



2022 Sustainability Report

Our Commitment to High-Value Choices



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Letter to Stakeholders

GRI 102-14

During 2022, Doxee continued its process of growth and development, playing an active and supporting role in the digital transformation process of the community and of the industrial fabric.

The speed at which change is required from a digital first viewpoint, the changes in the ways of interacting with companies and publish administrations, raising the quality standard of products and services, allows us to be competitive and face the new challenges posed by market, investing in sustainable innovative projects to ensure the continuity of business during and after the health emergency. During 2022, we obtained the classification of “innovative enterprise”, an instrument approved by the French AMF (Autorité des marchés financiers) aimed at recognizing small and medium-sized enterprises that place innovation at the center of their development strategy. As a result of moving towards a model of acting sustainably, aimed at integrating sustainability into corporate strategy, we have committed to improving our environmental, social and governance practices, choosing to measure and monitor our work through national and international ratings awarded at global level, because we believe it is only through respect and transparency that we can built an integrated, synergic sustainable development system.

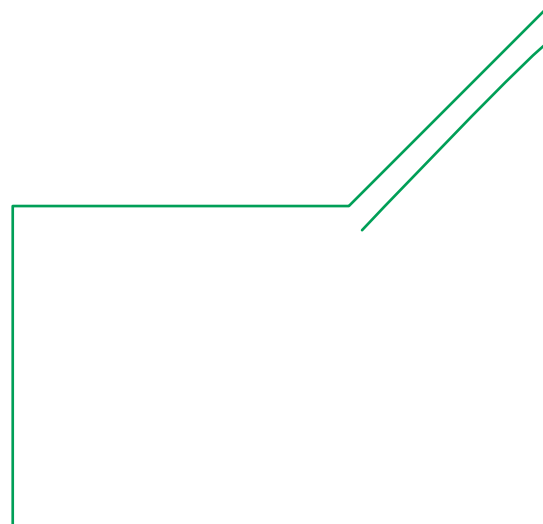
The continuous monitoring of the ISO 14001 certification, the appointment of a Mobility Manager, the decision to use suppliers of green energy and the launch of the new tool to calculate the carbon footprint avoided due to the use of some of our products provide more testimony to the Doxee Group's commitment to environmental issues and attention to climate change, among other issues.

In Doxee, sustainability is an integral part of the Group's governance and our top management is personally committed to its diffusion as a corporate value within the organization. The significant results achieved in governance during the year include obtaining ISO 37001 anti-bribery certification, Ecovadis' awarding and issue of the Silver Sustainability Rating Medal and obtaining the maximum score in the legality rating from the Italian Competition Authority (ACGM).

Doxee's future commitment will be to better understand and effectively assess the social impact of our technologies on people and communities. Awareness of the importance of these issues has generated an organizational change with the creation of an ad hoc committee that, together with top management, helps to oversee our environmental and social goals. As part of the broader Corporate Social Responsibility journey undertaken by the Group, the commitment to pursue public benefit purposes included in our Articles of Association as a Benefit Corporation and the monitoring of the environmental, social and technological innovation impacts generated continued be implemented.

Doxee is therefore committed to growing together with the communities where it operates and feels the responsibility to intervene by supporting charitable initiatives both locally and internationally.

Paolo Cavicchioli
Chairman



Highlights

	Unità di misura	2019	2020	2021	2022
Economic value					
Economic value generated	Euro/m	19.4	21.0	23.6	28.7
Economic value distributed	Euro/m	15.4	16.8	18.1	24.4
Management systems, certifications and awards					
Quality Management System - ISO 9001					
Environmental Management System - ISO 14001					
Information Security Management System - ISO/IEC 27001					
Anti-Bribery Management System – ISO 37001					
AgID Marketplace Qualification (PA Cloud Provider and Storage Provider)					
Certification as Access Point Provider on the PEPPOL network					
Ecovadis Assessment – Silver Sustainability Rating Medal					
Legality rating★★★					
Management and Organizational Model - Leg. Decree 231/2001					
The role of Doxee – Sustainability and ICT					

Optimisation
of document
management
and distribution
processes

Interactions
between customers
/ companies and
citizens / Public
Administrations

Digital
transformation

Dematerialisation
of processes and
documents

Human Resources					
Employees	No.	108	127	142	193
New hires	No.	23	24	26	38
Turnover (hires net of terminations)	%	14.6%	17.6%	22.4%	22.5%
Employees up to 30 years old	%	22.2%	20.7%	19.7%	21.2%
Environment					
Energy consumption	GJoule	2,446	2,174	1,888	2,790
Electricity from renewable sources	%	-	-	-	100%
Total Scope 1 / Scope 2 GHG emissions - Location Based	tCO2e	178	154	135	202
Total Scope 1 / Scope 2 GHG emissions - Market Based	tCO2e	234	199	184	143

Methodological note

GRI 102-45 GRI 102-46 GRI 102-50 GRI 102-51 GRI 102-52 GRI 102-53 GRI 102-54

This document is the third Sustainability Report of Doxee S.p.A. and its subsidiaries (hereinafter also referred to as “Doxee”, the “Doxee Group” or the “Group”). The document contains information relating to economic, environmental, and social issues that is useful to ensure an understanding of the activities carried out by Doxee, its performance, its results, and the impact they produced.

The Sustainability Report has been prepared by reporting on a selection of the “GRI Sustainability Reporting Standards” published by the Global Reporting Initiative (GRI), as indicated in the GRI Content Index of this document, according to the “Referenced” reporting option.

Doxee does not fall under the scope of Legislative Decree no. 254 of December 30, 2016, which, in implementation of Directive 2014/95/EU, has provided for the obligation to prepare a Non-Financial Statement (“NFS”) for public interest entities that exceed certain quantitative thresholds. This Sustainability Report is therefore prepared on a voluntary basis and does not represent a Non-Financial Statement.

The general principles applied in the preparation of the Sustainability Report are those defined by the GRI Standards: relevance, inclusiveness, sustainability context, completeness, balance between positive and negative aspects, comparability, accuracy, timeliness, reliability and clarity.

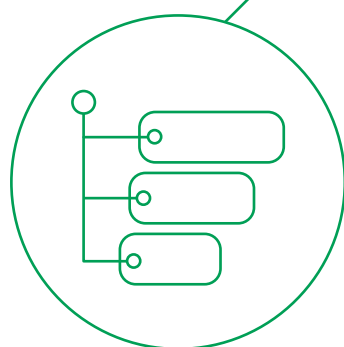
The performance indicators selected are those required by the reporting standards adopted and are representative of the specific areas of sustainability analyzed and consistent with the activities carried out by Doxee and the impacts it has generated. These indicators were selected based on an analysis of their materiality, as described in the “Materiality Analysis and Sustainable Development Goals” section. In the various sections of the Sustainability Report, quantitative information for which estimates were used is reported.

The scope of reporting of qualitative and quantitative data and information refers to the performance of the parent company Doxee S.p.A. and its subsidiaries consolidated on a line-by-line basis in the Group’s Consolidated Financial Statements at 31 December 2022.

The Sustainability Report is prepared on an annual basis. In order to allow for the comparison of data over time and the assessment of the performance of Doxee’s activities, figures from the previous year are shown for comparative purposes. Heads of various Doxee departments were involved in drafting the Sustainability Report.

The Sustainability Report was approved by the Board of Directors of Doxee S.p.A. on March 28, 2023 and was not audited by an independent auditor. The Sustainability Report is published on the Company’s corporate website at <https://www.doxee.com/about-us/sustainability/>. Further information can be obtained by contacting:

sustainability@doxee.com



01 Identity and Strategy

GRI 102-2 GRI 102-3 GRI 102-4 GRI 102-5 GRI 102-7 GRI 102-16

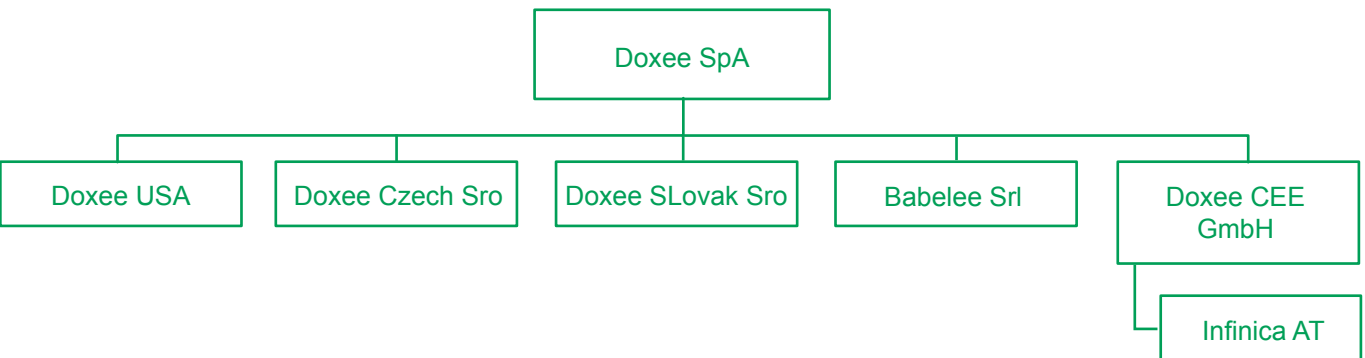
Doxee: transforming data into relationships

Doxee S.p.A, headquartered in Modena, Italy, is a high-tech company and a leader in the Customer Communications Management (CCM), Paperless and Digital Customer Experience (DCX) markets.

It provides firms—and specifically those in the Enterprise segment—with technological products delivered over the Cloud on a single patented proprietary platform (Doxee Platform).

Doxee supports and manages approximately 9 billion communications a year for nearly 200 Enterprises.

The Doxee Group



Company size

In 2022, the Group generated revenues of Euro 25.5 million and has a total of 193 employees.

