



ESG DATA ADDENDUM

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Introduction

This section provides additional and voluntary information on the Reply Group's sustainability topics for the year 2025. This information is disclosed for transparency purposes, stakeholder communication, and to support information requests from ESG ratings and international standards. In this context, since 2021 Reply has adhered to the **United Nations Global Compact** committing to support the Ten Principles on human rights, labour, environment, and anti-corruption promoted by the initiative, as well as to contribute to the achievement of the Sustainable Development Goals (SDGs).

The information presented in this chapter covers a range of environmental, social, and governance topics, selected to provide a broader view of the Reply Group's sustainability practices and performance. The chapter is organized into sections dedicated to Environmental, Social, and Governance Information, and also provides an overview of the certifications adopted and the ESG ratings obtained by the Group.

In the environmental context, the chapter includes data relating to waste management and water and energy consumption. Social information concerns the presence of vulnerable groups, employment conditions, coverage of collective bargaining agreements, as well as initiatives and data related to training and skills development. This section also includes information on supplier selection and evaluation processes.

With reference to governance, the chapter provides information on compliance with the Code of Ethics and the 231 Model, as well as on payment practices.

For a complete and comprehensive overview of the Reply Group's sustainability disclosures, please refer to the [Consolidated Sustainability Statement](#) included in the Annual Financial Report.

Certifications

Reply has implemented an integrated management system grounded in internationally recognized standards, ensuring the quality of processes, information security, and compliance with environmental and social requirements.

CERTIFICATION	DESCRIPTION	SCOPE
ISO 9001	Quality Management System	Reply Group.
ISO 14001	Environmental Management System	Reply S.p.A., Reply Ltd, Reply Deutschland SE, Reply Public Sector Consortium, member companies of the consortium in major European locations.
ISO 14064	Organizational Carbon Footprint	Reply S.p.A., Reply Public Sector Consortium, member companies of the consortium.
ISO/IEC 27001	Information Security Management	Reply S.p.A. (on internal services) and some group companies for which it is relevant to the services provided.
ISO 37001	Anti-Bribery Management System	Reply S.p.A., Reply Public Sector Consortium, member companies of the consortium.
ISO 42001	AI Management System	Group companies for which it is relevant to the services provided.
ISO 45001	Occupational Health and Safety Management System	Reply S.p.A., Reply Deutschland SE, Reply Ltd and part of the member companies of the consortium.
UNI/PdR 125:2022	Gender Equality Certification	Reply S.p.A., Reply Public Sector Consortium and part of the member companies of the consortium.
TISAX	Adoption of the Trusted Information Security Assessment eXchange standard	Reply S.p.A., Reply Public Sector Consortium, member companies of the consortium and Group companies for which it is relevant to the services provided.
CyberEssentials	Cybersecurity (UK Standard)	Group companies for which it is relevant to the services provided.

ESG Rating

The Reply Group participates in internationally recognized ESG assessment initiatives to support transparency towards stakeholders, investors, and business partners. In particular, the Group takes part in the Carbon Disclosure Project (CDP) reporting processes, annually completing environmental questionnaires related to climate topics, demonstrating its commitment to the structured disclosure of its environmental performance: the score achieved for 2025 was B.

In addition, Reply participates in major ESG ratings, including EcoVadis, S&P, FTSE Russell, MSCI Ethifinance, Sustainalytics, Synesgy, Open-es, Technology Sustainability Index, IntegrityNext, and FuturePlus.

Environment information

WASTE

Reply monitors the waste generated at its offices, classifying it according to its hazardousness and the type of treatment operation. The aim is to ensure accurate reporting and to promote the continuous improvement of the Group's environmental performance.

Waste recovered or disposed of in 2025:

WASTE OPERATIONS	2025			
	HAZARDOUS (TONNES)	NON HAZARDOUS (TONNES)	TOTAL (TONNES)	% OVER TOTAL
Preparation for reuse	0	0	0	0
Recycling	0.17	3.02	3.19	4.4%
Other recovery operations	0.24	69.52	69.76	95.6%
Directed from disposal (incineration/landfilling))	0	0	0	0
Total	0.41	72.55	72.96	-
% over total	0.6%	99.4%	-	100%

WATER

The Group's office water consumption is monitored, and the reporting of water usage volumes supports the overall assessment of environmental performance as well as the continuous improvement of resource management processes.

