	- 02 tCO <sub>2</sub> eq	- 139 tCO <sub>2</sub> eq	

GHG intensity on Total Revenues in tCO <sub>2</sub> eq/mIn€	2024	2023	YoY (%)
Total GHG emissions (location-based) to net revenues	14,3	16,7	-14%
Total GHG emissions (market-based) to net revenues	11,9	16,5	-23%

Overall, Maps Group's 2024 carbon footprint shows a **substantial reduction in total emissions**, with improved performance across all three emission scopes.

The main factors contributing to this result include:

- **increased use of certified renewable electricity**, where feasible;
- **optimisation of company premises**;
- the structured adoption of **flexible organisational arrangements**, directly reducing emissions related to business mobility.

These results represent significant progress in the Group's ongoing journey towards continuous improvement in environmental sustainability and the responsible management of its emissions.



## 4.2 ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### E5-1 – POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Currently, Maps Group does not have a formalised policy specifically dedicated to the efficient use of natural resources and the promotion of circular economy models. However, the Group recognises the growing strategic importance of these areas within the context of the ecological transition.

In particular, responsible resource management, waste reduction, and the recovery and reuse of materials from a circular perspective are regarded as emerging priorities in the continuous improvement of the company's environmental performance.

In line with this vision, Maps Group is committed to:

- progressively monitoring the environmental impacts associated with resource use throughout the life cycle of its business activities;
- identifying good practices already in place, with the aim of systematising them within a circular management framework;
- developing, in the medium term, a dedicated policy to define principles, objectives, and operational criteria for promoting more efficient resource use and reducing waste generation.

This pathway forms part of the Group's broader commitment to integrating sustainability into its operating models and actively contributing to European environmental objectives.

#### E5-2 – ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

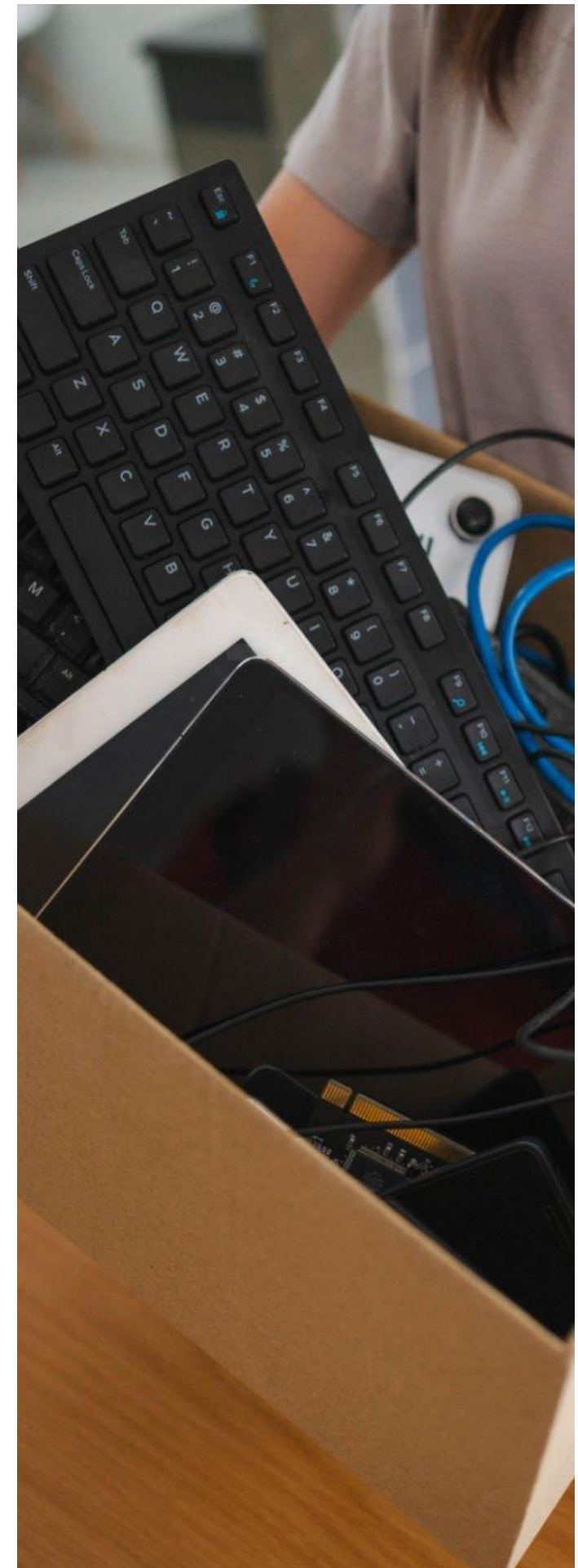
Maps Group's activities, focused on the development of proprietary software solutions for companies and public administration, are characterised by a low material impact in terms of natural resource use and waste generation. The predominantly digital nature of the business significantly limits the consumption of raw materials, making resource management more efficient from the very foundation of the operating model.

The main material resources purchased by the Group are paper and printer toner, the use of which has long been subject to optimisation thanks to the digitisation of document processes and the widespread adoption of hybrid working arrangements.

One of the most significant circular economy actions relates to the management of the IT equipment. For over five years, Maps Group has implemented a system for recovering and reusing obsolete laptops, eliminating almost completely the generation of electronic waste from workstation replacements. In line with a reuse principles, devices no longer suitable for professional activities are either:

- refurbished and sold to employees at a symbolic price; or
- made available on loan under the Maps Habitat project, supporting business continuity in remote working arrangements.

In 2024, an additional initiative was launched to reduce the environmental impact of daily activities: in several Group offices, including Parma, Riccione, Montesilvano, and Sulmona, water filters connected to the local water network were installed, enabling the supply of drinking water without the use of plastic bottles or water dispensers. This initiative has completely eliminated plastic consumption related to drinking water at the offices concerned.







Through these concrete actions, Maps Group demonstrates increasing attention to the sustainable management of resources and the optimisation of the life cycle of corporate assets, contributing consistently to the principles of the circular economy, even in the absence — for the time being — of a formalised policy.

METRICS AND TARGETS

E5-3 – TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

Although Maps Group has not yet defined formalised quantitative targets regarding resource use and waste generation, the topics of material efficiency and the transition towards more circular models are increasingly integrated into the Group’s strategic vision.

For this reason, Maps Group is committed to progressively promoting actions and behaviours aimed at reducing the environmental impact associated with resource inflows and outflows, with particular focus on:

- increasing the circular use of materials, in particular, through the recovery and reuse of IT equipment no longer suitable for professional use;
- limiting the use of virgin raw materials by promoting reuse and extending the life cycle of company assets;
- reducing waste generation and strengthening separate waste collection and responsible disposal practices;
- adopting alternatives to single-use materials, such as eliminating plastic bottles for drinking water in company offices.

These actions represent a further step towards an increasingly conscious and responsible approach to resource management, in line with circular economy principles and the evolution of leading environmental practices.



E5-5 – RESOURCE OUTFLOWS

The following table shows the quantities of hazardous and non-hazardous waste produced by Maps Group during 2024, divided by EWC code (European Waste Catalogue) and type:

Hazardous waste	Kg	Non-hazardous waste	Kg
160213*: discarded equipment containing hazardous components	80 kg	160214: discarded equipment, non-hazardous electronic waste	218 kg
160104*: end-of-life vehicles	2.100 kg	200307: bulky waste	25 kg
		150101: paper and cardboard packaging	680 kg

KG OF PAPER PURCHASED



129 Kg  
2024

137,5 Kg  
2023

KG OF PAPER PURCHASED PER EMPLOYEE



0,43 Kg  
2024

0,44 Kg  
2023

KG OF TONER PURCHASED



3,7 Kg  
2024

6 Kg  
2023

KG OF TONER PURCHASED PER EMPLOYEE



0,01 Kg  
2024

0,02 Kg  
2023





## HIGHLIGHTS

### 5. SOCIAL INFORMATION



**GENDER EQUALITY  
CERTIFICATION**



**97%**  
PERMANENT  
EMPLOYEES



**+28%**  
EDUCATION EXPENSES  
FOR CHILDREN

**100%**  
EMPLOYEES WITH CCNL CONTRACT



**ESTABLISHMENT OF THE INCLUSION  
AND GENDER EQUALITY COMMITTEE**

#### 5.1 ESRS S1 OWN WORKFORCE

Maps Group recognises its people as a fundamental and strategic asset for creating long-term sustainable value. The centrality of human capital is a guiding principle that shapes the Group's decisions and translates into structured policies for the selection, training, development, retention, and incentivisation of talent. The Human Resources function plays a crucial role in fostering shared professional growth pathways, promoting ongoing dialogue with employees, and cultivating a corporate culture based on trust, collaboration, and inclusion.

Maps Group ensures stable and protected working conditions, with a predominance of permanent contracts, reflecting its concrete commitment to promoting employee well-being, safety, and job security. Organic growth, combined with the careful integration of resources from acquired companies, strengthens internal cohesion and nurtures a widespread sense of belonging, further supported by engagement initiatives, cross-functional activities, and shared tools. The Group continues to invest in a positive and sustainable working environment, fostering work-life balance and valuing the unique contribution each person makes to collective success.

In this context, the Human Resources function plays a key role in enabling employee development and engagement through:

- careful staff recruitment;
- the definition of a common training plan and personalised development paths agreed with both the relevant managers and the employees themselves;
- the promotion of continuous dialogue with employees and the implementation of regular performance evaluation processes.

#### ESRS 2 SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

Maps Group recognises the strategic value of the active participation of its employees, collaborators, and workers' representatives in decision-making processes and in shaping its organisational model. In this regard, the Group promotes ongoing, structured, and transparent dialogue with its entire workforce, with the aim of integrating interests, expectations, and feedback into the design of its corporate policies.

One of the main tools adopted for this purpose is the periodic administration of **employee surveys**, which explore a wide range of aspects of company life — including the Maps Habitat project, corporate culture, and, in particular, the issue of equal opportunities. The insights gathered provide valuable guidance for directing continuous improvement initiatives and setting strategic priorities aligned with internal needs.

