

# SUSTAINABILITY REPORT 2023



# LETTER TO OUR STAKEHOLDERS

**Today, more than ever, effectively countering #cyber threats requires multi-sectoral technological capabilities that are "operational and cooperative" in synergy.**

In 2023, as planned, we implemented our strategy for external expansion which aligned closely with the goals we outlined in our IPO. These goals emphasized our ambition to establish CY4GATE as a leading European hub for technological expertise in the cyber sector.

We have worked on enhancing our value proposition by expanding our network both within Italy and across Europe. This reaffirmed our capability to provide cutting-edge cyber solutions using both Italian and European technology as a base. Our commitment extended beyond being a globally recognized technology vendor; we aimed to become a hub and benchmark in Italian cybersecurity and cyber intelligence.

We continued to build and strengthen the Group with the acquisition of 97.8% of IKS TN, an Italian cybersecurity company operating in the cybersecurity sector. A leader in combating digital fraud, IKS TN has a significant influence in banking and has a presence in the automotive markets.

Following on from the acquisition of RCS and Diateam in France, our majority acquisition of IKS TN (as resulting from the XTN Cognitive Security merger) further strengthened CY4GATE's position, enhancing our presence both domestically and internationally.

We continued to invest in the growth of our organization by bolstering our structure in terms of size, skills, and the range of services offered to customers. This investment extended to the development of knowledge and skills of our human resources, as well as our customers, suppliers, and partners. We recognize that it is only by investing in human capital that we can improve our ability to prevent and protect against cyber threats and to develop more advanced solutions.

We continue to support the empowerment of our employees and our supply chain. We take into consideration the implications that these have on creating a more innovative, productive work environment and positive, and as such, treat them as key factors in ensuring business success.

In line with our commitment to creating a more inclusive future and fostering equal opportunities, and in line with the Gender Equality guideline (PdR 125), we obtained official Gender Equality Certification. We also intend to support female empowerment in corporate growth paths. We will help eliminate stereotypes and discrimination and ensure that our corporate culture is increasingly inclusive and respectful toward our female employees.

In 2023, we reinforced partnerships with major industry players, universities, and research centers. We also signed new agreements to develop additional functionalities and integrations regarding our proprietary cyber product portfolio. Furthermore, we consolidated and signed further contracts with corporate and government clients using our existing proprietary products and expanded into foreign markets.

In 2023, we celebrated CY4GATE' listing on the Euronext Milan market in the STAR segment.

Our listing on the STAR segment is a source of pride for our company and demonstrates the value of our expertise in the field of Cyber, in Italy and in Europe.

We are delighted to have been nominated for the second consecutive year as finalists in the ESG Tech category in the Real Deals ESG Awards. Promoting ESG values is an integral part of our business model and our path to growth and development. We anticipate our products and solutions to make an important contribution to the creation of a digital world that is characterized by social responsibility and sustainable development.

We support the defense of and respect for human rights, which is confirmed by our adherence to the United Nations Global Compact, and the expansion of our offering of cyber intelligence and legal interceptions which ensure the safety of citizens and contribute to preventing and combatting serious crimes.

Our company was born with an intrinsic vocation for social responsibility and has developed over time to become a leader in innovation in the field of cybersecurity. Our aim is not just to generate economic value, but also to have a positive public and social impact. Our commitment to having a positive social impact serves to enhance the welfare and safety of the community.

Our 2023 Sustainability Report represents a new and excellent opportunity to share the principles we believe and reaffirm our commitment to building a sustainable cyber world.



*Domitilla Benigni*

Chairwoman  
**Domitilla BENIGNI**



*Emanuele Galtieri*

Chief Executive Officer  
**Emanuele GALTIERI**



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# 1.CY4GATE

Increasing our presence in the Italian and European cyber markets

1.1.

## COMPANY PROFILE

*We strive for continuous growth and both domestic and international expansion in the cybersecurity and cyber intelligence sectors, aiming to create additional value for our clients and shareholders.*

**CY4GATE Group, which currently counts 495 employees is a listed company on the Euronext STAR Milan segment<sup>1</sup>.** In the last few years, we have successfully managed mergers and acquisitions that have allowed it to upgrade and update its technological portfolio and gain access to new significant market segments in Italy and across Europe.

We are a unique Italian organization, operating in the cyber market. Our company offers products based on Italian and European proprietary technology, addressing the needs for information collection and analysis, as well as security requirements required by law enforcement, armed forces, institutions, and businesses, both nationally and in foreign markets.

The CY4GATE group operates in three application areas, and we are active in three different reference markets:

- Application areas:
  - Cyber Security
  - Decision Intelligence
  - Forensic Intelligence
- Reference markets:
  - Corporate segment
  - Armed forces and Institutions
  - Governmental Bodies and Italian and International LEAs (Law Enforcement Agencies)

<sup>1</sup> The number of employees is calculated in Full Time Equivalent and refers to all Group companies that fall within the scope of financial consolidation.



# CY4GATE group



Parent company, CY4GATE is a registered Italian joint stock company established in 2014. Its mission is to develop technologies, products and services that meet the stringent requirements of "Cyber Intelligence & Cyber Security" as specified by security agencies, armed forces, institutions, and businesses, both domestically and internationally. In June 2023, trading of the company's ordinary shares commenced on the regulated market Euronext Milan - STAR Segment.

CY4GATE S.p.A. has its registered headquarters in Via Coponia n. 8, Roma (RM); telephone: +39 06 9150 37 00; website: <https://www.CY4GATE.com/it/>; LEI code: 8156005DEB4D90F3E360.



XTN Cognitive Security is a company operating in the online fraud prevention sector, with a significant presence in banking and automotive industries.

On the 30th of September 2023, CY4GATE signed a preliminary agreement to acquire 77.8% of IKS TN, following the ongoing merger with XTN Cognitive Security. This new acquisition aligns with our stated objective to create a European technological hub for cybersecurity. The merging of cybersecurity and anti-fraud will provide the opportunity to develop new integrated solutions that meet growing security needs in the ever-changing digital landscape.



It is a French company specialized in the design, development and implementation of advanced testing, validation, and training systems in the field of cyber security. DIATEAM caters to both government and corporate clients.



Active since 1993, RCS is one of the leading Italian players in the forensic intelligence and data analysis market, having worked alongside law enforcement since its conception.



# The Structure of CY4GATE group

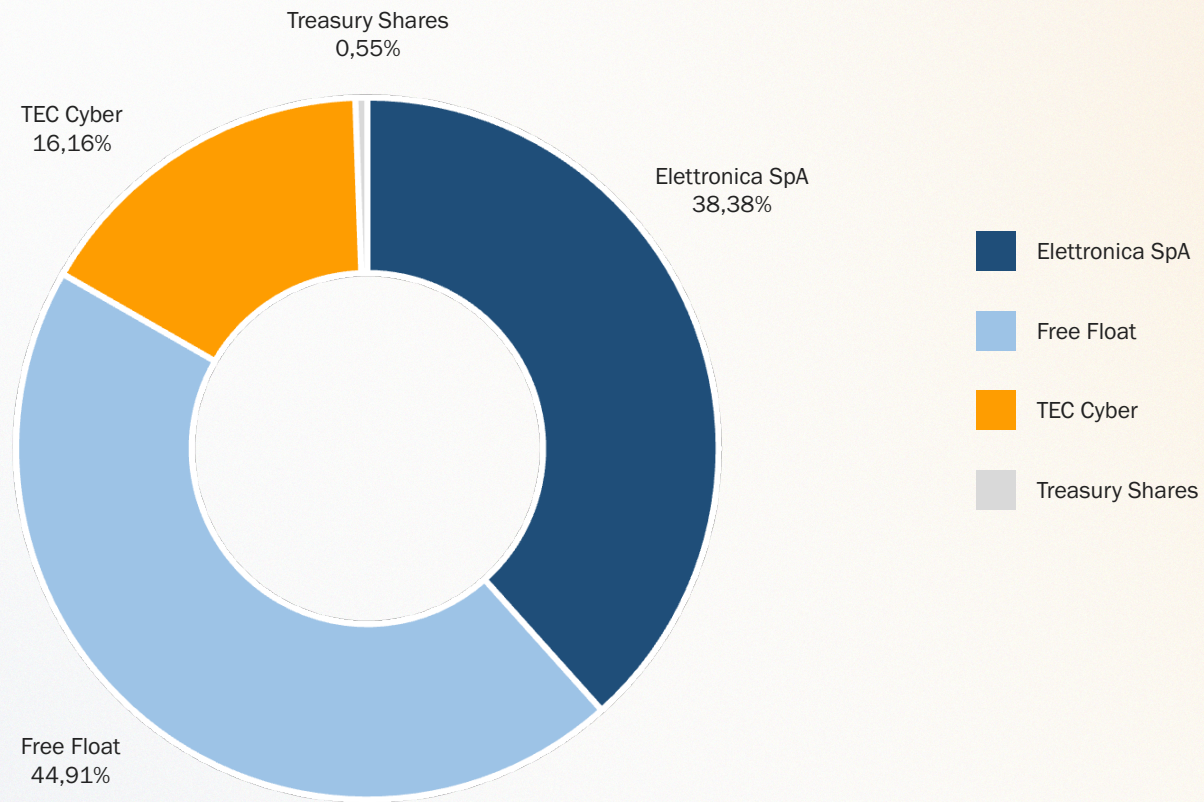


In late June 2023, CY4GATE moved from Euronext Growth to the Euronext STAR segment on the Milan Stock Exchange. The debut in the STAR segment aligns with the consolidation and internationalization objectives pursued in previous years.

CY4GATE's shareholder structure remains unchanged, except for a 0.55% stake in treasury shares. The share buyback program for these shares was initiated by the Board of Directors in August 2023.



# Shareholding chart



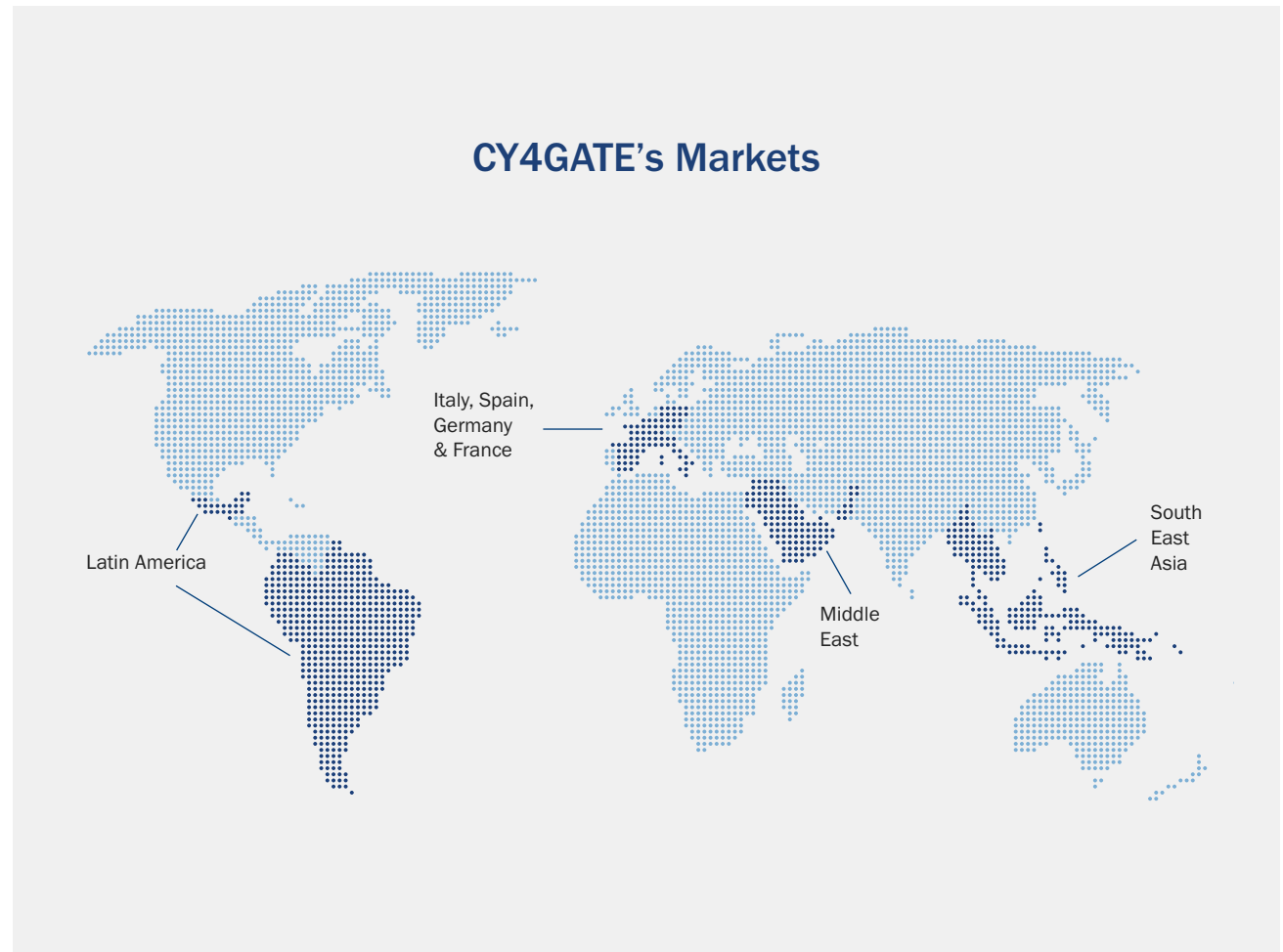


# CY4GATE'S GEOGRAPHICAL PRESENCE AND RELEVANT MARKETS

1.2.

*We aim to strengthen our presence on the domestic market and accelerate our international expansion journey. We will prove our ability to offer innovative cyber solutions based on predominantly Italian proprietary technology.*

CY4GATE Group primarily operates in Italy but is also active in Spain and in France and it is increasing its presence in Europe. Additionally, CY4GATE Group has a global presence with clients in the Middle East, Southeast Asia, and Latin America.





**REVENUE BY GEOGRAPHICAL AREA**

	<b>2022</b> <b>CY4GATE GROUP</b>		<b>2023</b> <b>CY4GATE GROUP</b>	
	€M	%	€M	%
Italy	34,09	63%	37,71	57%
Export	19,97	37%	28,78	43%
Total	54,06	100%	66,49	100%

**REVENUES FOR BUSINESS UNITS**

	<b>2023</b> <b>CY4GATE GROUP</b>	
	€M	%
Decision Intelligence	26,78	40%
Forensic Intelligence	29,97	45%
Cyber Security	9,74	15%
Total	66,49	100%



# OUR MISSION, VISION, AND VALUES

*We strive for continuous growth and both domestic and international expansion in the cybersecurity and cyber intelligence sectors, aiming to create additional value for our clients and shareholders.*

## Our Mission and our Vision

CY4GATE is a product-centric company specializing in comprehensive cybersecurity. Our mission is to develop platforms and services that cater to the demands of the Cyber Intelligence and Cybersecurity sector. This is the purpose and mission upon which CY4GATE was founded and which continue to guide us.

We have a clear vision: we aspire to become a hub of technological expertise in the European cyber market. We originated in Italy, but we aim to extend our presence across Europe, thus leading us onto the path of establishing supranational European technological sovereignty.



# Our values



## Innovation

Our experience from working alongside our clients has made us excellent innovators. We anticipate the challenges of tomorrow through continuous research and the development of technologically advanced solutions. The way in which we tackle each task with enthusiasm, our ability to combine scientific and industrial partnerships, and our innovative methods and processes all characterize the ongoing evolution of our work.



## Integrity

In our industry, excellence is an absolute must. Design, production and assistance follow rigorous control procedures and continuous improvement processes. This aims to ensure the timely fulfilment of each client's specific needs and requirements as well as ensure the utmost reliability of our products in any situation.



## Community

Our people are our most valuable asset. We believe in diversity and in integration, we believe in the power of sharing, and in continuous professional development of our teams. We believe in growth based on merit, which means valuing commitment and appreciating talent. We create a working environment that allows each of us to fully express our potential and to feel actively involved in the success of our company and in our own lives.



## Honesty

We strongly believe that respecting the rules allows us to build stable lasting relationships in each and every country in which we operate. Honesty, transparency, and accountability are fundamental to our way of working, both internally and in our interactions with partners and clients. This is because Mutual trust is a fundamental asset that allows us to nurture and protect.



## Energy and dynamism

We combine our respect for rules and procedures with a spirit of initiative, flexibility, and entrepreneurship. We balance swift decision-making with effective control mechanisms. The nature of our industry and our passion for innovation lead us to be agile in our work and proactive in our relationships with partners and clients.



# Our values

The **Three Pillars** that guide CY4GATE's business are as follows:

**Technological development** through the continuous evolution and innovation of our products;

**European expansion** where CY4GATE aims to establish itself as a center of expertise for European cyber technologies;

**Talent acquisition**, based on the understanding of the fundamental role that technical resources play in technological development.

In order to achieve its goals, CY4GATE is pursuing **a campaign of acquisitions and partnerships**, in tandem with organic, consistent, and positive growth of our product portfolio. We aim to achieve the following objectives:

- Enriching CY4GATE's portfolio offering in the cybersecurity sector.
- More effectively establishing a presence in the banking market, both in Italy and abroad where there is a strong demand for services that combine cybersecurity and anti-fraud.
- Accessing the additional markets of automotive, where XTN already has a presence.
- Increasing the repeat business and corporate presence of CY4GATE.

Our constant commitment to our major areas of influence (cybersecurity and cyber intelligence), facilitates the production of increasingly high-performing products and services, which generates enthusiasm and interest in the investor and shareholder communities (our primary stakeholders).



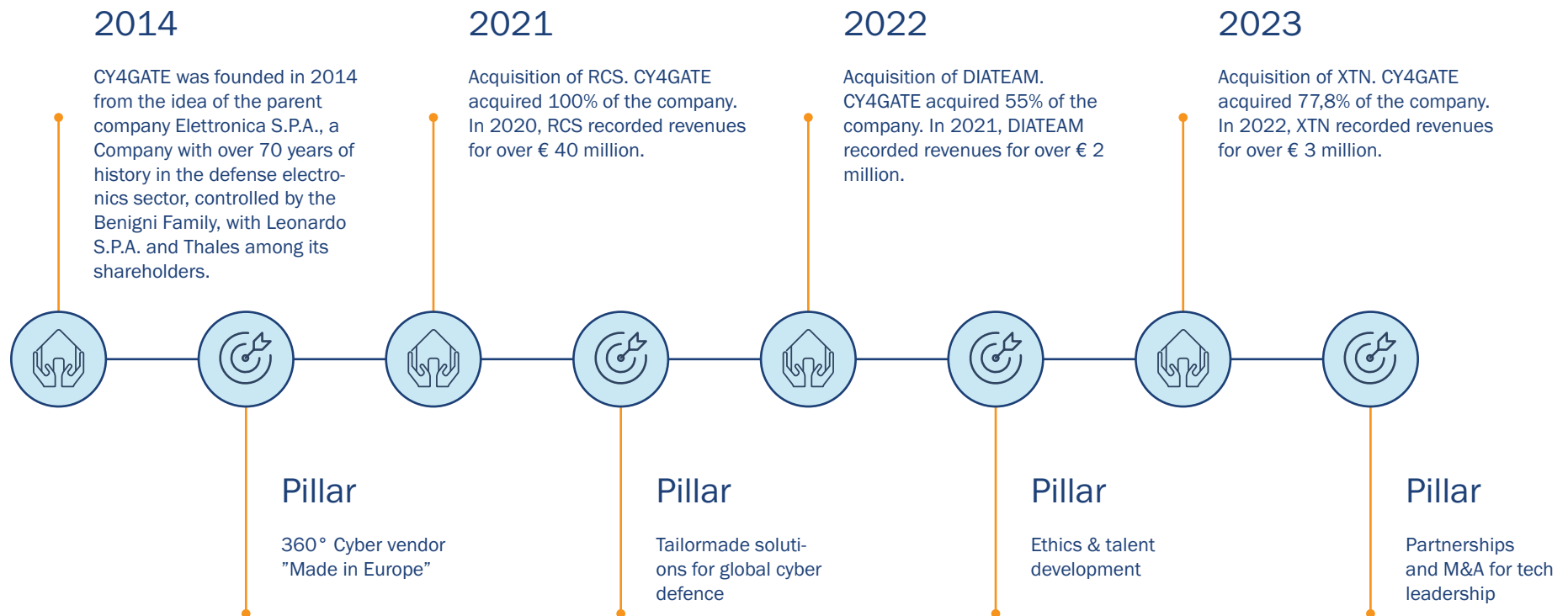
# PRODUCTS, TECHNOLOGIES, AND SOLUTIONS FOR A SAFER CYBER WORLD

*We aim to create an increasingly comprehensive offering capable of providing clients not only with 'products' but with end-to-end cyber capabilities and project solutions.*

CY4GATE is a unique and cutting-edge company, founded in 2014 through the vision of its parent company ELETTRONICA S.p.A. With over 70 years of history in the Defense Electronics sector, ELETTRONICA is controlled by the Benigni family and whose shareholders include Leonardo S.p.A and Thales. CY4GATE group represents a powerful combination of entrepreneurial and financial resources and expertise, creating an entity specialized in two rapidly expanding IT markets: Cyber Intelligence and Cyber Security. This has been achieved through acquisitions and strategic alliances.



# Pillars and outcomes





# Products

## Cyber Intelligence

### DECISION INTELLIGENCE

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QUIPO is an AI-based Decision Intelligence platform based on Artificial Intelligence that transforms data into information. It collects massive streams of heterogeneous data from multiple sources and analyzes it in real time. This software platform allows real-time and effective access to internal and external information, minimizing both fraud and reputation risks, and offers various customization options. It can be used by both government agencies and private companies.

### FORENSIC INTELLIGENCE

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Forensic intelligence supports law enforcement agencies by providing customizable and easy-to-use Forensic Intelligence & data analysis solutions.