Total water consumption in 2025:

WATER CONSUMPTION (CUBIC METERS)
2025
65,638

ENERGY

The Group monitors the energy consumption of its offices. It implements efficiency measures at its operating sites, such as the use of low-consumption LED lighting systems and the progressive optimization of technological infrastructure, in order to reduce consumption and improve overall energy management.

Total energy consumption in 2025 by source:

	2025
Total electricity consumption (MWh)	12,602
Total consumption of liquid fuels (MWh)	17,391
Total gas consumption (MWh)	3

Social information

VULNERABLE GROUPS

Reply adopts policies aligned with national regulations concerning vulnerable groups in all the countries in which it operates, with the aim of promoting their social and professional inclusion. Vulnerable groups consist of individuals who present a specific condition or characteristic (for example economic, physical, political, or social) that makes them more exposed to negative impacts related to the organization's activities, as defined by the GRI standard.

The number of employees belonging to vulnerable groups¹ is 674, representing 3.9% of the workforce. Among employees belonging to vulnerable groups are employees with disabilities, totalling 224. The percentage of employees with disabilities is 1.31%.

DIVERSITY METRICS

This paragraph aims to provide an overview of gender diversity at top management level and the age distribution of the company's employees.

The following table shows the gender distribution, both in absolute numbers and as a percentage, at top management level².

EMPLOYEES (NUMBER OF PEOPLE)	MALE	FEMALE	OTHER	NOT DISCLOSED
Number at top management level	435	62	0	1
Percentage at top management level	88%	12%	0%	0.2%

Below are the data on the distribution of employees by age group.

EMPLOYEES (NUMBER OF PEOPLE)	< 30 YEARS OLD	30 ≤ X ≤ 50	> 50 YEARS OLD
	7,238	8,448	1,387

¹ The data refer to Italy, Brazil, Romania, the United States (excluding Root16, a recent acquisition of the Reply Group), Germany, and Poland for 2025.

² Senior management refers to Group roles with managerial responsibilities that fall within the first and second levels below the administrative and supervisory bodies, across both internal functions and business activities.

NUMBER OF EMPLOYEES BY CATEGORY, GENDER AND AGE GROUP:³

CATEGORY	AGE GROUP	MALE	FEMALE	NOT DISCLOSED
Executive	< 30 years old	1	0	0
	30 ≤ x ≤ 50	276	43	1
	> 50 years old	158	19	0
Manager	< 30 years old	26	14	0
	30 ≤ x ≤ 50	1,487	494	2
	> 50 years old	364	95	3
Staff	< 30 years old	5,032	1,954	1
	30 ≤ x ≤ 50	4,114	1,894	5
	> 50 years old	431	208	2

WORKFORCE METRICS

This paragraph aims to provide an overview of metrics related to new hires, absenteeism and hours worked within the workforce. The information presented helps to describe workforce trends and certain relevant organizational dynamics during the reporting period.

The following tables show the total number of new hires, broken down by gender, age group, and geographic area⁴.

MALE

	NEW HIRES < 30 YEARS OLD	NEW HIRES 30 ≤ X ≤ 50	NEW HIRES > 50 YEARS OLD	TOTAL
Region 1	1,294	178	20	1,492
Region 2	221	149	21	391
Region 3	206	141	29	376

FEMALE

	NEW HIRES < 30 YEARS OLD	NEW HIRES 30 ≤ X ≤ 50	NEW HIRES > 50 YEARS OLD	TOTAL
Region 1	460	78	5	543
Region 2	65	48	5	118
Region 3	101	50	16	167

The overall absenteeism rate stands at 1.14%⁵.

	MALE	FEMALE	TOTAL
Hours worked ⁶	19,833,550.0	7,226,895.0	27,060,444.0

³ These data do not include interns or employees on non-guaranteed hours contracts.

⁴ Employees of Root16, a new acquisition of Reply Group, are not included in the metric. Interns and employees under non-guaranteed working hour contracts are not included.

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TRAINING

Reply invests in talent and skills development, promoting continuous training as an integral part of career paths. Some training activities are managed centrally to ensure consistency and quality of content, particularly those related to security, data protection, health and safety at work, human resources, soft skills, management, and project management.

Technical training and specialized certifications are organized independently by the individual Group companies, in order to respond effectively to the specific needs of different operational areas.