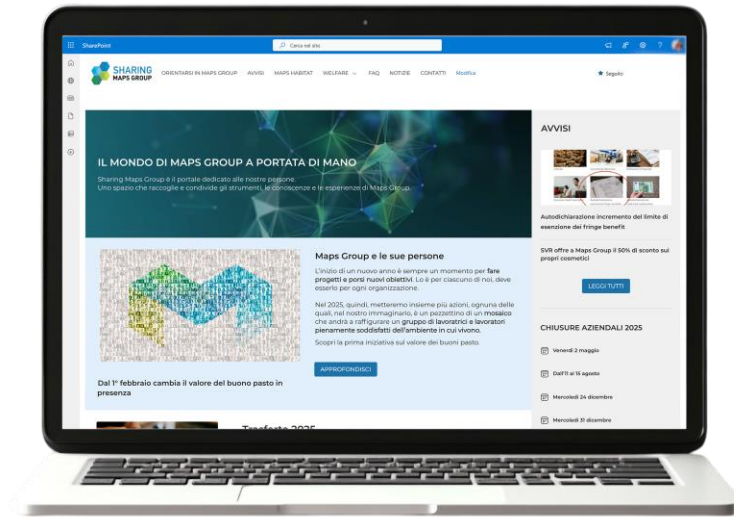
The Group has also implemented **a whistleblowing system** accessible to all stakeholders, including employees and other workers which enables the confidential reporting of behaviours that are not aligned with corporate values, applicable regulations, or principles of ethics and sustainability. This channel serves as an essential tool for listening, safeguarding, and reinforcing the organisation's culture.





To support the transparency and the dialogue with the external public, the Group's corporate website hosts sections dedicated to sustainability, governance, and investor relations, where the relevant information is shared on ESG commitments, shareholding, company performance, and corporate governance, promoting an open approach to corporate responsibility.

Within the organisation, employees are actively engaged through the **Sharing Maps Group channel**, which provides continuous updates on initiatives, events, welfare programmes, and webinars organised by the company. Direct interaction between employees and the reference functions — such as department heads and the Human Resources Office — is also encouraged. These opportunities for dialogue are structured to capture, in real time, any issues, improvement proposals, or emerging needs.



All feedback collected — through surveys, reporting channels, and both formal and informal exchanges — is analysed and summarised in dedicated reports, which feed into information flows regularly submitted to the company's highest governing bodies and used for auditing purposes. In this way, listening to the workforce becomes a concrete and ongoing element in the process of defining corporate strategy and evolving the operating model.

For further details, please refer to the section **GENERAL DISCLOSURES – ESRS 2 SBM – INTERESTS AND VIEWS OF STAKEHOLDERS**.

### ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

All employees and non-employee workers who are part of the workforce have been included, as they are, or could be, exposed to various impacts arising from the Group's activities, as indicated in the IROs table.

**No material negative impacts have been identified in relation to the workforce.** However, **Maps Group has implemented mitigation measures to address potential negative impacts on its employees** and is strongly committed to providing and facilitating timely and effective remedies should potential negative impacts occur.

**Material positive impacts include talent attraction, working conditions, and equal treatment and opportunities for all.** For further details, please refer to ESRS 2 SBM-3.

With regards to IROs, Maps Group's commitment to ensuring stable employment, fair pay,

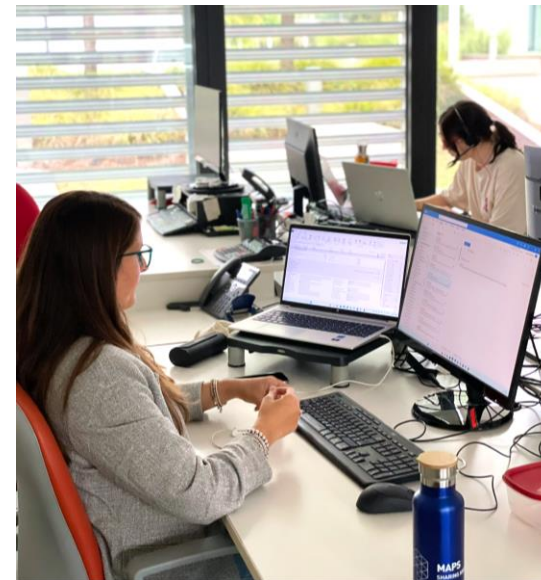
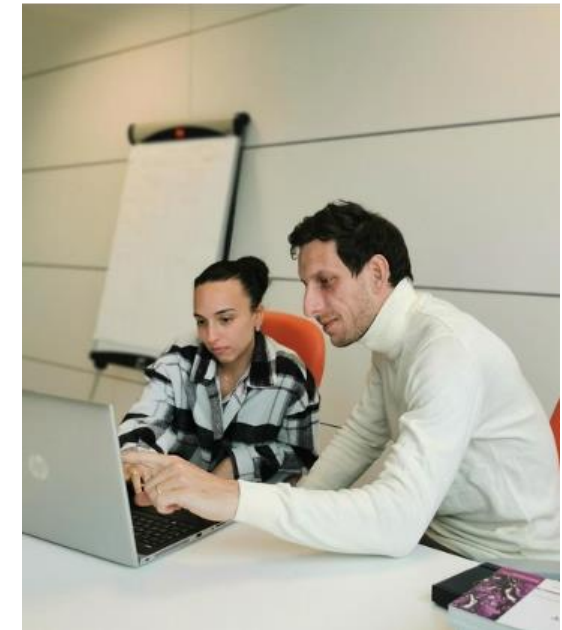
a good work-life balance, and welfare initiatives supports greater employee retention and productivity.

***This may generate long-term economic savings for the Group, including reduced absenteeism, lower turnover and recruitment/training costs, as well as creating new business opportunities and strengthening corporate reputation.***

**Maps Group recognises the importance of contributing to the well-being and professional development of its employees. To this end, it actively promotes the sharing of skills among new talent.**

In terms of working conditions, the Group considers stable employment, work-life balance, and fair and adequate working conditions (e.g., working hours, remuneration, opportunities for remote work, and flexible schedules) to be essential.

Aware of the importance of a safe working environment, the Group prioritises and safeguards occupational health and safety, investing in targeted training and risk prevention. Furthermore, it is committed to maintaining employee motivation through various welfare initiatives (e.g., parental leave, meal vouchers, insurance schemes).



**Maps Group recognises that diversity and inclusion are essential to a thriving work environment. For this reason, gender equality, equal access to employment, and the inclusion of persons with disabilities are key priorities.**

The Group ensures protection against all forms of harassment, particularly towards underrepresented or vulnerable groups of workers. It also recognises training and skills development as vital elements, investing significantly in the professional growth of employees and in strengthening their capabilities through dedicated training programmes and an annual training plan.

**Impacts on the internal workforce can generate material risks and opportunities**, such as long-term cost savings, enhanced corporate reputation, and increased productivity, stemming from higher employee retention supported by the Group's commitment to ensuring safe working conditions and building a skilled and talented workforce.

Conversely, **Maps Group recognises the significant risk** of incurring legal consequences due to discriminatory incidents, non-compliance with diversity and equal opportunity regulations, and/or failure to ensure equal opportunities in the workplace, particularly with regards to persons with disabilities.



## IMPACTS, RISKS AND OPPORTUNITIES MANAGEMENT

### SI-1 POLICIES RELATED TO OWN WORKFORCE

The Group has adopted a **Company Regulation**, a **Code of Conduct**, and a **Code of Ethics** that define and formalise the principles, values, and fundamental rules guiding behaviour within the organisation. Human resources policies are also formalised in the **Personnel Management Process**, which forms part of the Group's integrated management system certified under ISO 9001 and ISO 27001.



As part of its ongoing effort to strengthen its ethical and sustainability framework, Maps Group is committed to undertaking a structured review of its Code of Ethics, which already contains explicit references to the fundamental principles for the protection of human rights, including workers' rights. The objective is to integrate a section specifically dedicated to human rights, in line with major international standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, and the core conventions of the International Labour Organization (ILO).

This new section will serve as a clear and binding reference for all Group stakeholders, reinforcing Maps Group's commitment to responsible conduct across the value chain. The initiative forms part of the Group's broader ESG alignment programme, aimed at fostering a corporate culture increasingly focused on integrity, inclusion, and respect for human dignity in all operational contexts.

Although the Code of Ethics has not yet been updated to reflect certain values referenced above, the Group has already effectively implemented the principles it contains, applying them concretely in its policies and business practices. **This confirms Maps Group's commitment to ensuring ethical and responsible behaviour.**

### SI-2 PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

There are processes for the engagement process with MAPS workforce, for more details please refer to what is described in the Paragraph.

### SI-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

Maps Group has implemented structured processes to address and help resolve potential negative impacts on its workers, fostering a transparent, safe, and inclusive working environment. To this end, the Group provides several channels through which employees can freely raise concerns, report issues, or submit requests. Among these, **a whistleblowing channel** is available to all staff, enabling the confidential and protected reporting of potential violations or non-compliant behaviours, ensuring the anonymity of the whistleblower and protection against any form of retaliation.

In compliance with Legislative Decree 24/2023 (implementing EU Directive 2019/1937 on whistleblowing), the Group has also appointed **an external Reporting Manager**, responsible for:

- receiving, analysing, and assessing reports received;
- ensuring proper internal investigation in accordance with the timelines and procedures established by law;
- maintaining contact with the whistleblower, including requests for clarification or updates;
- safeguarding the identity of the whistleblower and any persons mentioned;
- coordinating with relevant functions to implement corrective actions, where necessary;
- preparing the required documentation in the event of inspections by supervisory authorities;
- communicating the results of completed investigations to the Board of Directors.

The entire process is guided by the principles of impartiality, timeliness, and confidentiality, with the aim of strengthening employees' trust in corporate integrity systems and preventing unlawful or inappropriate conduct.

In parallel, employees always have the option of engaging directly with the **Human Resources Office**, which serves as a constant point of reference for managing and resolving personnel-related matters, including complaints or requests for support. These channels are made available directly by the company and are integrated into the internal human resources management processes.

Maps Group promotes awareness and accessibility of these tools through internal communications on the *Sharing Maps Group* channel, regular reminders of their availability, the posting of relevant information in workplaces, and inclusion in company documents accessible daily via the "Corporate Regulations and Procedures" channel, as well as during training sessions on the Organisation, Management, and Control Model (Model 231).





SI-4 TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

Maps Group follows an approach focused on valuing internal talent, promoting professional growth pathways from the earliest stages of experience. In this context, **both curricular and extracurricular internships are encouraged**, with the aim of training and integrating young resources, facilitating their progressive and stable inclusion within the organisation. This dual strategy — limiting the use of temporary external collaborations and investing in internal resources — reflects Maps Group’s commitment to a sustainable, fair, and long-term development model.



Maps Group is deeply committed to promoting education and training through strong academic collaborations with universities. **Through sponsorships**, the Group supports educational projects that contribute to academic and scientific advancement. In addition, several Group professionals actively contribute to teaching, delivering lectures and seminars that integrate theory with practical experience, enriching students’ curricula with real-world knowledge, as well as collaborating on research projects through the *Group’s Research & Development Business Unit*.