Forensic intelligence is used to prevent or stop serious crimes such as terrorism, drug trafficking, organized crime, child pornography, and corruption.



# Products

## Cyber Security

### CYBERSECURITY PRODUCTS



**Real Time Analytics (RTA)** is a security information and event management (SIEM). It is an advanced cyber security application that enables the analyst to detect cybersecurity anomalies and creates conditions to rapidly strike back.

RTA is not an antivirus software that blocks intrusion, but it informs the end user whether they have a computer problem and provides potential solutions.

**Diateam Hybrid** digital twin is a platform for testing, rapid prototyping, training, and validation. It is a software platform capable of reliably reproducing either a company's or public entity's network, creating a virtual environment that enables simulated cyber-attacks, system development, testing, and benchmarking.

**Sentry** is a device capable of scanning mobile devices for the detection of attacks in real time (e.g., Advanced Persistent Threat – APT, unknown threats and vulnerabilities) made up of software elements (e.g., core license), usable via a hardware device (“mobile sweeper”) that allows scanning.

XTN cognitive security which, through the SMASHe SEA platform, offers transaction and user monitoring services on web platforms, applications, and mobile devices through AI algorithms.

### CYBERSECURITY SERVICES



Our pool of Cyber Security services covers the following topics:

- Red Teaming and Penetration Testing
- Compliance Assessment
- Managed Detection & Response
- Incident Response & Malware Analysis
- Hands-on Cyber Training and Security Awareness
- Cyber Resilience Design for Critical Infrastructure

**ProntoCyber** is an insurance platform for Digital Emergency Response against cyber-attacks and data breaches.

The platform is aimed at professionals, SMEs, and Enterprises and ensures rapid and effective support in managing cyber incidents from both cyber and legal perspectives.

**CY4GATE Academy** is a cyber educational concept conceived with the aim of enhancing and strengthening the company's distinctive knowledge base, structuring and expanding it, transforming it into a competitive asset. The Academy provides targeted training to strengthen the specific skills required by the company through the offer of an annual Cyber Threat Intelligence subscription service which enhances proactive and preventive defense activities in support of Detection & Response technologies (input to the SIEM ).



# 2.SUSTAINABILITY

## Our primary vocation

*The primary purpose behind our technological solutions is to neutralize threats and safeguarding individuals, organizations, society, the economy, and the environment.*

*We are focused on preventing negative impacts and fostering a generation of opportunities and positive outcomes. The guides us not only in the development of technological solutions but also in the development of organizational strategies.*

*We are naturally commitment to sustainability, but we actively translate this commitment into choices, actions, and concrete behaviors. Therefore, we constantly keep an eye on the demands of the industry in which we operate, and to the needs and interests of our stakeholders.*

*We deeply value human rights and, as such, distance ourselves from and sanction those who intend to misuse the data and solutions we provide.*

*We are born to protect, and sustainability is absolutely necessary to ensure protection and generate value for all.*

*Hence, we renew our commitment to sustainable development each year.*



# OUR COMMITMENT TO SUSTAINABILITY: A CONCRETE COMMITMENT THAT GENERATES VALUE

2.1.

*We operate in a dynamic industrial, technological, and social landscape characterized by significant opportunities for development, but also by high levels of instability and considerable socio-economic polarization and inequality. In this world, where the devastating effects of climate change are also becoming increasingly evident, it is more and more essential for organizations to be able to understand the world we live in, to anticipate and prevent risks, and to prevent negative impacts on people, the environment, and the economy. Understanding the context in which we operate is now more essential than ever to be able to contribute to sustainable development and the pursuit of the 2030 Agenda (Sustainable Development Goals).*

Our strategy and business model are naturally oriented towards preventing negative impacts and generating positive ones. The concept of prevention and protection is the serves as the basis for the development of all our products and services. It is also the basis for the principles that guide us in defining our objectives and the implementation of our management and control systems that ensure the creation and preservation of value for our stakeholders.

In order to determine the positive and negative impacts that CY4GATE group has on sustainability (including human rights), we have subjected our processes, network, and structure to assessment. This process references the process and due diligence recommendations outlined by the UNI ISO 26000 standard, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human rights, and the ICGN Global Governance Principles

Our impact-focused process has allowed us to define our areas of responsibility, and we have identified:

## 6 areas of sustainability, 16 material topics and 6 SDGs to which we contribute



Each area and topic bear their own significant questions, risks, and opportunities for value generation for CY4GATE Group and our stakeholders. Which positive and negative impacts do we generate via our choices and actions? How are we managing them, and how can we improve and modify them to prevent potential harm and to promote sustainable value generation? These questions drive us to improve our ESG (Environmental, Social and Governance) strategies and promote an inclusive, healthy, and sustainable economic environment.



## Governance and responsible management

*Which are the sustainability issues where CY4GATE thinks and acts?*

**Solid corporate governance:** it is essential to ensure informed, transparent decision-making, integrated with assessments of ESG factors in the creation of value and in the generation of impacts, compliant with the legislation; this to consolidate the trust of investors, customers, lenders, to seize strategic opportunities connected to ESG challenges, and finally to remain competitive in the market and leader in innovation.

**Sustainability-oriented strategies and policies:** our strategies and policies integrate and monitor sustainability issues and the point of view of stakeholders in the company objectives and vision, as well in the design, development and production of technologies, products, systems, and services; this in order to ensure consistency between what declared and what played, and to support both credibility and internal and external legitimacy of our work.

**Responsible business management:** this means adopting a risk-assessment-based approach, in order to integrate ESG risks and opportunities into planning and control systems; it also means adopting shared rules of conduct and management systems aimed at guaranteeing compliance with regulations, transparency with stakeholders' fairness in behaviors and business relationships. It also aims to prevent anti-competitive practices, ensure the quality of services and products, and promote the well-being of workers. This approach mitigates compliance risks and ensures timely management of economic, social, and environmental impacts. The system is designed to facilitate the achievement of corporate objectives and the pursuit of ESG values and purposes.

**Information security and privacy:** We guarantee information security and privacy with the use of our systems and procedures that we put in place to avoid damage and the compromising of our business and our image, to assure IT security, the business continuity of our clients and suppliers as well as the safety of citizens and activities of public significance.

**Corruption prevention:** this translates into the adoption of shared rules of conduct, control principles and specific organizational-procedural safeguards aimed at managing the risk of internal corruption as well as the definition of anti-corruption clauses in supply and commercial contracts.

## Human rights

*Which are the sustainability issues where CY4GATE thinks and acts?*

**Respect for human rights,** i.e. principles expressed in the Universal Declaration of the United Nations, in the Conventions of the International Labor Organization, in the OECD Guidelines, in the Charter of Fundamental Rights of the European Union and in any other relevant legislation. We have internalized these principles in the fundamental values that underpin the CY4GATE Code of Ethics and have translated them into rules and procedures that guide and manage our relationships with stakeholders and with the market.

## Business Management

*Which are the sustainability issues where CY4GATE thinks and acts?*

**Leadership in innovation:** we make our contribution to ensuring quality technological advancement and to building a national technological sovereignty that cannot be separated from the creation of a European technological sovereignty; all this to meet the needs of governments and businesses in protecting key infrastructures, services, and citizens. For this, we are leading the creation of a European center of excellence in cyber technologies and products through a series of acquisitions and alliances. For this reason, we pay constant attention to the development of our in-house skills and to the promotion and production of innovation through a continuous research and development process, in partnership with universities and other strategic players in the cyber sector. This development and innovation model promotes respect for human rights, including respect for property rights, in commercial relationships and in the innovation, research,

and development processes. It fosters practices for managing impacts within our group's companies and partners. This all helps to promote a sustainable development model in the IT sector.

**Our relationship with our clients,** and paying attention to their needs, serve as a driving force for innovation and the creation of cutting-edge solutions. We are also committed to enhancing our clients' knowledge and skills, which is crucial for leveraging the potential of cyber intelligence and reducing the risks of cyber-attacks). However, our mission goes above and beyond this: we want to democratize cybersecurity by making it accessible to small and medium-sized enterprises (SMEs) that may struggle to secure adequate solutions and interventions due to the high level of financial investment and expertise required. This leaves SMEs (as well as the larger companies that represent SMEs in the supply chain) vulnerable to cyber-attacks. This drives us to seek synergies and alliances with other companies which enable us to build solutions that are accessible to SMEs and strengthen the cyber resilience of the entire supply chain, from small to large enterprises.

However, our mission goes beyond this: we aim to democratize cybersecurity, making it accessible even to small and medium-sized enterprises (SMEs) that may struggle to secure adequate solutions and timely interventions due to the level of economic resources and expertise required. This vulnerability increases the exposure to the risk of cyber-attacks, even for large enterprises for which SMEs represent the supply chain. This has driven us to seek synergies and alliances with other companies, enabling us to build solutions accessible to SMEs, strengthening the cyber resilience of the entire supply chain, from small to large enterprises.

**Responsible management of the supply chain:** for CY4GATE this means selecting reliable companies and at the same time promoting the development of their skills and competencies, through training courses, in order to guarantee the quality of supplies in compliance with industry standards and strengthen trust throughout the supply chain by customers and investors, as well as guaranteeing a cyber ecosystem capable of meeting present and future challenges, also through the promotion of behavior oriented towards sustainability.



## People and work

*Which are the sustainability issues where CY4GATE thinks and acts?*

**Managing and looking after our people** is very important to us at CY4GATE. **The empowerment of our employees** and the promotion **of equal opportunities and gender equality** drives us to put in place processes and procedures that create a workplace that fosters continuous motivation for personal and professional growth for the duration of each employee's career at our company. We aim for our workplace to both foster career satisfaction and positively cater to our employees' personal and social needs. Our organizational and resource management methods have been designed to uphold principles of fairness and merit recognition. They promote equal opportunities for all, and value the importance diversity.

**Occupational health & safety** at CY4GATE isn't just organizational method for complying with the rules. It represents an approach that aims to create a safe and comfortable workplace, where the well-being of employees is a key factor in the success of our business. We achieve this by increasing health & safety awareness among employees and the providing tools and services for prevention and assistance in addition to what is provided for in the National Collective Labor Agreement (CCNL).

## Responsibility towards the community

*Which are the sustainability issues where CY4GATE thinks and acts?*

The ideation, design, and production of CY4GATE products and services is developed to respond to the needs of protection, security, and access to essential services of citizens, companies, and governments.

The Cyber Forensic Intelligence solutions developed and produced by CY4GATE represent a significant support to the activities of law enforcement and security agencies in the fight against criminal and terrorist activities. This means

contributing to the **protection and safety of the community**. The Community Safety passes also from cybersecurity and protection of critical infrastructures, our core mission and vocation, through Cyber Resilience and Corporate Intelligence solutions which stand for CY4GATE contribution to public and private companies and institutions in the prevention and protection of hacker attacks, guaranteeing data protection and privacy and business continuity, with particular attention to public utilities; but also to small and medium-sized enterprises which today represent a point of weakness of cybersecurity.

## The environment

*Which are the sustainability issues where CY4GATE thinks and acts?*

At CY4GATE group, **Energy efficiency and the reduction of emissions** means efficiency of its premises and conscious behavior of its employees in the use of energy resources, to place products and services on the market while reducing CO2 emissions to a minimum.

We promote mindful and efficient use of energy, and we recognize it as the primary resource used for our business functions and production processes. We also advocate responsible waste management and water usage. While this may not be directly relevant to our industry, it is relevant when it comes to our day-to-day consumption.



# THE UN SDGS (SUSTAINABLE DEVELOPMENT GOALS): OUR CONTRIBUTION TO SUSTAINABLE DEVELOPMENT GENERATES VALUE

*The 2030 Agenda for Sustainable Development is a vast and ambitious development program endorsed in September 2015 by the governments of all 193 UN member countries. It embodies the awareness and the need to view development and well-being as a combination of economic, social, and environmental factors and issues. It aims to leave no one behind.*

*As the 2030 deadline approaches, it is becoming evident that there is still much work to be done in order to ensure the pursuit of sustainability and to achieve the targets that were set.*

Through our commitment to sustainability, at CY4GATE Group we actively contribute to the pursuit of the goals outlined in the 2030 Agenda. We actively contribute to 6 of the 17 United Nations Sustainable Development Goals.





# CY4GATE and the 2030 Sustainable Development Goals



CY4GATE Group fosters the development of specialized cyber skills through our high-tech professional training initiatives aimed at our clients, partners, and suppliers. We contribute to creating value through cooperating and sharing our talents and expertise with universities and other public institutions.

We also provide our employees with opportunities to acquire and refine specific technical and professional skills geared towards innovation.



At CY4GATE Group, we have put in place human resource management procedures guided by the principles of equal opportunities and the reduction of the gender gap at all stages of professional life, from hiring and skills development to career advancement. We also strive to achieve work-life balance and effective parenting management.

CY4GATE Group actively promotes gender equality in the Cyber sector by participating in activities developed and proposed by the Italian Chapter of the Women4Cyber Foundation.



CY4GATE Group contributes to sustainable economic growth, that generates a positive impact in terms of employment and value for investors, clients, and communities. We are doing this through the establishment of a European center of excellence for cybersecurity. This is made possible through acquisitions and the forging of alliances at both national and European levels. We also create a positive impact through the refining of our operations and the fusion of the expertise, strategies, and solutions of reputable players in the European cybersecurity industry.

We are creating job opportunities and fostering professional growth in a rapidly expanding and highly specialized sector, providing individuals with distinctive skills and the chance to leverage them. CY4GATE Group also encourages the creation of skilled jobs, and we ensure safe and dignified working conditions, even in businesses across the supply chain.



CY4GATE Group is a driving force for innovation in the cyber domain. Every day, we safeguard access to essential public services as well as the operations of public and private organizations. We do this through the development of our resilient digital infrastructures and our advancement and securitization of Italy and Europe's cybersecurity. CY4GATE Group promotes and facilitates access to digital technologies, even for small and medium-sized enterprises. This is crucial for the development of reliable and resilient infrastructures in organizations. We fuel the growth and economic sustainability of small businesses operating in highly specialized sectors, promoting their integration into their relevant markets and industries.



At CY4GATE Group, we are always looking to improve energy efficiency and aim for environmentally friendly and low-impact usage of our corporate premises and technological infrastructures. We promote responsible and sustainable use of natural resources.



CY4GATE Group contributes to preventing corruption and fostering an environment of fair competition and cooperation in the interests of societal development.

Our tools and our organizational and managerial decision-making contribute to the development of our group companies and their relationships. We ensure that they operate effectively, are responsible, transparent at all levels, and committed to respecting and promoting human rights.

We, as a company ensure that the use of our technological solutions is always in line with human rights and we contribute to the protection and security of society by supporting government actions in the fight against serious crimes such as terrorism, child pornography, drug trafficking, arms trafficking, and corruption.

CY4GATE Group ensures compliance with workplace health & safety regulations, and we foster a work environment where the dignity of individuals and the fight against discrimination form the basis of our employee management policies.

We hold businesses in our supply chain accountable by incorporating the following into our procurement requisites: adherence to anti-corruption measures, workplace health & safety standards, as well as ethical and environmental requirements.



# RESPECT FOR HUMAN RIGHTS: OUR GUIDING STAR

2.3.

*Recognizing and respecting human rights is fundamental to a commitment to legality, justice, and social equity. At CY4GATE Group, we assume responsibility for respecting, protecting, and implementing human rights.*

As a business, as we collect substantial amounts of data through our IT solutions for the protection and security of businesses, institutions, and citizens, and enable our public and private clients to do the same. When it comes to human rights, our primary responsibility is to **ensure the proper use of data and prevent any misuse that could lead to human rights violations.**

Our commitment to human rights extends to the **protection of labor rights**, the exercise of **union and political rights** in the workplace, as well as the promotion of **equal opportunities**. We are dedicated to **eliminating all forms of discrimination against women and any type of diversity**. This commitment also extends to our relations with suppliers and clients.

We deepened our commitment in 2022 when we joined the principles of the United Nations Global Compact, which we reaffirmed in 2023 following an assessment for the first Communication on Progress.

*How are we translating our commitment into concrete actions?*

## Our Products

Our policies and processes which aim to ensure:

- The development of technological solutions for the security and protection of citizens and national institutions.
- No exports to countries where there are significant risks of human rights violations.

- A commitment from our partners, clients, and suppliers to respect human rights principles and the rules defined in the following: in the Code of Ethics and in the organizational management and control model as per Legislative Decree 231/2001, in the Anti-Corruption Code, as well as in the policy for combatting money laundering and the financing of terrorism by companies. Violation of any of the above will result in the termination of contracts.

## Our People

The business' code of ethics, management systems and processes, and Gender Equality policy have all been developed and implemented to respect and in force human rights, including:

- The prohibiting of discrimination based on race, skin color, sex, language, religion, political opinion, sexual orientation, nationality, background, social status, union membership, age, or disability and any other form of discrimination or intolerance for diversity.
- The prohibiting of any form of exploitation of child labor, forced labor, or irregular labor.
- A guarantee of the ability to exercise political and union rights.
- Assurance of equal opportunities for all workers and associates
- The protection of sensitive data of individuals, whether they are employees, associates, visitors, clients, or suppliers.
- The safeguarding of the health & safety of workers, in compliance with current regulations and the highest standards of safety and hygiene.

## Our Supply Chain

We implement policies and procedures aimed at ensuring:

- The prohibiting of any form of forced labor and human trafficking. We've implemented measures to prevent the risk of modern slavery.
- The verification of suppliers' compliance with requirements related to the safeguarding of the health & safety of individuals.
- The verification of reliability and legality of documentation, as well as a commitment to respect human rights through the signing of specifically prepared documentation during contract signing stages.

# OUR STAKEHOLDERS

2.4.

*An awareness of our impacts and of our contribution to sustainable development requires for us to put ourselves in the shoes of our stakeholders. Their needs, interests, considerations, and concerns form the foundation of strategies that help us to overcome obstacles, seize opportunities, and improve sustainability.*

For us, a successful business model means pursuing and aligning excellent economic-financial performance, and governance, social, and environmental performances to satisfy our key stakeholders, which are: **The general public**, who we protect by investing in and developing technologies in the field of cybersecurity and cyber intelligence.

- **Our shareholders** and investors, who support our business development, and whose value we ensure by focusing on transparency, fairness, integrity, the adequacy of our governance, as well as the sustainability of our economic performance.
- **Our employees**, our people who form the core value of our group. We are committed to building a work environment that prioritizes well-being, health & safety, positive work-life balance, and equal opportunities. We protect and enhance the value that our employees create by promoting their empowerment and skills development.
- **Our clients**, both public and private, whose security and resilience we ensure by providing them with cutting-edge solutions, and the finest tools and technologies which contribute to creating a safer and digital world.
- **Our partners and suppliers, universities, and research centers** with whom we have built synergies and shared our expertise in order to strengthen their capabilities. And with whom we have fostered a robust cyber innovation ecosystem capable of tackling current and future challenges, both in Italy and in Europe
- **Representative bodies and public institutions**, with whom we communicate and cooperate to contribute to the development of a healthy and competitive industrial sector.
- **The media**, which allows us to voice and showcase our commitments, and at the same time serves as a conduit for issues, questions, and alerts of collective interest.



Our group companies maintain constant communication with each other through both structured and informal channels.



STAKEHOLDER CATEGORY	WHO ARE THEY	MODES OF COMMUNICATION AND ENGAGEMENT
The General Public	Individuals, individually or organized, who directly or indirectly interact with CY4GATE and on whom the company can have an impact	Our website, social media, our breach reporting system
Financial communities	Entities interested in CY4GATE's strategic vision and the managerial and relational skills it brings to the table	Events, communications with current and potential analysts and investors, website, social media, breach reporting system
Substantial shareholders	Investors in CY4GATE interested in the company's ability to create economic and social value.	Shareholders' meetings, consolidated financial statements, management reports, specific meetings.
Our employees	Individuals who contribute essential skills to CY4GATE, contribute to achieving business objectives and who expect rewarding career prospects and workplace well-being	Intranet, surveys, meetings, training sessions, breach reporting system
Clients (public and private)	Entities whose complete satisfaction of needs is a priority for CY4GATE and who expect fairness and care in return	Dedicated meetings, complaint management, feedback collection system, breach reporting system
Our partners and other companies in the sector	Entities that share CY4GATE Group's vision and expertise and with whom we cooperate to build solutions for the market. Partners with whom to construct a cyber innovation ecosystem at a national and European level.	Specific meetings, dedicated encounters, training sessions, breach reporting system
Universities and research centers	Entities who provide CY4GATE Group with research know-how and human resources, and who look for opportunities to enhance and apply their knowledge assets	Research projects, dedicated meetings, breach reporting system
Suppliers	Entities who provide CY4GATE with tangible and intangible assets with the aim of shared growth	Surveys, dedicated meetings, breach reporting system
Public institutions	Entities that regulate the market and foster development opportunities for a healthy and competitive industrial sector	Events, specific meetings
The media	Entities who disseminate information about CY4GATE's activities or from whom the company can acquire valuable insights for the pursuit of its objectives	Press releases, social networks, breach reporting system
Representative bodies	Entities with whom to share projects and initiatives to strengthen the productive sector.	Participation in working groups, specific meetings

# 3. GOVERNANCE

## Responsibility, Trustworthiness & Transparency

*Ensuring compliance with rules, and to leading the group towards sustainable corporate growth, and creating value for the Group and all its stakeholders all requires complex governance.*

*Therefore, in a continuously expanding group, it is essential to establish a governance structure where ethics, professionalism, and the assumption of responsibility are the prerequisites in the composition of governing and control bodies. Roles, functions, and information flows must be well assigned and clearly defined, allowing for informed decision-making processes when it comes to sustainability issues.*

*We possess decision-making and managerial tools capable of informing conscious choices, as well as preventing and managing the impacts of our actions.*

*We have built and continue to refine a system of rules, procedures, and processes with the following as a basis: transparency, ethics, compliance with laws and national and international standards, respect for stakeholder interests, and human rights. This is essential to ensure solid and balanced economic, financial, and organizational management that is able to support sustainable development throughout our company's lifespan and create value for our stakeholders.*



# A commitment to a clear and verifiable focus on sustainability



We confirmed adherence to the Global Compact following the first Communication on Progress assessment. Our adherence, obtained in 2022, further proves our company's commitment to respecting human rights and implementing the ten principles related to human rights, labor, the environment, and the fight against corruption.