Revenues by Segment (Amounts in millions of Euro)	2020		2021		2022	
	Revenues	%	Revenues	%	Revenues	%
Telco & Media	7,024,183	39.7%	8,010,133	38.4%	9,959,829	39.1%
Utilities	6,969,554	39.4%	8,779,410	42.1%	9,566,749	37.6%
Financial Services	1,462,020	8.1%	1,598,822	7.7%	1,905,048	7.5%
IT Services	1,262,419	7.1%	1,419,135	6.8%	1,612,324	6.3%
Others	987,967	5.6%	1,039,056	5.0%	1,322,462	5.2%
Public Sector	n.a.	n.a.	n.a.	n.a.	1,088,155	4.3%
Total	17,706,144	100.0%	20,846,556	100%	25,464,567	100%

Revenues by geographical area (Amounts in millions of Euro)	2019		2020		2021		2022	
	Revenues	%	Revenues	%	Revenues	%	Revenues	%
Italy	14,069,083	90.8%	16,342,437	93.2%	18,092,394	87%	21,137,983	83.01%
EU	522,651	3.4%	711,668	4.0%	1,926,072	9%	2,224,752	8.73%
Extra EU	899,096	5.8%	652,039	3.7%	828,090	4%	2,101,831	8.25%
Total	15,490,830	100%	17,706,144	100%	20,846,556	100%	25,464,567	100%

Group companies and offices

Company	Country / Headquarters	Activity
Doxee S.p.A. Parent Company	Modena, Italy	High-tech – Customer Communications Management (CCM), Paperless and Digital Customer Experience (DCX) markets. It provides firms—and specifically those in the Enterprise segment—with technological products delivered over the Cloud on a single patented proprietary platform (Doxee Platform).
Doxee USA inc.	USA	Initial vehicle for developing the Partner Based project on the PaaS (Platform as a Service) model to support the Group's internationalization strategy. Partner management is conducted in collaboration with Doxee SpA's Sales department. Doxee USA Inc. provides support and development of professional services for international projects, in particular for the Latam region.
Doxee Slovak s.r.o.	Slovakia	It operates in the CCM market: a reference Enterprise market, in particular in the Utilities and Finance sector.
Babelee S.r.l.	Italy	It offers a platform based on proprietary technology for the processes of video automation and the generation of personalized videos.
Doxee Czech s.r.o.	Czech Republic	It operates in the CCM market. The company has some important customers in the Finance sector.

Infinica GmbH	Austria	<p>It operates in the CCM market, mainly targeting clients in the banking, insurance and utilities sectors.</p> <p>It has developed an SaaS platform focused on providing CCM services dedicated to creating and distributing on-demand personalized and interactive documents, to manage multiple processes targeted to clients, such as on-boarding and I customer caring.</p>
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In addition to the Group's headquarters in Modena, where the design and development of solutions are carried out, Doxee's presence in Italy also includes offices in Rome, Milan (since 2021) and Catanzaro (the MISE—Ministry of Economic Development—project on Catanzaro was completed in June 2021).

History, Mission and Values



Mission and Values

Doxee works **alongside companies and Public Administrations to support them in the process of digital transformation**. In Doxee's vision, the digitization of communication processes is the starting point for enhancing the value of data, enabling companies and Public Administrations to offer a technologically advanced and innovative digital experience dedicated to customers and citizens.

Mission: The Digital Customer Experience

Digital technologies have transformed the way we interact with companies and Public Administrations, raising the quality standard and making different forms of interaction obsolete.

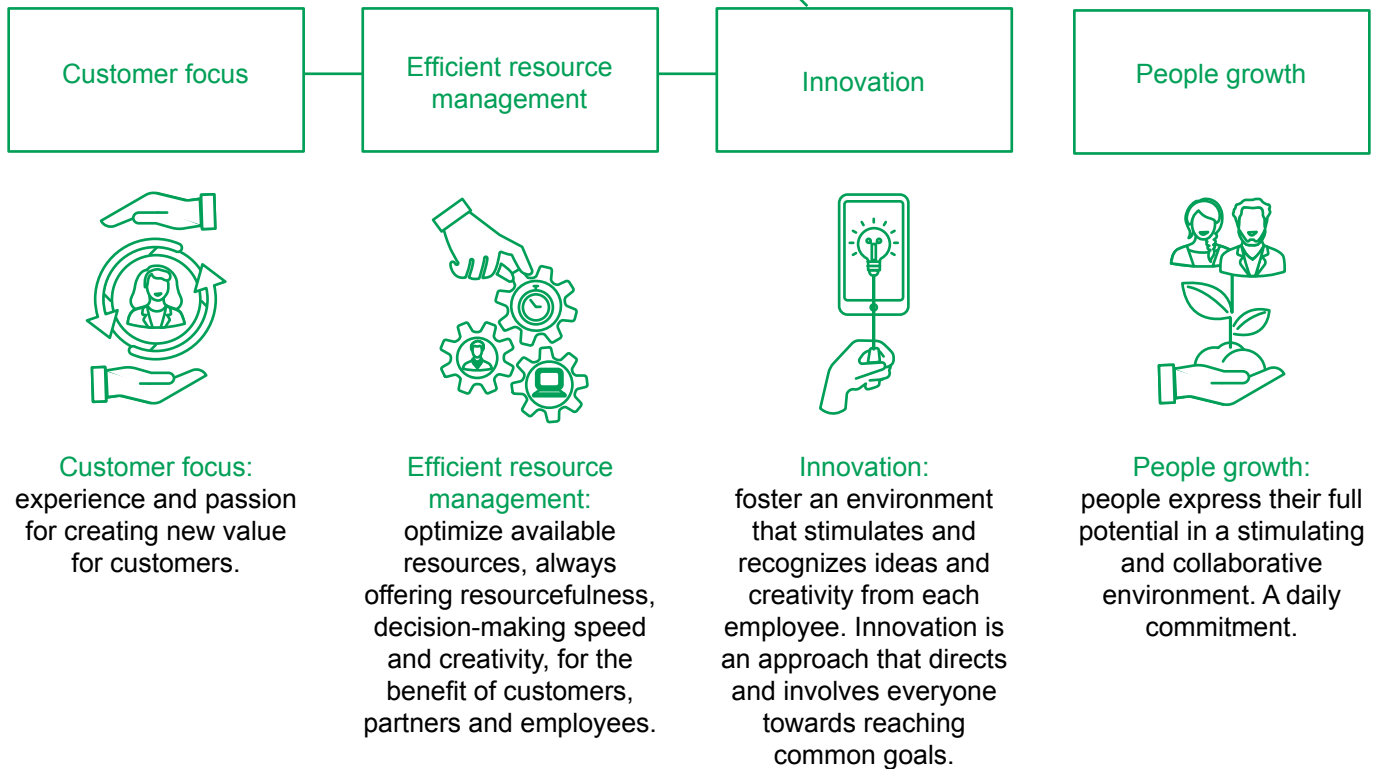
Doxee's mission is to extract value from the data of companies and Public Administrations and transform it into valuable relationships with their customers and citizens.

Whatever the mode, channel or moment in which a customer comes into contact with a company, the interaction experience is essential for consolidating the relationship, learning about the needs and desires of the customer and using this information in subsequent interactions, developing a continuous process that places the customer at the center and has the purpose of creating value for the company.

Values

Collaborative approach, unwavering commitment, autonomy and trust in people are the hallmarks of the Doxee team. Doxee's leadership is committed to developing and fostering a collaborative culture that contributes to the excellence of our professional services and work environment.

Doxee has synergistic and experienced leadership that embraces the company's core values:



The market scenario

GRI 102-2 GRI 102-10

Though with great uncertainty and faced with new forecasts of slowdown in the global economic cycle, many Italian companies are leveraging **their ability to continue to adapt to new contexts**, testing operating models to overcome the difficulties that are dimming the outlook for the next year.

Over the years, while technology has certainly affirmed its strategic role in business, there has been a growing awareness in companies that success should not only be measured in economic terms, but also in the ability to generate value for the community, for the environment and for stakeholders.

The increased awareness of the benefits of digitalization in terms of saving time and money and the ease of sharing data and remote work is clear, even though this is facing a new crisis which, after the critical phase of the pandemic, once again requires the revision of development strategies and investments. Companies are aware that they need to transform, and digital first is now part of their strategies as a significant change. The latest market data confirms this, showing that the **IT segment rose by 7% in 2022, amounting to Euro 30.77 billion¹**.

Within this scenario, businesses responded by investing in ICT products and services, thus accelerating the digital transformation process that, in turn, allows them to be competitive and face the new challenges posed by market, with targeted investments in sustainable innovative projects to ensure the continuity of activities during the health emergency.

In terms of investments in innovation and technology, 2022 saw an increase of 5.4% in expenditure by Italian companies compared to 2021. **The value of the market amounted to around Euro 36.3 billion**, and is expected to exceed Euro 38 billion in 2023.

IT Services, which include professional services dedicated to developing, integrating and managing systems, solutions and applications, generated total expenditure of Euro 12.1 billion, equal to 33% of total ICT expenditure. Instead, over 51% of expenditure was absorbed by hardware (Euro 9 billion) and software (Euro 9.6 billion) which, compared to the previous year, recorded sharp growth, continuing to support the evolution of remote work, the migration of applications to the cloud and the transformation of data centers. Today, the Italian National Recovery and Resilience Plan (PNRR) offers companies and institutions the opportunity to take advantage of the experience gained during the pandemic crisis and continue along the paths embarked upon, particularly with regard to digital evolution.

It is therefore critical to understand what tools will be available to companies and what strategies should be adopted to maximize the results of the efforts made during the emergency and avoid missing out on an opportunity for sustainable growth.

In this context, it is important to also keep in mind **the strategic role of Big Data, whose market is expected to reach a value of Euro 2 billion in 2024, with an annual growth of 12%, giving a strong boost to Artificial Intelligence tools and systems**. With an average annual growth of 22%, AI is also expected to play an increasingly decisive role in business strategies, from marketing operations to the optimization of production systems. Moreover, the need for companies to quickly respond to threats related to digitalization, as well as to data and systems security activities, will positively influence the Cybersecurity trend, with an average annual rate of 13% and an expenditure that will exceed Euro 2 billion in 2024. Thanks to the aforementioned PNRR measures, after the 2020 slowdown, the IoT is also expected to return to an upward trajectory, especially thanks to the IoT industry component.