**Internship agreements** are another key pillar of these collaborations. These initiatives not only strengthen ties between the academic and business worlds but also prepare a new generation of skilled professionals ready to contribute to the sector innovation. **The conversion of certain internships into permanent employment** demonstrates the Group’s commitment to innovation and continuous growth. In some cases, the Group also offers its proprietary solutions as educational tools, such as the GZOOM® VALUE GOVERNANCE software used in the *Master delle performance degli enti locali* programme at the University of Ferrara, Faculty of Economics.

In 2024, universities with which collaborations or agreements for internships were initiated or continued include: **UniBO, UniPR, UniMore, Bocconi, UniTN**, and **UniTO**.



Università di  
Bologna



Università di Parma



Università Bocconi



Università di Trento



Università di Modena e  
Reggio



Università di Torino

Maps Group firmly believes that internships are a key opportunity both for the growth of young students and for the development of the company itself. Internship opportunities are open to students from bachelor’s and master’s degree programmes, in all thematic areas covered by the company. Curriculum based internships — including those supporting thesis projects — are carried out under a “training on the job” model, pairing students with an experienced professional in their field of study, involving them in specific projects, and enabling them to work as part of a real team.

Through internships, students can acquire practical skills and direct knowledge of the relevant business sector, complementing their theoretical training with hands-on work experience. During both curricular and extracurricular internships, Maps Group involves interns in courses from its own **Training Plan**, ensuring that the internship experience prepares them effectively for entering the job market.

These internships provide students with exposure to the working world and the opportunity to immerse themselves in the company culture, learning values and skills that are crucial for their future careers. At the same time, the company benefits from fresh ideas and perspectives brought by enthusiastic and motivated young talent. This synergy not only enriches the team but also builds a solid foundation for the future by investing in a generation of prepared and innovative professionals. Maps Group believes that long-term success is also built through the commitment to cultivate and support potential future leaders. Non-curriculum internships represent not only training periods for young people but also an opportunity to identify and nurture new talent. Many of the Group’s current employees began their careers through extracurricular internships, which often led to permanent employment opportunities. The table below provides figures for curricular and extracurricular interns, also including comparative data for the 2023 reporting year.

OFFICE	INTERNS 2024		INTERNS 2023	
	CURRICULUM	NON-CURRICULUM	CURRICULUM	NON-CURRICULUM
Parma	10	-	-	2
Milano	1	2	-	1
Modena	1	-	-	-
Sulmona	-	-	-	-
Montesilvano	1	3	-	1
Riccione	-	-	-	1
Rovereto	3	-	-	-
Genova	-	-	-	-
Prato	-	-	-	-
Roma	-	-	-	-
Fermo	-	-	-	-
Total	16	5	-	5



## METRICS AND TARGETS

### SI-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

In spite of not yet having defined specific targets with timelines and performance indicators in the area of its workforce, Maps Group reaffirms its concrete commitment to generating positive impacts for its employees. This commitment is reflected in the promotion of fair and inclusive working conditions, which include job stability, a safe working environment, working hours compatible with private life, adequate remuneration, organisational flexibility, non-monetary benefits, remote working, a comprehensive welfare plan, parental leave, and more.

Maps Group also places particular emphasis on gender equality and equal opportunities in access to and progression within the workplace. At the same time, it actively manages the risks and opportunities related to human capital, strengthening employee retention, motivation, and productivity. To support this, targeted training programmes are implemented to foster skills development and the enhancement of internal talent.

### SI-6 – CHARACTERISTICS OF THE UNDERTAKING’S EMPLOYEES

In accordance with the requirements of the CSRD Directive and in line with ESRS SI-6, the following section presents the main information on working conditions within our organisation. The objective of this section is to provide a clear and transparent overview of how workers’ rights are safeguarded and how decent, fair, and sustainable working conditions are ensured.

The following tables provide a detailed breakdown of the main quantitative indicators describing the current situation and the company’s policies on working conditions, by type of employment contract, gender, working time arrangements, and workplace location.

**As of 31 December 2024, the total number of employees in the Group was 302, of which 97% held permanent contracts.**

2024	FEMALE	MALE	OTHER	NON COMMUNICATED	TOTAL
Number of employees (in number of people)	106	196	-	-	302
Number of permanent employees	102	192	-	-	294
Number of fixed-term employees	4	4	-	-	8
Number of non-guaranteed time employees	-	-	-	-	-
Number of full-time employees	85	189	-	-	274
Number of part-time employees	6	22	-	-	28

COMPANY LOCATIONS	2024			2023		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
PARMA	56	36	92	64	36	100
MODENA	23	14	37	21	16	37
MILANO	43	26	69	46	25	71
MONTESILVANO	23	4	27	21	3	24
SULMONA	9	4	13	12	4	16
RICCIONE	8	9	17	10	7	17
FERMO	11	9	20	12	9	21
GENOVA	4	-	4	4	-	4
PRATO	2	-	2	2	-	2
ROVERETO	12	3	15	12	3	15
ROMA	2	1	3	1	2	3
ARICCIA	2	1	3	-	-	-

NEW HIRES										
NUMBER OF PEOPLE	2024					2023				
	<30	30-50	>50	TOTALE	TURNOVER %	<30	30-50	>50	TOTAL	TURNOVER %
MALE	13	5	1	19	9,7%	12	17	0	29	14,1%
FEMALE	8	5	0	13	12,3%	8	3	0	11	10,5%
TOTAL	21	10	1	32	10,6%	20	20	-	40	12,9%
TURNOVER %	36,2%	6,2%	1,2%	10,6%	-	36,4%	11,6%	0,0%	12,9%	-

DEPARTURES										
NOMBRE OF PEOPLE	2024					2023				
	<30	30-50	>50	TOTAL	TURNOVER %	<30	30-50	>50	TOTAL	TURNOVER %
MALE	10	14	4	28	14,3%	9	10	1	20	9,8%
FEMALE	8	1	2	11	10,4%	1	4	0	5	4,8%
TOTAL	18	15	6	39	12,9%	10	14	1	25	8,1%
TURNOVER %	31,0%	9,3%	7,2%	12,9%	-	18,2%	8,1%	1,2%	8,1%	-





SI-7 – CHARACTERISTICS OF NON-EMPLOYEES IN THE UNDERTAKING’S OWN WORKFORCE

Maps Group makes limited use of, and only in exceptional circumstances, external non-employee workers, giving preference to consultancy assignments and minimising the use of precarious contractual arrangements, such as on-call contracts and coordinated and continuous collaborations. The engagement of external parties — whether individuals (consultants, freelancers) or legal entities (consulting firms) — is carried out in compliance with ethical principles, applicable regulations, and internal procedures, with the aim of ensuring qualified services consistent with the Group’s values.

The Group does not make use of workers provided by companies whose main activity is the recruitment, selection, and supply of personnel (NACE Code N78).

COMPOSITION OF CONSULTANTS

INDIVIDUALS	NUMBER	THIRD-PARTY COMPANIES	NUMBER
OTHER CONSULTANCY	1	OTHER CONSULTANCY	5
FUNCTIONAL ANALYST	6	FUNCTIONAL ANALYST	3
PRODUCT CONSULTANT	0	PRODUCT CONSULTANT	1
SPECIALIZED CONSULTANT	3	SPECIALIZED CONSULTANT	1
SOLUTION PROVIDER	0	SOLUTION PROVIDER	3
DEVELOPER	1	DEVELOPER	3
TOTAL	11	TOTAL	16

SI-8 – COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

All Maps Group employees are covered by national collective labour agreements (CCNL), corresponding to 100% coverage. With regard to social dialogue, there are currently no internal trade union representatives or formally elected worker representatives within the Group, and there are no agreements in place with European Works Councils or European Companies for worker representation. However, Maps Group maintains an open and ongoing dialogue with its employees, fostering a collaborative working environment attentive to both individual and collective needs, even in the absence of formal representation structures.

TOTAL NUMBER OF EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS

	2024	2023
TOTAL NUMBER OF EMPLOYEES	302	310
NUMBER OF EMPLOYEES WITH COLLECTIVE AGREEMENTS	302	310
PERCENTUALE TOTALE	100%	100%

SI-9 – DIVERSITY METRICS

Maps Group is committed to promoting **gender equality**, even in a sector such as technology, which has historically been male-dominated. In recent years, however, we have seen a significant improvement in our figures, with a growing female presence in our teams, although further progress is still needed in managerial positions. Recognising the importance of diversity and inclusion, **the subsidiary Artexe S.p.A. obtained gender equality certification in 2024**, a milestone that has served as an important catalyst for a comprehensive internal review extended to the entire Group. This certification has represented not only a formal achievement, but also a key tool for raising awareness among Group employees about the importance of creating a fair and inclusive working environment.

The first indicator of the certification relates to the **integration of gender equality into corporate culture** and strategy. To this end, Artexe has formalised and implemented a **strategic plan** aimed at fostering the development of an inclusive workplace, with corporate values aligned to an inclusion-oriented culture. The Group has also launched a series of **internal awareness initiatives**, such as diversity and inclusion **training courses**, **internal perception surveys** on these topics, and **communication campaigns** focusing on the value of equality and mutual respect.

The **Group’s HR processes** are also structured to ensure that every stage of the employee lifecycle is managed inclusively, with particular attention to the recruitment and promotion processes, in order to avoid gender-based discrimination. The company has also adopted policies that guarantee equal participation in training programmes, including leadership courses, ensuring balanced representation of both genders.





A detailed job classification system is in place that ensures clarity and transparency in roles and responsibilities. Career development project has been launched, open to both men and women, establishing the principle of equality and promoting the opportunities for professional growth and personal development for all. These initiatives highlight our commitment to creating a workplace where gender equality is not only recognised but actively practised.

In terms of governance, Artexe has implemented a **monitoring and oversight system** to ensure transparency in the gender equality management. An **internal Committee dedicated to inclusion and equity** has been established with the aim of periodically assessing progress and proposing new strategies.

The following disclosure is intended to provide a transparent and detailed overview of the Group’s human capital composition, with particular reference to gender distribution within top management and the age distribution among employees. In line with the principles of diversity, equity, and inclusion, the Group regularly monitors these data in order to assess the level of representativeness and to support the development of increasingly inclusive and intergenerational human resources management policies.