Rating	2020	2021	2022	Trend 2021-2022	Benchmark
Governance	8	33	61	↗	↑
Social	6	20	52	↗	↑
Environment	0	10	63	↗	↑
External Stakeholders	0	45	100	↗	↑
Rating	5	27	64	↗	↑

EthiFinance issued our ESG-ES Rating. We received a score of 64/100 which placed CY4GATE well above the average of the 154 companies who were assessed in the Information Technology sector.



We were nominated as finalists in the Real Deals ESG Awards, in the "ESG Tech" category, for the second year in a row. This initiative, which is promoted by one of the leading international private equity magazines, aims to identify and celebrate those making positive changes through ESG in the private equity sector.

Società	Data Decisione	Esito	Rating	Scadenza-Revoca-Annullamento-Sospensione
CY4GATE S.p.A.	21/02/2023	Rating Attribuito	★★★★	21/02/2025

We obtained our legality rating (The Legality Rating is an evaluation framework used to gauge a company's level of compliance with prevailing regulations and laws). We obtained our legality rating in February 2023 after a process which began in 2022.



In 2022, we were awarded the "Cyber Security Made in Europe" label from the European Cyber Security Organization (ECSO). This is a prestigious and unique certification designed for companies operating in the cybersecurity sector with their headquarters and primary market in the European territory.

# Material topics and our contribution to the SDGs

## SUSTAINABILITY ISSUE

- Robust corporate governance
  - Sustainability-focused strategies and policies focusing on sustainability.
  - Responsible business conduct
  - Data security and privacy
  - Corruption prevention
- 

## SDGS TO WHICH WE ARE CONTRIBUTING





# Our impact and commitment to sustainability

## ISSUE: ROBUST CORPORATE GOVERNANCE

### OUR IMPACT

*An inadequate governance system could result in:*

A lack of necessary information to lead and govern the Group, failure to consider ESG factors in defining development scenarios, as well as non-compliance with relevant regulations, leading to economic and financial harm to the Group, investors, and the entire supply chain. It may also result in missed strategic opportunities both for CY4GATE and in the development of a high-impact sector in building technological autonomy and security for countries and citizens.

*Implementing robust corporate governance, means guaranteeing:*

The long-term sustainability of CY4GATE, shielding us from risks and enabling us to navigate dynamic and changing scenarios, thus creating conditions to seize development opportunities in the medium to long term; the stability and integrity of our relationships with our investors, clients, employees, suppliers, and partners through sustainable business practices; ethical and sustainable conduct within CY4GATE group, which creates not only economic value, but also social value.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

The implementation of a governance structure with a Board of Directors possessing the correct characteristics and competencies to ensure expert decision-making, independence, and the ability to lead us on a path of sustainable business development. The establishing of committees and the delegation of roles and responsibilities to ensure the acquisition and analysis of industry information. This might include information on the following: risks (both in terms of economic and financial matters), compliance with regulations, as well as economic, environmental, and social issues.

At an organizational level, the delegation of responsibilities and the establishing of a team to oversee ESG matters, their integration into our business processes, and drafting of sustainability reports. The latter being subject to the consultation and approval by a governing body.



## ISSUE: SUSTAINABILITY FOCUSED STRATEGIES AND POLICIES

### OUR IMPACT

#### *Inadequate management of this issue could result in:*

A loss of strategic opportunities for our Group; poor consideration of environmental, social, and economic issues that may negatively affect our development trajectories; Failure to protect the interests of our stakeholders.

#### *Integrating ESG issues into strategies means ensuring:*

That our stakeholders' concerns are addressed, which will provide us with an opportunity to identify new lines of business, alternative production methods and an opportunity to improve the reputation of our brand.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

Designing a 3-year commitment plan, with annual updates, based on impact analysis. The establishing of a committee for Controls, Risks and Sustainability to advise the Board of Directors on sustainability issues.



## ISSUE: RESPONSIBLE BUSINESS CONDUCT

### OUR IMPACT

*The inadequate integration of ESG issues into our management systems could result in:*

Social, environmental, and economic impacts on the community, resulting from the failure to protect collective interests and distribute any generated value; Financial or reputational losses for our group (such as sanctions and loss of contracts)

*Integrating ESG issues into strategies means ensuring:*

A sustainability-oriented corporate culture; the consideration of social and environmental factors when it comes to our products and processes. This will lead to more balanced and efficient operations that are compliant with regulations (with additional cost savings); Management practices and products/services meet the needs of our key stakeholders. This will result in an improved workplace atmosphere and employee well-being, as well as enhanced business relationships with our suppliers and clients.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

The adoption of systems, models and management processes that are focused on respecting and integrating relevant ESG issues. This includes the adoption/implementation of:

- An Organizational Model pursuant to the Legislative Decree 8 June 2001, No 231.
- An integrated quality policy and system
- Policies and systems for information security and privacy management
- An anti-corruption code and reporting committee.
- A policy to counter money laundering.
- A specific procedure to ensure the transparency of financial operations and the prevention of conflicts of interest among governing bodies.
- A system for reporting issues and potential/real-time breaches that may negatively affect our Group or the well-being of individuals.



## ISSUE: DATA SECURITY AND PRIVACY

### OUR IMPACT

#### *Inadequate management of this issue could lead to:*

Cybersecurity breaches, which may cause business interruptions, leakage of personal data, and loss of information (including strategically significant data) which may result in further losses for our Group; the compromising of business operations and the Group's image which affects our clients and our suppliers and could pose a threat to the security of citizens and jobs of public-interest.

#### *Adequately managing the security of data and privacy means:*

Safeguarding company, partner, and client data in order to protect our reputation and the interests of our stakeholders.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

At CY4GATE Group, we have implemented the ISO 27001:2013 Information Security Management System, as well as a Privacy Management System in compliance with the provisions of the current EU Regulation no.679/16



## ISSUE: CORRUPTION PREVENTION

### OUR IMPACT

*Inadequate management of the prevention and counteraction of corruption could result in:*

Potential non-compliance with legislative provisions and/or regulations and internal procedures. This may have a financial impact on our Group (sanctions and loss of contracts) or cause damage to our reputation. Poor oversight may facilitate corruption. Corruption along the value chain could also cause a misallocation of resources and revenues, as well as negative environmental impacts and abuse of human rights.

*Managing this issue adequately involves:*

Promoting a culture of legality, transparency, and anti-corruption along with implementing procedures and systems to prevent their occurrence; protecting CY4GATE group from any unlawful acts or corruption attempts made by employees while maintaining a positive reputation.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

The adoption of our Anti-Corruption Code, the establishing of the Reporting Committee, and the planned adoption of the Coordination and Consultation Body for the Prevention of Corruption (composed of the current president and the presidents of the Board of Statutory Auditors and the Supervisory Body pursuant to Legislative Decree 231/01).

Specific organizational-procedural safeguards are provided in the 'Special Part A' (Parte Speciale A) of the Organizational and Management Model "231" (MOG 231).

The achievement of our Legality Rating as of 2023.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

### **In the 3-year period 2023-2025, we committed to:**

- Defining a company ethical code and sustainability policy. We committed to involving employees in the process to ensure a greater awareness and alignment with our values and principles.
- Establishing an internal committee to oversee and advise on risks and sustainability.
- Introducing incentive mechanisms linked to ESG results.

### **In line with the above commitments, in 2023 CY4GATE improved and updated our systems and procedures. Namely:**

- We updated our code of ethics and Organization and Management Model in order to align with CY4GATE's new circumstances (i.e. the acquisition of new companies and our listing on the STAR segment of EURONEXT Milan. This update takes into consideration changes in legislation, developments in case law, and national and international best practices.
- We established the Control, Risks, and Sustainability Committee, and created an Internal Auditor role.
- We established an Appointment and Remuneration committee.
- We confirmed our commitment to the ten principles of the United Nations Global Compact
- We enhanced our policies and procedures with regards to ESG regulatory areas
- We updated our impact and materiality analysis in order to ensure well-informed sustainability planning and management.

### **For the 3-year period 2024-2026, we are committed to:**

- Directly involve our key stakeholders in the ESG impact assessment process in order to improve CY4GATE group's ability to understand and manage sustainability concerns, and to ensure value creation for all.



# ROBUST GOVERNANCE: A SOLID FOUNDATION FOR OUR ETHICAL AND SUSTAINABLE ENDEAVORS

3.1.

*Implementing and promoting responsible and sustainable behaviors requires a governance structure capable of taking ownership of and understanding and integrating the following into our business strategy and operations: management of economic, environmental impacts as well as impacts on people.*

CY4GATE Group has strengthened its governance structure, both to meet the requirements of the Euronext STAR segment and to ensure the integration of ESG considerations into our company's strategies, processes, and activities. We have adhered to an administration and control model in line with the 2020 Corporate Governance Code for Listed Companies. This model ensures an appropriate balance of powers and

a clear distinction of functions: strategic supervision is entrusted to the Board of Directors, which serves for a term of 3 fiscal years and is assisted by internal board committees; management is delegated to the Chief Executive Officer; control is carried out by the Board of Statutory Auditors.



## CY4GATE Group's Board of Directors

We appoint the Board of Directors in compliance with legal regulations and current statutory provisions, based on lists submitted by the shareholders. Only shareholders who hold a stake (individually or together with other shareholders) of at least 5% have the right to submit lists.

THE MEMBERS OF THE BOARD OF DIRECTORS *	2021		2022		2023	
	N°	%	N°	%	N°	%
Independent members	2	29%	2	22%	3	33%
Female members	2	29%	2	22%	4	44%
Male members	5	71%	7	78%	5	56%
Members under 30	0	0%	0	0%	0	0%
Members aged between 30-50 years	2	29%	3	33%	2	22%
Members aged over 50 years	5	71%	6	67%	7	78%

\* In the 2022 the number of directors in office increased from 7 to 9 following the acquisition of 100% of the share capital of Aurora S.p.a, and the approval of the Extraordinary Shareholders' Meeting of 07/02/2022.

NAME	POSITION HELD	FIRST TOOK POSITION ON	OTHER POSITIONS AND RESPONSIBILITIES HELD
Domitilla Benigni	Chairperson of Board of Directors	15/05/2020	3 positions held: Chief Executive Officer and Managing Director of ELT Group. Member of the Technical Scientific Committee of the National Cybersecurity Agency."
Emanuele Galtieri	CEO	31/03/2021	1 position as CEO of CY4GATE; 1 position as President of the Subgroup's Board of Directors
Alberto Sangiovanni Vincentelli	Director	31/03/2021	4 positions held as a Member of the Board of Directors and 4 as President
Cinzia Parolini	Independent Director	04/08/2021	1 position held in university committees
Roberto Ferraresi	Director	15/03/2022	1 position as Chief Executive Officer
Paolo Izzo	Director	04/11/2022	1 position as Vice President of Sales at ELT
Alessandro Chimenton	Director	26/7/2023	1 position as a Member of the Board of Directors
Alessandra Bucci	Independent Director	27/04/2023	3 positions as a Member of the Board of Directors, 4 positions as a member of intra-board committees, 1 position as the Board's Sustainability Representative, 1 position as President of the Sustainability Committee, and 1 position as President of the Join Group-Business Advisory Committee.
Maria Giovanna Calloni	Independent Director	27/04/2023	4 positions as a Member of the Board of Directors



*Each member of the council possesses skills relevant to the sustainable governance of the company.*

	2023
Skills	%
Strategic planning	100%
Business and finance management	100%
Risk management	67%
Innovation and Technologies	78%
Digital IT and cybersecurity	44%
Environmental sustainability	44%
Social sustainability	56%
Legal and HR management	11%

The payment of the Board of Directors is determined during a meeting during the appointment phase. The incentive plan for executive directors, as well as executives with strategic responsibilities, is governed by a specific regulation called the "Phantom Stock Option Plan 2020-2022." Directors and executives will receive incentives subject to achieving objectives as determined by the Board of Directors.

**The total annual compensation ratio**, which compares the annual total compensation of the company's highest-paid individual with the average annual total compensation of all employees (excluding the aforementioned individual), is **4.12** for 2023. Additionally, there was no change in the annual compensation of the highest-paid individual compared to the previous year

## The committees within CY4GATE Group

CY4GATE has established 4 internal board committees with advisory and propositional functions, providing additional control measures. These committees are comprised of at least three non-executive directors, with a majority being independent. The chairperson of each committee is chosen from among the independent administrators. These committees are:

- The Control, Risks, and Sustainability Committee: chaired by Cinzia Parolini and composed of Alessandra Bucci and Roberto Ferraresi.
- The Strategic Committee: chaired by Prof. Alberto Luigi Sangiovanni Vincentelli, with Domitilla Benigni, Emanuele Galtieri, and Roberto Ferraresi as members.
- The Related Parties Committee: chaired by Maria Giovanna Calloni and composed of Cinzia Parolini and Alessandra Bucci.
- The Nomination and Remuneration Committee: chaired by Alessandra Bucci and composed of Maria Giovanna Calloni and Paolo Izzo



## The Board of Statutory Auditors

The Board of Statutory Auditors consists of a minimum of 3 and a maximum of 5 Standing Auditors and 2 Substitutes. It oversees compliance with the law and the Bylaws, adherence to the principles of proper administration, and specifically, the adequacy of the organizational, administrative, and accounting structure adopted by the Company and its effective operation.

The new members of the Board of Statutory Auditors were appointed during a shareholders' meeting held on 27/04/2023, and they will hold their positions for a period of 3 fiscal years.

NAME	POSITION HELD	POSITION FIRST HELD IN	OTHER POSITIONS HELD/ROLES
Stefano Fiorini	Chairman of the Board of Statutory Auditors	15/05/2020	3 positions as Chairman of the Board of Statutory Auditors; 2 positions as Sole Auditor; 5 positions as Effective Statutory Auditor; 1 position as Liquidator.
Paolo Grecco	Statutory Auditor (Permanent)	15/05/2020	1 position as President of the Board of Revisers; 1 position as Sole Auditor; 1 position as Member of the Supervisory Board.
Daniela Delfrate	Statutory Auditor (Permanent)	04/08/2021	11 positions held as Statutory Auditor; 1 position as President of an association
Sebastiano Bonanno	Statutory Auditor (Temporary)	15/05/2020	2 positions as Board of Directors members; 3 positions as Chairman of the Board of Statutory Auditors; 5 positions as Member of the Board of Statutory Auditors; 4 positions as Sole Auditor
Allegra Piccini	Statutory Auditor (Temporary)	27/04/2023	Two positions as a member of committees and councils of professional orders



## Integrating and managing impacts

**The Board of Directors** plays an active role in integrating sustainability into our strategies, management processes and operations. The Board serves to guide and help define the scope of our sustainability practices, as well as to evaluate and approve the results we achieve and the commitments we make. This includes providing approval of our Sustainability Report.

To this end, the Board of Directors has established an ad hoc committee and assigned the responsibility for the sustainability reporting process to the CFO. The Board also gathers information and insights on specific ESG issues, and manages the associated impacts through responsibilities, functions and tasks carried out by internal board committees and the CEO. These, in turn, utilize internal control and risk management systems to identify and manage risks and impacts, reporting back to the Board of Directors.

Another important channel for acquiring information and addressing concerns is through communicating with investors. To facilitate this, the Board of Directors has adopted a Shareholder Communication Management Policy. This policy outlines various avenues for direct contact between the Company and investors through the Investor Relations function. For institutional investors, the Company also arranges one-to-one meetings, group meetings, presentations, investor days, roadshows, conference calls, or virtual meetings.

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**Zero concerns were reported to the highest governing body in 2022 and 2023.**

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**The Internal Controls, Risks, and Sustainability Committee (CRS)**, established in 2023, serves to advise the Board of Directors on sustainability matters. Its primary objective is to support the integration of sustainability into our corporate strategies and to gauge materiality. This committee oversees sustainability issues, suggests potential updates to the Sustainability Policy, and any other internal regulatory document related to it. Additionally, the CRS Committee provide strategic supervision on risk management and internal control systems, ensuring a thorough evaluation of risks, including those associated with ESG. To help enhance the Group's sustainable success, this committee gathers information on potential and actual impacts, acquiring data through feedback, complaints, and reports from relevant functions.

In addition to the CRS Committee, we have established other internal board committees who are entrusted with guidance, oversight, and support functions (Related-Party Committee and Nominations and Remuneration). There are also other bodies and other subject specific departments of the business, such as the Coordination and Consultation Body for the Prevention of Corruption, the Anti-Money Laundering function, the Internal Audit function established in 2023, as well as the Legal, Human Resources, and finance departments.

Another significant internal board committee that plays a crucial role in sustainability orientation is the Strategic Committee. This committee It assists the Board of Directors and the delegated bodies of the Company with evaluations and decision-making.

Our **Chief Executive Officer** is an ex officio member of the Strategic Committee. Within the scope of their duties, the CEO is responsible for establishing and maintaining our internal control and risk management system, as well as implementing the guidelines set by the board of administration.

With regards to sustainability issues, the CEO is involved in the process of defining our priorities and commitments. This process is led by the corporate CFO, who, with the support of a dedicated team within the Finance and Compliance department, directs, coordinates, and monitors the planning and implementation of ESG commitments and non-financial reporting.

To support the CY4GATE's focus on sustainable development, we focus on refining the knowledge and skills of the members of governance bodies and specific functions on **ESG issues and 231/2001**. In 2023, we **provided 92 hours** of training on specific aspects of the Organizational and Management Model ex dlgs 231/2001 **to 10 participants, 3 hours** of online training on anti-money laundering to **2 participants** while each and **16,5 hours** in 3 meeting to 2 participants with legal expertise, while every employee at CY4GATE S.p.A. received 1 hour of training on Gender Equality.



# AN INTEGRATED MANAGEMENT APPROACH AND RISK-BASED THINKING: FUNDAMENTALS OF RESPON- SIBLE MANAGEMENT

3.2.

*Adopting management and control systems in which ESG issues are drivers in risk analysis and evaluation allows us to act in compliance with laws and human rights, which ensures the correctness and quality of our business operations. It also enables the proactive identification and management of both positive and negative impacts.*

At CY4GATE, we ensure **responsible business conduct** through our implementation of a risk-based thinking approach which forms the foundation of our internal risk management control system. We apply this approach across various risk-specific control systems including those related to management control systems, workplace health & safety systems, quality systems, data security systems, privacy systems and all other systems dedicated to compliance with regulations.





Our group's **Risk Management system** addresses risks related to product quality, process compliance, information security, personal data handling, and crimes outlined by Legislative Decree 231/2001. This includes environmental crimes, health and safety offenses, corruption, and corporate and tax crimes. This structured system, with scheduled review and reporting mechanisms, enables timely risk management. It activates preventive measures defined within the integrated management systems (IMS - SGI):

- The **Code of Ethics** and the Organizational, Management, and Control Model (MOG) under Legislative Decree 231/2001 guide CY4GATE Group, our governing bodies, employees, collaborators, and all stakeholders. They serve as directives and controls, defining rules of conduct and tools to facilitate action. We require our clients, suppliers, and partners to fully commit to understanding and adhering to these principles and rules. Any violation of these principles will result in immediate contract cancellation. The Code of Ethics and MOG were updated in 2023 to accommodate the Group's expansion and transition to the STAR segment of the Milan Stock Exchange.
- The **Internal Control and Risk Management System** comprises rules, procedures, and organizational structures aimed at effectively identifying, measuring, managing, and monitoring key risks to contribute to the sustainable success of the company. A key entity involved with this system is our **Internal Auditing Department**, established in 2023 after we transitioned to the STAR segment.
- **Risk-specific management systems**, such as the **ISO 9001:2015** Quality Management System, ensuring quality products and services throughout the product/service life cycle to satisfy clients. Also, the **ISO 27001:2018** Information Security Management System.
- **Management systems that ensure compliance with regulations**, including the **personal data protection** management system with the delegation of a Data Protection Officer (DPO); the **workplace health and safety** management system adopted under Legislative Decree No. 81/2008 and based on UNI-ENAIL guidelines; a coherent system of integrity and transparency principles to prevent and combat illicit practices, contained in the **Anti-Corruption Code**; the organizational model adopted by CY4GATE for mitigating **risks associated with money laundering and the financing of terrorism**, (including the Anti-Money

Laundering corporate function); procedures for related parties and internal dealing **to prevent and mitigate conflicts of interest and ensure transparency towards investors; in matters of anticompetitive behavior**, CY4GATE adopts contractual clauses and, through the adoption of MOG 231, safeguards from crimes related to anticompetitive behaviors, ensuring the possibility of reporting violations through the reporting system.

- **Breach reporting systems**, including a platform that allows secure and confidential access for all stakeholders to report issues and potential or actual violations that may have negative impacts on the Group or our people's well-being. Reports can be made through the platform and/or directly through an impartial and specifically trained person/function designated within the Group's companies.