ICT and sustainability: market opportunities

Digitization has changed society, transforming the way we interact and entertain relationships. This change has an important technological spin-off: the large amount of available data that often goes unused. The solutions developed by ICT companies are used in many areas

of daily life and are related to the social and economic development of communities. The role of the ICT sector is of great importance, especially when it comes to the positive social and environmental impacts that it is able to generate, contributing to sustainable and inclusive development:

ICT infrastructure - Access to information and services: digital inclusion and reduction of the digital divide.

Connectivity between people and organizations - Improved connectivity and communication between citizens, companies and the Public Administration with which people interface.

Resource efficiency - Digital technologies offer solutions for more efficient ways to collect and analyze large data sets with the help of tools for analyzing big data.

Doxee's role

Doxee helps companies and Public Administrations in their digital transformation journey by offering new levers to compete and communicate digitally. **Doxee** offers customers and citizens the opportunity, through a valuable experience, to get closer to companies and Public Administrations, improving the relationship with these organizations and the quality of life.

The scenario and the macro-trends are therefore important opportunities for Doxee to capitalize on its capacity for technological innovation, experience and professionalism acquired in the Italian market, but also in the international market, strengthening its current presence.

Among these:

- Business interest in DCX and Digital issues, also due to the introduction of regulatory compliance obligations
- Growing Public Administration attention toward the issues of communication and interaction with citizens, with a view to simplifying and making the processes of public service providers more accessible.

Optimization
of document
management
and distribution
processes

Interactions
between customers
/ companies and
citizens / Public
Administrations

Digital
transformation

Dematerialization
of processes and
documents

Doxee processes company data to optimize document management and distribution processes, dematerialize billing and storage processes, and transform every transaction into a business development tool.

Thanks to Doxee's innovative technologies, every moment of interaction between customer and company or between citizen and Public Administration can be enriched through interactivity, bidirectionality and personalization.

Doxee has transformed the communications of hundreds of companies on a global scale into bidirectional, digital and interactive communication channels that support their digital transformation processes. Doxee's innovation and research & development activities have also enabled the creation and deployment of innovative technologies that help customers and communities in the digital transformation process.



Process transformation – The impact of dematerialization

Doxee is recognized as a specialist in finding solutions for the digital transformation of business processes and the Company has directed its activities toward the development of IT solutions aimed at digitizing entire business processes. In this context, the dematerialization of processes and documents allows customers to drastically reduce the environmental impact related to the use of paper and related processes, such as printing and delivery, simplifying how normal activities are conducted and optimizing processes in terms of efficiency and competitiveness in the market.

To quantify the environmental impact of these initiatives, the Company has invested in the creation of a software prototype capable of estimating the paper and Co2 emissions savings obtained by a customer when activating Doxee digital services.

The digital transition of the Public Administration

Doxee services are widely applicable in the Public Administration field, where, in line with the principles of the Digital Agenda, they are the driving force behind the process of digital transformation, which contributes to the objectives of simplification and innovation of public institutions to improve internal processes, as well as their relationship with citizens.

The result includes elements of digital inclusion for citizens, who are thus able to take advantage of simpler and more immediate mechanisms for interacting with the PA, which further results in strengthening their trust in institutions.

Partnership

The development of strategic partnerships, an element that characterizes a sustainable business model, is aimed at accelerating the penetration and growth in sectors such as Public Administrations, healthcare, travel and leisure, automotive and consumer goods. In particular, the development of business partnerships allows the positioning of interactive experience products in the Public Administration market, while technology and business partnerships are functional for the integration and marketing of Doxee's products in specific sectors.

The development of partnerships with technology companies is considered essential to ensure the integration of the Doxee Platform and its products with CRM, Marketing Automation and ERP systems in order to better meet companies' needs to govern their transition to the world of digital.

The significant partnerships include the agreement with Scribe, a software provider focused on offering electronic signature and identification solutions, for a complete digitization of contract signing processes; the partnership with Nurtigo, to enable customers to adopt marketing process automation services; as well as the partnership with Messagepoint, leading provider of cloud-based solutions for content management in the Customer Communications Management domain, to enable enterprise customers to benefit from Messagepoint's AI-powered Content Hub capabilities within the Doxee Platform® ecosystem. [see Business and strategic partnerships]

Among the new partnerships developed during 2022, we note that with Lleida.net, an innovative provider for the certification of electronic notification and contracting processes. Thanks to this partnership, Doxee integrates an additional service into its technology platform that adds to the already extensive range of technologically advanced products to support companies in the digital transition phase and in complete dematerialization.

02 Doxee and Sustainability

GRI 102-40 GRI 102-42 GRI 102-43 GRI 102-44 GRI 102-47 GRI 102-48 GRI 102-49 GRI 103-1

The journey undertaken by Doxee toward a model of acting sustainably is a profound change that requires **integrating sustainability into corporate strategy** and ensuring a suitable, structured change management process toward a transition that continued during 2022.

Doxee's commitment to improving our environmental, social and governance practices is demonstrated by the decision to measure and monitor our work through national and international ratings awarded at global level, because we believe it is only through respect and transparency that we can build an integrated sustainable development system.

In 2022, Doxee was awarded the “**SILVER**” medal for **ESG engagement by Ecovadis**, a leading platform for monitoring sustainability in global supply chains. This was an improvement on 2021.

EcoVadis' scores are based on the policies and actions of companies regarding the themes of the environment, labor and human rights, ethics and sustainable tenders in accordance with international standards, including the United Nations Global Compact, the agreements of the International Labor Organization (ILO), the Global Reporting Initiative (GRI) standards and the ISO 26000 standard for social responsibility.

Nonetheless, in recent years, Doxee has implemented increasing internal measures supported by ethical goals with a focus on legality, obtaining a greater recognition in 2022 from the Italian Competition Authority (AGCM) and a **legality rating with a maximum score of three “stars” ★★★**.



Sustainability and social responsibility are thus the guiding parameters of Doxee's business. In 2021 it decided to undertake a journey to create and share value, and sanctioned this in its Articles of Association, officially becoming, in July 2021, a **Benefit Company**, a type of for-profit company, but with a higher level of transparency and accountability, which integrates in with corporate purpose, in addition to profit objectives, **having a positive impact on society and on the biosphere**.

Doxee Benefit Corporation: Priorities, commitments and objectives for sustainable growth

As evidence of its commitment to sustainability, in July 2021 Doxee obtained the status of “Benefit Corporation” (“Società Benefit” or “SB” in Italian), through the approval by the Extraordinary Shareholders' Meeting of the amendments to articles 1, 2 and 25 of the Articles of Association, which provided for the adoption of the aforementioned legal form, the inclusion of “Società Benefit” or the abbreviation “SB” next to the company name and the inclusion in the Company's business purpose of “Public Benefit Purposes”.

Doxee has thus formalized its commitment to sustainability to all intents and purposes, identifying internal roles responsible for the Public Benefit Purposes defined and the drafting of the annual Impact Report, through which the Company will communicate to the community the objectives and achievement of the same Public Benefit Purposes.

In particular, the Doxee Group has set itself a series of particularly challenging objectives, which will bring environmental benefits including saving paper, reducing the carbon footprint and collaboration with university research institutes and centers for the dissemination of the culture and value of technological innovation.

The six Public Benefit Purposes included in the Articles of Association, which characterize Doxee's commitment as a Benefit Corporation are as follows:

1. The development of innovative IT tools designed to simplify the everyday actions of users with important environmental improvements;
2. Dissemination and promotion of the culture of technological and digital innovation, the use of digital communication systems designed to simplify the everyday actions of users and beneficiaries of these systems and at the same time to generate environmental improvements, through communication, awareness-raising and engagement activities aimed at stakeholders;
3. Dissemination and promotion of the culture of eco-sustainable development, including eco-sustainable mobility, and/or circular economy metrics, within the technological innovation and digitalization services offered by the Company and/or the Company's social inclusion;
4. Design and implementation, on an annual basis, of internal training courses on technological and digital innovation, as well as on the use of digital communication systems, also in relation to eco-sustainable development and mobility and/or circular economy metrics;
5. Promotion, within the work environment, of a culture of gender equality and pursuit of the well-being of human resources, creating a work environment suitable for nurturing skills and fostering the adoption of work-life balance policies for employees and collaborators and/or implementing corporate policies aimed at sustainable mobility plans;
6. Promotion of the importance of both technical and scientific training in schools, universities and post-graduate schools and the reduction of the gender gap present in the choice of or in the access to these disciplines, implementing, by way of example, internships, student placements, or carrying out teaching activities.

The status of Benefit Corporation is part of the broader Corporate Social Responsibility journey undertaken by Doxee, following the approval of the first Sustainability Report in 2020 and of the Stock Grant Plan which, according to Doxee's management, represents one of the tools for the retention of talent among its employees.

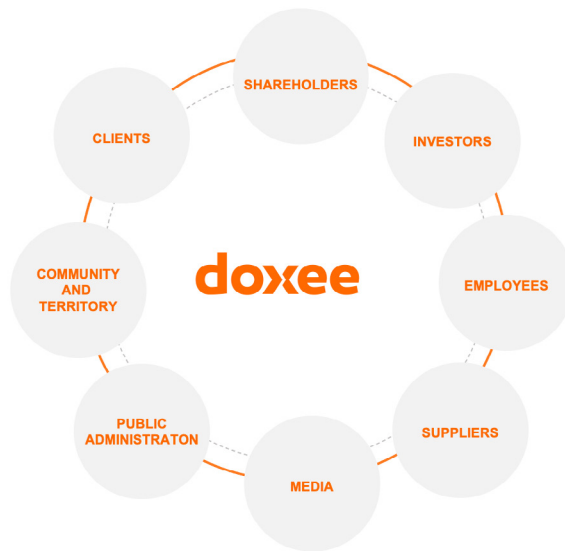
The role of Stakeholders

Stakeholders are single individuals or groups who are subject to the impact of activities and decisions of an organization, but who, at the same time, have an influence on the organization itself. An organization's staying power requires an appropriate and effective medium to long-term strategy for dealing with Stakeholders, in order to analyze and understand their expectations, needs and opinions (stakeholder engagement).