TOTAL NUMBER OF EMPLOYEES BY CLASSIFICATION AND GENDER

	AT 31 DECEMBER 2024			AT 31 DECEMBER 2023		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
EXECUTIVES	5	-	5	5	-	5
MANAGEMENT	25	5	30	20	5	25
OFFICE STAFF	164	99	263	178	98	276
WORKERS	2	2	4	2	2	4
TOTAL	196	106	302	205	105	310

TOTAL NUMBER OF EMPLOYEES BY CLASSIFICATION AND BY AGE GROUP

	AT 31 DECEMBER 2024				AT 31 DECEMBER 2023			
	<30 YRS	30-50 YRS	>50 YRS	TOTAL	<30 YRS	30-50 YRS	>50 YRS	TOTAL
EXECUTIVES	-	-	5	5	-	-	5	5
MANAGEMENT		14	16	30	-	11	14	25
OFFICE STAFF	58	145	60	263	55	160	61	276
WORKERS	-	2	2	4		2	2	4
TOTAL	58	161	83	302	55	173	82	310

S1-10 – ADEQUATE WAGES

With regards to remuneration, all Maps Group employees are hired under the applicable National Collective Labour Agreements (CCNL), which establish the minimum wage levels according to the qualifications and the duties performed. In line with the provisions of the CCNL, Maps Group ensures wages that are adequate, fair, and consistent with the role held, thereby guaranteeing a solid pay base in line with industry standards.

The Group is committed to ensuring the fairness and appropriateness of the contractual classification of its workers — whether employees or collaborators — in accordance with current legislation, the applicable National Collective Labour Agreements (CCNL), and the duties actually performed.

S1-11 – SOCIAL PROTECTION

All Maps Group employees are hired under the applicable National Collective Labour Agreements (CCNL), which ensure an adequate social protection coverage. This means that all personnel benefit from the protection offered by the public system — such as health insurance, unemployment benefits, disability coverage, and parental leave — while also accessing supplementary corporate welfare schemes, which include additional health insurance policies differentiated according to the applicable CCNL and the contractual level. Through its Welfare Plan and specific initiatives, Maps Group complements and strengthens public protections, offering tangible support for the economic and personal well-being of its employees.

**The Group’s Welfare Plan** includes a range of non-monetary benefits aimed at improving the economic and social well-being of employees and their families.

Numerous initiatives support work-life balance, such as the option to work remotely, flexible working hours, and a study leave. In addition, at Maps Group offices, employees can receive mail and parcels, make use of laundry and tailoring services at the Parma headquarters, and purchase organic products from a local social farming cooperative with which Maps Group has a partnership.

All welfare plan initiatives are described on the internal **Sharing Maps Group** platform, where events and activities are published monthly to encourage personal interests, promote a sense of community, and share information — with the ultimate goal of creating sustainable value for all.







Maps Group also makes company spaces available for extra-work activities and initiatives organised among colleagues, fostering the sharing of passions and experiences.

The company offers flexible benefits to both permanent and fixed-term employees, accessible via an external welfare platform, in order to broaden the range of options and make the selection process faster and more user-friendly.

To support employees with children, Maps Group provides reimbursement of up to €300 per year for education, babysitting, or other childcare expenses. Eligible expenses include the purchase of schoolbooks, summer camps, canteen services, school transport, school and university tuition fees, study trips, extracurricular training courses, and sports activities.



#### TOTAL AMOUNT OF FLEXIBLE BENEFITS

2024	2023
95.282,17 €	95.355,02 €

#### EDUCATION COSTS FOR CHILDREN

2024	2023
39.126,83 €	30.488,66 €

In accordance with the objectives established and the HR policies defined by the Group, the Maps Group Welfare Plan has been adopted by all the companies acquired over the years.

#### NEGOTIATED DEALS

The welfare plan includes numerous agreements that Maps Group has established for its employees. Among these active agreements, benefiting our employees, are partnerships with travel agencies, gyms, retail establishments such as cafes and restaurants, laundries, and cooperatives offering organic food products..

#### MEAL VOUCHERS

In 2024, Maps Group distributed meal vouchers through “Ticket Restaurant” for a total value of €235,553. **For 2025, the Group plans to increase** the amount granted to each employee for the meal voucher allocated for each day worked on site.

#### TOTAL AMOUNT OF MEAL VOUCHERS

2024	2023
235.553,00 €	234.210,00 €

*\*The count also includes the €2 smart voucher for days worked remotely, recognized as of September 2020 with the implementation of the Maps Habitat Project.*

#### SUPPLEMENTARY HEALTH INSURANCE

Maps Group believes it is essential to integrate public health services with additional health care, available to all Group employees.



#### S1-12 – PERSONS WITH DISABILITIES

Maps Group is strongly committed to safeguarding the right to work and to promoting a healthy, safe, and inclusive professional environment for all of its employees. The inclusion of graduates and early-career professionals and individuals belonging to protected categories – including persons with disabilities – is a priority for the Group. We believe in the unique value of each individual and are committed to creating environments in which everyone feels welcomed, valued, and empowered to fully express their potential, regardless of personal characteristics.

In this regard, Maps Group actively collaborates with several local cooperatives, including Ecole Società Cooperativa Sociale (formerly Cigno Verde), Biricc@, and Aliante, which work to promote the employment of disadvantaged individuals in sectors such as agriculture, cleaning services, laundry, and tailoring.



#### TOTAL NUMBER OF EMPLOYEES (OTHER DIVERSITY INDICATORS)

	AT 31 DECEMBER 2024			AT 31 DECEMBER 2023		
	PROTECTED CATEGORY	WITH DISABILITIES	OTHER	PROTECTED CATEGORY	WITH DISABILITIES	OTHER
EXECUTIVES	0	0	0	0	0	0
MANAGEMENT	0	0	0	0	0	0
OFFICE STAFF	0	11	0	0	12	0
WORKERS	0	1	0	0	1	0
TOTAL	0	12	0	0	13	0

2024  
  
6 MALE

2023  
  
5 MALE

2024  
  
6 FEMALE  
OF WHICH 1  
WORKER

2023  
  
8 FEMALE  
OF WHICH  
1 WORKER

*The above figure includes only those hired directly by the companies of the Maps Group, without including the cooperatives mentioned above.*



### SI-13 – TRAINING AND SKILLS DEVELOPMENT METRICS

The role of a specific professional training is to enable staff to operate to the best of their knowledge at all times, thereby making the expected contribution to the quality of work at Maps Group.

Staff are trained and continuously updated on:

- delegated activities;
- privacy, quality, and information security topics;
- workplace health and safety;
- proper management of activities at risk of criminal offences, in accordance with the Organizational Model 231;
- diversity and equal opportunity topics.

Training needs are identified based on internal reports, the need for updates, and the outcomes, monitoring, and effectiveness of previous activities.

Requests to attend training activities may be submitted:

- by any staff member directly to the Human Resources Manager;
- by Project Managers, who may request training updates for the staff they coordinate.

For each person holding one or more roles as defined in the Maps Group organizational chart, the Management:

- defines a “minimum competence level” (a professional minimum compliance profile used to select the person to fill each role, as specified in the Role Evaluation Sheet);
- assesses, at the beginning of each calendar year, the training needs for each role in relation to its areas of competence;
- determines any necessary training activities and prepares the annual staff training plan;
- evaluates the effectiveness of the training provided by reviewing the results achieved against the initial objectives and conducting direct discussions with staff (self-assessment, satisfaction with the training received, any reports of new training needs, and the evaluation by the relevant supervisor). The results of these evaluations are also included in an annual summary report on the training carried out.

Following the planning of the training activities, a **“Training Plan”** is prepared, after which the trainers or the organization delivering the course are selected, and the corresponding service contract is issued. Training activities may take place directly at Maps Group premises, including through qualified in-house personnel, at the provider’s location, or via videoconference.

The development of expertise and cultural background is also supported, subject to company agreement, through the possibility of taking an annual allocation of study leave hours.

With regards to **soft skills**, the Group places particular emphasis on the topic, offering corporate courses on managerial and leadership skills development delivered by professionals and aimed at employees with established profiles and high potential. All employees are also offered **team-building** activities, either organized directly by the Group or delivered through accredited professionals.



### AVERAGE HOURS OF TRAINING

	2024			2023		
	F	M	TOTAL	F	M	TOTAL
EXECUTIVES	0	2,6	2,6	0	3,2	3,2
MANAGEMENT	54,6	43,5	47,7	65,2	63,8	64,4
OFFICE STAFF	133,8	22,8	41,3	32,9	17,2	20,3
WORKERS	0,0	0,0	0,0	0,0	0,0	0,0
TOTAL	57,8	39,4	45,8	62,8	60,2	60,9

Maps Group is committed to developing a structured process for defining and advancing **career paths**, as well as for the growth and enhancement of employee skills. Among the initiatives designed to ensure professional development, all Group employees participate in an **evaluation process** focused on the technical skills relevant to their profile, soft skills, the results achieved in previously identified areas for improvement, and the attainment of assigned objectives.





The evaluation session also serves as an opportunity for dialogue, mutual feedback, verification, and the definition of objectives and areas for improvement for the following period. **The performance evaluation process** applies to the entire Group workforce, regardless of whether or not an employee's compensation includes a variable component linked to the achievement of assigned objectives.

In 2024, 38% of employees received variable remuneration ("MBO") based on the achievement of annual objectives, compared to 39% of those eligible, and against 38.4% in 2023.

## SI-14 – HEALTH AND SAFETY METRICS

Protecting health and safety in the workplace is a fundamental priority for Maps Group, as it is an essential element in ensuring the well-being and protection of its employees. The Group not only complies with the obligations set out in Legislative Decree 81/2008, but also adopts best practices aimed at ensuring both physical and psychological safety within the work environment. From the moment they join the company, employees are introduced to a strong culture of prevention through mandatory health and safety training designed to raise awareness of potential risks and encourage responsible behaviour. Specific refresher programmes are also provided for safety managers and officers to support proactive and informed management.

Maps Group's commitment is reflected in the continuous monitoring of risks, the adoption of workplaces and infrastructure that also meet the needs of employees with disabilities, and the establishment of internal procedures that promote safe practices in the context of remote work, including the provision of tools for setting up ergonomic and safe workstations.

In recent years, the Group has also devoted particular attention to the safe and responsible management of company vehicles, in locations where they are used, establishing a dedicated team to oversee this area. The actions undertaken include:

- regular maintenance of company vehicles to ensure reliability and reduce risks associated with unexpected breakdowns;
- the use of modern vehicles equipped with advanced driver-assistance technologies such as automatic emergency braking and lane-keeping systems. To this end, a process is underway to phase out less efficient company-owned vehicles and replace them with solutions that ensure high standards of safety and comfort for drivers;
- mandatory on-board equipment, including a warning triangle, high-visibility vest, and first-aid kit, in compliance with applicable regulations;
- the implementation of a monitoring system for company vehicle usage, aimed at improving the organisation of travel and promoting a more efficient and safer approach to corporate mobility.