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***Zero reports or complaints received regarding negative impacts of any sort in 2022 and 2023.***

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***Zero cases of non-compliance with laws and regulations in the last two years.***

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***Zero ongoing or concluded legal actions during the reporting period related to anticompetitive behavior, antitrust violations, or practices in which the organization has been identified as a participant in the last two years.***

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**Ensuring the security and privacy of data** is a particularly important goal for us here at CY4GATE because the risks of security system breaches are continually increasing. Our Information Security Policy is implemented to safeguard the Information Management System from what we call 'threats and incidents', be they internal or external, that could compromise product development and service delivery. Our Information Security policy involves keeping the risk management system up-to-date, and safeguarding data and ICT assets. CY4GATE has obtained ISO/IEC 27001:2013 certification, which is testament to our accurate and detailed approach to business. We are capable of providing quality cybersecurity products and services in the following sectors:

- The design, development, installation, support, and maintenance of HW and SW systems in the field of Cybersecurity and Cyber Intelligence.
- The design and delivery of specialized consulting services for MSS (Managed Security Services) cybersecurity.
- Network security; security system surveillance; VA/PT; SOC Management; Incident management & analysis; Security advisory

Protecting information means ensuring the proper management of personal data through the use of security measures that ensure compliance with **GDPR** requirements and principles. This is so that we can guarantee the lawful processing of data and safeguard the rights and interests and fundamental freedoms of the data subject. In compliance with the provisions of EU Regulation 2016/679 (General Data Protection Regulation – GDPR), CY4GATE have implemented our own management system for the protection of personal data. Our **privacy management system** defines a set internal rules, methodologies, roles, and responsibilities assigned to all bodies/departments involved in the processing of personal data. As per the General Data Protection Regulation, we have tasked a data protection officer with overseeing compliance with said regulation and other legal provisions related to data protection. The data protection officer essentially acts as an integral component of our internal Control and Risk Management system.



*Zero substantiated complaints regarding breaches of client privacy and loss of client data were reported in the last two years.*

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*Zero leaks, thefts, or losses of client data were detected in 2022 and 2023.*

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We are guided by principles of integrity and the adherence to rules. The same principles guide our relationships with all our stakeholders.

**Preventing corruption**, ensuring respect for human rights, and ensuring lawful behavior and compliance with regulations at all times are principles that are made evident through CY4GATE's governance style and our implementation of tools and systems for control and management. Notably, we have adopted an **Anti-Corruption Code**, which was approved by the Board of Directors on 13/09/2023. We also established a **Coordination and Consultation Body for the Prevention of Corruption**. This body comprises the acting President, the Presidents of the Board of Statutory Auditors, and the Supervisory Body pursuant to Legislative Decree 231/01.

Furthermore, we established a **Reporting Committee**, composed of the Heads of the following departments: HR, Legal & Shared Services, Group Accounting, Finance, Controlling & Procurement. This committee is responsible for managing the investigative phase and the reporting of received reports and notifications. This committee will prepare a 6-monthly summary report of activities carried and the progress status of Action Plans related to reports concerning behaviors associated with risk of corruption.

The CRS Committee ensures additional safeguarding. This committee provides opinions on specific matters related to the identification of key corporate risks, including risks related to our internal corruption prevention system. It also supports the judgement and decision-making of the Board of Directors when it comes to their management of risks arising from adverse events.

*Each of our group companies have undergone a corruption risk assessment, covering 100% of the Group's business locations, in the last two years.*

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*There are 108 significant corruption-related risks.*

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*All 14 members (i.e. 100%) of the Board of Directors, the Board of Statutory Auditors, and the Supervisory Body have been made aware of the organization's anti-corruption policies and procedures in the last two years.*

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*All 461 (i.e. 100%) CY4GATE Group employees were made aware of the organization's anti-corruption policies and procedures in 2022 and 2023.*

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*35 employees, including managerial and representative personnel, and 113 employees were trained on anti-corruption and MOG231 in 2022.*

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*All our partners and suppliers (i.e. 100%) are kept informed about our anti-corruption policies and procedures. Our partners and suppliers all receive and sign the purchase orders, acknowledging the general conditions containing references to MOG 231 and the Anti-Corruption Code.*

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*Zero confirmed incidents of corruption and zero cases of proven corruption where employees have been dismissed or subject to measures for corruption in the last two years.*

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*Zero confirmed incidents of corruption resulting in contract termination or non-renewal with business partners due to corruption-related violations in the last two years.*

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*No legal actions for corruption were taken against our organization or our employees during the reporting period.*

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# 4.INNOVATION

## Our commitment to creativity and the generation of new ideas

*Cybersecurity is fundamental to protecting networks and information against increasingly sophisticated threats. For this reason, we are committed to ensuring that our technologies remain cutting-edge. We ensure this through the ongoing technological development and continuous evolution and innovation of products. The need to enhance the level of cyber resilience is a common goal for both the private and public sectors.*

*Moreover, we are actively engaged in the collection and analysis of online information, that is generated by the use of digital and electronic devices and disseminated through the Internet. We remain steadfast in our commitment to safeguarding the security of individuals.*

*Establishing a European Centre of Excellence in the Cyber sector is a pivotal step towards fostering autonomy and overcoming technological constraints in Europe. We have emerged as the foremost player in the Italian Law Enforcement market. We have refined our expertise in Cyber products and technology that is 'Made in Europe'.*

*As we strive for growth in both skills and scale, we invested in acquisitions and partnerships, fostering organic expansion and reinforcing our presence in foreign markets.*

*We persist in our commitment to building and ensuring a secure cyber environment that contributes to the well-being of all our stakeholders.*

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### **10 Companies**

***We have entered into strategic acquisitions and partnerships with 10 companies.***

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### **7 Universities and research centers**

***We work with 7 research centers and universities to advance our innovation process.***

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### **€7.5 M**

***The value of our investments into R&D in 2023***



# Material topics and our contribution to the SDGs

## SUSTAINABILITY ISSUE

- Leadership in innovation
  - The safeguarding and security of the community
  - Cybersecurity and the protection of critical infrastructure
- 

## 2030 SDGS TO WHICH WE ARE CONTRIBUTING





# Our impact and commitment to sustainability

## ISSUE: LEADERSHIP IN INNOVATION

### OUR IMPACT

#### *Not managing the issue appropriately could lead to:*

Negative economic and reputational impacts for CY4GATE, due to an insufficient ability to anticipate technological changes, successfully develop new products, and promptly offer new services. A low inclination towards innovation could also have repercussions on the development of the cyber sector and the economy of the countries in which we operate.

#### *Focusing on leadership in innovation means:*

Ensuring high-quality and innovative product standards, investing in Research and Development, forming alliances and partnerships (both in Italy and internationally), promoting a culture of innovation in the cyber sector, fostering the overcoming of technological constraints, and simultaneously ensuring autonomy and technological sovereignty both in Italy and in Europe.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

The scouting of national and European organizations with expert know-how and subsequently carrying out acquisitions and forming partnerships. We will do this to guarantee technological innovation, overcome technological constraints, and secure our position in new relevant market segments. The presence of a dedicated Research and Development organizational structure, in cooperation with other entities/organizations in the innovation ecosystem



## ISSUE: THE SAFEGUARDING AND SECURITY OF THE COMMUNITY

### OUR IMPACT

#### *Not managing the issue appropriately could lead to:*

Negative impacts on the security of members of the public and their legitimate interests, as well as harm to our reputation, due to the improper use of cyber intelligence and cybersecurity solutions.

#### *Focusing on the safeguarding and security of the community means:*

Investing in refining and improving the proprietary technologies of our products, establishing partnerships with experts, and reinforcing procedures to prevent any unauthorized and illegal replication of our technological solutions. This commitment extends across the entire value chain, and it involves ensuring the respect for human rights and bolstering public safety enforcement by relevant authorities.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

At CY4GATE, we have adopted a Code of Ethics in which we pledge to respect human rights. Subscribing to this Code of Ethics is an integral part of the contractual documentation we provide to both our clients and suppliers. Furthermore, we have refined our procedures to prevent any unauthorized and illegal reproduction of our technological solutions.



## ISSUE: CYBERSECURITY AND THE PROTECTION OF CRITICAL INFRASTRUCTURE

### OUR IMPACT

*Not managing this issue appropriately could lead to:*

Negative impacts on the security and continuity of public utility services, as well as negative impacts on our reputation.

*Focusing on the cybersecurity and the protection of critical infrastructure means:*

Investing in refining and improving our proprietary product technologies and maintaining a constant focus on training our partners and clients to ensure greater cyber resilience for both public and private enterprises. This will consequently help safeguard citizens' right to the privacy of their information and secure and continuous access to public utility services.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

The development of proprietary technologies.

Providing dedicated training programs for improving the cyber resilience of our clients and suppliers.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

### For the 3-year period 2023-2025, we committed to:

- Continuing our internationalization strategy and the establishment of a European center of excellence for cyber technologies and products, making them available to companies and institutions.
- Promoting innovation and the development of Italian entrepreneurship in the cyber sector.
- Ensuring compliance with the principles of the Global Compact in order to foster the creation of a sustainable digital world that respects human rights.

### In line with the above commitments, in 2023 we:

- Finalized our acquisition of 55% DIATEAM.
- Completed the acquisition of 77% of IKS TN. This third acquisition reaffirms our positive track record of mergers and acquisitions (M&A) over the last 2 years.
- Reported on our progress after one year of joining the United Nations Global Compact. We did this in accordance with the Global Compact COP (Communication of Progress) policy.

### For the 3-year period 2024-2025, we are committed to:

- Continuing with our internationalization strategy and the establishment of a European center of excellence for cyber technologies and products. We commit to laying the right foundations for robust growth as first movers in the industry and to create additional value for our clients and shareholders.
- Sustaining our promotion of innovation and the development of Italian entrepreneurs in the cyber sector. Continuing to ensure and promote adherence to the principles of the Global Compact. We commit to this to foster the creation of a sustainable digital world that respects human rights.



# LEADERSHIP IN INNOVATION: MANAGEMENT METHODS AND PROCESSES

4.1.

*Our management strategies are designed to foster an innovation-friendly environment, employing a multi-tiered growth and strengthening strategy.*

The development and refining of expertise and cutting-edge technologies in the field of cybersecurity is becoming increasingly crucial to ensure public safety and the smooth and secure conduct of activities by businesses, institutions, and the civil society, both in Italy and in Europe.

With this in mind, CY4GATE Group is actively working towards establishing a European center of excellence in the cybersecurity sector. Our primary goals are to secure technological sovereignty and enhance our value proposition for our clients. To achieve these objectives, we are implementing a comprehensive growth and reinforcement strategy on several levels.

Including:

- The acquisition of specialized companies in the cyber sector
- The forging of strategic and operational alliances
- Engaging in international research and development partnerships and groups
- Taking part in networks and initiatives in Italy and internationally
- The adoption of an innovation-focused organizational structure

We make **acquisitions** in order to establish ourselves as a leading group in the field of cyber intelligence and cybersecurity. This will be achieved through the amalgamation of skills, experiences, and products which will enable our entire group to meet the demands of a rapidly evolving market and to have a more significant impact internationally.

In January 2023, CY4GATE successfully concluded the acquisition of a 55.33% stake in **DIATEAM SAS**, a French company specializing in designing, developing, and implementing advanced systems for testing, validation, and training in the cybersecurity domain. DIATEAM SAS cater to government and corporate clients. Our strategy for investment in DIATEAM primarily aims to expand CY4GATE's cybersecurity segment offering, which will allow us to strengthen our presence beyond the national market by capitalizing on upselling and cross-selling opportunities with existing clients. Furthermore, the technological and professional synergies between our two companies will enrich the expertise of us both. This acquisition will facilitate the integration and enhancement of our product portfolio along the cybersecurity value chain.

In November 2023, CY4GATE announced the acquisition of **XTN Cognitive Security®**, a product-based company operating in the online fraud prevention sector. XTN Cognitive Security® has a notable presence in banking and also has ventures in automotive sectors. This acquisition has created valuable synergies with CY4GATE products and has opened up substantial upselling and cross-selling opportunities.



We also aim to establish ourselves as a leading group in the cyber intelligence and cybersecurity sector by forming **strategic alliances with companies** that provide complementary products and services.

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Our well-established partnership with **Alfa Group** allows for an integrated approach to preventing, managing, and countering cyber fraud in the banking and insurance sector. Similarly, our enduring partnership with **Keytech** enables the joint provision of effective and specialized solutions for real-time analysis and management of cyber-attack risks, even with SAP – the widely used management software in companies and public entities globally. Our partnership agreement, initiated in 2022 with **Almawave**, a part of the Almagroup and a leader in Artificial Intelligence, natural language analysis, and Big Data services, is part of a strategic partnership aimed at integrating specific Almawave technologies into CY4GATE's decision intelligence platforms. These technologies focus on natural language recognition and interpretation through natural language processing techniques.

Also last year, we signed an agreement with **ATLANTICA Cyber Security**, a company controlled by Atlantica Digital that specializes in defending businesses from cyber-attacks. This agreement enables the provision of advanced cybersecurity services for the country's critical infrastructure. Our cooperation with ATLANTICA is focused on safeguarding the data and applications of Italian companies and institutions. Furthermore, the cybersecurity teams of CY4GATE and Atlantica have established an Incident Response task force to provide swift solutions and responses to cyber-attacks targeting clients protected by the Atlantica's services, powered by CY4GATE technology.

Our new partnership with **DeepCyber**, an Italian company specializing in Cyber Threat Intelligence solutions, has enabled CY4GATE to integrate DeepCyber's technologies and know-how to enhance our cybersecurity business line. Moreover, our 2023 agreement with **Reco 3.26**, an Italian company specializing in Image Recognition and Video Analysis for both private and public entities, has granted CY4GATE exclusive rights to utilize Reco's artificial intelligence technology for video analysis and computer vision within national Law Enforcement Agencies.

Our partnership with **JAKALA**, a leading MarTech company in digital transformation, has resulted in the development of ProntoCyber®: the first e-commerce platform for cybersecurity tailored for professionals, SMEs, and Large Enterprises. This innovative solution combines JAKALA's digital expertise with CY4GATE's cyber know-how to address the cybersecurity needs of professionals and SMEs, who are particularly exposed to cyber risks and often lacking in terms of cyber resilience.

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Integrating technological solutions and expertise to expand and strengthen our 360° cyber offering, along with continued investment in **research & development** will, support CY4GATE Group's strategic goal of becoming a key player in the cyber sector, both in Italy and internationally.

For years, CY4GATE has been actively involved in relevant Research and Innovation initiatives, both internationally and in cooperation with our partners with whom we have encouraged cross-fertilization

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- **ECYSAP** project: This is a European project for information defense (also known as the "European Cyber Situational Awareness Platform") with the main objective of creating a European platform for cyber situational awareness to streamline the work of military personnel in cyber missions.
- **REACT** project: Named "Responsive Electronic Attack for Cooperative Task," this project aims to develop Cyber Electro Magnetic Activities (CEMA) capability and cyber resilience in the avionics domain.
- The **GEODE** project: The "Galileo for EU Defence" project aims to develop military capabilities within the European Union using the European satellite navigation system Galileo, particularly focusing on the Public Regulated Service (PRS).
- **Cyber4de** project: Launched within the European Defence Industrial Development Programme in December 2021, the "Cyber Rapid Response Toolbox for Defence Use" (CYBER4DE) project addresses the challenge of developing a modular and scalable rapid response cyber toolbox to handle cyber incidents in various complex national and international scenarios.

- **CERERE** Project: "Cyber Electromagnetic Resilience Evaluation on Replicated Environment" project aims to develop advanced cyber resilience verification capability for systems engaged in planning and/or executing attack chains through the use of the electromagnetic spectrum (i.e., Cyber Electro Magnetic Activities).
  - **Alnception Research** Project: The international research project "AI Framework for Improving Cyber Defence Operations" (Alnception), led by a consortium of which CY4GATE is a part, secured funding from the European Defence Fund (EDF) in 2021. The project aims to develop techniques and tools based on advanced artificial intelligence algorithms to promptly detect potential malicious intrusions into systems and devices, generating alerts to prevent cyber attacks from affecting vital defense and security activities. The project, with a duration of 3 years and a total value of approximately €8.2 million (of which €450,000 for CY4GATE), involves companies and research entities from eight nations.
  - **Research and Innovation Contract**: In November 2023, CY4GATE signed a contract for a Research and Innovation activity in the field of cybersecurity with a significant national high-tech entity. The supply has a value of €700,000 for a duration of 6 months and involves the deployment of a team of highly qualified resources from the company to initiate an initial phase of study and research on the protection of interconnected networks and sensors (IoT/OT). This is the first phase of a broader, multi-year international project for which the company has been recognized as a qualified technological partner.
  - **Gartner Recognition**: For the year 2023, CY4GATE has been reaffirmed as a "Representative Provider" by Gartner for the most advanced applications of Artificial Intelligence in Decision Intelligence and Cyber Security.
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We are deepening our own know-how and fueling research and development through our partnerships with **universities and other public institutions**.

In March 2023, CY4GATE joined **CATCH at MIND, the European Digital Hub coordinated by the University of Milan**. In the role of a technological partner for cybersecurity, CY4GATE works together with partners from the following backgrounds: academia, clinical, technological, innovative business, and the third sector. The hub aims to accelerate the transition of the Italian and European healthcare system into the era of digital innovation.

Our internship programs and the participation of CY4GATE professionals in academic initiatives demonstrate a good practice of cross-development between research, implementation, and education. Additionally, we are working together with university start-ups to continue nurturing research and development activities.

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Our partnerships, initiated in 2019, with the LUISS Cyber Academy, the CNR for the CECASP research project, and the collaboration with the University of Rome La Sapienza for the SAFE research project in 2020 all contribute to our ongoing commitment to fueling research and innovation. Additionally, collaborations with the University Roma Tre, Tor Vergata University, and agreements with RCS and the Polytechnic University of Turin for the 2020-2022 period align with our strategic goals. Since June 2022, we have been collaborating with the University of Padua, including a contract for three researchers with the University of Padua and the University of Turin. Furthermore, we support the Université libre de Bruxelles' participation in the NMUN Initiative, a UN simulation in New York aimed at university students to foster new ideas and strategies.

In 2023, 1 industrial doctorate was activated with the University of Cassino and another with the University of Padua, with which 2 research grants were also activated. Furthermore, support was provided for the participation of the Université libre de Bruxelles in the NMUN Initiative, a UN simulation taking place in New York aimed at university students to promote the emergence of new ideas and the definition of new strategies.

The collaborations started in previous years remain.

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**Participating in national and international networks and initiatives** puts CY4GATE Group in the public eye and allows us pursue synergies for the joint development of technologies and projects with a broader array of industry companies, institutions, and research entities that share our guiding principles.



We confirmed our participation in "Cyber Security Made in Europe" after obtaining the **ECSO**, the "**Cyber Security Made in Europe Label**" at the end of 2022. This is a prestigious and unique certification for companies in the field of cybersecurity with legal headquarters and a primary market based in Europe.



Our ongoing collaboration with **GAIA-X**, endorsed by the Italian government, aims to establish a federated European cloud services infrastructure. This initiative seeks to foster an open, transparent, and secure digital ecosystem which will enable the sharing of data and services within a trusted environment. CY4GATE will contribute by offering our know-how in Decision Intelligence and Cyber Security services to effectively counter cybersecurity threats in the cloud.



Our participation as a partner in the **Cybersecurity Competence Centre 4.0** is also noteworthy. This competence center is the product of a diverse, interdisciplinary, and multi-stakeholder public-private partnership. It covers a broad spectrum of expertise and promotes the development of a network of expert partnerships, supporting the provision of guidance and training services, as well as the development of research and innovation projects. In 2023, CY4GATE emphasized the importance of technological sovereignty and, looking ahead to the future of cybersecurity, highlighted the collective need for a focus on the cybersecurity protection of space infrastructure as well as increased focus on the supply chain. The latter, with its most vulnerable elements being SMEs, is increasingly targeted in cyber attacks.



In 2022, CY4GATE Group joined the **ABI Lab Consortium**, which secured us the right to use the "Partner ABI Lab" label. Furthermore, we took on the role of a cybersecurity advisor for CERTFin, the Computer Emergency Response Team for the Italian financial sector. As of 2023, CY4GATE maintains its position as an Innovation Partner for the research and innovation center.



CY4GATE also participated in the IEEE International Workshop on Technologies for Defense and Security. We presented a paper on the integration of Artificial Intelligence and Machine Learning in military decision-making. The paper assessed the role of AI and Machine Learning in enhancing effectiveness and efficiency compared to human decisions.



CY4GATE's Chairman of the Board, Eng. D. Benigni, is a founding member actively involved in the Women4Cyber Foundation initiative. He currently serves as the President of Women4Cyber Italy. Established in 2018 with the endorsement of the European Commission, the Women4Cyber initiative officially became a part of the European Cyber Security Organization (ECSO) in January 2019.

In 2023, CY4GATE actively participated in promotional activities and the Youth Ambassador Program, which involved the engagement of five young women committed to supporting the mission of W4C Italia for one year.



CY4GATE actively maintains technological leadership by adopting an **organizational model that encourages a continuous approach to innovation**. This involves employing highly qualified personnel, utilizing innovation-focused work methods, and employing design thinking processes that foster internal collaboration across different specializations. We place emphasis on continuous learning and engagement in highly challenging environments.

In line with this, in 2022, we established a "Data & Artificial Intelligence Centre of Competence". This specialized area within the Engineering department actively focuses on researching, developing, and implementing Composite AI models to benefit all product Business units.

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***In 2023 the number of CY4GATE employees involved in Research and Development activities increased from 112 to 137.***

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# CRITICAL INFRASTRUCTURE AND THE COMMUNITY: OUR RESPONSIBILITIES AND COMMITMENTS

*We develop cybersecurity services to enhance information protection, thus minimizing the impact of data breaches with a prompt response and personalized solutions.*

Incorporating the advantages of innovation for the benefit of the community is a fundamental part of our mission. Prioritizing the defense against attacks on critical infrastructures, both public and private, is a national and European priority. Dealing with criminal and terrorist activities, along with managing 'big data' for public utility, requires advanced solutions. For CY4GATE Group, transforming insights from Research and Development into tangible cybersecurity solutions is a social responsibility first, and a business opportunity second. Therefore, we always operate in compliance with regulations and licenses to ensure security and respect for human rights, preventing any misuse of our technological solutions.