An adequate system of relationships also enables companies to better define goals and favors their decision-making processes.

Doxee has identified the following main categories of Stakeholders for whom the relationship activities provide specific and differentiated tools:

Doxee Stakeholder Map



Stakeholder Category	Activities of engagement and relationship
SHAREHOLDERS	<ul style="list-style-type: none"> Board of Directors Shareholders' Meeting Publication on the website of company performance information through economic, financial and non-financial reporting
INVESTORS	<ul style="list-style-type: none"> Shareholders' meetings Investor relations Website/dedicated section Regular meetings Communication activities through the media of the company's main initiatives and achievements
EMPLOYEES	<ul style="list-style-type: none"> Dialogue with Human Resources Informal meetings and training events Corporate welfare initiatives Corporate intranet Internal Newsletter / Dedicated Communication Training and periodic updating activities

SUPPLIERS	<ul style="list-style-type: none"> • Shareholders' meetings • Definition and sharing of projects' standards • Partnership (Products and innovation)
CLIENTS	<ul style="list-style-type: none"> • Meeting and commercial events • Planning meetings • Web site and other dedicated communication channels • Newsletter
PUBLIC ADMINISTRATION	<ul style="list-style-type: none"> • Local and national wide Public institutions • National/local authorities • Or specific requests • Sending and exchanging communications for fulfilment of document requests under national and local legislation and specific requests
COMMUNITY AND TERRITORY	<ul style="list-style-type: none"> • Events • Partnership in Open Innovation projects Innovation • Training and CSR training
MEDIA	<ul style="list-style-type: none"> • Interviews • Conferences • Events • Corporate web site

Materiality analysis and the Sustainable Development Goals

The materiality analysis is a fundamental process within a journey of sustainability. This tool defines the topics that have or could have a (positive or negative) material impact on the actions or decisions of the company or of its stakeholders, providing, as a result, indications to follow to obtain positive results and responsible growth in relation to governance and the aspects of sustainability: economic, environmental and social sustainability.

In drawing up the third Sustainability Report, Doxee was involved in a process of increasing awareness of and identifying material topics that set out the scope of the reporting.

The materiality analysis process undertaken in the reporting period considered entailed activities performed within the company, through the involvement of the top management in line with the following steps:

The process	
1	Mapping of stakeholders and the methods of engagement and relations
2	Sector benchmarking analysis (national and international comparables)
4	Evidence/feedback from engagement activities carried out on a recurring basis with stakeholders and results of contextual analyses carried out for the purposes of management systems.
5	Validation of materiality issues by top management.
6	Comparison with the 2021 results.

The preliminary materiality analysis, carried out for the purposes of drafting this Sustainability Report, highlighted **15 topics of interest to Doxee**, shown in the table below and grouped into four macro areas. **Governance and Compliance, Economic and Product Responsibility Social Responsibility and Environmental Responsibility.**

GOVERNANCE AND COMPLIANCE	Ethics, Anti-Bribery and integrity in the conduct of business
	Data protection and security of data and information
	Responsible Supply Chain Management
ECONOMIC AND PRODUCT RESPONSIBILITY	Generation and distribution of economic/financial value
	Innovation and investment in digitalization
	Quality and reliability of services
	Digitalization and digital inclusion
SOCIAL RESPONSIBILITY	Ability to attract and retain talent
	Training and skills development
	Well-being at work and company welfare
	Occupational health and safety
	Relations with and engagement of local communities
	Diversity, Inclusion and Equal Opportunities
ENVIRONMENTAL RESPONSIBILITY	Environmental impacts and Climate Change
	Development of ICT solutions with a social/environmental impact

Actively contribute to meeting the global sustainability challenges is becoming the number one priority in the work of institutions, businesses and organizations. To demonstrate awareness of those aspects and confirm its future commitment to promoting a business model that comprises economic, social and environmental responsibility in all aspects and activities, Doxee has identified the Sustainable Development Goals (SDGs) linked to its material topics, to which it could increasingly contribute over the medium-long term.



The Sustainable Development Goals – SDGs – are a set of 17 goals defined by the United Nations, to guide countries and organizations throughout the world on the path of reducing inequalities and promoting economic prosperity, social development and protection of the environment. Each goal includes 169 specific targets, and together comprise the fundamental elements of the Agenda 2030 for Sustainable Development.

In light of its area of action, Doxee has correlated the Sustainable Development Goals with its own material topics, by analyzing the GRI indicators reported during 2022 and the goals of the projects activated and supported in relation to the SDGs and the targets in accordance with the “Framework Linking the SDGs and the GRI Standards”, a guide updated to May 2021 by the Global Reporting Initiative, which supports organizations in linking the targets of each of the 17 SDGs with the disclosure of the GRI Standards.

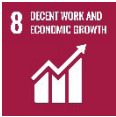








GOVERNANCE AND COMPLIANCE












Ethics, Anti-Bribery and integrity in the conduct of business	Make all financial information available, fulfill the regulations set out by law on all fronts, both in terms of production and as regards the product created. Honesty, transparency and ethics, to guarantee the sustainability of the business over the long term.	  
Data protection and security of data and information	Data are an important resource for organizations and it is fundamental to protect them from any unauthorized access. Data breaches and non-compliance with regulatory requirements may cause significant damages to companies.	  
Responsible Supply Chain Management	Manage our supply chain using sustainability criteria, continuing to guarantee the quality of our products or services. Assess the social and environmental impact of suppliers along the supply chain in order to disseminate the culture of sustainability through the chain. Also guarantee the development and creation of value of local communities, through decisions of procurement from local producers/suppliers.	 

ECONOMIC AND PRODUCT RESPONSIBILITY

Generation and distribution of economic/financial value	Responsible management of the economic-financial resources of the company to guarantee its going concern status, stability and business continuity with the goal of creating value in the short, medium and long term and for all stakeholders. Committing to investment and to developing business operations capable of generating value for everyone.	 
Innovation and investment in digitalization	Continue investing in research and development, creativity and technological and design innovation. Activate partnerships with global level research centers to create innovative solutions to improve the quality of work, efficiency and the quality of life. Develop, working closely with clients, flexible solutions to handle the challenges they must face every day.	
Quality and reliability of services	Product quality is the ability of products to meet client expectations. Moreover, products shall fulfill the regulations set out by law on all fronts.	
Digitalization and digital inclusion	Implement digital instruments and technologies that make company processes and flows more efficient. Speaking of "digital transformation" means using technology to perform activities while creating different methods for steering growth, searching for new markets, for example.	

RESPONSABILITÀ SOCIALE

Ability to attract and retain talent	Encourage processes of inclusion in work and professional growth by involving young people and workers from the world of universities and schools.	
Training and skills development	Encourage paths for professional growth and strengthen technical, managerial and organizational skills of employees through training.	  
Well-being at work and company welfare	The fundamental values of diversity, equality and inclusion can be respected by recognizing the unique value that each employee represents for the company, combatting all types of discrimination and violence in the workplace and guaranteeing equal opportunities for professional and personal growth in a safe, protected working environment. This topic also regards developing a company welfare plan and methods for managing and organizing work (remote working) such as instruments to ensure a work-life balance for people.	 
Occupational health and safety	The management of the company, its people and infrastructure requires constant control over sensitive processes, with specific regard to preventing accidents and occupational diseases for all personnel assigned productive activities, including strategic suppliers/partners. That approach constantly improves health and safety in all workplaces, reducing risks to the minimum and thus guaranteeing the best working conditions.	  

Relations with and engagement of local communities	The development of the local areas of operation as an integral part of the business model, not only in terms of distributing the value generated, but also through cooperation/partnerships with local organizations and institutions, relations with and engagement of the community.	    
Diversity, Inclusion and Equal Opportunities	Promote and protect diversity (of race, religion, culture, gender, sexual orientation and age), promoting initiatives of dialogue and cooperation to capture the opportunities provided by different experiences, knowledge, abilities and backgrounds.	 
ENVIRONMENTAL RESPONSIBILITY		
Environmental impacts and Climate Change	Develop energy efficiency initiatives at the company's facilities and sites, promote running the business more sustainably by using and generating energy from renewable sources. The analysis of carbon emissions produced by company operations, the awareness of one's own environmental impact and the definition of actions to adapt and/or mitigate atmospheric emissions of company operations.	 
Development of ICT solutions with a social/environmental impact	Develop ICT solutions with positive environmental impacts, as potentially capable of reducing the use of paper, due to digitization processes.	 

Material topics were also assessed in relation to the relevance of potential impacts (prioritization), on an assessment scale of 0 to 4. The results are shown in the chart below.



Compared to the Materiality Assessment of 2021, the clearest deviations include an increase in the materiality of the Development of ICT solutions with social/environmental impacts and the Environmental impacts and Climate Change, in line with the development of new ICT solutions that generate greater awareness of the carbon footprint and with attention to sustainable mobility.

03 The Business Model

GRI 102-2 GRI 102-6

Products and Solutions

Doxee has radically innovated the CCM, Paperless, and DCX markets, creating three product lines available that allow customers to significantly improve the operational efficiency of Mission-critical processes.



Software as a Service (SaaS)
Platform as a Service (PaaS)
On-premise (Op)

document experience (dx): the product line dedicated to the production, multi-channel distribution and digital storage of documents.

paperless experience (px): the product line that includes Electronic Invoicing, Long Term Digital Preservation, Electronic Ordering, Electronic Signature, Certified Electronic Delivery and other products for customers looking to dematerialize their business processes.

interactive experience (ix): the product line dedicated to DCX, it includes the production and distribution of interactive micro web sites (Doxee Pweb®) and personalized videos (Doxee Pvideo®), the marketing automation option (Doxee Booster®) and the interface for managing the entire process of creating and publishing digital content in communications already natively personalized, created using Doxee Pvideo® and Doxee Pweb® (Doxee Content Hub). Doxee's products, capable of making communication interactive and highly personalized, are a marketing tool for companies, as they help them grow their business.