This integrated approach reflects the Group's commitment to ensuring a safe, responsible, and continuously evolving work environment, in line with the principles of social responsibility.

Maps Group adopts a structured and cross-functional approach to managing occupational health and safety, relying on dedicated roles and specialist expertise within all Group companies. A specific health and safety officer, reporting to the Facility Manager, is responsible for regulatory compliance and emergency management. This role is supported by ongoing training to strengthen and update technical skills in line with evolving regulations and industry best practices.

In each Group company, the following roles have been formally appointed: the **Head of the Prevention and Protection Service (RSPP)**, the **Workers' Safety Representative (RLS)**, and the occupational physician, in addition to those responsible for emergency management at each location.

Occupational health surveillance is ensured through periodic medical examinations for all job categories, conducted by the occupational physician. To maintain consistency and continuity of health surveillance across decentralised offices, Maps Group has appointed local occupational physicians coordinated by a lead occupational physician. This structure ensures the effective assessment of employees' fitness for work across all locations, providing consistency in evaluations and in the overall management of workplace health.

Since 2023, Maps Group has further strengthened its occupational health and safety organisation by establishing a dedicated Facility Management Team, tasked with managing both operational and documentation-related aspects of workplace safety across company sites.



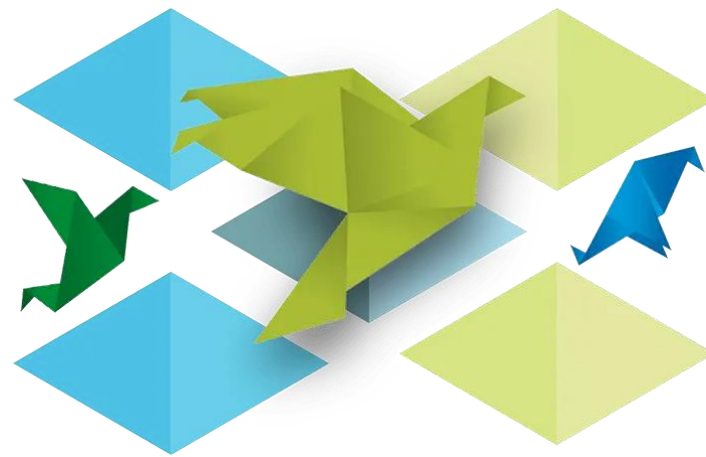


As part of this enhancement, **an internal register** has been implemented, divided into the “Accidents and Near Misses” and “Events” sections, to systematically monitor incidents, analyse them, and define appropriate corrective actions.

A dedicated Microsoft Teams channel has also been activated for the sharing of occupational health and safety documentation and procedures. Within this digital space, the **Risk Assessment Documents (DVR) and the health and safety organisation charts** specific to each Group site and company are made available, facilitating information access and dissemination among employees.



To ensure the maintenance of infrastructure and the proper archiving of documentation relating to periodic inspections, the Group uses its **proprietary software, SmartNebula**, which enables effective and traceable management of maintenance activities and checks on safety devices at its sites.



The entire process of recording, assessing, and managing of incidents is handled directly by the Facility Management Team through the Events Register, reinforcing a preventive and proactive approach to safety.

Maps Group’s activities do not present significant critical issues in terms of workplace safety. The main risk, considered low, is associated with the use of display screen equipment, while other minor risks relate to factors such as office lighting, microclimate, work-related stress, musculoskeletal disorders, electrical hazards, exposure to magnetic fields, and the risks of fire and earthquakes. To prevent these risks, the Group prepares and regularly updates the Risk Assessment Document (DVR) in compliance with regulatory standards and periodically verifies the skills of emergency response personnel.

Attention to workplace safety is further demonstrated by periodic inspections of company sites, involving dedicated personnel and the Head of the Prevention and Protection Service (RSPP). In addition, all Group buildings are maintained in safe condition through a structured mandatory maintenance programme for equipment and systems, monitored via a compliance schedule.

Alongside mandatory occupational health and safety training, Maps Group disseminates documentation on best practices for remote work and related risks through the company portal, Sharing Maps Group. Every identified risk or incident is addressed through corrective actions, regular audits, and the Events Register, which enables continuous monitoring of residual risk.

When the installation of hardware equipment is outsourced to subcontractors, the direct involvement of the suppliers is required to coordinate installation and provide training at the client’s premises. Where necessary, preliminary coordination meetings are organised with the client’s Head of the Prevention and Protection Service to draft and share the DUVRI (Single Document for the Assessment of Interference Risks).

In addition, in coordination with the tender team, checks are carried out on the technical and professional suitability of subcontractors, verifying their compliance with safety regulations and the validity of the mandatory documentation required under Legislative Decree 81/2008, thereby ensuring safe and compliant management of outsourced activities.

Thanks to thorough risk analysis and the implementation of numerous safety measures, no cases of occupational diseases or serious workplace accidents occurred in 2024, with the exception of one commuting accident that resulted in an absence of 101 days (including public holidays) and one near miss recorded in the Accident Register. However, two additional commuting accidents were reported, which were promptly managed and analysed in order to identify and implement corrective measures.

The Group aims to introduce additional health and safety controls in 2025.





SI-15 – WORK-LIFE BALANCE

Maps Group protects the right of all employees to take **parental leave**, actively supporting both mothers and fathers in reconciling professional and family responsibilities.

PARENTAL LEAVE 2024	MALE	FEMALE	TOTAL
EMPLOYEES WHO TOOK PARENTAL LEAVE DURING 2024	7	5	12
OF WHICH STATUS AT 31.12.2024			
STILL ON LEAVE	-	1	1
RETURNED AND STILL EMPLOYED	7	4	11
OF WHICH RESIGNED	-	-	-
RETURN TO WORK RATE AT 31.12.2024	100%	80%	92%
EMPLOYEES WHO TOOK PARENTAL LEAVE DURING 2023	6	6	12
OF WHICH STATUS AT 31.12.2023			
STILL ON LEAVE	-	3	3
RETURNED AND STILL EMPLOYED	6	3	9
OF WHICH RESIGNED	-	-	-
RETURN-TO-WORK RATE AS OF 31.12.2023	100%	50%	75%
EMPLOYEES WHO TOOK PARENTAL LEAVE DURING 2023	6	6	12
OF WHICH STATUS AS AT 31.12.2024			
STILL ON LEAVE	-	-	-
RETURNED AND STILL EMPLOYED	5	6	11
OF WHICH RESIGNED	1	-	1
RETENTION RATE AT WORK AS OF 31.12.2024	83%	100%	92%

In line with the current regulations, the Group adopts inclusive and flexible policies designed to address individual needs and promote family well-being, as well as gender equality. Particular reference is made to the **Maps Habitat** project, the results of which are reported in **Paragraph 1-5 – Energy consumption and mix.** Among its objectives, the project aims to ensure work-life balance.

In addition, the Maps Group welfare plan includes a fund to cover education and childcare expenses for employees’ children.



MAPS HABITAT  
TEAMWORK FROM REMOTE

Launched in September 2019, the **Maps Habitat** project aims to support the well-being and needs of people, enabling better time management through various work arrangements and thereby improving work-life balance.

Maps Habitat seeks to create a professional environment that fosters talent, growth, and autonomy through a work organisation model based on objectives and trust. It also offers employees the opportunity to achieve cost savings by reducing home-to-work commuting expenses. Lower commuting levels also bring clear environmental benefits by reducing emissions from the use of transport to reach the office. The ideal “Habitat” that enables such growth is built on trust, reliability, quality of life, connections, and relationships.

TELEWORKING AND FLEXIBLE HOURS

The new work model allows all employees to choose from nine weekly plans (“Habitat”) that enable them to alternate between days in the office and days working remotely, according to their individual needs. This system offers flexible working hours, promoting a better work-life balance.

The Group provides a daily allowance of €2 to cover connection costs associated with teleworking. In addition, each employee may choose to receive, on a free-loan basis, one of the following pieces of equipment:



Ergonomic chairs  
with armrests



Monitor



Posture kit: keyboard, mouse,  
PC booster and footrest

These items are provided in addition to the laptop and other remote communication and collaboration devices already supplied by Maps Group to all employees.





## TEAMWORK

Maps Habitat ensures the continuity of teamwork both remotely and on-site, promoting the exchange of ideas and collaboration. The initiative requires that each programme includes a few hours per week of team members working together in person, as well as one full day in the office for group meetings. To further strengthen team cohesion, the Group has allocated a budget for each work team to organise team-building moments, such as lunches. Maps Group is also open to supporting employees who wish to arrange other social gatherings, such as Christmas toasts or after-work aperitifs.

In addition, technological tools for online collaboration have been introduced, and company spaces have been reorganised as meeting places, with more meeting rooms and shared rotating desks, as the offices are designed as spaces for interaction rather than for individual work.

Since 2023, Maps Group has also offered all employees the opportunity to combine work and holidays, allowing them to work remotely for up to three consecutive weeks per year from the location of their choice. The aim is to extend this work arrangement to any new companies that may be acquired.

For 2025, the Group plans to organise dedicated webinars with qualified personnel on the subject of parental leave, with the aim of facilitating the understanding of the relevant regulations and enabling employees to fully exercise their rights.



## S1-17 – INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

During the reporting period, no incidents of discrimination were identified within Maps Group. Similarly, no reports were received through dedicated channels (such as grievance mechanisms or whistleblowing procedures) relating to discriminatory behaviour or violations of human rights. Furthermore, there were:

- no sanctions, penalties, or compensation paid in connection with incidents of discrimination or related complaints;
- no severe human rights violations involving the workforce;
- no sanctions, penalties, or compensation paid as a result of human rights-related incidents.

All of the above data are consistent with the quantitative information contained in the annual financial statements.