CY4GATE Group operates under the NATO Commercial and Governmental Entity Code (**NCAGE code**), assigned by the Ministry of Defense through the Central Codification Body (OCC).

The company also holds a license under Article 28 of the TULPS (An acronym for "Testo unico delle leggi di pubblica sicurezza"; in English: Consolidated text of public safety laws) for the design, manufacture, possession, and commercialization of electronic equipment specifically designed for military use, intended for the Armed Forces and national and foreign police forces.

CY4GATE Group is **registered with the National Registry of Companies and Consortia for the export, import, transit, and brokerage of armament materials** in whole or in part,

in specific categories as better defined by the Ministerial Decree of September 29, 2021.

As of 2020, CY4GATE Group holds **NOSI** (an acronym for "nula osta di sicurezza industriale"), which, according to Italian regulations, serves as an authorization for the processing of information, documents, or materials classified up to 'top secret' level.

CY4GATE is certified with the **"Cybersecurity Made-In Europe"** label.

Sales of our so-called "dual use" products to non-EU countries adhere to the export authorization procedures conducted by the **UAMA office** (Unit for Authorizations of Armament Materials) of the Ministry of Foreign Affairs and International Cooperation.

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## Of CY4GATE Group's client base

**86% are Cyber Intelligence solutions clients.**

**14% are Cyber Security clients.**

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# Cybersecurity and the protection of critical infrastructure

Digitalization represents a powerful engine for global economic growth and is one of the fundamental pillars of Italy's national Recovery and Resilience Plan (PNRR) and of European development strategies. However, the widespread use of digital tools increases the risk of cyber-attacks for both companies and individuals. These attacks can jeopardize the know-how and operations of businesses and public institutions, putting at risk access to and availability of essential public services, as well as the misuse of sensitive data and information."

	CY4GATE GROUP 2022	CY4GATE GROUP 2023
% of public sector clients for Cyber Security solutions by type	Security agencies (14.2%) Government entities (28.5%) Armed forces (28.57%) National/European research programs (28.57%)	Security agencies (37.5%) Government entities (50%) National/European research programs (12.5%)
% of private sector clients for Cyber Security solutions by type	Public Utilities (9.1%) Other (90.1%)	Public Utilities (25 %) Other (75%)

Our cybersecurity solutions and services, which we develop through collaborations with partners and companies within the group, are designed to enhance the protection of organizations' data and information. Our solutions and services aim to minimize impacts in case of data breaches and create conditions for a rapid response. CY4GATE provides comprehensive support to businesses in the field of Cybersecurity. We do this by designing and evaluating complex ICT systems and solutions. Our company assists organizations in identifying, managing, and resolving cyber-attacks before they can damage their core business. Operating through an integrated SOC/CERT model, CY4GATE ensures rapid and effective incident response through our digital emergency service, providing a team of cybersecurity experts. To enhance client defenses, CY4GATE runs a recruitment, training, and specialization program, recognizing the importance of knowledge and expertise as the frontline of defense. CY4GATE Academy and DigiLab provide bespoke courses and mentoring, simulating real cyber challenges

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**9 training courses delivered in 2023.**

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# Safeguarding of the safety of the community

The cyber-Intelligence solutions that we develop at CY4GATE Group contribute significantly to the efforts of governments, public institutions, and law enforcement agencies to protect their citizens and save lives. In fact, the ability to gather and analyze online information (that is generated by the use of digital and electronic devices and disseminated through the Internet) is fundamental to modern law enforcement intelligence activities. This is crucial for countering criminal and terrorist actions, conducting investigations, and making decisions in situations of uncertainty.

## 86% of CY4GATE Group's clients who purchase Cyber Intelligence solutions consist of Prosecutors, Security Agencies, and Armed Forces

	CY4GATE GROUP 2022	CY4GATE GROUP <sup>2</sup> 2023
% of public sector clients for Cyber Intelligence solutions by type.	Judicial Office 94% Security Agencies 3% Armed Forces 3%	Judicial Office 91% Ministries 5% Security Agencies 3% Armed Forces 1%

CY4GATE's forensic intelligence software platforms for the collection and analysis of passive and active data were developed in compliance with Italian and European regulations. These platforms provide significant assistance in investigative activities, under the mandate of a public prosecutor. Through artificial intelligence, our Gens.AI software creates virtual avatars that interact with physical subjects on the web. Also known as Virtual Humint software, this software is particularly effective in combating drug trafficking, child pornography, and subversive crimes.

Use of such software is reserved for Italian and foreign police forces. Specifically in Italy, their use is allowed exclusively for countering specific serious crimes at the disposal of the Judicial Authority, in compliance with the provisions of the Privacy Guarantor.

Our cyber-Intelligence solutions such as QUIPO (a decision Intelligence platform) and C4I, aid intelligence analysts by extracting "informational output" on a specific subject, objective, or target from vast amounts of data from diverse sources. Such software enhances decision-making by providing a comprehensive understanding of scenarios and assessing potential impacts of each choice.

<sup>2</sup> The figures for 2023 refer to the expanded scope, which includes DARS, in addition to CY4GATE and RCS



## 5. OUR PEOPLE

### A key resource for business development

*It is our people that power our innovation. We aim to promote their well-being and actively encourage a positive work-life balance, and we aim to provide everyone with opportunities for personal and professional development. We ensure our people benefit from job and contractual stability and have created an empowering and inclusive workplace. These are all imperatives for CY4GATE group.*

*Each year, we dedicate ourselves to improving our working processes, promoting active participation and encouraging personal skills, and supporting women's empowerment in their corporate development journeys. We recognize that each individual is unique and we value them for it. It is our duty and responsibility to understand each person's capabilities, develop their skills, and enrich their professional and personal experience. We do this through providing continuous training opportunities.*

*We are working towards becoming a European cyber technology center of excellence. Creating a sense of community and nurturing relationships among colleagues are essential to pursuing our goals. We therefore strive to ensure that each and every employee feels like an integral part of the CY4GATE team, and a growing project that benefits everyone.*



# The People of CY4GATE



*In 2023, CY4GATE counted 461 employees<sup>3</sup>  
of which*

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*18% are women, 13% of which are team leaders  
32 individuals are employed on apprentice contracts*

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*CY4GATE is growing each year  
In 2023, we hired 102 employees  
of which 17% were women*

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*In 2023, we also provided 4,973 hours of training*

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<sup>3</sup> This figure refers to the companies within the Group included in the scope of the sustainability balance sheet consolidation: CY4GATE, RCS Spa, and Dars Telecom S.L..



# Identification of material topics and our contributions to the SDGs (UN Sustainable Development Goals)

## SUSTAINABILITY ISSUES

- People management and care
  - Empowerment of individuals
  - Equal opportunities and gender equality
  - Health & safety at work
- 

## SDG'S TO WHICH WE ARE CONTRIBUTING





# Our impact and commitment to sustainability

## ISSUE: PEOPLE MANAGEMENT AND CARE

### OUR IMPACT

*Not managing this issue appropriately could result in:*

Inadequate human capital allocation, loss of necessary skills and competencies, high employee turnover rates, low levels of productivity, decreased motivation and poor well-being levels in the workplace, and a diminished ability for CY4GATE to attract and retain quality talent.

### *Caring for our people means:*

Recognizing the value, merit and contribution of each individual, and creating a stimulating and encouraging work environment that fuels motivation. It means creating a sense of belonging and promoting the well-being of our employees as well as fostering job stability.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

Implementation of internal procedures and policies for fair recruitment. Our hiring process and human resource management is based on merit recognition and the principle of equal opportunities. We implement an agile working approach that allows each and every employee to define set and manage their own workloads with a focus on work-life balance.

Implementation of a welfare plan and a smart working policy. Implementation of the Integrated Management Office (a temporary structure that leads integration efforts) which allows us to remain close to our employees and ensure that every employee receives the same attention and that their needs are catered to equally.



## ISSUE: EMPOWERMENT OF INDIVIDUALS

### OUR IMPACT

*Not managing this issue appropriately could lead to:*

A depletion of in-house skills, a decrease in motivation levels and professional satisfaction, direct negative impacts on personnel in terms of both professional and financial growth and employability/mobility in the market.

*Focusing on the empowerment of individuals means:*

Fostering innovation and corporate growth, creating a stimulating environment, and generating opportunities for each and every employee's professional and personal growth.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

Implementation of training and appraisal procedures within management systems. The development of tailored training and career path mentoring and the introduction of cultural exchange programs among group companies.



## ISSUE: EQUAL OPPORTUNITIES AND GENDER EQUALITY

### OUR IMPACT

*Not managing this issue appropriately could lead to:*

Undervaluing the power of uniqueness and diversity, an increased risk of employee discrimination, which may have a negative impact on operations and our reputation, as well as cause moral harm and limit employees' rights and their opportunities for personal and professional growth.

Promoting equal opportunities and gender equality means advocating for diversity, equality, and inclusion. It involves fostering equal opportunities, reducing the gender and generational gaps, facilitating a positive work-life balance, creating a positive working environment that fosters well-being and growth, increasing hiring rate of women and young people, as well as contributing to the reduction of employment inequality in the STEM sectors.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

Adoption of a gender equality policy, appointing of a steering committee in accordance with the guidelines outlined in UNI PdR 125:2022 and obtaining certification. (The UNI PdR 125:2022 certification helps organizations to promote gender equality)



## ISSUE: HEALTH AND SAFETY AT WORK

### OUR IMPACT

*Not managing this issue appropriately could lead to:*

Health risks for employees and partners and non-compliance with regulations.

*Focusing on health and safety means:*

Preventing and reducing occupational illnesses, enhancing the health and well-being of workers, fostering a culture of workplace safety and adhering to workplace legislation.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

Ensuring the presence of a risk assessment document relating to the protection of health and safety in the workplace. Implementation of the Organizational, Management and Control Model pursuant to the legislative decree 231/2001, including the identification and management of risks related to health and safety at the workplace.

Training and education on health and safety at the workplace for all employees, including interns and those employed on training schemes.

Insurance covering all personnel, including third parties operating in workplace premises or under the supervision of CY4GATE group.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

### For the 3-year period 2023-2025, we committed to:

- Finalizing our integrated employee management policies Promoting and facilitating intercultural exchanges among employees across our international subsidiaries/group companies.
- Implementing equal opportunities management systems and obtaining gender equality certification

### In line with the above commitments, we achieved the following in 2023:

- We continued the implementation of employee management policies and procedures through the Integrated Management Office
- We facilitated employee exchange opportunities between our offices and subsidiaries/group companies. This helped improve the integration process for our group companies while enhancing the professional development of our employees.
- We implemented a gender equality management system in line with UNI/PdR 125:2022 certification and earned certification for the 3-year period 2023-2025.

### Between 2024 and 2026 we are committing to:

- Implementing the gender equality policy and fulfilling our commitments
- Continuing to strengthen our skills by nurturing talent and fostering opportunities for professional growth for our employees.



# OUR EMPLOYEES: THE KEY TO OUR SUCCESS

*Our human resource management strategies place a lot of focus on employee well-being. This positively impacts employee engagement, employee retention and employee turnover rates.*

For CY4GATE Group, employee management goes far beyond the recruitment and employment of talent.

We have taken substantial action to ensure a fair approach and to promote equal opportunities. Not only have we worked hard to standardize processes and procedures, but we have also implemented changes to our organizational structure.

Specifically, in 2022 we set up an Integrated Management Office (IMO), centralized in the Rome office. Over the course of 2023, we streamlined the roles of this office and refined the areas of focus for the HR TEAMS for each company within CY4GATE group.



# An overview of our employees

	CY4GATE GROUP 2022	CY4GATE GROUP 2023
Total employees	366	461
<i>of which women</i>	71	84
<i>% women</i>	19%	18%
<i>of which men</i>	295	377
<i>% men</i>	81%	82%
<i>women employees based in Italy</i>	366	430
<i>% employees based in Italy</i>	100%	93%
<i>Employees based abroad</i>	0	31
<i>% employees based abroad</i>	0%	7%



# Job security and stability

Job security contributes to maintaining a positive and productive workplace. Employees who feel safe in their job roles are more inclined to stay motivated, engaged and to work efficiently. This, in turn, results in an increase in business productivity and a reduction of costs associated with employee turnover and training costs.

Individuals who commit to staying with us long-term develop a profound understanding of our processes, products, and clients. This enhances both the quality of their work and client satisfaction levels.

We believe that our company policy of ensuring job security and contractual stability is key to attracting and retaining high-caliber talents who share our values.

	CY4GATE GROUP 2022	CY4GATE GROUP 2023 <sup>4</sup>
Total no. of full-time employees	360	449
<i>No. of Women</i>	65	75
<i>No. of Men</i>	295	374
<i>Of which are based in Italy</i>	360	421
<i>Of which are based abroad</i>		28
Total no. of part-time employees	6	12
<i>No. of Women</i>	6	9
<i>No. of Men</i>	0	3
<i>Of which are based in Italy</i>	6	9
<i>Of which are based abroad</i>		3

Continues on next page...

<sup>4</sup> The data in the table marked with \* refers to the companies CY4GATE Spa, RCS Spa, Azienda Informatica Italiana srl (incorporated into RCS during 2023), totaling 430 employees. The other data refers to all companies within the Group included in the scope of the sustainability balance sheet consolidation, totaling 461 employees.



# Job security and stability

	CY4GATE GROUP 2022	CY4GATE GROUP 2023 <sup>4</sup>
Total number of employees on temporary/ fixed-term contracts*	1	3
<i>No. of Women</i>	0	2
<i>No. of Men</i>	1	1
<i>Of which are based in Italy</i>	1	3
Total number of employees on permanent contracts*	365	427
<i>No. of Women</i>	71	74
<i>No. of Men</i>	294	353
<i>Of which are based in Italy</i>	365	427
% of total employees covered by collective agreements	100%	100%
Total number of third-party workers whose work is overseen by the organization*	36	59
Minimum no. of weeks' notice provided to employees and their representatives prior to implementation of significant operatio- nal changes.	We adhere to the relevant regulations governing events that impact employees	

<sup>4</sup> The data in the table marked with \* refers to the companies CY4GATE Spa, RCS Spa, Azienda Informatica Italiana srl (incorporated into RCS during 2023), totaling 430 employees. The other data refers to all companies within the Group included in the scope of the sustainability balance sheet consolidation, totaling 461 employees.



# Employee welfare

In compliance with the provisions of the Metalworking National Collective Labor Agreement, CY4GATE employees benefit from complementary pension tools and accompanying support services.

In 2023, the **Health Plan Regulation** came into effect, which provides a higher level of healthcare assistance than the basic plan provided by the Metasalute contractual fund. This new benefit applies to all permanent employees. The monthly membership fee to the fund is paid by the Company. Each employee has the option of adding his or her family members to the coverage (the additional contributions/fees being the responsibility of the employee).

At CY4GATE Group, we recognize the value of **smart working**. That's why we have put in place specific regulations to facilitate its implementation.

Our group is also committed to creating a peaceful work environment and promoting a **sense of community** by putting in place various initiatives, such as:

- Flexible in-and-out working schedules and autonomy on how to get the job done.
- An in-house bar, refreshment points and designated spaces for breaks.
- The provision of a company butler service and a fitness center, as well as partnerships with various sports and health centers.
- Opportunities to receive an Amazon voucher worth 200 euros (as requested by employees) and discounts at sports centers.
- A creativity room and a pet-friendly policy.

Benefits provided to full-time employees, but not applicable to employees on part-time or temporary contracts include:

- Healthcare assistance in particular Metasalute for office workers/regular employees and middle-managers, and Fasi with Previndir for managers
- Company cars. Permitted use of which is based on role and position.
- Complementary pension fund (Cometa for office workers/regular employees and middle-managers, Previgen for managers)
- Extraprofessional injury insurance for managers (Previndir Fund).

Our low employee turnover rates reflect our investment in creating a working environment where employees feel appreciated and valued.



# Employee welfare

## CY4GATE GROUP 2023<sup>5</sup>

Employee turnover rate	8%
Turnover rate for female employees	1%
Turnover rate for male employees	10%
Turnover rate for employees aged under 30*	29%
Turnover rate for employees aged between 30-50*	6%
Turnover rate for employees aged 50+*	2%
Turnover rate for employees based in Italy	10%
Turnover rate for employees based in foreign countries	1%
Total terminations	66
<i>No. of women</i>	15
<i>No. of men</i>	51
<i>Aged under 30*</i>	11
<i>Aged between 30-50*</i>	26
<i>Aged 50+*</i>	7

<sup>5</sup> The data marked with \* refers to the companies CY4GATE SpA, RCS SpA, Azienda Informatica Italiana srl (incorporated into RCS during 2023), totaling 83 employees hired and 44 terminated; all others refer to all companies included in the scope of the Sustainability Balance Sheet consolidation



# GENDER EQUALITY: OPPORTUNITIES TO VALUE AND PROMOTE

5.2.

*We are committed to implementing a management system that promotes equal opportunities, values diversity, and supports female empowerment. This commitment extends to providing opportunities for growth within the company, ensuring equal pay, implementing policies for supporting parenthood and positive work-life balance as well as policies for managing business processes.*

In 2023, we adopted new systems for the management of **equal opportunities** and completed the UNI/PdR 125:2022 gender certification process. We actively support the implementation of policies which promote gender equality and female empowerment within the company.

**We have appointed a Gender Equality Committee** who will oversee and conduct the tasks and activities outlined in the Gender Equality Management System. This committee also has a dedicated email address for reporting and handling any enquiries and complaints (comitato\_pdr@CY4GATE.com). The committee has also implemented an alternative system for submitting anonymous reports. The individuals appointed to guide the committee are named in the table below:

NAME AND SURNAME	ROLE IN THE ORGANISATION
Daniele Narduzzi	Chief Human Resource & Legal Officer
Caterina di Casola	Head of Human Resources
Alessio Allegria	Quality Specialist
Stefania Sica	Head of Defense & Security Sales Italy
Alessia Pisoni	Finance Business Partner Manager
Nicoletta Pantano	Technical Leader



Our Human Resources Manager and our HR Training Manager participated in the Target Gender Equality training program, developed by the United Nations Global Compact, to enhance the knowledge and skills necessary to increase the impact on SDG 5 - Gender Equality of the United Nations' 2030 Agenda.



## Employees under 30 go from 10% to 16% and the number of female managers triples

	CY4GATE GROUP 2022		CY4GATE GROUP 2023 <sup>6</sup>	
	N°	%	N°	%
Managers	15	4%	20	4%
<i>No. of women</i>	1	7%	3	15%
<i>No. of men</i>	14	93%	17	85%
<i>Aged under 30*</i>	0	0%	0	0%
<i>Aged between 30-50*</i>	10	67%	9	56%
<i>Aged 50+*</i>	5	33%	7	44%
<i>Belonging to a 'vulnerable' category*</i>	-	-%	0	0%

<sup>6</sup> The data marked with \* are calculated with reference to CY4GATE S.p.a. and RCS Spa, Azienda Informatica Italiana srl (incorporated into RCS during 2023), totaling 16 managers, 55 middle managers, and 327 office-workers. The other data are calculated in relation to the total number of employees of all companies within the Group included in the scope of the sustainability balance sheet consolidation



	CY4GATE GROUP 2022		CY4GATE GROUP 2023 <sup>6</sup>	
	N°	%	N°	%
Total managers present in the first line of reporting to the top management*	12	80%	14	88%
Female managers present in the first line of reporting to the top management	0	0%	2	13%
Middle managers	47	13%	57	12%
<i>No. of women</i>	5	11%	7	12%
<i>No. of men</i>	42	89%	50	88%
<i>Aged under 30*</i>	0	0%	0	0%
<i>Aged between 30-50*</i>	34	72%	35	64%
<i>Aged 50+*</i>	13	28%	20	36%
<i>Belonging to a 'vulnerable' category*</i>	-	-%	1	2%
Women in the organization with delegated authority over a budget for expenditure/investment*	2	3%	2	3%
Office workers	277	76%	352	76%
<i>No. of women</i>	58	21%	70	20%
<i>No. of men</i>	219	79%	282	80%
<i>Aged under 30*</i>	28	10%	51	16%
<i>Aged between 30-50*</i>	211	76%	241	74%
<i>Aged 50+*</i>	38	14%	35	11%
<i>Belonging to a 'vulnerable' category*</i>	-	-%	13	4%
Apprentices	27	7%	32	7%
<i>No. of women</i>	7	26%	4	12%
<i>No. of men</i>	20	74%	28	88%
<i>Aged under 30*</i>	27	100%	31	97%
<i>Aged between 30-50*</i>	0	0%	1	3%
<i>Aged 50+*</i>	0	0%	0	3%
<i>Of which are technical apprentices</i>	25	93%	30	94%
<i>Of which are administrative apprentices</i>	2	7%	2	6%
<i>Belonging to a 'vulnerable' category*</i>	-	-%	0	0%



CY4GATE Group actively works to review its activities and decision-making with the aim of promoting diversity, eliminating gender discrimination, and supporting equal opportunities for all. We consider that salaries play a significant role in the retention of qualified employees.

	CY4GATE GROUP 2023 <sup>7</sup>
Value of average wage for women	€41,525.72
<i>Female managers</i>	€102,706.81
<i>Female middle-managers</i>	€65,310.05
<i>Female 'office workers'</i>	€37,869.87
<i>Female apprentices</i>	€25,063.86
Value of average wage for men	€48,004.16
<i>Male managers</i>	€122,249.77
<i>Male middle-managers</i>	€73,714.49
<i>Male 'office workers'</i>	€41,673.95
<i>Male apprentices</i>	€20,240.54
Gender-based employee wage ratios	0.9
<i>Managers wage ratio</i>	0.8
<i>Middle-managers wage ratio</i>	0.9
<i>'Office workers' wage ratio</i>	0.9
<i>Apprentice wage ratio</i>	1.2
Women with variable compensation	5

<sup>7</sup> This data refers to CY4GATE S.p.A. and RCS Spa., totaling 397 employees, of whom 74 are women and 323 are men.