These products are supplied through the following models: Software as a Service (SaaS), Platform as a Service (PaaS) and On-premise (Op):

- **il modello SaaS** consists in delivering products in the form of the Cloud-based standard service;
- **the PaaS model** consists in delivering products by having customers use the Doxee Platform®, as the basis for providing and delivering SaaS services;
- **the Op model** consists in granting the rights to use Doxee's technology through licensing.

Doxee Platform®: the technology platform

The Doxee Platform is the technology platform designed and built by Doxee to deliver products with virtually unlimited flexibility and scalability. It has an architecture that makes it possible to efficiently manage high production volumes, but above all, it eliminates the costs associated with system administration, as well as all those related to managing the physical infrastructure if the Doxee Platform is delivered in Cloud mode (SaaS and PaaS).

The Doxee Platform includes all the tools needed to design, configure and develop any type of communication, both promotional and transactional. The Doxee Platform allows customers to monitor all phases of communication production, from design, implementation and review to approval and delivery of communications to their recipients.

The communications production process is managed and monitored, from development to delivery and multi-channel delivery, in accordance with the Service Level Agreements between Doxee and individual customers. In particular, the Doxee Platform controls the outcome of the distribution and delivery of communications to recipients and the analysis of related performance and correspondence with the quality standards agreed upon with customers.

Doxee has created the platform, designing all applications independently and, thanks to this approach, having full control of its technology, has distinguished itself internationally for providing software solutions for CCM that are both flexible and functional.

The characteristics of the Doxee model

Technological innovation and expertise in the sector

- Know-how in the study, design and development of the best technologies in the service of communication processes for the Enterprise market.
- Innovative product offer for DCX.
- Achieved Innovative SME requirements in 2019.

Integrated product lines

- Three integrated product lines for complete coverage of different needs in the sectors: Telecommunications and Media, Utilities, Banking & Insurance, and Public Services.
- Design of customized solutions and vertical configuration of product lines based on a deep knowledge of the different customer journeys in the reference sectors.

Strong customer loyalty

- Deep integration with the main processes of companies with a strong B2C orientation (customer acquisition, invoicing, management of late payments from default to credit recovery).
- Continuous innovation of communication processes to offer a competitive advantage to companies in improving the CX of their customers, to the benefit of the business.
- Continuous focus on improving the operational efficiency of key business processes.

Doxee innovative technologies: customer benefits

Cloud Architecture

The Doxee Platform® is not just a simple lift-and-shift (a traditional software product running on Cloud infrastructure), but an integrated ecosystem of Cloud products that Doxee employs and combines with its own technologies to deliver a unique product for which Doxee owns the intellectual property rights of the key elements, including data capture and transformation, content production and delivery, digital archiving and storage. The result is a platform of interoperable and combinable Cloud products that meet every customer need.

This approach makes our products particularly well suited to support enterprise Cloud transformation strategies. Cloud transformation for a customer consists in transferring software, historically managed on its own physical infrastructure, to higher performance Cloud infrastructures, including infrastructure management services, security and software updates, with a significant reduction in costs for the customer.

Doxee has an international track record of success in the transformation of mission-critical processes such as invoicing and reporting to the Cloud.

Interoperability

Doxee, thanks to its expertise in the Cloud, is able to offer products that are integrated or easily integrated with standard market services and solutions, ensuring a very fast time-to-market and therefore a significant competitive advantage for its customers.

Among its products, Doxee includes the Cloud integration service offered by the US company Informatica L.L.C., allowing customers who use it to exchange data with the Doxee Platform through a mode integrated with their systems. In this regard, Doxee was the first Advanced Technology Partner in Italy to deliver products integrated with those developed by AWS.

Doxee is also a certified partner of Zuora, a leading global provider of SaaS services dedicated to managing billing processes, based on subscriptions and memberships. Through the Zuora connector, the Doxee Platform® can be rapidly integrated within the billing processes to support compliance issues related to the respect of European and Italian regulations on electronic invoicing, but also to support communication processes related to transactions through the production and delivery of interactive communications and paged documents.



Multi-tenant model

The Multi-tenant model allows applications with completely different characteristics to be managed for multiple customers using the same software. With this model, the Doxee Platform can manage hundreds of customers at once, ensuring strict segregation of each customer's data and applications while guaranteeing the privacy of managed data.

Visual configuration

Unlike other IT solutions, the Doxee Platform offers an entirely visual configuration mode, which is supported by graphical interfaces that simplify the use of the products included in the three Doxee product lines.

In particular, regardless of the chosen delivery method (PaaS, On-premise, SaaS), the visual configuration facilitates and speeds up the digital transition and the use of technology, offering the following benefits to the customer:

- centralizes development activities under Doxee and does not require the customer to have any dedicated resources with developer skills;
- facilitates continuous updating and ensures compatibility with configurations set up directly by the customer;
- reduces the margin of error, since the visual configuration is supported by automatic verification tools that prevent the most common errors.

Trademarks and patents

Doxee has registered two patents that are valid for the Italian territory. One patent relates to the system and the method for generating personalized digital audiovisual content with speech synthesis ("Patent 1"). The second patent, instead, relates to the system and method for reproducing digital audiovisual content including at least one animation ("Patent 2").

Doxee has also filed two applications with the Patent and Trademark Office related to the registration of the system and method for generating personalized digital audiovisual content with a pre-recorded human voice component, valid in Italy and in Europe. Doxee has also filed an application relating to the registration of the system and method for the generation of customized digital audiovisual content with speech synthesis, valid in the European territory.

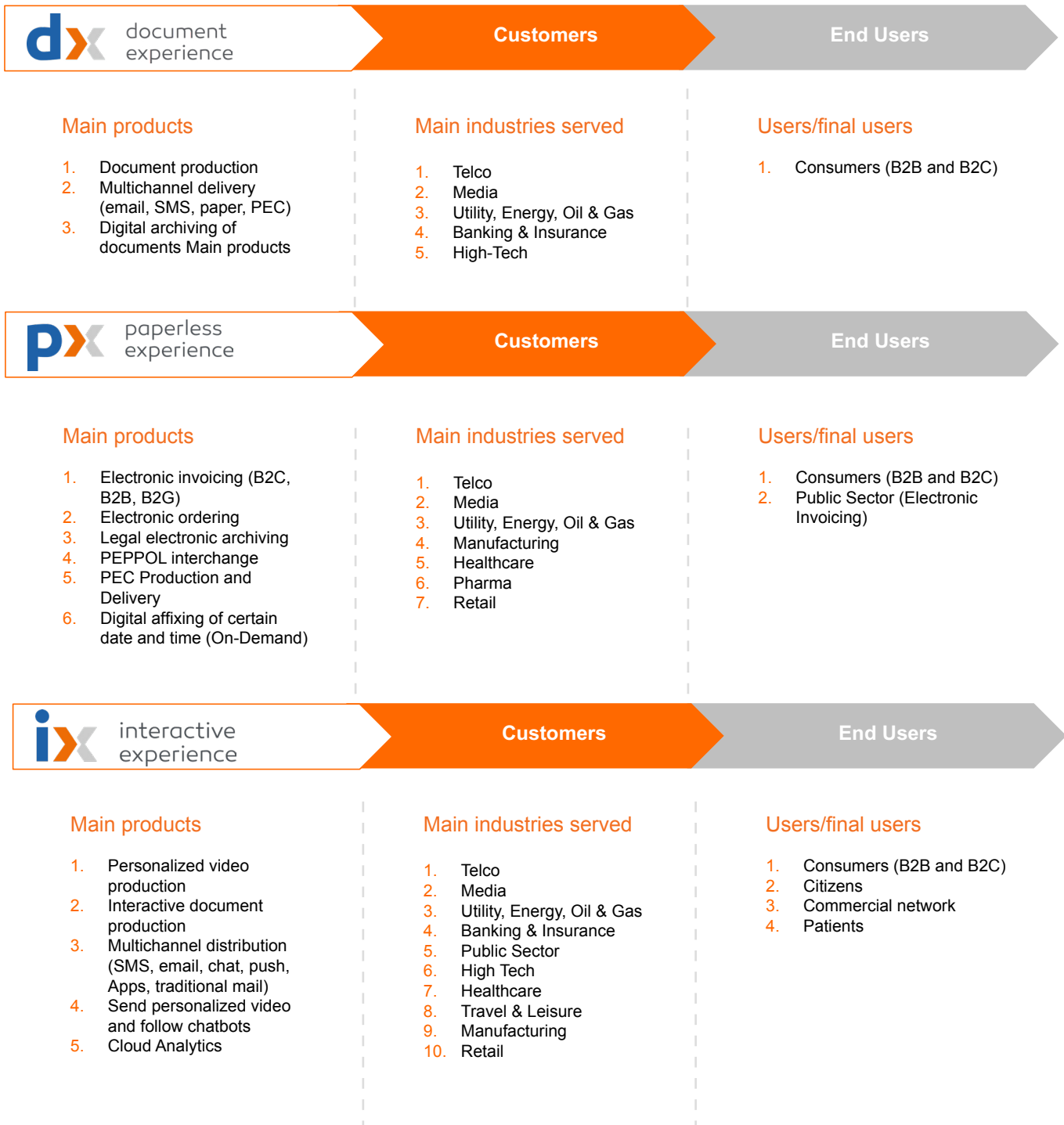
Babelee has filed a patent in Italy entitled "Method and system for the automatic generation of videos from unusual information". Doxee holds the registration of the Doxee®, Doxee Platform®, Doxee Pvideo®, Doxee Pweb® and Doxee Booster® trademarks for the US and European markets.

Customer relations

GRI 102-2 GRI 102-6

Customers and sales network

Doxee is present in Europe and in the United States (USA) and operates, directly and indirectly, in the main world markets, through about 100 employees and an extensive network (direct and indirect) of vendors. Doxee has about 200 Italian and foreign customers, mostly companies in the Enterprise segment.