## HIGHLIGHTS

### 6. CLIENTS



0%  
PENALTIES



87%  
LOYALTY

CUSTOMER INVOLVEMENT IN STAKEHOLDER ENGAGEMENT  
FOR DOUBLE MATERIALITY ANALYSIS

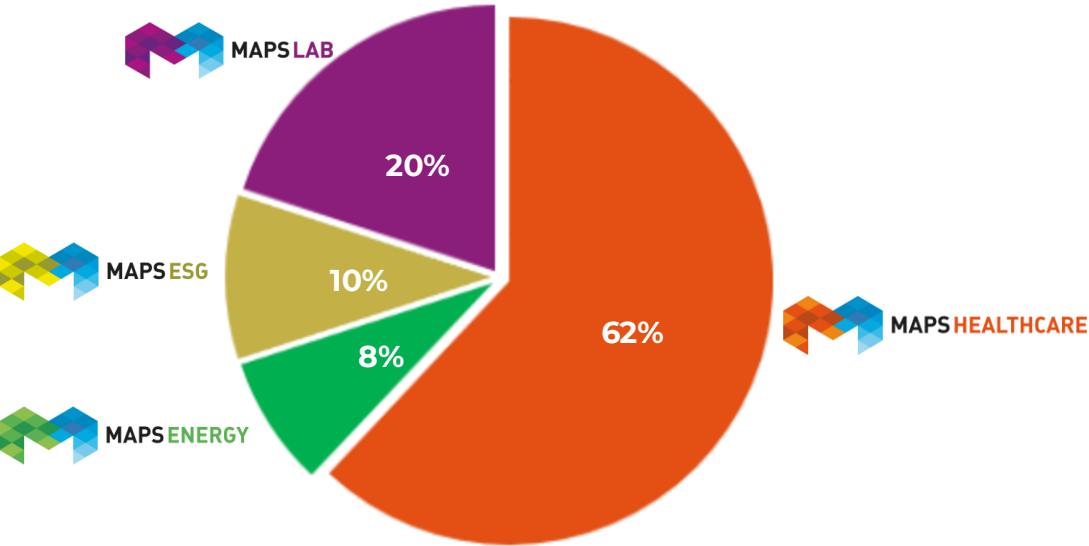




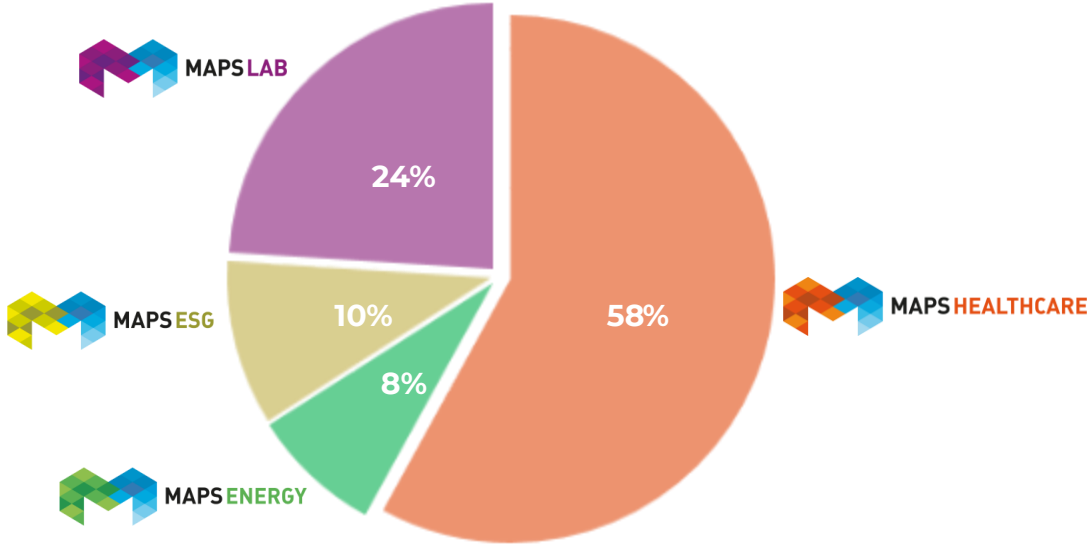
6.1 ESRS S4 CONSUMERS AND END-USERS

The Group has a diversified customer base that has progressively expanded in recent years with the growth of the corporate perimeter. The chart below shows the number of end customers served, broken down by customer type, and highlights the markets in which the Group operates. The diagram also illustrates the breakdown of Maps Group’s revenues by market, based on the activities of its various Business Units. The data show that the Healthcare market continued to account for the largest share of Group revenue in 2024. The other Business Units reported stable results, with a slight decrease in the MapsLab BU.

BREAKDOWN OF REVENUES 2024



BREAKDOWN OF REVENUES 2023



CUSTOMER SATISFACTION

In order to monitor the level of customer satisfaction, during the year, several representative KPIs were recalculated, providing an objective assessment of the degree of the clients’ satisfaction: Penalties. In fact, by comparing the total amount of penalties with the Group’s total revenues, we obtain an objective and representative indicator of the level of customer satisfaction. The maintenance of the figure recorded in 2023 reflects the quality of the services offered by Maps Group



PENALTIES

2024

0,00%

2023

0,00%

CUSTOMER LOYALTY

Customer loyalty is an important KPI that measures the willingness of clients to continue choosing our solutions and services. Specifically, we have decided to assess customer loyalty by monitoring the percentage of customers who, during the year, chose to continue using our products. As can be seen, while customer loyalty remains positive, it shows a slight decrease, which will be duly taken into account by the management of Maps Group.



CUSTOMER  
LOYALTY

2024

87%

2023

91%

STRATEGY

ESRS 2 SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

The Group's customers were involved in the double materiality analysis process by means of a survey proposed to a selected number of clients pre-identified by each Business Unit Manager.

For more information on the double materiality analysis carried out by Maps Group, please refer to the section [“GENERAL INFORMATION - ESRS 2 SMB-2 Interests and Views of Stakeholders”](#).

ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODE

The strategic management of risks, opportunities and impacts related to Consumers, Customers and End Users is a central element for the sustainable growth of Maps Group.



Identifying and enhancing opportunities related to **staff training, data protection, innovation, and customer engagement** can generate economic, competitive, and reputational benefits. At the same time, a lack of investment in innovation and development could entail tangible risks in terms of customer satisfaction and loss of competitiveness, making a proactive and integrated approach to evaluating these factors essential.

For further details on the double materiality analysis carried out by Maps Group, please refer to the section **GENERAL INFORMATION – ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks, and opportunities** and the section **ESRS 2 SBM-3 Relevant impacts, risks, and opportunities and their interaction with the strategy and business model**.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### S4-1 POLICIES RELATED TO CONSUMERS AND END-USERS

Customer relations are duly addressed in the Group's Code of Ethics, which promotes communication based on completeness, transparency, collaboration, and courtesy, as well as innovation as a core value underpinning the Group's activities. It is also considered of primary importance that the market operates on the basis of fair and equitable competition.

Customers are also given due attention with regard to quality, safety, and data confidentiality, including privacy.

For further details, please refer to the section **Data Privacy, Data Security and Cybersecurity (Entity-Specific)** and the **section Intellectual Property and Competitive Behaviour (Entity-Specific)**.

### S4-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

Maps S.p.A. has established a structured system to prevent, mitigate, and remedy negative impacts on consumers and end users, providing several communication channels, including the email address **marketing@mapsgroup.it**, the role of the Client Manager as the direct contact for receiving and managing reports, and a whistleblowing procedure compliant with Legislative Decree 24/2023 that ensures the confidentiality of the whistleblower.

These tools are made accessible via the company website and contractual documentation, while the effectiveness of the system is monitored through the recording and analysis of reports, verification of response times and quality, and internal audits aimed at the continuous improvement of the issue management system.

### S4-4 TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

For more information on the innovation and research and development, please refer to the Paragraph **"Intellectual property and competitive behaviour MDR-A ACTIONS"**







## HIGHLIGHTS

# 7. GOVERNANCE



0  
CASES OF CORRUPTION

## DISSEMINATION OF BUSINESS CULTURE



INTERNAL  
NEWSLETTER



COMPANY  
EVENTS



TEAM BUILDING  
ACTIVITIES



REGULAR  
TRAINING



COMPANY OFFICES AS PLACES FOR  
INTERACTION AND EXCHANGE



MANAGEMENT INVOLVEMENT  
IN THE SHARING OF CORPORATE VALUES

## 7.1 ESRS G1 BUSINESS CONDUCT

### GOVERNANCE

#### ESRS 2 GOV-1 THE ROLE OF THE ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES

For information on the role and composition of the administrative, management and control bodies of Maps Group, please refer to the section ["GENERAL INFORMATION – GOV-1 – Role of the Administrative, Management and Control Bodies."](#)

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### ESRS 2 IRO-1 DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Through its double materiality analysis, Maps Group has identified three material topics related to business conduct, which are fundamental to its operations: **corporate culture, whistleblower protection, and active and passive corruption.**

Promoting ethical, transparent, and fair business practices — **supported by a solid and diversified governance structure and the adoption of dedicated policies** — is a priority for the Group, both for its positive impact on internal and external stakeholders and for the potential economic benefits in terms of increased market value, additional business opportunities, and enhanced reputation. **Strengthening corporate culture** and **protecting whistleblowers** are not only legal requirements but are also essential for the business, growth, and the reputation of Maps Group.

**Active and passive corruption** represents a tangible risk for Maps Group, mainly due to its interactions with external stakeholders, including public administrations. Any incidents of corruption and/or breaches of anti-corruption regulations could have serious financial repercussions for the Group, potentially leading to loss of business opportunities as stakeholders may be reluctant to collaborate with a company involved in unethical practices. Furthermore, the Group could face substantial costs from sanctions.

Maps Group recognises that maintaining robust practices against active and passive corruption, as outlined in its Code of Ethics, is essential for the sustainability of its business in both the short and the long term. To this end, it has implemented measures, procedures, and the Code of Conduct to prevent, detect, and minimise the risk of corruption-related offences and to report any incidents of corruption.

For further details on the double materiality analysis carried out by Maps Group, please refer to the section ["GENERAL INFORMATION – ESRS 2 IRO-1 Description of the processes to identify and assess relevant impacts, risks, and opportunities"](#) and the section ["ESRS 2 SBM-3 Relevant impacts, risks, and opportunities and their interaction with the strategy and business model."](#)



## G1-1 CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

As mentioned previously, Maps Group adopts corporate policies inspired by principles of ethics, integrity, and responsibility, formalised in the **Code of Ethics** and the **Code of Conduct** — key documents that guide the behaviour of employees, collaborators, and stakeholders. These principles are incorporated and further detailed in the Organisational **Model 231** and the **Company Regulations**, and are actively promoted through tools and initiatives that foster the dissemination of **corporate culture**, such as the internal newsletter Sharing Maps Group, corporate events and team-building activities, recurring training sessions, direct involvement of the management in sharing corporate values, enhancement of office spaces as places for interaction and exchange, and the constant availability of institutional content on the official Maps Group website.

## G1-3 PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

The Group has implemented measures, procedures, and the Codes of Conduct to prevent, detect, and minimise the risk of corruption-related offences, as provided for in Articles 318 et seq. of the Italian Penal Code. In addition, an internal whistleblowing system is available to report any incidents of workplace corruption.

All employees, including the highest governance bodies, receive continuous training and updates on anti-corruption as part of the training relating to the special section of Legislative Decree 231/2001.