TYPE OF COURSE	TOTAL TRAINING HOURS	TOTAL HOURS/ EMPLOYEE
Technical training	35,119.5	2.1
Language courses	42,870.0	2.5
Privacy / Information Security	89,432.0	5.2
Health and Safety training	38,478.0	2.3
Soft Skills Courses	20,762.3	1.2
Project Management Academy	18,746.0	1.1
DEI Courses	92,112.0	5.4
Other	151,428.8	8.9
Total hours	488,948.5	28.6

In addition to governance safeguards and reporting channels, in 2025 the Group launched a training program on Diversity, Equity & Inclusion and on the prevention and management of discrimination, harassment, and inappropriate behaviour, addressed to the entire workforce. The initiative supports both the prevention of such phenomena and the recognition and proper handling of reported situations, also through dedicated modules for leadership roles.

SUPPLIER RELATIONSHIP MANAGEMENT

Reply manages procurement through direct suppliers, whose selection and the definition of purchasing terms for goods and services are guided by principles of legality, competition, objectivity, fairness, impartiality, price equity, and the quality of the goods and/or services, with careful consideration given to service guarantees and the range of available offers.

The Group currently conducts ESG-based self-assessment campaigns for suppliers with more than 15 employees, using a questionnaire that evaluates aspects related to the environment, health and safety, as well as commitment to ethical integrity and transparency in business practices.

Although strict social and environmental criteria are not currently applied in supplier selection, these self-assessment campaigns make it possible to evaluate suppliers with respect to their ESG commitments and to identify any critical issues, which can then be assessed on a case-by-case basis.

The following data provide an overview of supplier evaluation activities conducted during the reporting period.

SUSTAINABILITY EVALUATION

The sample of suppliers involved in the self-assessment process amounted to 332.

The participation rate recorded for 2025 was 80%, with 265 suppliers completing the online questionnaire.

SOCIAL-CRITERIA EVALUATION

The percentage of new suppliers assessed using social criteria in 2025 was 70.2%.

COLLECTIVE BARGAINING AGREEMENTS

Reply considers the provision of stable and long-lasting employment relationships to be a fundamental requirement for supporting the growth of its employees and this is applied in countries where it is provided for by local legislation (Italy, Brazil, Belgium, France). For employees not covered by collective bargaining agreements, Reply determines their working conditions and terms of employment in analogy to the collective bargaining agreements under which other employees are classified.

COUNTRY	NO. OF EMPLOYEES COVERED BY A COLLECTIVE BARGAINING AGREEMENT	% OF EMPLOYEES COVERED BY A COLLECTIVE BARGAINING AGREEMENT
Italy	10,135	100%
Brazil	288	100%
Belgium	145	100%
France	378	100%

Governance information

ETHICS - INDICATORS

In line with the Group's governance and internal control system, which also includes reporting and oversight mechanisms, the following table presents the main indicators of compliance with the Code of Ethics and the Anti-Corruption Policy, including participation and training levels on offences under Legislative Decree 231/01.

At Group level, the **Code of Ethics** has been accepted by 94.7% of employees, specifically by 100% of executives, 98.6% of managers, and 93.7% of staff.

At Group level, the **Anti-Corruption Policy** has been accepted by 95.6% of employees, specifically by 97.3% of executives, 97.9% of managers, and 95.1% of staff.

In Italy, communication of the **Organizational, Management and Control Model** (Model 231) is carried out upon employee onboarding and includes explicit acceptance of the model as well as the successful completion of a verification test. All members of the Governance Body, composed entirely of individuals based in Italy, have been informed about Model 231 and have received specific training on the subject.

At employee level, 92% have completed training on Model 231, specifically 90% of executives, 91% of managers, and 92% of staff.

PAYMENT PRACTICES

In 2025, the average time taken by Reply to pay an invoice was 48 days. The figure was calculated as the average number of days between the invoice issuance date and the payment date. Standard payment terms, considering all third-party suppliers, range between 30 and 60 days.

Reply's suppliers are divided into two main categories—external collaborators and suppliers of other goods and services—for which no differences in payment terms apply. 100% of payments were made within the standard payment terms. In 2025, there were no legal proceedings due to payment delays.

Contacts

The point of contact for questions regarding the Consolidated Sustainability Statement or the information disclosed is the ESG Team, at the following email address: sustainability@reply.it