Quality and reliability of the service

Customers represent the most important capital and the key point for Doxee's development. The ability to meet customers' needs and anticipate their expectations is a key factor in gaining and maintaining their trust. Doxee S.p.A. pursues its business success in the markets it serves by offering quality products and services at competitive conditions and in compliance with the rules to protect fair competition.

Doxee's products represent efficient solutions for customers, including from a financial perspective: their use does not require any capital expenditure, but only paying fees and/or variable costs to Doxee that include the technological and regulatory updates made automatically and constantly by the company.

Doxee S.p.A. recognizes that the appreciation of those who request products or services is of primary importance for its business success and therefore undertakes to:

- observe internal procedures for managing customer relations;
- provide, with efficiency and courtesy and within the limits of the contractual provisions, high quality products and services that meet or exceed the customer's reasonable expectations;
- provide accurate and comprehensive information about products and services so that customers can make informed decisions;
- adhere to the truth in advertising and other communications.

Doxee has a significant presence in several private sectors and in the Public Administration market.

- **Telecommunications, Media and IT**
- **Utilities**
- **Banking & Insurance**
- **Public Administrations**

Service Review Management - In order to keep the quality of the services provided under constant control, Doxee has adopted an internal Service Review Management process (part of the ISO 9001, 27001 and 14001 certified integrated management system), under which systematic review activities of the trend of service KPIs with customers are standardized and documented. To guarantee the effective execution of the activities, internal Service Managers are dedicated to the operational management of the process.

Service Desk Tools - Al fine di migliorare il servizio di supporto erogato ai clienti e dei temi di customer care, sono nel 2021 sono stati aggiornati gli strumenti interni dell'area di Service Desk, con l'adozione di nuovi tool finalizzati a garantire una maggiore tracciabilità e condivisione delle informazioni, sia internamente rispetto alle diverse funzioni aziendali, sia esternamente verso i clienti. È in corso l'estensione del progetto anche ad altre aree aziendali, in modo da migliorare complessivamente l'esecuzione dei processi interni e, conseguentemente, le performance percepite dai clienti.

Net Promoter Score® - The application of the adopted Net Promoter Score® method, which is widely used internationally to measure the level of "brand loyalty" in customer-supplier relations, began in 2020. To date, the measurements carried out regard marketing initiatives such as the Doxee Digital Club, webinars and the creation of materials such as eBooks, white papers and case studies, with very positive results (27, +8% compared to 2021).

Business and strategic partnerships

GRI 102-2 GRI 102-6

The skills acquired, the unique elements of the solutions offered and the approach to the customer have allowed Doxee to establish partnerships with highly qualified companies. At the date of this document, the most relevant strategic partnerships are: Postel S.p.A., Zuora Inc., Amazon Web Services Inc. and Capgemini S.A., Messagepoint Inc., Scrive AB. In addition to these, Doxee has chosen to cooperate, on the basis of commercial agreements, with leading operators specialized in specific sectors or geographical areas such as: PricewaterhouseCoopers S.r.l., RGI S.p.A., CWS. Nurtigo S.r.l.

Postel S.p.A.

The partnership is focused on the promotion of ix products to support the digitalization of the Public Administration and the insurance market managed by Postel S.p.A. Doxee supports Postel S.p.A. in the sale of ix products, with the aim of increasing the digital services offered to its customers and, therefore, revenue.

Zuora Inc.

The partnership is aimed at the global marketing of px and ix products. Zuora Inc. is a high-tech company, listed on the New York Stock Exchange and focused on the management of payment processes related to subscriptions. Through this partnership, Doxee is able to sell e-invoicing and interactive communication products globally and has a native integration with Zuora Inc.'s platform that allows interoperability between the two solutions.

Capgemini S.A.

Capgemini S.A. is a leading consulting services company at the forefront of innovation in Cloud technologies. This partnership is oriented to the marketing of dx and ix products and is aimed at companies operating in the banking, insurance and telecommunications sectors.

AWS Amazon Web Services

The partnership is focused on the development of products and services in the Cloud and on artificial intelligence topics. Doxee was the first AWS Advanced Technology Partner in Italy and is considered one of the reference partners of AWS for the shared marketing initiatives and the awards obtained. It provides successful solutions based on the AWS platform with high sales and technical, marketing and go-to-market support.

Doxee has obtained a further important recognition by recently becoming a certified AWS Technology Partner for the public sector in Italy, enabling it to support the Italian Public Administration in improving and simplifying communication with citizens and encouraging the use of digital channels to offer high levels of service personalization and valuable content.

Messagepoint Inc.

Messagepoint is a provider of cloud-based content management software solutions in the Customer Communications Management domain, leader in the insurance, financial, healthcare and printing services sectors.

The partnership with Messagepoint makes it possible to take full advantage of the power of artificial intelligence to ensure efficiency, compliance and meaningful connections in communications with customers, also thanks to the personalization of communications using content.

Customer-oriented employees that request and personalize on-demand and batch communications are able to respond quickly to customers with accurate and approved content.

Scrive

Scrive is a software provider focused on electronic signature and identification solutions, with which Doxee has partnered to offer its customers the ideal tool that enables the full digitization of the contract underwriting processes.

The agreement with Scrive is part of Doxee's broader strategy aimed at building an application ecosystem around its technological asset, the Doxee Platform®. With the Scrive electronic signature solutions, in combination with the Doxee document experience (dx) and paperless experience (px) products, customers will be able to digitize complex processes and perfectly integrated with the tools and procedures already in use within their organizations.

Lleida.net

Lleida.net is an innovative provider for the certification of electronic notification and contracting processes, specializing in the delivery of secure electronic communications. With this agreement, Doxee moves forward with integrating qualified trust services for eIDAS-compliant electronic delivery. Thanks to Lleida.net's technology, the new Certified Electronic Delivery services will enable public and private organizations to send certified communications using digital channels and to receive notifications with full legal value.

Supply chain management

GRI 102-9

The selection process

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality and price of the good or service, as well as guarantees of service and timeliness. In supply relationships, Doxee S.p.A. is committed to:

- observing internal procedures for managing relations with suppliers;
- not precluding any supplier that meets the requirements from competing for a supply contract with Doxee S.p.A. and adopting objective evaluation criteria in the selection process, based on stated and transparent procedures;
- obtaining the collaboration of suppliers in constantly ensuring that the needs of Doxee S.p.A. customers are met in terms of quality, cost and delivery times to an extent at least equal to their expectations;
- maintaining a frank and open dialogue with suppliers, in line with good business practices.



Supplier Management

Doxee has adopted a Supplier Management policy and process, which is an integral part of the Company's Integrated Management System that is ISO 9001, ISO 27001, ISO 14001 and ISO 37001 certified.

This business management policy aims to be a reliable, transparent and effective communication tool, through which Doxee makes employees, customers, suppliers, public bodies, trade associations and other stakeholders aware of its activities, performance, aspects, programs and objectives on environmental and sustainability issues.

The Management team defines and discloses its environmental sustainability values through its corporate Environmental Policy, which is communicated and disseminated inside and outside the Company, with particular reference to customers, suppliers and interested third parties. The aim is to qualify and give preference to suppliers who act with a view toward continuous improvement of their environmental performance. This policy defines the quality, safety and environmental criteria that must be guaranteed in the selection, access and use of suppliers. Monitoring and auditing mechanisms are also defined, aimed at checking that the suppliers' performance remains in line with the identified standards. A single supplier inventory is centrally maintained, which lists all suppliers used and classifies them based on their characteristics.

The management and monitoring criteria adopted differ depending on the type and classification. In particular, periodic audits are carried out via self-assessment questionnaires for suppliers classified as relevant under two key drivers:

- Environmental issues ("EMS relevant")
- Information security and protection ("ISMS relevant" and "DPMS relevant").

La frequenza delle attività è definita sulla base del grado di importanza attribuito al fornitore rispetto alla classificazione in "Strategic", "Tactical" e "Operational".

Suppliers

The main suppliers include:

- infrastructure and connectivity service providers;
- print and delivery providers, for dx services;
- professional services and consulting providers;
- suppliers for the purchase of hardware.



1. Suppliers of ICT and cloud infrastructure
2. Printers and postal delivery companies
3. Development outsourcer



1. Suppliers of ICT and cloud infrastructure
2. Development outsourcer
3. Certification Authority



1. Suppliers of ICT and cloud infrastructure
2. Development consultants

04 Corporate Governance

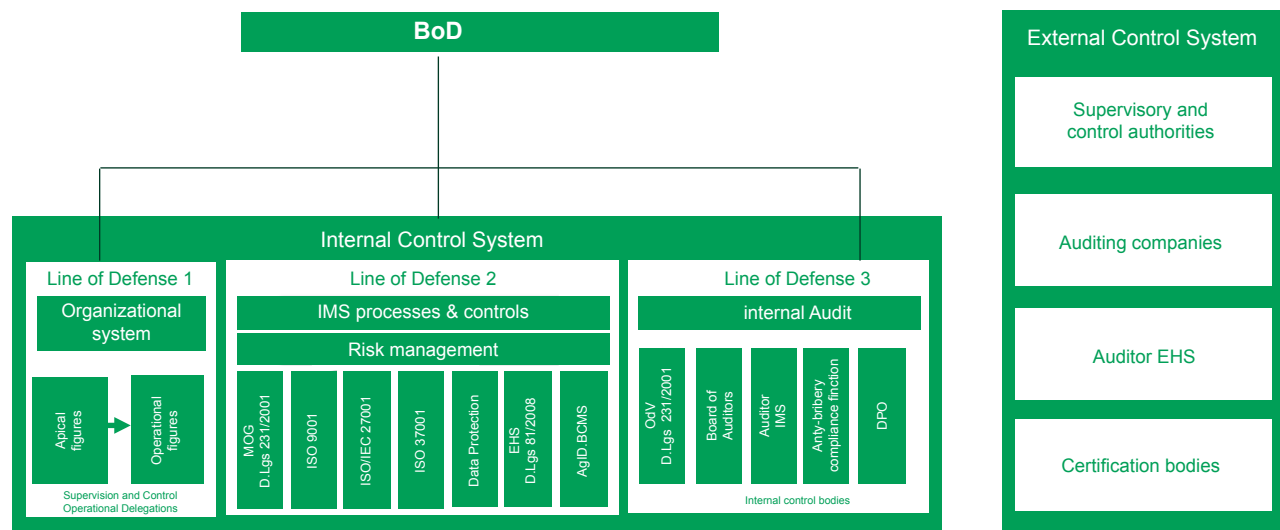
Responsible business management

GRI 102-13 GRI 102-18 GRI 405-1

The governance model of Doxee S.p.A. and, in general, its entire organizational system, is structured to ensure that the Company implements its strategies and achieves its objectives. The structure of Doxee S.p.A. was created taking into account the need to provide the Company with an organization that guarantees maximum efficiency and operational effectiveness.