For more detailed information, please refer to the section **“Supervisory Body” in ESRS GOV-1 Role of the Administrative, Management and Supervisory Bodies**, and to the section **Processes to remediate negative impacts and channels for own workforce to raise concerns” in S1-3**, which further details the whistleblowing system.

## METRICS

For 2025, the Group's Compliance function is working on increasingly efficient, flexible training sessions including practical explanations regarding concrete cases, involving legal experts on the subject of corruption.

## G1-4 INCIDENTS OF CORRUPTION OR BRIBERY

During the reporting period, as in the previous year, there were **no cases of violation of the regulations in force on active or passive corruption by the Group**, nor with reference to its employees.



## HIGHLIGHTS

# 8. ENTITY-SPECIFIC INFORMATION



CERTIFICATION BY ACN ("NATIONAL CYBERSECURITY AGENCY") OF SEVERAL TECHNOLOGICAL SOLUTIONS OF MAPS GROUPS SUCH AS GZOOM®, ROSE AND ZEROCODA®

RESEARCH AND DEVELOPMENT  
EXPENDITURE AS % OF REVENUES



10,3%  
IN 2024



9,7%  
IN 2023



ESTABLISHMENT OF THE  
CYBERSECURITY TABLE



GZOOM®  
AS A TOOL FOR  
RISK ASSESSMENT





## 8.1 RISK MANAGEMENT AND BUSINESS CONTINUITY

### (ENTITY-SPECIFIC)

An effective risk management system is essential to safeguarding the stability and growth of Maps Group, as the absence of such an approach — or an inadequate one — can significantly compromise the business. In particular, the integrated analysis of impacts, risks, and opportunities makes it possible to proactively identify critical issues, seize growth opportunities, and strengthen organisational resilience, including sustainability-related risks, to the benefit of financial performance, operational continuity, and long-term value creation.

Maps Group regularly reviews **its risk profile within an integrated risk management framework**, taking into account the various aspects emerging from the double materiality analysis. This activity makes it possible to identify and assess risks that may be material to the business and to stakeholders, including those of an economic, environmental, social, and governance nature. Based on this analysis, the company implements preventive and corrective measures aimed at mitigating identified risks and ensuring the operational continuity and sustainability of its business model.

### MDR-P POLICIES

The policies relating to risk management can be found in the documentation associated with the certifications obtained by the companies of Maps Group. These include the policies and **documentation relating to ISO 9001, ISO 27001** (with its extensions 27017 and 27018), privacy, gender equality, occupational health and safety, and certified medical devices.

### MDR-A ACTIONS

In 2024, Maps Group initiated the process aimed at obtaining, in 2025, specific certifications for certain healthcare technology solutions, such as medical devices, which **required dedicated risk analyses**, namely:



**With reference to Privacy**, the function in charge periodically carries out both enhanced risk analyses and specific DPIAs - Data Protection Impact Assessments.

For more information, please refer to the next paragraph **"Data Privacy, Data Security and Cybersecurity"**.

Maps Group periodically conducts, through the Compliance function, specific **Business Impact Analyses (BIA)** for each business line within the scope of its **integrated ISO 9001-27001 system**. This process is designed to determine the effects of a **business interruption on services**. The BIA identifies how quickly each project/service must be restored to operational status following a disaster scenario.

The purpose of the BIA is to define measures to mitigate risks and prevent service unavailability. Business impacts are assessed based on a worst-case scenario, assuming that the physical infrastructure has been destroyed and that all records, equipment, and other assets are inaccessible. The objectives of the BIA are to:

- assess financial impacts, assuming the worst-case scenario;
- assess intangible (operational) impacts, assuming the worst-case scenario;
- identify the maximum estimated recovery time.

**In 2024**, the Group also began using its **proprietary software, GZOOM®**, for integrated risk assessment management in relation to Legislative Decree 231/2001.

All risks mentioned in the double materiality analysis are taken into account in the implementation of Maps Group's activities and in the relevant sections of this report.

### MDR-O TARGETS

**Among the Group's objectives** is the ongoing updating of the enhanced risk analyses already carried out on its technology solutions, as well as the development of additional analyses.

**In the medium term**, Maps Group aims to obtain ISO 42001 certification in the field of Artificial Intelligence.



## 8.2 DATA PRIVACY, DATA SECURITY AND CYBERSECURITY

### (ENTITY-SPECIFIC) (GRI 418-1)

Data protection and cybersecurity are increasingly important strategic priorities for Maps Group and are managed through the Compliance function and the Privacy Office, with the support of specialised personnel and consultants. On one hand, non-compliance with privacy and data security regulations can expose the organisation to **significant risks**, including legal sanctions, reputational damage, additional operating costs, and potential business disruptions in the event of breaches or cyber incidents.

On the other hand, adopting a proactive approach enables the Group to **turn privacy and cybersecurity management into a tangible value-creation opportunity**, as products and technology solutions with specific certifications bring a competitive advantage in the market.

Among the main benefits expected by Maps Group are enhanced operational reliability, access to new markets, strengthened corporate reputation, and competitive advantage.

### MDR-P POLICIES

**The Group's Privacy Manual** is the reference document for managing and overseeing activities involving the processing of personal data, in compliance with Regulation (EU) 2016/679 (GDPR) and the applicable national legislation.

It sets out the procedures for processing personal data relating to both internal stakeholders (employees, collaborators, directors) and external stakeholders (customers, suppliers, users, partners), ensuring transparency, fairness, and security in all operations.

### The Manual is structured into a set of tools and operational documents, including:

- Register of personal data processing activities, maintained and updated through the GZOOM® software.
- Privacy organisation chart, defining internal responsibilities (Data Controller, DPO, privacy contacts, authorised processors), promoting a clear chain of responsibility and accountability.
- Enhanced risk analyses, conducted periodically on Maps Group's technology solutions to identify, assess, and mitigate potential risks arising from data processing, including the preparation of DPIAs (Data Protection Impact Assessments) where required. DPIAs are prepared internally in all cases where Maps Group acts as Data Controller. In cases where Maps Group acts as Data Processor, it may be required to cooperate with the end client to ensure the proper drafting of the DPIA.
- Privacy notices and consent forms, prepared according to the principle of transparency and differentiated by data subject type, channel, and purpose of processing.
- Formal appointments of authorised data processors, defining roles and operational instructions, and of System Administrators, in accordance with the criteria set out in the Privacy Authority's guidelines.
- Privacy training registers, documenting the training activities carried out to ensure Maps Group staff is aware of and competent in data protection matters.
- Contracts and engagement letters with Data Processors and Sub-processors, governing relationships with external parties processing data on behalf of the Group, ensuring contractual compliance and adherence to appropriate security measures.
- **ISMS – Information Security Management System, described in the Operating Manual adopted in accordance with ISO/IEC 27001, supporting integrated governance across data privacy, data security, and cybersecurity.**
- Video surveillance documentation, including specific notices, legal basis for processing, retention periods, and measures to protect the data collected.

### The privacy management system is also underpinned by:

- **The Code of Ethics**, which expressly refers to the protection of privacy and the proper use of personal and confidential information.
- **The Code of Conduct**, which sets out behavioural standards, including those relating to data management. The document expressly refers to and incorporates, with respect to the rules of conduct to be followed, the Code of Conduct for the Processing of Personal Data for Commercial Information Purposes, approved on 29 April 2021 by the Italian Data Protection Authority..





- **The Data Retention Policy**, which precisely defines the retention periods for personal data in cases where the Group acts as Data Controller, in compliance with the principle of storage limitation.

### ISO:27001 Certification

Maps Group, through its subsidiaries Maps S.p.A., Artexe S.p.A., I-Tel S.r.l., and IASI S.r.l., has also obtained ISO 27001 certification.

The system consists of a Policy, Internal Procedures, and a Guidelines Manual, which are periodically updated.

These policies, aligned with European regulations and international best practices, take into account the interests and needs of key stakeholders. Their definition and review are carried out in accordance with the Group's values, with the aim of ensuring integrity, trust, and sustainability in relations with all stakeholders.

### MDR-A ACTIONS

The internal Privacy Team, composed of employees and supported by external consultants, works in collaboration with an external Data Protection Officer (DPO), as required by GDPR 679/2016. Through weekly sessions, the DPO supports the Privacy Team in identifying and addressing any shortcomings in data processing.

For new staff and delivery consultants, **a training programme** is in place that, in addition to the course on data security and protection (ISO 9001 and ISO 27001), includes an initial session on the fundamental principles of the GDPR, followed by a second session focusing on the technical aspects of privacy. Training is periodically updated, and **ad hoc sessions** are organised to explore specific topics depending on work areas and roles, taking into account regulatory changes and their impact on the products and services offered.



The Privacy Team, also in coordination with the Compliance function, carries out activities aimed, among other things, at:

- Monitoring the ongoing maintenance and updating of the Register of Processing Activities;
- Promptly appointing System Administrators;
- Managing joint controllership agreements between Group companies on privacy matters;
- Periodically updating, from a technical standpoint, the proprietary GZOOM® solution used as the Register of Processing Activities;
- Periodically analysing the Group's solutions and services to assess and mitigate product-related risks, also through the use of the proprietary GZOOM® solution;
- Updating privacy documents and policies;
- Conducting enhanced risk assessments, followed by the remediation of gaps in security measures;
- Responding to client audits;
- Identifying personnel requiring ad hoc training.

**In the area of Cybersecurity**, in line with what was outlined in the 2023 Report, certification was obtained from the **ACN (Agenzia per la Cybersicurezza Nazionale – National Cybersecurity Agency)** for certain Maps Group technology solutions, including GZOOM®, Rose, and ZeroCoda®, thereby demonstrating compliance with the requirements of the new National Cybersecurity Agency for the provision of cloud services to the Public Administration. This qualification ensures the highest levels of security for cloud platforms provided to the Public Administration in accordance with specific security standards.

**A Cybersecurity Committee** has been established, composed of the Privacy Team, the Compliance function, and the R&D Team, which meets periodically.

On the technical front, **data encryption has been introduced for certain healthcare solutions**, along with the implementation of MFA (Multi-Factor Authentication).

### MDR-M METRICS

In 2024, no substantiated complaints were recorded within Maps Group regarding customer privacy violations or the loss of personal data, confirming the Group's ongoing commitment to data protection and regulatory compliance. Overall, one data security incident was identified within the Group; however, it did not constitute a data breach as defined by Regulation (EU) 2016/679 (GDPR).

No reports were received pursuant to Legislative Decree 231/2001.



