



Cerved Group S.p.A.

Community Support Policy

Approved by the Board of Directors on 13 March 2020

Contents

INTRODUCTION.....	3
REFERENCE PRINCIPLES	3
COMMITMENTS AND ACTIONS.....	3
MANAGEMENT, MONITORING AND REPORTING	4
POLICY DISSEMINATION AND UPDATING	5

Introduction

The Cerved Group (hereinafter also referred to as “Cerved” or “Group”) is Italy’s leading operator in the field of credit risk analysis. It offers services for the assessment and management of credit positions and is one of Europe’s top rating agencies. The Group’s corporate Purpose is to help the national economic system protect itself from risk and sustainably grow by putting data, technologies and talent at the service of people, businesses, banks and institutions.

The Group is committed to collaborating for the growth of an inclusive, sustainable and resilient future for people and for the planet, and has thus embarked on an increasingly pervasive path of integration of responsible principles and actions in its corporate strategy and daily activities.

In its operations and in the supply chain, the Group aims to contribute, through its business activities, to the development of a consciousness that can foster knowledge, innovation and transparency. The work of each person, the interpersonal relationships that are created, the relationships with customers, with the Group’s suppliers and the economic and financial community in which it operates can contribute to having a strong social impact on both stakeholders and the whole community.

Reference principles

This Policy confirms what is already laid down in the Company’s Purpose and stated in the Code of Ethics and specifies the reference principles, practical commitments and management methods.

Furthermore, in compliance with current legislation, Cerved is inspired by the principles issued by national and international reference organisations, such as:

- Principles of the United Nations Global Compact, signed by the Group in 2018;
- 2030 Agenda Sustainable Development Goals (SDGs) of the United Nations, with specific attention to the following SDGs:
 - 4: “Ensure inclusive and equitable quality education and promote learning opportunities for all”;
 - 8: “Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all”;
 - 9: “Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation”;
 - 16: “Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels”.

Commitments and actions

Cerved’s role as a preferential interlocutor of numerous national and international institutions is supported by a unique store of data, information and assessment at national level which provide fundamental support in the pursuit of the corporate Purpose, i.e. support the national economic system.

The approach adopted by the Group focuses on the following areas of intervention:

- Promotion of economic knowledge and partnerships with bodies, institutions and associations;
- Support through donations and sponsorships.

In order to bring about the commitments made within this Policy, Cerved has identified the actions to be implemented for each area of intervention:

- Promotion of economic knowledge and partnerships with bodies, institutions and associations:

Through its business activities, Cerved disseminates data, analyses and research for free to promote the transparency of the market, develop knowledge and promote innovation nationally. To encourage constant updating, the Group provides free newsletters on Cerved's public platform "Cerved Know", focusing on various subjects and legislative updates of an economic nature contained in the following sections: businesses & markets, credit, data innovation, tool & educational and studies & analysis. It also includes informative reports on topics of economic interest presented in small doses to facilitate their understanding, thus promoting financial education and economic development. Cerved's public platform also provides free tools for businesses and individuals that allow them to perform analyses and studies on their financial data.

Cerved collaborates with bodies, institutions and associations through partnership aimed at the publication of studies and reports concerning the Italian entrepreneurial fabric, whose objective is to promote an advanced business culture and encourage national development through the adoption of innovative practices. The Group also organises events with cultural implications, with the goal of informing the community and insiders on the economic and financial state of health of Italian SMEs and their future prospects. To create and consolidate the data-driven community, Cerved also organises a day with first class speakers, demos and workshops, dedicated to all those who want to discuss and look to the future.

Lastly, the Group supports institutions and policy makers in making economic, political and legislative decisions by freely providing information, data, ideas and position papers, in order to encourage transparency and constant updating.

- Support through donations and sponsorships:

In addition to the main community support activities described above, Cerved also carries out utility and social solidarity activities that can positively affect and bring benefits to the community. These initiatives are mainly carried out through the promotion of corporate volunteering and direct support through donations and sponsorships and are selected by a specially created committee based on the most urgent needs expressed by the reference communities. As defined in the Code of Ethics, the projects aim to satisfy needs expressed in the social, educational, training and environmental spheres, as well as those of sports and art.

Management, Monitoring and Reporting

All the Group's community support activities are carried out in compliance with the law, with the principles and rules of conduct set out in the Group's Code of Ethics, with the control principles of applicable Organisation, Management and Control Models that the Group Companies have adopted pursuant to Italian Legislative Decree no. 231/2001 and with the remaining corporate procedures/regulatory instruments.

In particular, all the community support activities are subjected to a preliminary feasibility analysis which aims to verify whether they are consistent with the Group's objectives, principles and commitments and if the partners and counterparties are credible and reliable. Furthermore, all the operations and transactions must be adequately documented so as to allow the verification of the decision-making, authorisation and performance process, as well as the characteristics and reasons for these operations.

Cerved checks the effectiveness of the approach adopted and defined in this Policy also through procedures that identify the risk of violation of the principles adopted, periodical monitoring of performance indicators that measure compliance with the commitments made, and a specific system for reporting violations.

The same Group risk management model considers, among other things, the issues relevant to the Company, allowing the identification of company activities and the organisational areas in which risks could occur, the performance of audits in the activities and areas identified and the definition of appropriate improvement plans, where necessary.

As provided for in the event of violation of the principles and requirements of the Code of Ethics and in accordance with the “Procedure for the use and management of the system for reporting violations”, the Cerved Group provides stakeholders with traditional and digital reporting tools, which may also be used in the event of alleged breach of rules, principles and commitments in relation to community support.

The Group also undertakes to inform its stakeholders in a transparent manner about the strategies and results achieved in the areas dealt with in this Policy by reporting them in documents published on the corporate website and on any other communication tool considered appropriate and practical for such purpose.

Policy Dissemination and Updating

The principles and commitments laid down herein shall be observed by the members of the corporate bodies, as well as by whoever is bound by an employment relationship with a Group Company and, in general, by all those who work for these Companies, whatever the relationships held.

Cerved promotes the same principles both internally and externally, with those subjects that operate on its behalf (such as suppliers or business partners in general). In fact, the Policy is brought to the attention of all the aforementioned parties and made available on the website of each Group company. They are informed of the contents of the same individuals, groups, organisations and institutions with which relationships of interest are established for Cerved's business (including the partners and counterparties of all community support initiatives).

This Policy will be assessed for the purpose of updating at least once a year in light of the evidence emerging from management and monitoring activities, any changes in corporate strategies or activities and the evolution of national and international trends and regulations regarding community support.