Over the years, Doxee S.p.A. has followed a path of building, evolution and continuous improvement of an Integrated Management System aimed at ensuring maximum value for all its stakeholders, including its customers, service users, employees and shareholders. The aim is to be able to better respond to the needs of customers and users, which are constantly and rapidly evolving, and to better fulfil the mission of improving the quality and safety of the services it provides.

The following figure briefly illustrates the scheme of the Governance Model and the Integrated Control System in place at Doxee S.p.A.

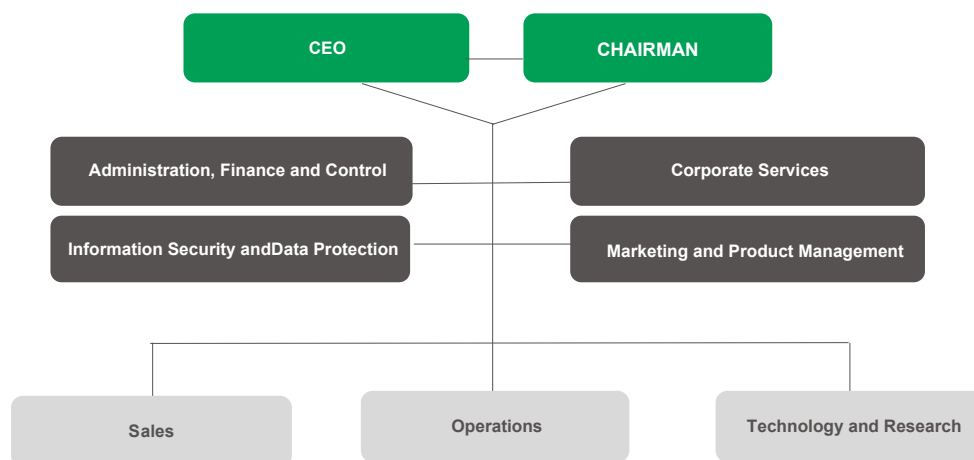


Directors and Officers

Board of Directors	
Paolo Cavicchioli	Chairman and Chief Executive Officer
Sergio Muratori Casali	Vice Chairman and Chief Executive Officer
Giuseppe Dal Cin	Director
Pier Luigi Morara	Director
Paola Leoni	Director
Board of Statutory Auditors	
Gianluca Riccardi	Chairman
Marcello Braglia	Standing Auditor
Vincenzo Tardini	Standing Auditor

Board of Directors – Gender diversity					
Women		Men		Total	
1-	20%-	4	80 %	5	100 %
Board of Directors – Diversity by age group					
Under 30 years old		Between 30 and 50 years old		Over 50 years old	
-	-	-	-	5	100%

Organizational structure



External initiatives and memberships

Associations

The main industry associations of which Doxee is a member are:

	Confindustria is the main association representing manufacturing and service companies in Italy. Its mission is to promote the affirmation of business as an engine of economic, social and civil growth of the country.
	ANORC (Associazione Nazionale Operatori e Responsabili della Custodia di contenuti digitali) is the national reference point for companies and professionals involved in the digitization and protection of information and document heritage in the public and private sectors, promoting institutional dialogue, professional training and development, organization of events, as well as the development of information and communication activities in the sector.
	Assintel is the national association of reference in Italy for ICT and Digital companies of Confcommercio - Imprese per l'Italia. It is at the forefront for the development of digital culture within the national economic system. Doxee is a member of "Assintel Assoconservatori Accreditati", a specific section of Assintel.
	EESPA acts as a trade association at the European level for a broad and dynamic community of e-Invoicing service providers, from organizations providing network, business outsourcing, financial, technology and EDI services. EESPA is an international non-profit association organized under Belgian law.
	OpenPEPPOL is an international non-profit association under Belgian law and is composed of members from both the public and private sectors. The association has assumed full responsibility for the development and maintenance of the PEPPOL specification, building blocks and services and implementation across Europe.
	Aspen Institute (Italy) is a private, independent, international, non-profit association characterized by the discussion and exchange of knowledge, information and values.

Control model and policies

GRI 103-2 GRI 205-3

Organization, management and control model pursuant to (Leg. Decree 231/2001)

Doxee has adopted an “Organization, Management and Control Model” (the “Model”) pursuant to Italian Legislative Decree 231/01, the legislation that introduced the administrative liability of legal entities into Italian law. In accordance with this legislation, a Supervisory Body has been set up to oversee the functioning of and compliance with the Model and to ensure that it is kept up to date. The Code of Ethics, which identifies the guidelines for company conduct, is an integral part of the Model, the aims of which are to:

- make known to all Doxee S.p.A. employees and to all those who collaborate with the Company or have business relations with it, that the Company condemns, in the most absolute manner, conduct contrary to laws, regulations, supervisory rules, or in any case in violation of internal regulations and the principles of sound and transparent management of the business on which the company is based;
- determine, in all those who operate in the name and on behalf of Doxee S.p.A. in the “areas of activity at risk”, the awareness that they may incur, in case of violation of the provisions contained therein, in an offence punishable by penal and administrative sanctions, not only against the company, but also against themselves;
- ensuring, as far as possible, the prevention of the commission of offences, including criminal offences, within the Company by means of:
 - the control of all areas of activity at risk;
 - the training of personnel in the correct performance of their duties;
 - the establishment of a system of sanctions for cases of violation of the Model;
- reiterate that Doxee S.p.A. does not tolerate unlawful conduct of any kind and for any purpose whatsoever, since such conduct (even if the company was apparently in a position to take advantage of it) is in any case contrary to the ethical principles to which Doxee S.p.A. intends to adhere.

During 2022, as well as in the previous years, no episodes of bribery or corruption involving directors or employees of Doxee were ascertained.



Code of Ethics

Doxee is determined to ensure the utmost fairness in the conduct of its business and related activities, including the protection of its image and reputation. The Code of Ethics sets out the principles and ethical values to which Doxee adheres in carrying out its activities, and of which it expects the strictest compliance by all persons in the company and, more generally, by all those who cooperate and collaborate with it in the pursuit of its corporate mission.

Doxee follows the principles of the Code of Ethics in all actions, operations, relationships and transactions carried out in the management of the various corporate activities. The Code of Ethics applies to those who hold positions of representation, administration or management, or exercise, even de facto, management and control of Doxee, or to those who cooperate and collaborate with it, for any reason, in the pursuit of its business objectives, as well as to all employees without exception, collaborators and anyone who has business relations with Doxee.

In particular, Doxee's Directors are required to be guided by the principles of the Code of Ethics in setting the objectives of the Company, in proposing investments and implementing projects, and in any decision or action related to the management of Doxee.

In order to achieve its objectives, Doxee complies with the following principles:

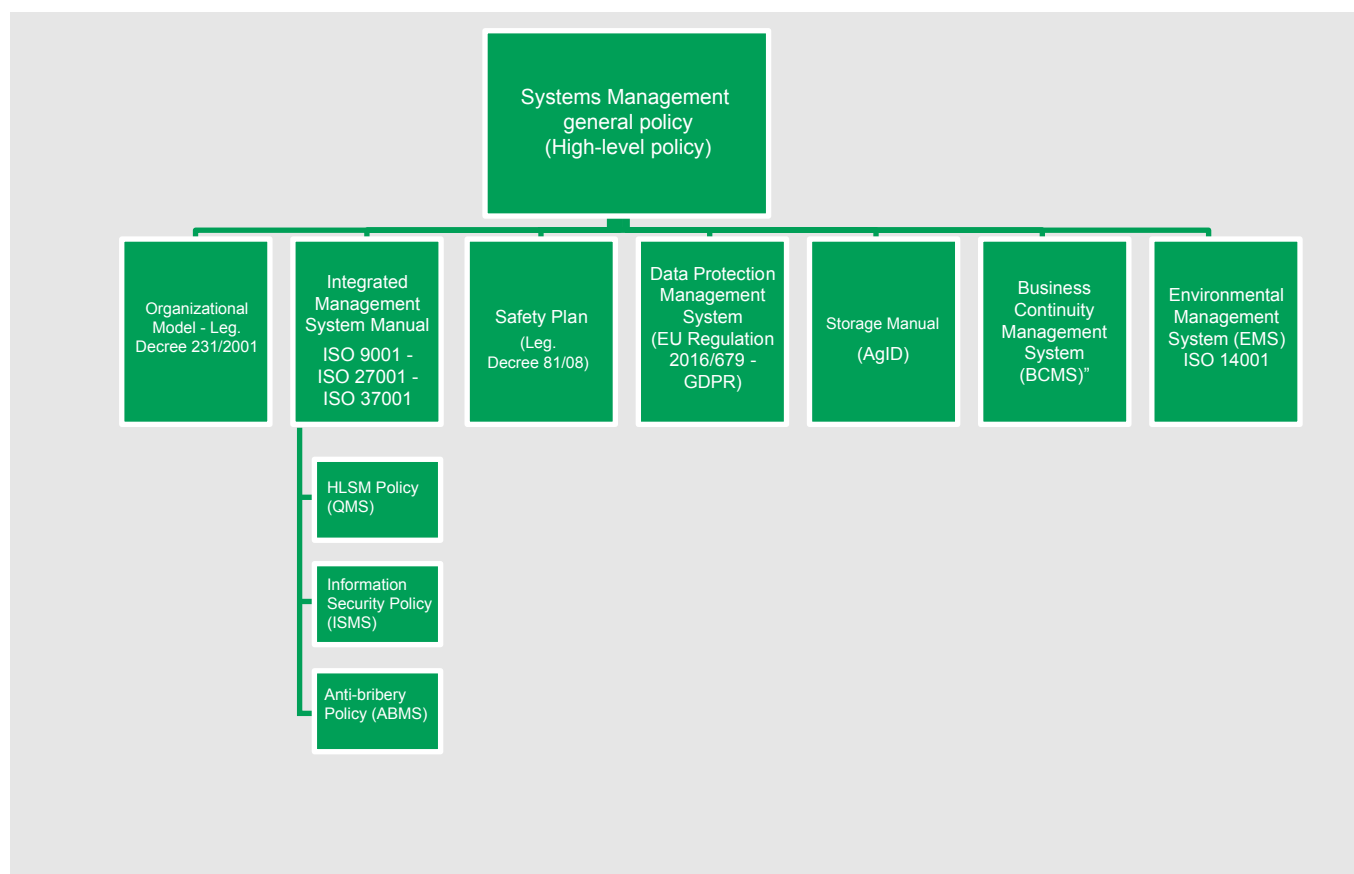
- Responsibility
- Fairness
- Transparency
- Confidentiality
- Fight against corruption and conflicts of interest
- Competition
- Impartiality
- Environment, health and safety
- Protection of minors