At CY4GATE Group, we recognize the value and importance of **parenthood**. We promote the full use of maternity leave and paternity leave.

*In 2023, 100% of employees who had the right to parental leave made use of it. 25% of these employees were men<sup>8</sup>.*

*90% of mandatory paternity leave days were used by eligible employees.*

	CY4GATE GROUP 2023
Total number of employees who had the right to take parental leave, by gender	8
Men	2
Women	6
Total number of employees who made use of their parental leave	8
Men	2
Women	6

<sup>8</sup> This data refers to CY4GATE S.p.A. and RCS Spa, as well as all the data reported until the end of this paragraph."



The return rate for employees returning to work in the business after having taken parental leave is 100% of employees in parental leave.

**CY4GATE GROUP  
2023**

Total no. of employees who returned to work during the reporting period after taking parental leave	7
<i>Of which are men</i>	2
<i>Of which are women</i>	5
Total no. of employees who were expected to return to work after taking parental leave.	7
<i>Of which are men</i>	2
<i>Of which are women</i>	5
The return-to-work rate of employees who have taken parental leave, by gender	100%
<i>Of which are men</i>	100%
<i>Of which are women</i>	100%
Total no. of employees remaining 12 months after returning to work following parental leave	8
<i>Of which are men</i>	2
<i>Of which are women</i>	6
Total no. of employees who returned to work following parental leave in the previous reporting period	8
<i>Of which are men</i>	2
<i>Of which are women</i>	6
Retention rate of employees who have taken parental leave, by gender	100%
<i>Of which are men</i>	100%
<i>Of which are women</i>	100%



# TALENTS AND SKILLS: AN ASSET TO CONTINUOUSLY DEVELOP AND STRENGTHEN

5.3.

*Attracting and retaining top talents and key skills while fostering employee motivation and a sense of belonging forms the basis of our human resources policies. Our goal is to help realize the potential of each individual talent and provide them with opportunities for growth within our company.*

At CY4GATE Group, we adopt certified recruitment and selection procedures within the integrated quality and safety systems. Similarly, the development and consolidation of skills are points of attention and investment for the group, which oversees the skills assessment and training processes in a structured and standardized manner, in order to guarantee and protect its distinctive know-how.

## OUR OBJECTIVES FOR RECRUITMENT, SELECTION AND PLACEMENT



### RECRUITMENT

To reach and capture the target audience while maintaining the effectiveness and efficiency of the process in terms of time and output quality.



### SELECTION

To evaluate the candidate's profile with objective tools and methodologies for defining the process of skills, attitudes, and motivations in relation to the requirements for effective coverage of the job description.



### PLACEMENT

To promote awareness of one's role, with respect to the organizational system as a whole.



In 2023, CY4GATE continues to invest in young talent.

**36% of new hires are aged under 30.**

	CY4GATE GROUP 2022		CY4GATE GROUP 2023	
	N°	%	N°	%
Total no. of hires	93	25%	102	22%
Men	72	77%	85	83%
Women	21	23%	17	17%
< 30 years of age	33	35%	30	36.1%
between 30 & 50 years of age	52	56%	45	54.2%
> over 50 years of age	8	9%	8	9.6%
Italians	93	100%	82	80%
Foreigners	-	-%	20	20%

Career planning is achieved through the identification of both a vertical and horizontal growth path that uses training and internal mobility as drivers.

#### CAREER PATHS: STEP BY STEP

##### MAPPING

Analysis and mapping of roles, skills, knowledge, experience, and requirements for each organisational position. Accompanied by an assessment of individual talent in relation to their expectations.



##### COMPETENCY MODELLING

Create a model of technical and soft skills consistent with corporate values and culture to enhance the behavior and contributions of individuals, involving the whole team in the pursuit of corporate objectives.



##### IMPLEMENTAION

One-to-one analysis with the employee to identify opportunities for growth, to jointly establish a career path and clear direction, and all the responsibilities, objectives and incentives that correspond to career upgrades, and the training path to develop the necessary skills.



## IN 2023, 291 EMPLOYEES TOOK PART IN APPRAISALS, THIS CORRESPONDS TO 63% OF ALL EMPLOYEES.

We maintain that regular appraisals are greatly beneficial to the personal development of individual employees and contributes to competency management and human capital development.

### CY4GATE GROUP 2023<sup>9</sup>

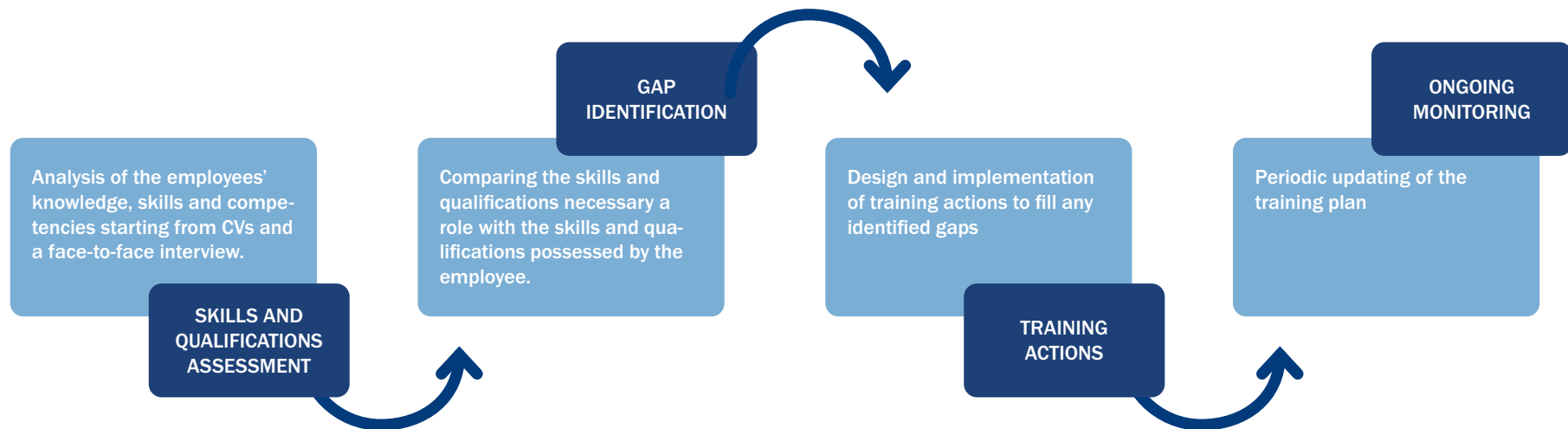
% of employees who regularly receive performance and professional development appraisals	63%
<i>Female employees</i>	17%
<i>Male employees</i>	83%
<i>Of which are: Managers</i>	1%
<i>Middle-managers</i>	11%
<i>Office workers</i>	88%
% of female employees who regularly receive performance and professional development appraisals	60%
% of male employees who regularly receive performance and professional development appraisals	64%
% of directors who regularly receive performance and professional development appraisals	20%
% of managers who regularly receive performance and professional development appraisals	56%
% of managers who regularly receive performance and professional development appraisals	72%

<sup>9</sup> This data is calculated in relation to the total number of employees of all companies within the Group included in the scope of the sustainability balance sheet consolidation



## EMPLOYEE TRAINING PROCESS AND ONGOING MONITORING

The employee training process is regulated internally by our group companies' business quality management systems.



In 2023, we implemented role-specific training that encompassed technical and managerial aspects, as well as business-focused training. This included access to high and low-level masters programs and certifications. We completed training on Model 231, Health & Safety training (both general and specific), specific fire warden and first-aid training, as well as 27001 Privacy and Gender Equality training. Furthermore, employees were given the option to attend internal technical training with monthly themed workshops, alongside the implementation of the Coursera e-learning platform. We also offered onboarding training, which offers an industry overview and an insight into our products.

In 2023, our CY4GATE Academy programs continued. The Academy, which offers a focus on relevant knowledge in the context of digitization and the increasing demand for highly specialized roles, garnered excellent feedback in terms of participation and acquired skills.



	<b>CY4GATE GROUP 2022</b>	<b>CY4GATE GROUP 2023</b>
Average total hours of training provided to employees	10.8	11.6
<i>of which training hours provided to female employees</i>	6.2	16.4
<i>of which training hours provided to male employees</i>	12	10.5
<i>of which training hours provided to managers</i>	5.1	3.8
<i>of which training hours provided to middle-managers</i>	12	15.4
<i>of which training hours provided to office workers</i>	12	12.4

\*Excludes training on MOG/2001 and on the subject of health & safety identified in their respective activities.

Furthermore, CY4GATE encourages and values individuals who demonstrate initiative for self-upgrading. To this end, we provide opportunities to take part in events and activities outside of the business, for example facilitating staff participation in conferences and international events.

We demonstrate our commitment to developing our talents by participating in and organizing 'skills-enhancement' initiatives and events. In 2023, in partnership with Elettro-nica S.p.A, CY4GATE were proud supporters of the Shaping Innovation Award 2023, an Innovation award open to all employees of the ELT and CY4GATE Group as well as our affiliated companies. The goal was to gather, select, and reward innovative proposes related to the companies' areas of business.

The Company demonstrates its commitment to talent development by participating in and organizing events and initiatives aimed at enhancing skills.



# HEALTH & SAFETY FOR THE WELL-BEING OF OUR EMPLOYEES

5.4.

*At CY4GATE, we place a lot of focus on workplace health & safety. We adhere to the relevant regulations, provide complementary care support, and strive to create a comfortable working environment. A safe and health-conscious workplace is essential for the well-being of employees and contributes to developing an awareness of the importance of prevention and care which benefits both the individual and the business.*

We are driven by our goal to improve health & safety conditions in full compliance with applicable legislation.

**All 520 employees and third-party workers (100%)<sup>10</sup>**, whose work/place of work is supervised by our group, are covered by our **occupational health and safety management system**. This is in line with Article 30 of legislative decree 81/08.

The management of health & safety at the workplace involves identifying roles and responsibilities, defining, and implementing training and information activities, continuously monitoring our organizational and procedural systems, adapting it as needed, and engaging in risk identification, assessment, and management.

## ORGANISATIONAL AND MANAGEMENT MEASURES FOR HEALTH & SAFETY IN THE WORKPLACE

- Monitoring of the organizational / procedural system regarding safety at work
- Staff training and awareness raising activities on workplace health & safety issues.
- Traceability of individual activities aimed at identifying the resources necessary to ensure the application of the provisions of the law in force.
- Constant assessment of the risks that may have an impact on the health and safety of workers, formalized in a Risk Assessment Report.
- Updating of protection measures and production changes, with particular reference to health surveillance aspects.

<sup>10</sup> The data complies with GRI 403-8 and refers to employees and non-employees, but whose work and/or workplace is controlled by the organisation, of the Gr CY4GATE Group companies falling within the scope of the Sustainability Report.

At an organizational level, CY4GATE's Prevention and Protection Service consists of an external Head of the Prevention and Protection Service, formally appointed by the Employer. This individual works together with the employer in the development of a Risk Assessment Document and emergency procedures (First Aid and evacuation). During the editing of the Risk Assessment Document, the Workers' Representative for Safety is consulted.

The assessment of hazards and risks is categorized into two main categories:

- Risks arising from structural and environmental factors: related to workspaces and general environmental conditions, irrespective of specific activities performed by workers.
- Risks associated with specific tasks and equipment: linked to 'similar groups of workers' carrying out similar activities and this exposed to the same occupational risks.

Specific preventative and protective measures are implemented for each identified risk. Such measures include work processes, employee behavior, work organization, collective protection systems, PPE and other measures as dictated by law and best practices. We have reported no work-related hazards posing a risk of high-risk injury.

Line managers monitor their team's adherence to preventive and protective measures, taking on board feedback to enhance health and safety where possible.



	CY4GATE GROUP 2022	CY4GATE GROUP 2023 <sup>11</sup>
No. of deaths resulting from workplace injuries/accidents	0	0
No. of workplace injuries with 'serious consequences'	0	0
No. of workplace injuries	1	2
Rate* of deaths following workplace injuries/accidents	0	0
Index of severity of workplace injuries	0	0
Index of frequency of workplace injuries	2.07	2.79
Number of hours worked	482240	715651.51
Ratio of severity of workplace injuries	N/A	N/A

\*The rate was calculated based on one million hours worked.

<sup>11</sup> This data refers to CY4GATE S.p.A. and RCS Spa, as well as Azienda Informatica Italiana srl (incorporated into RCS during 2023)

We conduct **mandatory health surveillance for workers** in accordance with the provisions of Legislative Degree 81/08 and its subsequent amendments. The mandatory health surveillance works as follows. An expert physician is appointed, as well as two assistant physicians. The service is provided by PraxiMedica and the health protocol is established based on current knowledge in Occupational Medicine, legal norms, and risk assessment

The expert physician conducts medical examinations of the employees' fitness with relevance to their job roles and tasks. The expert physician also manages their medical risk records and works together with us on the periodic revisions of the DVR (Risk Assessment Document).

The assistant physicians handle any pre-employment medical examinations requested by HR. We promote employees' health via our occupational health services, specifically the pre-employment medical examinations and subsequent periodic check-ups (pending specific instructions from the RSPP). The complementary health insurance, Metasalute, is a valuable benefit that allows workers to access non-work-related medical and health assistance.



	CY4GATE GROUP 2022	CY4GATE GROUP 2023 <sup>12</sup>
No. of injuries or deaths due to recordable work-related ill health	0	0
No. of cases of recordable work-related ill health	0	1

<sup>12</sup> Ibid

	CY4GATE GROUP 2022	CY4GATE GROUP 2023
N. of employees who have received health & safety training	142	146
Hours of 'prevention and protection' training per year	1,128	1,236

At CY4GATE Group we are committed to raising awareness of risks and to encouraging behaviors that safeguard the health & safety of workers. We do this through providing adequate training and information on occupational health & safety. As early as 2021, we established a **'Information Training and occupational health & Safety Training'** protocol, referencing the following legislative framework:

- Legislative Decree 9 April 2008, no.81 and its subsequent amendments. 'Implementation of Article 1 of law no.123, concerning the protection of health and safety in the workplace'.
- The 'Permanent Conference for Relationships among the Central Government, the Regions, and the Autonomous Provinces of Trento and Bolzano' agreement of 21 December 2011.

Specifically, our training includes general and more specific low-risk training, as well as emergency training (fire wardens, and first aid).

Health & safety at work is essential for creating a people-friendly workplace.



# 6. CLIENTS

## Privileged partners

*Our "tailor-made" approach aims to help our clients tackle cyber matters with greater peace of mind, simplifying the technical complexities associated with cybersecurity.*

*Our organizational structure is client focused, we are committed to establishing solid and long-lasting relationships, that are based on transparency and the ability to provide swift, high-quality responses.*

*We start by getting to know and understand our clients as well as possible, then guiding them towards tailored technical solutions to meet their specific needs. This is made possible through a robust technological portfolio, complemented by a sales structure revamped in 2023, both in terms of expertise and territorial coverage. Finally, we provide training to companies and institutions, enabling them to use our products and services with awareness and proficiency.*

*CY4GATE's development strategy also involves selecting clients based on their ethics. We believe in the importance of respecting human rights, and we firmly oppose anyone intending to misuse our technologies or act in a way that goes against democratic principles.*

*Data can be an extremely powerful tool, but it can also be very dangerous if it falls into the wrong hands.*

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**CY4GATE Group's provision of services to private companies and institutions:**

**89% Public sector clients**

**11% Corporate clients**

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# Income by geographical region

	CY4GATE GROUP 2022	CY4GATE GROUP 2023
Revenue from clients*	€ 54,062,437	€ 66,489,053
Revenue by geographical region*	71	84
Italy	€ 34,375,749	€ 37,712,516
Outside of Italy	€ 19,686,688	€ 28,776,537

\*The data refers to all companies within the Group that fall within the scope of financial consolidation.

## Material topics and our contribution to the SDG's

### SUSTAINABILITY ISSUES:

### THE 2030 SDGS TO WHICH WE ARE CONTRIBUTING

Relationship with customers





# Our impact and our commitment to sustainability

## ISSUE: RELATIONSHIP WITH CUSTOMERS

### OUR IMPACT

#### *Not managing this issue appropriately could lead to:*

Inadequate management of our clients' needs, as well as a lack of understanding of the present and potential cyber-security and cyber intelligence needs of businesses in an ever-changing technological landscape. This could result in a loss of competitive edge and profits, and increased vulnerability of client companies, with potential repercussions on national security.

#### *Client focus:*

Client focus means providing timely and expert responses, it means fostering the building of strong and lasting relationships as well as satisfying our clients' security needs. It also involves sharing knowledge with clients to allow a well-informed use of our products and services, enhancing the security and resilience of clients. Additionally, it ensures the appropriate use of our products for the safety of citizens and the respect of human rights.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

CY4GATE has a Quality Management System in place to regulate the provision of products and services as well as to monitor client satisfaction.

Notably, CY4GATE has a dedicated department for Client Management and Marketing.

We have also strengthened our organizational model to be ever closer to our clients and end users.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

**In line with our commitments made last year for the three-year period 2023-2025, (namely the following):**

- Promoting high-level technological advancement within the European Union, through an ongoing commitment to research and innovation, in close collaboration with our clients and partners.
- Enhancing the resilience of our customers by providing them with greater knowledge and awareness in managing cyber protection.
- Facilitating access to defense services against cyber-attacks and creating solutions that are accessible to small and medium-sized businesses, both in terms of affordability and human resources and necessary skills.

**In 2023 we carried out the following:**

- We collaborated with JAKALA to develop ProntoCyber®, an e-commerce platform for cybersecurity designed for professionals, SMEs, and Large Enterprises.
- We signed a strategic agreement with Reco 3.26 for an artificial intelligence solution applied in the field of video analysis and computer vision.

**For the three-year period 2024-2026 we are committed to:**

- Driving forward the de-seasonalization of the business by focusing on corporate clients.
- Maintaining optimal levels of innovation and technology in products and services to consolidate CY4GATE's competitive position in the face of new market challenges.



# CLIENT RELATIONS: TAILOR-MADE SOLUTIONS

6.1.

*Through our modular and flexible offering and with the use of Italian technology, we are able to cater to the specific needs of our clients and satisfy some very challenging market niches.*

The CY4GATE Group adopts a client-centric policy, where the needs and expectations of businesses and institutions are guiding elements not only for the client management and satisfaction process, but especially for the conception and implementation of personalized technological solutions. These solutions are designed to help our clients address challenges, seize opportunities, and mitigate threats in the field of cybersecurity.

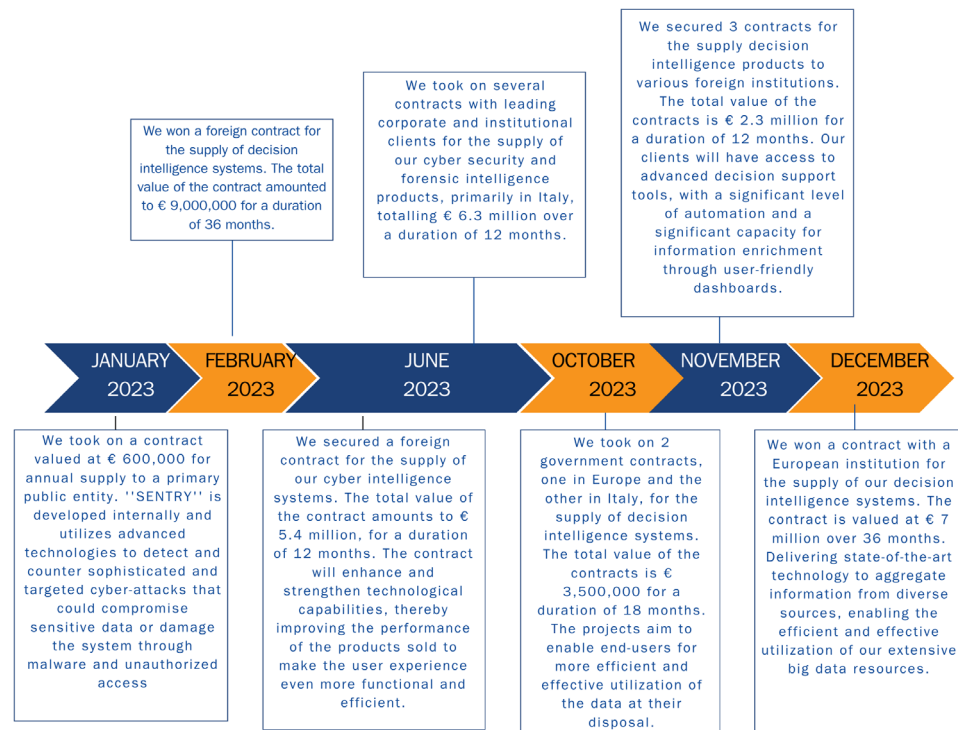
We provide bespoke services that ensure close proximity to our clients. We believe in building solid and enduring relationships through providing specialized support, aimed at helping clients achieve new milestones and adapt to the evolving needs of the cyber sector.

CY4GATE Group's customers are PAs and institutions and corporate companies that require cybersecurity, cyber intelligence, and forensic intelligence services (data management for use by law enforcement agencies).

Each of our group companies adopt organizational solutions and procedures that aim to guarantee transparency, reliability and quality in the acquisition and management of clients and orders. The order acquisition process is fully integrated into the integrated management systems of our group companies.

Furthermore, to further enhance the value offered to our clients and to customize products, the CY4GATE Academy has developed **innovative client-focused training programs** with a strong emphasis on practical laboratory sessions. These programs aim to develop key skills in the cyber security and intelligence sector.

## Our main projects from 2023



These **DIGILABs** are tailored specifically to each client. Each client has unique needs, and for this reason, each DIGILAB will offer a unique blend of education, training, laboratory sessions, and continuous support for each client team. This

will ensure that they are equipped to tackle their cyber missions and identify the right tools for each specific task within their company.