MDR-T TARGETS

Among its strategic objectives for 2025, the Group aims, among other things, to obtain qualification as an “Important Entity” compliant with the requirements of the European NIS 2 Directive, thereby strengthening its position in the field of cybersecurity and its ability to operate as a reliable partner for entities and organisations subject to high network and information system security standards.

In the medium term (by October 2026), Maps Group intends to achieve full alignment with all requirements of the European NIS 2 Directive on cybersecurity.

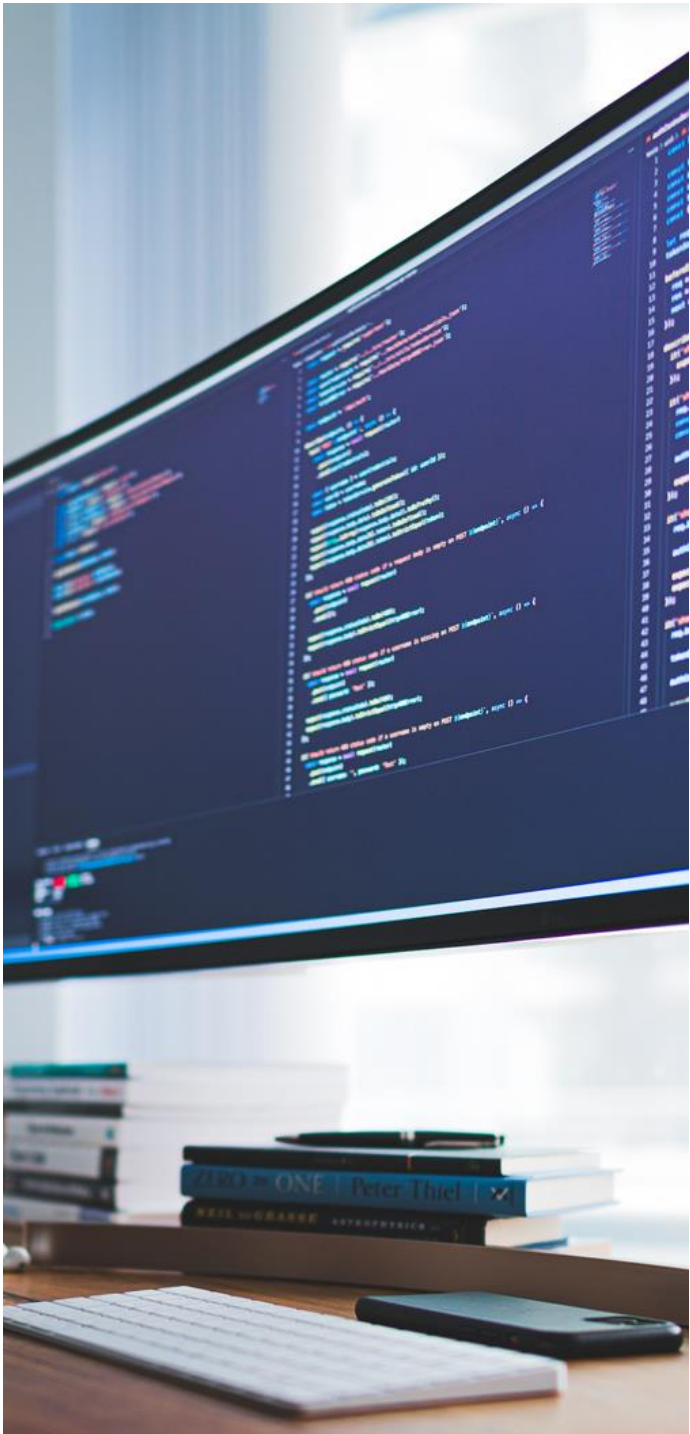
8.3 INTELLECTUAL PROPERTY AND  
COMPETITIVE BEHAVIOUR

(ENTITY-SPECIFIC) (GRI 206-1)

The protection of intellectual property represents an important strategic lever for Maps Group to consolidate its competitive advantage and generate new revenue opportunities through royalties, licences, and the valorisation of intangible assets. Ongoing investment in research and development is essential to sustaining innovation, while any shortfall in this area could have significant economic implications, including loss of market position and missed growth opportunities.

MDR-A ACTIONS

Maps Group has an organisational unit with the specific objective of identifying market challenges and opportunities, assessing the feasibility of potential solutions, and developing and implementing those selected to address the identified market needs. Proprietary solutions developed by Maps Group through the R&D Business Unit are then handed over to the market-focused Business Units for commercial go-to-market and delivery. The BU plays a crucial role in corporate innovation, managing technological innovation projects and leveraging public funding and resources from the National Recovery and Resilience Plan (PNRR) to maximise available resources.



It works closely with the academic community, also contributing to student training by offering the opportunity to prepare theses within the company, participate in seminars, and provide support to doctoral candidates. Through these interactions, the company is able to identify market needs and develop innovative software solutions, ensuring continuous growth and a competitive edge.

The partnership with academia therefore benefits both the company and educational institutions, creating an environment conducive to the development of new ideas and talent.

As part of its activities in this area, the Legal Department supports the enhancement of intangible assets, handling the registration of trademarks, the filing of patents, and their subsequent maintenance and monitoring, thereby contributing to the protection and development of the Group’s intellectual property portfolio.

During the year, Maps Group collaborated with major national and European research centres in various initiatives, receiving funding from third parties, including the European Union. The objective of these projects is the further development and implementation of the Group’s technology solutions. The following table presents all new initiatives in which Maps Group participated and the funding received for the year, specifying the beneficiary company within the Group.





PROJECT	ENTITY	TOTAL AMOUNT OF FUNDING	DESCRIPTION	AMOUNT 2024	BENEFICIARY	PROJECT DURATION
HELIOS	Consortium Bi-Rex	110.334,00 €	<p>HELIOS Project – Holistic Energy-efficient Living and Integrated Optimization System.</p> <p>A project in which MAPS participates together with a consortium.</p> <p>The HELIOS project aims to develop a prototype of a Digital Twin — an evolution of the current BIM-based management of a constructed building — into a real-time, adaptive version integrated with the external ecosystem (e.g., other stakeholders or systems), equipped with connected, interoperable, and sustainable technologies that enable the monitoring and optimisation of energy resource use.</p> <p>The solution will allow property managers to:</p> <ul style="list-style-type: none"><li>• simulate the building's energy profile;</li><li>• enrich it with real field data (e.g., user behaviour);</li><li>• reconfigure processes for optimal space management, including maintenance planning.</li></ul> <p>Ultimately, the project seeks to improve the building's energy efficiency and performance in terms of occupant comfort, accelerating the adoption of a data-driven and model-based approach to facility management. HELIOS also aims to contribute to achieving climate neutrality, referencing the standards of the EU "Fit for 55" package, which attributes 40% of final energy consumption to buildings and encourages improving the energy performance of 75% of the building stock.</p>	65.586,00 €	Maps Sp.A.	FROM 01/01/2024 TO 30/06/2025 (18 months)
PROGRESS	UNIBZ	99.171,98 €	<p>PROGRESS Project – Digitalisation and Innovation for the Energy Efficiency of Local Communities.</p> <p>With the PROGRESS project, we aim to demonstrate how the intelligent application of digitalisation can support an energy cooperative such as CEIS in achieving its objectives:</p> <ul style="list-style-type: none"><li>• maximising self-balancing, both locally and overall;</li><li>• ensuring maximum grid stability through innovative approaches to congestion management.</li></ul> <p>The project's main activities include:</p> <ul style="list-style-type: none"><li>• digital modelling of the grid;</li><li>• use of artificial intelligence techniques to forecast consumption and non-dispatchable renewable energy generation;</li><li>• optimisation of grid efficiency and balancing;</li><li>• simulation of virtual assets, such as distributed storage systems.</li></ul> <p>These tools will enable CEIS to study and validate alternative scenarios to improve its energy efficiency.</p> <p>The results of PROGRESS could serve as a benchmark for other energy cooperatives in the region, making a tangible contribution to a more sustainable energy future.</p>	60.040,00 €	Energenius S.r.l.	FROM 15/06/2024 TO 15/09/2025 (15 months)

PROJECT	ENTITY	TOTAL AMOUNT OF FUNDING	DESCRIPTION	AMOUNT 2024	BENEFICIARY	PROJECT DURATION
META	FILSE S.p.A.	230.015,85 €	<p>Project in which Maps S.p.A. participates together with a consortium (led by Ansaldo)</p> <p>Regional Programme ERDF 2021–2027 – Priority 1: Development and strengthening of the competitiveness and attractiveness of the Ligurian system, with particular focus on innovation, digitalisation, and capacity building. Specific Objective 1.1: Develop and strengthen research and innovation capacity and the introduction of advanced technologies. Action 1.1.1 – Call for proposals: SUPPORT FOR THE IMPLEMENTATION OF INDUSTRIAL RESEARCH AND EXPERIMENTAL DEVELOPMENT PROJECTS BY COMPANIES AFFILIATED WITH RESEARCH AND INNOVATION CLUSTERS.</p> <p>The project involves the development of a new zero-carbon-footprint microturbine, starting from the current AE-T100 natural gas model, and studying its performance with hydrogen-based fuels.</p>	119.906 €	Maps Sp.A.	FROM 01/04/2024 TO 31/12/2024
HARMONISE	Harmonise, European Research Council,	574.875,00 €	<p>HARMONISE (Hierarchical eneRgy MONItoring and control System for smart-grid intEgration) is a project funded by the European Union under the Horizon Europe programme, aiming to revolutionise the way energy is managed, distributed, and consumed within urban districts.</p> <p>Its main goal is to develop an end-to-end solution for the creation and the management of Positive Energy Districts (PEDs) — urban areas capable of producing more energy than they consume on an annual basis.</p>	47.888,80 €	Maps Sp.A.	FROM 1/06/2024 (42 months)

Maps Group has also continued with commitment the projects initiated in previous years. The details provided in the table above include the start date of each project and the respective contributions received during the financial year ended 31 December 2024.

**In 2024 alone, a share of 10.3% of total revenues was invested in research and development, up from 2023 (9.7%).** This further confirms Maps Group's continuous commitment to identifying customer needs and finding the most suitable and sustainable solution for them in the long term.

MDR-M METRICS

All Group companies are committed to competing fairly, avoiding anti-competitive behaviour and violations of antitrust laws.

During 2024, as in 2023, no episodes of anti-competitive behavior were detected or reported.

MDR-P POLICIES

Maps Group attaches great importance to fair and fair competition in the market.

This principle is also crystallized in the **Group's Code of Ethics** where a specific paragraph on Competitive Practices is provided.





**MAPS GROUP**  
SHARING KNOWLEDGE

Approved by the Board of Directors of Maps S.p.A. on 01/08/2025