# CLIENT SATISFACTION: ONE OF OUR MOST IMPORTANT COMMITMENTS

6.2.

*Ensuring client satisfaction is one of our greatest priorities. This ethos strengthens our competitive advantage and allows us to achieve success as a leading hub of Italian and European technological expertise in the Cyber sector.*

For CY4GATE, ensuring client satisfaction means providing increasingly personalized technological solutions while fully respecting all our contractual requirements. Each of our group companies tailor the client experience based on the products and services offered.

At CY4GATE, **each client has a dedicated Account Manager**, who serves as a unique point of reference for all projects and programs with the company.

**Correct contractual execution** is crucial. This includes ensuring adherence to commitments regarding timelines, costs, and quality. After the sale, CY4GATE continues to support customers with post-sales consultation for the use of our technological solutions.

**Measuring client satisfaction** provides us with valuable insights to improve business performance. Both companies allow clients to report any issues through the opening of 'support tickets', which activate the resolution process.

CY4GATE regularly sends questionnaires to clients to gauge satisfaction levels and to rate the importance of specific products and services. In addition to surveys, we analyze other sources of information to indirectly evaluate client satisfaction, including complaints, client contract renewals, client communications and reports from our client meetings.



## 7. SUPPLY CHAIN

### Our partners in continuous improvement

*Our "tailor-made" approach aims to help our clients tackle cyber matters with We focus a great deal of attention on our supply chain, and we consider our suppliers as partners in the development of innovative our proprietary products and services, both in Italy and in Europe.*

*We take great care in the accreditation and evaluation process of our supply chain, not only in order to ensure not only the reliability of purchases (of products and services) and to monitor the trend in the quality of supplies over time, but also in order to create a safe and respectful working environment for all involved parties. This in turn, incentivizes continuous mutual improvement.*

*Supply chain management plays a crucial role in cyber risk mitigation, as it involves a complex network of suppliers and partners that may be vulnerable to cyber-attacks. For this reason, rigorous vigilance and security is crucial at each stage of the supply chain.*

*We ask our suppliers to commit to providing high-quality and sustainable services and to manage all activities with a consideration of customer and stakeholder satisfaction while paying attention to economic, environmental, and social sustainability.*



# CY4GATE Group's suppliers



*We work with 1537 suppliers, counting:  
1053 domestic suppliers  
484 foreign suppliers*

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*we have made 2923 orders to suppliers*

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*with a total order value of € 27,451,408.93*

## Material topics and our contribution to the SDG's

### SUSTAINABILITY ISSUES:

Responsible supply chain management

### 2030 SDGS TO WHICH WE ARE CONTRIBUTING





# Our impact and our commitment to sustainability

## ISSUE: RESPONSIBLE SUPPLY CHAIN MANAGEMENT

### OUR IMPACT

*Not managing this issue appropriately could result in:*

Damage to our brand's image and potential negative social and environmental impacts, both on employees and the community. This could stem from suppliers behaving out of line with regulatory provisions and the Group's policies regarding health, safety, and the environment.

*Focusing our attention on the supply chain means:*

Ensuring the quality of our products and services, ensuring business continuity, and making a meaningful economic and social impact

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

CY4GATE utilizes a Management System with specific procedures for the accreditation and periodic evaluation of our suppliers. This system includes clauses in supply contracts which obligate suppliers to respect human rights and comply with ESG principles.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

### For the 3-year period 2023-2025, we committed:

- Enhancing communication with suppliers in order to improve our collaborative experience and boost our shared path towards social responsibility in the supply chain.
- Enhancing the potential of our suppliers through training and empowerment.

### In line with the above commitments, we achieved the following in 2023:

- We perfected the implementation of Sourcing Management procedures and procedures for the procurement of professional services.
- We encouraged suppliers to adhere to our commitment to social responsibility and ethical and sustainable development.
- We sponsored and participated in international events such as Cybersec2023 (where one of our directors Emanuele Galtieri gave a speech titled 'The supply chain: a crucial player in cyber risk mitigation').

### For the 3-year period 2024-2026, we are committing to:

- Enhancing communication and collaboration with suppliers in order to improve relationships with our partners and to promote an increasingly ethical and sustainable management of services.



# OUR SUPPLIERS: THE VALUE CHAIN

7.1.

*We take great care in the selection of our suppliers, and we consider them to play an essential role in creating value for our stakeholders.*

CY4GATE's supply chain is primarily composed of **companies that provide hardware, software, and know-how** for the development of products and services. We select our computing materials suppliers from authorized manufacturers and distributors, which are not subject to embargoes and can safely guarantee the origin of the products they supply. Each of these suppliers adhere to high standards of confidentiality and security. These are fundamental requirements for the products and services that CY4GATE offer.

When it comes to know-how, we rely on a group of **outsourcing companies** who select and provide highly qualified and specialized personnel, often for extended periods. CY4GATE establishes agreements with these outsourcing companies (who are mostly Italian and mainly composed of young professionals) in order engage with those with whom there is a mutual interest in cooperating.

Each of the companies that provide computing materials and know-how to CY4GATE are listed in our **Suppliers Register** after they have undergone an accreditation/qualification process. All listed companies are also subject to periodic evaluations. The reliability index on the Supplier Evaluation Sheet is recalculated annually based on what has been supplied.

## An overview of CY4GATE's suppliers

**CY4GATE GROUP  
2023**

No. suppliers by product category	Hardware	255
	Software	80
	Professional services	134
	Other	1068
% of orders issued to suppliers by location	Domestic suppliers	76%
	Foreign/international suppliers	24%
% of orders issued to suppliers by type of activity	Hardware	28%
	Software	12%
	Professional services	27%
	Other	34%
No. of suppliers with whom we have maintained long-term relationships		53



# SUPPLIER RELIABILITY: THE ACCREDITATION AND EVALUATION OF OUR SUPPLIERS

7.2.

*We strive to create a chain process that complies with standards. We also strive to promote a socio-ethical standard of excellence among companies with whom we have contractual relationships.*

CY4GATE Group has established **accreditation and qualification processes for suppliers** to ensure their reliability in supplying goods, services, and know-how that is essential for the development and distribution of our products.

While maintaining independent supplier management procedures, our affiliate companies follow similar criteria within their own integrated quality and safety management systems. This process involves collecting detailed information on supplier reliability and assessing their compliance with the quality requirements, competition law, and regulatory requirements. Information is also collected on compliance with the principles and rules established in our group's governance documents, including adherence to environmental or similar programs. The collected information is documented in our **Supplier Evaluation Forms**.

## *As of 2023, we work with 62 accredited suppliers*

We require our suppliers (and where appropriate their subcontractors) to complete a questionnaire that allows us to gauge a greater understanding on matters such as social responsibility and ethical and sustainable development. Additionally, we invite them to agree to an Ethical Behavior

Commitment Declaration. In addition to operating in accordance with the Laws and Regulations in force, the Ethical Behavior Commitment Declaration stipulates that suppliers must:

- Adhere to all ethical and environmental requirements and require the same from their subcontractors.
- Be subject to monitoring as required by CY4GATE.
- Identify the causes and promptly implement actions to resolve any non-compliance with ethical, environmental, and quality requirements.
- Use environmentally friendly and recyclable raw materials and packaging.

Depending on the outcome of the evaluation, the candidate supplier company may be added directly to the Suppliers Register, or further documentation may be requested, with the possibility that it may be deemed inadequate. Each accredited supplier is subject to periodical evaluation, after which any improvement actions may be requested. Non-compliance with any such requests will result in removal from our Qualified Suppliers Register.

Any violation by our suppliers of the rules established in Decree 231 of the Code of Ethics, and of anti-corruption and anti-money laundering may result in the termination of the contract.

***We have no recorded incidents of non-compliance with workplace safety and no incidents of corruption recorded among the suppliers.***

During 2023, none of our suppliers were subject to sanctioning measures by control bodies for violation of workplace health & safety. Furthermore, no incidents of corruption were reported.



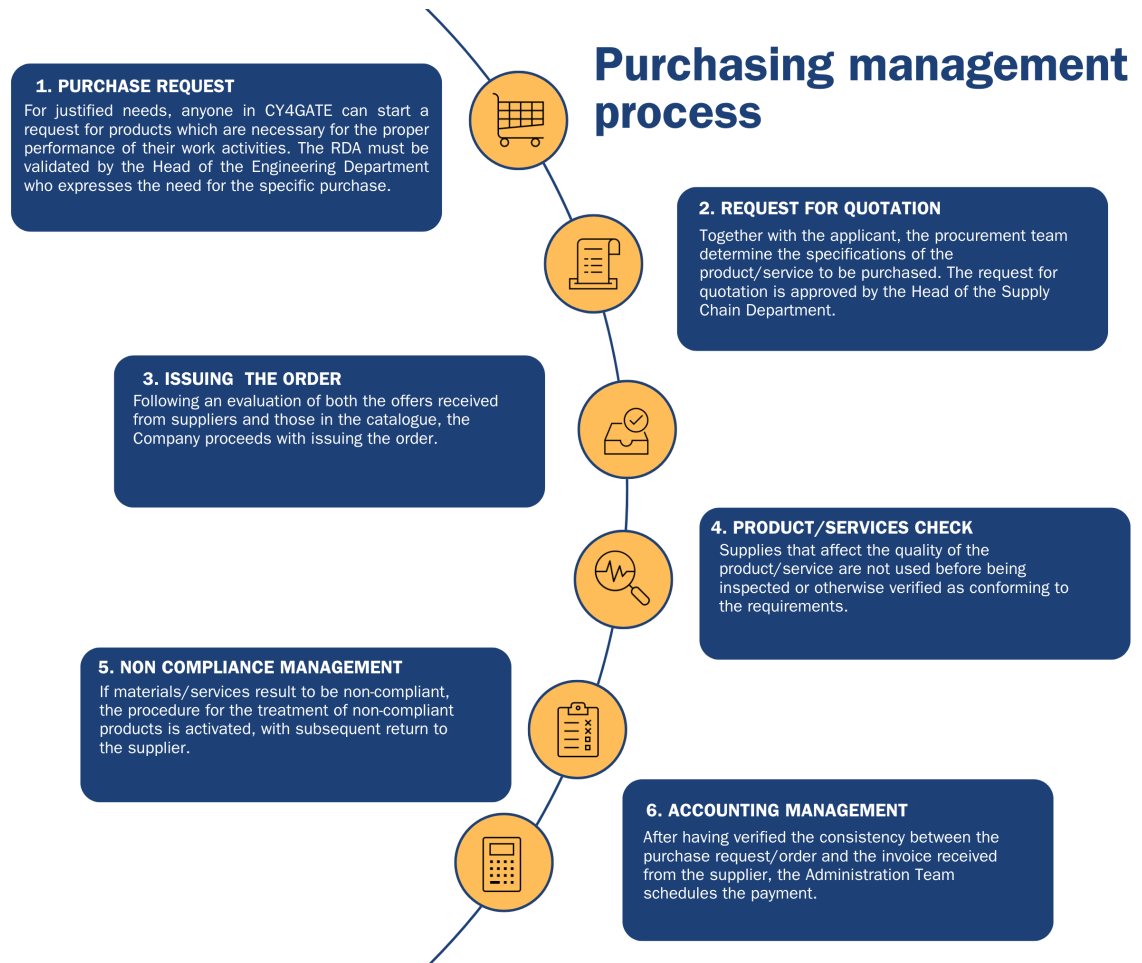
# OUR PROCUREMENT PROCESS: EFFICIENCY AND RELIABILITY

7.3.

*Purchasing procedures play a significant role within the Group. They aim to ensure the reliability of products and services, as well as to promote continuous improvement of activities and performance, with a particular focus on the development of innovative technologies.*

The procurement processes within our group's companies are structured in a way that ensures the reliability of all procured products or services. Our objective is to continuously improve business activities and services for the development of innovative technologies (including in the digital field), while at the same time taking into account sustainability requirements and respect for human rights.

CY4GATE group boasts an internal IT Procurement Committee, which was established to optimize synergies between various business entities, as well as to promote coordinated and timely decision-making in IT procurement. It also ensures full alignment of IT development plans among affiliate companies. The IT Procurement Committee is tasked with being the center of decision-making for procurement of IT hardware, software, and apps requiring an investment greater than 20,000 euros. This committee is comprised of managers and employees in the following areas in both CY4GATE and RCS: IT, Engineering, Procurement, Accounting, Finance & Controlling.





## 8. THE PLANET

### The environment is an asset we all share

*Even digital activities contribute to CO2 emissions, although their impact is currently relatively minimal.*

*We combine our passion for technology and innovation with a commitment to looking after the environment and making a positive impact on nature by promoting corporate sustainability.*

*This commitment drives us to ensure that our operational strategies that strike the right balance between business and environmental needs. We aim to optimize usage of natural resources, we pledge to offer products with low environmental impact, and to meticulously focus on the efficiency of our industrial processes. We also reconcile the need for individual cybersecurity with environmental protection.*

*Our dedication to the common interest of protecting the environment is all-encompassing.*



# CY4GATE Group energy consumption

	CY4GATE GROUP 2023
Total energy consumed in Gjoules	5617.29
Total energy consumed outside the organization for employees' commuting between home and work	2669.91
% saving of energy consumed outside the organization for commuting between home and work, resulting from Smart Working	56%
Energetic intensity (or eco-efficiency) of the organization: Total energy consumed over total production value (Gjoule/M Revenues)	84.48
Energetic intensity (or eco-efficiency) of the organization: Total energy consumed over total full-time equivalent employees (Gjoule/FTE)	12.48



***In 2023 we planted 100 trees in the CY4GATE Treedom forest which contributed to the offsetting of 17 tons of Co2.***



# Material topics and our contribution to the SDGs

**SUSTAINABILITY ISSUES:**

**THE 2030 SDGS TO WHICH WE ARE CONTRIBUTING**

Energy efficiency and reducing emissions





# Our impact and our commitment to sustainability

## ISSUE: ENERGY EFFICIENCY AND REDUCING EMISSIONS

### OUR IMPACT

#### *Not managing this issue appropriately could lead to:*

Inadequate programs for managing the energy efficiency of our premises and cyber services/products. Adequate management would involve having specific departments and/or designated employees for environmental compliance. Inappropriate management of this issue may result in increased CO2 emissions and costs, insufficient energy savings, and reputational as well as financial and environmental damage to the business.

#### *Focusing on energy efficiency means:*

Integrating an ecological and energy transition approach into our production processes and premises management. This will allow us to further improve our energy efficiency. It will also help us in the reduction of direct and indirect CO2 emissions and the reduction of other substances emitted during our production processes, building maintenance and logistics.

### MANAGEMENT METHODS FOR PREVENTING AND MANAGING IMPACTS

In order to minimize our environmental impact, at CY4GATE we make sure to source our energy resources carefully and to continuously monitor our consumption. With this same goal in mind, at CY4GATE we invest in regularly upgrading our manufacturing systems and machinery as well as acquiring new technologies.



## CY4GATE'S COMMITMENT TO GREATER SUSTAINABILITY

### For the 3-year period 2023-2025 we committed to:

- Continuing to put in place corporate policies and procedures with a particular focus on the environment.
- Raising employee awareness regarding sustainable behaviors.

### In line with the above commitments, we achieved the following in 2023:

- We promoted sustainable transport options for employees.
- We introduced a toner (ink) recycling service, with dedicated collection bins.

### For the 3-year period 2024-2026 we are committing to:

- Continuing to improve our energy efficiency while promoting the environmentally friendly and low-impact use of our premises and technological infrastructure, as well as encouraging responsible consumption of natural resources.



# OUR SUSTAINABLE MANAGEMENT OF NATURAL RESOURCES

8.1.

*We implement corporate strategies that align our business needs with a mindful consideration of the environment. This guarantees sustainability, social responsibility, financial savings, and compliance with regulations.*

Today, the ecological transition, the fight against climate change, and the reduction of waste are the main challenges that we face globally.

The cyber sector that we operate in has a relatively low environmental impact, this is both due to the services provided and the absence of production facilities required. Nevertheless, we are committed to reducing the environmental impact associated with our energy consumption. Although not among our material issues/topics, we monitor our water consumption and our water and waste management.

Each of the companies within the Group conduct business in compliance with all applicable laws in relation to pollution and the environment.

Within CY4GATE Group, environmental management varies depending on each company and their respective location.





At CY4GATE S.p.A, energy is our primary resource. We consume energy to manage our premises and laboratories, particularly in the field of cyber solutions when it comes to data traffic and its related energy consumption. At CY4GATE we align our operations with environmental policies and the ISO 14001 certification pathway established by our parent company, Elettronica S.p.A., at their headquarters. Our choice of eco-friendly computer equipment, including servers and PCs is a testament to our commitment to reducing our energy consumption. This commitment to reducing consumption also guides our company's practices in using these devices.

With the same goal in mind, we promote remote working as a strategy to reduce the impacts resulting from commuting between home and work. Furthermore, to encourage sustainable mobility for employees, in 2023 we installed solar panels and loading platforms for electric vehicle charging in 2023.

At CY4GATE, we also take necessary measures for the correct disposal of technological devices, which constitutes the majority of special waste handled by the company. We reuse such devices whenever possible. Regarding general waste, we have introduced separate waste collection, in line with our parent company's policy. These waste items are taken daily to our parent company's recycling depot/waste separation area where it is kept until collected by the municipal waste management service.

Furthermore, in 2023 we introduced a toner (laser printer ink) collection service, using dedicated collection bins.

When it comes to water, this isn't one of our critical resources, as we don't use it for industrial purposes. The management of our water supply and disposal is entrusted to our parent company, which adopts specific environmental management policies.



RCS S.p.A. is ISO 14001 certified and operates under an Integrated Quality, Environment, and Information Security System. This system is applicable to the design, integration, assistance, and maintenance sectors, specifically for systems managing computerized interception of telephone, telematic, environmental interceptions, and geolocation. The company operates in the cities of Milan and Naples.

RCS is committed to delivering services that not only meet market demands and customer expectations but also ensure environmental responsibility. This commitment involves minimizing environmental impacts and mitigating the risk of incidents that could affect employees and the surrounding environment. RCS fulfils its compliance obligations by adhering to applicable environmental regulations and other agreements related to its environmental impacts. RCS actively pursues continuous improvement in its environmental performance, with a specific focus on waste management, energy conservation, and pollution prevention.

Our group's green ethos is further emphasized by our partnership with Treedom, the pioneering platform that allows remote tree planting while enabling users to follow the project's story online.

Recently, CY4GATE took a proactive role in the Orientation and Tutoring days for prospective students at the University of Salerno. Employing a game-based approach, the company engaged participants in a learning challenge, offering a tree planted in CY4GATE's Treedom forest as a reward.



# METHODOLOGY

CY4GATE Group's 2023 Sustainability Report (hereinafter referred to as the SR) is our Group's second SR, compiled in accordance with GRI Standards for the period 01/01/2023 - 12/31/2023, with a reporting scope of covering more group companies compared to the 2022 SR. Specifically, the entities included in the 2023 sustainability report are: CY4GATE S.p.A. (already included in the 2022 SR), RCS ETM Sicurezza Spa (already included in the 2022 SR), and Azienda Informatica Italiana Srl (incorporated into RCS during 2023), Dars Telecom S.L., a company indirectly controlled by CY4GATE S.p.A., through RCS SpA's 65% ownership of Dars Telecom S.L. The following Group companies are not included within the scope of the 2023 SR: Servizi Tattici Informativi Legali Srl - (STIL), Tykelab S.r.l., and Diateam S.A.S. Companies that fall within the scope of financial consolidation, which are subject to audit and are publicly available; as well as the Group's financial statements and periodic financial reports can be accessed via the following link: <https://www.CY4GATE.com/en/company/investor-relations/financial-statements-and-periodic-reports/>. The SR reports information from the same period as the group's annual consolidated financial statements, and the SR is approved at the same Board of Directors meeting as the approval of the consolidated financial statements.

The 2023 SR reports on the Group's activities for the year 2023 and, where available and relevant, also reports data from the previous year (2022).



# METHODOLOGY

Information related to GRI standard 2\_General Disclosure 2021, as well as GRI 3\_Material Topics 2021 and information regarding specific standards related to the Group's material topics, have been collected and consolidated through the creation of a single informative dashboard for all Group companies that fall within the reporting scope. Similarly, the analysis of impacts, from which we defined our material topics and commitments, takes into consideration our Group companies' responsibility scope and their organizational and managerial methods, both individually and collectively. We took into account that many of the systems, procedures, and governance rules, as well as human resources management, and business relationship practices are being integrated into a Group-wide organization and management approach.

However, since the companies included in the SR have different levels of maturity regarding sustainability measurement systems and reporting processes, not all the information required by the GRI standards was available from every group company; therefore, we have reported using the data available for 2023 and have committed to measuring and collecting the missing or partially missing information for the subsequent reporting cycle. In any case, the informative dashboard which we created for data collection and management has been structured to capture and monitor the broadest possible range of KPIs and information. For our Group, this informative dashboard is a helpful tool for defining baselines and areas for improvement and integration for subsequent reporting cycles.

The reporting process and the document have been subject to external review by KPMG, the company that also audits CY4GATE Group's consolidated financial statements. Details of the review are contained in the Assurance report attached to the 2023 SR.

## Reporting principles

CY4GATE Group started the reporting process and defined the contents of the 2023 report in compliance with GRI 1: Foundations 2021. More specifically, the Group applied and acted consistently with the following reporting principles:

- **Accuracy:** To ensure accurate reporting of qualitative and quantitative information, we conducted a mapping of internal systems, procedures, and regulations to link them to material topics. This approach aims to supporting reporting using available evidence and maintain consistency with information provided in other documents and sections of the website (<https://www.CY4GATE.com/en/company/governance/>; <https://www.CY4GATE.com/en/company/investor-relations/>). To collect the required quantitative information for the disclosed criteria, we developed a KPI dashboard focusing on sustainability areas and topics. Each company within the Group recorded values for 2023, and where available, for 2022. Data was sourced from our internal management systems. When data involves processing or estimation, the dashboard outlines the calculation methods, ensuring reproducible measurements and calculations for consistent results. Assumptions, estimation techniques, and any limitations are explicitly detailed in the GRI content table for estimated data.
- **Balance:** The document includes all data required by the disclosures, whether positive or negative, in order to provide a comprehensive representation of the facts.
- **Clarity:** When structuring the document, from crafting the index to composing the content, we've focused on making information easily accessible. This includes using bold text, colors, and varying font sizes. Additionally, we've incorporated graphs, maps, and tables to communicate quantitative data clearly and to outline qualitative

information. Furthermore, we've made the document available in both Italian and English to enhance accessibility.

- **Comparability:** To ensure comparability, the reported information pertains to both the current reporting period and the preceding one, with the latter representing the first significant year for Group performance. Additionally, commitment reporting includes commitments for the reporting period, achievements to date, and commitments for the subsequent period. Consistent metrics and measurement methods are maintained from year to year to allow for comparability. Any changes are noted and explained to maintain transparency.
- **Completeness:** The document provides information about its impacts and their management; in the 2023 Sustainability Report, CY4GATE Group offers all relevant details to enable stakeholders to assess the Group's performance. For each material topic, CY4GATE Group discloses its perspective; it presents the management approaches adopted and, where available, specific actions and initiatives taken, involved parties, outputs produced, and results achieved. This is accompanied by an analysis of risks and negative impacts, as well as opportunities and positive impacts related to the topic. When a material topic is covered by an existing GRI Standard and data is available, CY4GATE provides the relevant specific information. If the material topic is not covered by an existing GRI Standard, additional information beyond GRI 3-3 Material Topics Management is identified. Reasons for omission of information are provided in the GRI content table when data is unavailable.
- **Sustainability Context:** In presenting the Group's economic, social, and environmental performance within the broader context of sustainability, CY4GATE examined the major relevant themes in the sector in which we operate. We took into consideration the actions and objectives of



# METHODOLOGY

the 2030 SDGs to which CY4GATE Group can contribute in terms of our economic, social, and environmental impacts.

- **Timeliness:** In order to make the information available to data users in a timely manner, the SR is approved in the Board of Directors meeting for the approval of the Annual Financial Report. This typically takes place by the end of the first quarter of the year. The report is and then subsequently published.
- **Verifiability:** As of 2023, the reporting process and the document itself both undergo external assurance. Additionally, the entire process is verifiable through the consultation of documents created to track mapping activities, the analysis and evaluation of impacts, definition of commitments and objectives, and data collection. This documentation is shared and verified by the Controls, Risks, and Sustainability Committee.

## Stakeholder Engagement Approach

At CY4GATE Group, we have identified and analyzed our stakeholders by engaging with representatives from various business departments. This has allowed us to build a Stakeholder Map, which describes the nature of our relationships and identifies the channels and tools our Group uses to interact with each of them. To date, the company has not yet undertaken direct engagement with stakeholders to identify potential and actual impacts or to devise prevention and mitigation responses to potential negative impacts. In order to understand stakeholder interests and expectations, we conducted benchmark analyses of companies operating in similar sectors, taking into consideration documents and reports from national and international bodies that address

relevant issues such as human rights, environmental impacts, and corruption. The documents we consulted include: organizations' materiality matrices used as benchmark references; ESG information required by the financial market; regulations concerning Health and Safety at Work, human rights compliance, privacy, anti-corruption, gender equality, and the environment, which articulate the interests of the involved parties; in-depth articles on specific topics that verify the relevance of certain issues for particular stakeholder categories; the ASVIS website, concerning the objectives to which CY4GATE Group contributes; and the United Nations Global Compact website. Additionally, for some categories such as Partners and employees, sharing the Sustainability Report in general meetings has still allowed material topics to be communicated. Additionally, channels for complaints and the methods of employee relations and evaluation serve as ways to attract the attention of these groups to specific matters.

Nevertheless, the direct and dedicated engagement of certain key stakeholder categories will be an objective for 2024.

## Processes for determining material topics

In order to establish which sustainability topics best represent the Group's impacts on various aspects of sustainability, including human rights, we conducted a context analysis of our organizations. We followed the process on recognizing social responsibility, core subjects and specific matters as indicated by the UNI ISO 26000 Standard, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the ICGN Global Governance Principles. We also analyzed themes and matters articulated by specific GRI standards. We conducted a ben-

chmark analysis to determine themes and matters relevant to our industry. For this analysis we referred to sustainability reports and other non-financial reporting documentation from organizations operating in similar sectors.

Specifically, the process involved the participation of four parties:

- Expert consultants, who defined and guided the reporting process and developed an initial assessment which was shared and finalized with the involvement of other corporate actors.
- The CEO and Top Management, who provided information to conduct external and sector context analysis, as well as providing insight, and strategic and business information for the correct framing of our sustainability scope, impact analysis, and the identification of material topics. The CEO and Top management also validated our impact analysis and materiality and proceeded to identify and adopt an improvement plan.
- The CFO, acting as the head of the sustainability reporting process, along with a team from within the Finance and Compliance department, participated in the assessment process by providing the necessary documentation and insights, and verifying the outcomes of the analysis.
- The internal board committee for Control, Risks, and Sustainability, established in 2023. This committee analyzed the impact analysis and material topics, validated the analysis, and provided improvement suggestions.

Impact analysis and materiality definition were originally conducted at the time of CY4GATE's first sustainability report in 2021 and exclusively concerned CY4GATE as an individual company; following acquisitions in 2022 and 2023, the analysis was revised and updated to add into its scope the following group companies which have significant impacts in terms of employees and production value: RCS ETM



# METHODOLOGY

Sicurezza Spa, Azienda Informatica Italiana Srl (incorporated into RCS), and Dars Telecom S.L. Other companies will gradually be incorporated into the materiality scope in 2024 and 2025.

Compared to previous years' processes, which focused on the "relevance" and comparison of internal and external views. For the 2023 materiality analysis, in accordance with the GRI Universal Standards 2021, we adopted a methodology based on the Group's "impact" perspective.

We conducted an identification and analysis of risks and opportunities, taking into consideration the general principles and guidelines outlined in ISO 31000 "Risk management – Principles and guidelines", as well as the disclosure specification in GRI 3 - Material Topics 2021.

More specifically, we defined risks, opportunities, negative and positive impacts for each sustainability area and linked them to sustainability issues (Governance and responsible management, People and work, Business management, Human Rights, Environment, Responsibility towards the community). We conducted a risk and opportunity assessment and prioritized impacts by assigning impact significance and likelihood and setting a threshold for determining material topics, based on a set of defined criteria.

**Figure 1: Criteria used to define the assessment grid for determining impact significance**

Sustainability scope (from ISO 26000)	Relevance of the themes concerning the company's business scope, the context in which it operates, and the relationships that characterize its decision-making and operational processes
Scale (from GRI-3)	How grave the impact is determined by the impact on important assets for the company and significant issues and resources for the context, considering legal and political guidelines.
Scope (from GRI-3)	How widespread the impact is determined by its extension and diffusion.
Irremediable Character (from GRI-3)	How hard it is to counteract or make good the resulting harm.

**Figure 2: Criteria used to define the assessment grid for determining likelihood:**

Sustainability scope (from ISO 26000)	Relevance of the themes in relation to the company's business scope, the context in which it operates, and the relationships that characterize its decision-making and operational processes.
Risk event monitoring (from ISO 31000)	Presence, characteristics, and adequacy of the organizational, control, and management measures implemented by the company concerning identified risk events.
Actual impacts (from GRI-3)	Identification of actual impacts, meaning those that have already occurred.



# METHODOLOGY

Each risk and opportunity event were assessed for impact and probability, resulting in placement on an impact-probability matrix, where risks and opportunities were classified on a 5-point scale from low to very high, based on the intersections of impact and probability assessments. Among the themes positioned in the impact-probability assessment matrix, themes that obtained a high or very high impact level, combined with probability levels ranging from low to very

high, were considered material. Similarly, themes that recorded a medium impact level and a high or very high probability level were also considered material.

In cases where only one of the two impacts (negative or positive) fell within the materiality threshold, following a conservative approach, the theme was considered material.

MATERIAL TOPICS	CHANGES MADE TO THE MATERIAL TOPICS COMPARED TO THE PREVIOUS REPORTING PERIOD	TOPIC BOUNDARY			
		INTERNAL	EXTERNAL	DIRECT	INDIRECT
The safeguarding and security of the community	N/A		The Community, Public Institutions, Partners, Universities, and Research Centers		X
Cyber security and the protection of critical infrastructure	N/A		The Community, Public Institutions; Public & Private Clients; Partners, Universities, and Research Centers		X
Human rights	N/A	X	The Community; Suppliers; Public & Private Clients	X	
Leadership in innovation	N/A	X	Public Institutions; Public & Private Clients; Partners, Universities, and Research Centers; Representative Organizations	X	
Robust corporate governance	N/A	X	Shareholders; Finance Communities; Public & Private Clients	X	
Energy efficiency and reducing emissions	N/A	X	The Community; Finance Communities; Public Institutions	X	
Sustainability-focused strategies and policies focusing on sustainability.	N/A	X	All Stakeholders	X	

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# METHODOLOGY

MATERIAL TOPICS	CHANGES MADE TO THE MATERIAL TOPICS COMPARED TO THE PREVIOUS REPORTING PERIOD	TOPIC BOUNDARY			
		INTERNAL	EXTERNAL	DIRECT	INDIRECT
Responsible business conduct	The following have been integrated into the topic/issue: Transparency of information towards customers and investors; Prevention of anti-competitive behaviors.	X	All Stakeholders	X	
Empowerment of individuals	N/A	X		X	
Equal opportunities and gender equality	N/A	X	The Community	X	X
Health & safety at work	N/A	X	Representative Bodies	X	
Corruption prevention	N/A	X	Public Institutions; Public & Private Clients; Suppliers	X	X
Data security and privacy	N/A	X	Public & Private Clients; Suppliers	X	X
People management and care	N/A	X		X	
Client relations	N/A	X	Public & Private Clients	X	
Responsible supply chain management	N/A	X	Suppliers	X	

For any further information about the report and its contents, please contact us at: <https://www.CY4GATE.com/it/contattaci>



# GRI CONTENT

<b>Declaration of use</b>	CY4GATE s.p.a. has drawn up a report for CY4GATE Group in compliance with the GRI Standards for the period 01/01/2023 - 31/12/2023
<b>GRI 1 used</b>	GRI 1 - General Disclosures 2021- version 2021
<b>Relevant Sector GRI Standard</b>	not applicable



# GRI CONTENT

## REPORTING GENERAL INFORMATION

GRI STANDARD	INFORMATION	LOCATION	OMISSION		
			REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>GRI 2: General Disclosures – 2021 Version</b>	2-1 Organizational details	Ch. 1 CY4GATE, pp 6-13 Methodology, pp. 76-80			
	2-2 Entities included in the organization's sustainability reporting	Methodology, pp. 76-80			
	2-3 Reporting period, frequency and contact point	Methodology, pp. 76-80			
	2-4 Restatements of information	Methodology, pp. 76-80			
	2-5 External Assurance	Methodology, pp. 76-80 Independent audit firm report, p. 91			
	2-6 Activities, value chain and other business relationships	Ch. 1 CY4GATE, pp 8-9;11-12; Ch. 4 Innovation, pp 36-47 Ch. 6. Clients, pp 63-66 Ch. 7 SupplyChain, pp 67-71			
	2-7 Employees	Ch. 5 Our People, pp 48-62 according to the number of people			
	2-8 Workers who are not employees	Ch. 5 Our People, pp 48-62, <i>temporary workers with consultancy functions;</i> <i>according to the number of people</i>			
	2-9 Governance structure and composition	Ch. 3 Governance, pp 24-35			
	2-10 Nomination and selection of the highest governance body	Ch. 3 Governance, pp 24-35			



# GRI CONTENT

## REPORTING GENERAL INFORMATION

GRI STANDARD	INFORMATION	LOCATION	OMISSION		
			REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>GRI 2: General Disclosures</b> – 2021 Version	2-11 Chair of the highest governance body	Ch. 3 Governance, pp 24-35			
	2-12 Role of the highest governance body in overseeing the management of impacts	Ch. 3 Governance, pp 24-35			
	2-13 Delegation of responsibility for managing impacts	Ch. 3 Governance, pp 24-35			
	2-14 Role of the highest governance body in sustainability reporting	Ch. 3 Governance, pp 24-35			
	2-15 Conflicts of interest	Ch. 3 Governance, pg 32-35			
	2-16 Communication of critical concerns	Ch. 3 Governance, pp 28-31			
	2-17 Collective knowledge of the highest governance body	Ch. 3 Governance, pp 28-31			
	2-18 Evaluation of the performance of the highest governance body	Ch. 3 Governance, pp 24-35			
	2-19 Remuneration policies	Ch. 3 Governance, pp 24-35			
	2-20 Process to determine remuneration	Ch. 3 Governance, pp 24-35	2.20.a.ii; b	Information not available/incomplete	Actions not currently implemented
	2-21 Annual total compensation ratio	Ch. 3 Governance, pp 24-35			
	2-22 Statement on sustainable development strategy	Letter to our stakeholders, pp 2-3; Ch.2 Sustainability, pp 14-23			



# GRI CONTENT

## REPORTING GENERAL INFORMATION

GRI STANDARD	INFORMATION	LOCATION	OMISSION		
			REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>GRI 2: General Disclosures</b> – 2021 Version	2-23 Policy commitments	Ch.2 Sustainability, pp 14-23 Tables "Our impacts and our commitment to sustainability" in: Ch. 3 Governance, pp 24-26 Ch. 4 Innovation, pp 36-37 Ch. 5 Our people, pp 48-49 Ch. 6 Clients, pg. 63 Ch. 7 Supply Chain, pg 67 Ch. 8 The Planet, pg. 72			
	2-24 Embedding policy commitments	Ch. 3 Governance, pp 24-35			
	2-25 Processes to remediate negative impacts	Ch. 3 Governance, pp 24-30; pp 31-34- Tables "Our impacts and our commitment to sustainability" in: Ch. 3 Governance, pg 25 Ch. 4 Innovation, pg 37 Ch. 5 Our People, pg 49 Ch. 6 Clients, pg. 63 Ch. 7 Supply Chain, pg 67 Ch. 8 The Planet, pg. 72			
	2-26 Mechanisms for seeking advice and raising concerns	Ch. 3 Governance, pp 31-34			
	2-27 Compliance with laws and regulations	Ch. 3 Governance, pp 31-34			
	2-28 Membership associations	Ch. 2 Sustainability, pp 20-22 Ch. 4 Innovation, pg 38-43			



# GRI CONTENT

## REPORTING GENERAL INFORMATION

GRI STANDARD	INFORMATION	LOCATION	OMISSION		
			REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>GRI 2: General Disclosures – 2021 Version</b>	2-29 Approach to stakeholder engagement	Ch. 2 Sustainability, pp 20-22 Methodology, pp. 76-80			
	2-30 Collective bargaining agreements	Ch. 5 Our People, pp 50-52			

## RENDICONTAZIONE TEMI MATERIALI

GRI STANDARD	INFORMATION	LOCATION	OMISSION		
			REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>GRI 3 - Material Topics – 2021 Version</b>	3-1 Process to determine material topics	Ch. 2 Sustainability, pp 14-17 Methodology, pp. 74-79			
	3-2 List of material topics	Ch. 2 Sustainability, pp 14-17 Tables " Material topics and our contribution to the SDGs" in: Ch. 3 Governance, pp 24-26 Ch. 4 Innovation, pp 36-37 Ch. 5 Our People, pp 48-49 Ch. 6 Clients, pg. 63 Ch. 7 Supply Chain, pg 67 Ch. 8 The Planet, pg. 72 Methodology, pp. 76-80			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
Energy consumption	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Tables "Our impacts and our commitment to sustainability" in: Ch. 8 The Planet, pg 72			
	<b>GRI 302: Energy – 2016 version</b>	GRI 302-1 Energy consumption within the organization	Ch. 8 The Planet, pg 71	302-1-a,b,c,d	Information not available/incomplete	Overall measurement of consumption for the energy purchased
		GRI 302-2 Energy consumption outside of the organization	Ch. 8 The Planet, pg 71; data estimated on the basis of the days worked on site and an average of km traveled for the home-work route			
		GRI 302-3 Energy intensity	Ch. 8 The Planet, pg 71			
Protection and safety of the community	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Tables "Our impacts and our commitment to sustainability" in: Ch. 4 Innovation, pp 36-37			
Cybersecurity and protection of critical infrastructures	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Tables "Our impacts and our commitment to sustainability" in: Ch. 4 Innovation, pp 36-37			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
<b>Empowerment of Individuals</b>	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Tables "Our impacts and our commitment to sustainability" in: Ch. 5 Our People, pp 48-49			
	<b>GRI 404: Training and Education 2016 version</b>	GRI 404-1 Average hours of training per year per employee	Ch. 5 Our People, pp 56-59			
		GRI 404-2 Programs for upgrading employee skills and transition assistance programs	Ch. 5 Our People, pp 56-59			
		GRI 404-3 Percentage of employees receiving regular performance and career development reviews	Ch. 5 Our People, pp 56-59			
<b>Occupational health &amp; safety</b>	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Tables "Our impacts and our commitment to sustainability" in: Ch. 5 Our People, pp 48-49			
	<b>GRI 403: Occupational Health and Safety 2018 version</b>	GRI 403.1 - Occupational health and safety management system	Ch. 5 Our People, pp 59-61			
		GRI 403.2 - Hazard identification, risk assessment, and incident investigation	Ch. 5 Our People, pp 59-61			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
Occupational health & safety	GRI 403: Occupational Health and Safety 2018 version	GRI 403-3 Occupational health services	Ch. 5 Our People, pp 59-61			
		GRI 403-4 Worker participation, consultation, and communication on occupational health and safety	Ch. 5 Our People, pp 59-61			
		GRI 403.5 - Worker training on occupational health and safety	Ch. 5 Our People, pp 59-61			
		GRI 403.6 - Promotion of worker health	Ch. 5 Our People, pp 59-61			
		GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Ch. 5 Our People, pp 59-61			
		GRI 403.8 - Workers covered by an occupational health and safety management system	Ch. 5 Our People, pp 59-61			
		GRI 403.9 - Work-related injuries	Ch. 5 Our People, pp 59-61			
		GRI 403.10 - Work-related ill health	Ch. 5 Our People, pp 59-61			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
Managing and looking after our people	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 5 Our People, pp 48-49			
	GRI 401 - Employment – 2016 version	GRI 401.1 - New employee hires and employee turnover	Ch. 5 Our People, pp 52 -55			
		GRI 401.2 - Benefits provided to full-time employees that are not provided to temporary or parttime employees	Ch. 5 Our People, pp 50-52			
		GRI 401.3 - Parental leave	Ch. 5 Our People, pg 52-55			
	GRI 402: Labor/Management Relations 2016 version	GRI 402-1 Minimum notice periods regarding operational changes	Ch. 5 Our People, pp 50-52			
Respect for human rights	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-20 Ch. 3 Governance, pp 24-26 Ch. 4 Innovation, pp 36-37 Ch. 5 Our People, pp48-49 Ch. 6 Clients, pg 63 Ch. 7 Supply Chain, pg 67			
Equal opportunities and gender equality	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 5 Our People, pp 48-49			
	GRI 405: Diversity and Equal Opportunity 2016 version	405-1 Diversity of governance bodies and employees	Ch. 3 Governance, pp 27-30 Ch. 5 Our People, pp 50 -55			
		405-2 Ratio of basic salary and remuneration of women to men	Ch. 5 Our People, pg 50-55			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
Corruption prevention	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 3 Governance, pp 24-26;31-34			
	GRI 205: Anti-corruption 2016 version	GRI 205-1 Operations assessed for risks related to corruption	Ch. 3 Governance, pp 31-34			
		GRI 205.2 - Communication and training about anti-corruption policies and procedures	Ch. 3 Governance, pp 31-34			
		GRI 205.3 - Confirmed incidents of corruption and actions taken	Ch. 3 Governance, pp 31-34			
Leadership in innovation	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 4 Innovation, pp 36-37;38-43			
Robust Corporate Governance	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 3 Governance,, pp 24-26;27-30			
Sustainability-oriented strategies and policies	GRI 3 - Material Topics – 2021 version	3-3 Management of material topics	Ch. 2 Sustainability, pg 14-20 Ch. 3 Governance, pg 24-26			



# GRI CONTENT

GRI MATERIAL TOPICS	GRI STANDARD	GRI STANDARD DISCLOSURE	LOCATION	OMISSION		
				REQUIREMENTS OMITTED	REASON	EXPLANATION
Information security and privacy	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 3 Governance, pp 24-26;31-34			
	<b>GRI 418: Customer Privacy 2016 version</b>	GRI 418.1 - Substantiated complaints concerning breaches of customer privacy and losses of customer data	Ch. 3 Governance, pp 31-34			
Responsible business management	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 3 Governance, pp 24-26;31-34			
	<b>GRI 206: Anti-competitive Behavior 2016 version</b>	GRI 206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Ch. 3 Governance, pg 31-34			
Our relationship with our clients	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 6 Clients, pp 62-65			
Responsible management of the supply chain	<b>GRI 3 - Material Topics – 2021 version</b>	3-3 Management of material topics	Ch. 2 Sustainability, pp 14-17 Ch. 7 Supply Chain, pp 67-70			



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Thanks to all the managers, employees and collaborators of CY4GATE Group for their contribution and collaboration to the realization of the Sustainability Report

Approved by resolution of the Board of Directors of March 14, 2024.





AUDITOR'S REPORT:

ONLY AVAILABLE IN  
ITALIAN VERSION