Management systems

High Level System Management Policy

Doxee has a High Level System Management Policy that defines the mission and vision of the Company. It defines the principles on the basis of which individual policies are prepared for regulating business processes and management systems. Specific policies therefore direct the organization toward the achievement of objectives.

The structure of Doxee's management systems and policies is represented as follows:



The Quality Management System

Quality Management System - ISO 9001: for the “Design of solutions and delivery of managed services in SaaS and SaaS mode in the areas of Customer Communication Management, Customer Experience, Electronic Invoicing, Standard Digital Storage and Long-term Storage”, it ensures that the business processes that make up the Doxee value chain are properly documented, maintained and monitored, to ensure high levels of customer service.

Environmental Management System

Environmental Management System - ISO 14001 Environmental Certification for the “Design, supply, installation, development and implementation of solutions and delivery of services managed with own infrastructure or cloud in SaaS and PaaS mode in the areas of Customer Communication Management, Customer Experience Management, Electronic Invoicing, Standard Digital Storage and Long-term Storage”. The certification was obtained in March 2021 and guarantees the existence of an environmental management system for the management and control of environmental aspects related to the nature of Doxee's activities, products and services.

Information Security Management System

Information Security Management System - ISO/IEC 27001: for the “Design, supply, installation, development and implementation of solutions and delivery of services managed with own infrastructure or cloud in SaaS and PaaS mode in the areas of Customer Communication Management, Customer Experience Management, Electronic Invoicing, Standard Digital Storage and Long-term Storage, with application of the ISO/IEC 27017 and ISO/IEC 27018 guidelines”. The certification includes the ISO/IEC 27017 and 27018 extensions for service delivery from cloud-based platforms and is also a requirement for AgID accreditation regulations.

This system defines the policies and operational processes necessary for ensuring secure management (in terms of Confidentiality, Integrity and Availability), in compliance with the legislation concerning the information processed by Doxee in various capacities and the protection of personal data, in accordance with the provisions of GDPR.

Anti-Bribery Management System

Anti-Bribery Management System – ISO 37001: “Anti-Bribery Management Systems” is the first international standard for management systems created, based on international best practices, for the purpose of reducing the risks and costs linked to possible phenomena of corruption, promoting an ethical business culture, respecting legality. Doxee obtained this certification in 2022, on completion of the process begun in the previous year.

AgID Qualification

Over the years, Doxee has been accredited as a Storage Provider by AgID (Agenzia per l'Italia Digitale) and has been recognized for its high value in terms of quality and security. The Company's processes are aligned with the technical rules on the storage of electronic documents. Following the latest regulations, which also introduced changes to Italian Legislative Decree no. 82 of 7 March 2005, (The Digital Administration Code - CAD), Doxee is registered and qualified in the specific AgID Marketplace for IT document storage services.

Since May 2019, Doxee is also a qualified provider on the AgID Marketplace for Cloud Services for the PA, a platform that displays the services and infrastructures qualified by AgID in accordance with the provisions of the AgID Circulars no. 2 and no. 3 of 9 April 2018.

Certification as Access Point Provider on the PEPPOL network

Doxee is able to manage the procedures for receiving and sending orders addressed to Italian and European Public Administrations and to and from the NSO (Nodo Smistamento Ordini – the central infrastructure for the exchange of electronic orders between public bodies and suppliers) in the manner prescribed by law. Therefore, Doxee operates as an intermediary through the PEPPOL communication channel, assuming the roles of Access Point (AP) and Service Metadata Publisher (SMP), accredited both to AgID (PEPPOL Authority for Italy) and to the NSO itself.

Risk Management

Doxee has an integrated risk management model where risks in the areas of information security (ISO 27001), business (ISO 9001), environment (ISO 14001), anti-bribery (ISO 37001), Model 231 and data protection are identified and managed.

Cybersecurity and Data protection

GRI 418-1

The information security policy is a key part of Doxee's set of controls to ensure that managed information is effectively protected and can meet its obligations to customers, shareholders, employees and suppliers.

Policy, guidelines and operating procedures

- The Information Security policy, the foundation document for the system, outlines the set of controls adopted to ensure that information managed by Doxee is effectively protected to meet obligations to customers, employees, suppliers and other stakeholders;
- The Acceptable Use policy, a document that describes the set of rules and conditions for the use of and access to the company's information systems;
- The Backup Recovery policy, a document containing guidelines and rules to be followed when performing backup and recovery activities;
- The Cryptographic policy, a document that describes how cryptographic issues are managed within the company, explaining to which contents it must be applied and which standards and rules must be followed in the application;
- The Physical Access policy, a document that describes the rules to be followed for physical access to Doxee premises;
- The Supplier Management policy, a document that defines principles and practices for supplier management, including selection, classification and monitoring criteria;
- The Email Attachment Confidentiality operating procedure, which describes how to ensure the confidentiality of email attachments sent by Doxee employees and suppliers;
- The Information Security Test Guidelines, a set of guidelines that describes the principles to be applied when carrying out security tests relating to software development activities.

The main operational processes defined within the system are as follows:

- The Access Management Process, a process that describes the operational activities to be performed to ensure secure and compliant management of access to the various corporate systems;
- The Information Security Incident Management Process, a process that describes the operational activities to be performed in case of security incidents (i.e. incidents that affect the confidentiality, integrity and availability of data processed by Doxee); it includes the ad hoc management of cases involving the leakage of personal data (data breach), with possible notification of the Authority for the Protection

of Personal Data, if required; e disponibilità dei dati trattati da Doxee); include la gestione ad hoc dei casi che implicano la fuga di dati personali (data breach), con eventuale notifica al garante privacy ove richiesto;

- Supplier Management Process, a process that describes the operational activities for managing suppliers, in compliance with regulations and quality and safety standards.sicurezza.

Compliance with regulations

To date, the Company has not received any disputes or complaints from external parties or regulatory bodies regarding breaches of regulations, the rights of data subjects or personal data for which the Company is the Data Controller.

Data Breach in the role of Data Controller: no event is reported in 2022.
Data Breach in the role of Data Processor: in 2022 8 Data Breaches occurred, up on 2021. However, these were substantially all linked to the loss of correspondence by the delivery provider, with an impact of less than 10^{-4} % on the total documents handled annually by Doxee using this method.

In addition to the above events, one data breach occurred, caused by a technical problems, which resulted in communications sent to the wrong addressees. The number of data subjects involved was limited, 2% of total data subjects, and we received no notices from the Personal Data Protection Authority. Countermeasures were introduced to mitigate the risk that this incident could reoccur.

Regulatory compliance

GRI 307-1 GRI 419-1

The [High Level System Management Policy](#) defines guidelines regarding regulatory compliance.

Compliance with environmental regulations

During 2022 there were no events that gave rise to sanctions and/or litigation due to non-compliance with environmental laws, rules and regulations. Similarly, as of the date of preparation of this Sustainability Report, there are no outstanding environmental disputes.

Non-compliance with laws and regulations in the social, economic and tax area

As of the date of this document, there are no cases of violations of laws and/or regulations relating to social, economic and tax provisions. No sanctions of this nature were received in 2022 and no significant proceedings have been reported in this regard.

05 Economic Sustainability and Creation of Shared Value

GRI 201-1

Financial performance

Economic data	2021	2022
Turnover	20.846.555	25.464.567
Value of production	26.128.074	32.911.612
Net profits	1.794.570	1.244.818
EBITDA	5.485.596	4.934.612
EBITDA/VAL of Prod%	23,2%	17,2%

Financial Data	2021	2022
Equity	8.757.346	13.470.540
Net Financial Position (NFP)	-3.348.409	14.472.228
Investments	4.652.748	6.641.983

Investments

Each year Doxee, makes significant investments in the internal development of technologies that are among the most advanced in the reference markets.

Historically, the Company invests an average of 12% - 14% of the value of production in Research and Development activities, also relying on numerous collaborations with universities and research centers.

Among the main areas of investment, we find the process of creating patents, the CPQ (Configure Price Quote) project, the microservices for integration of external functions and services, the data gateway, the Advanced Electronic Signature service, the Message Point tool and the continuous updating and improvement of the corporate Website.

One of the major experimental research and development projects concerns Event-Driven architectures within the Doxee platform to introduce new channels and new use cases. The investments made in 2020 and 2021 amount to Euro 3.3 million and Euro 4.6 million, respectively. The positive trend of investments continued in 2022, reaching Euro 6.6 million.

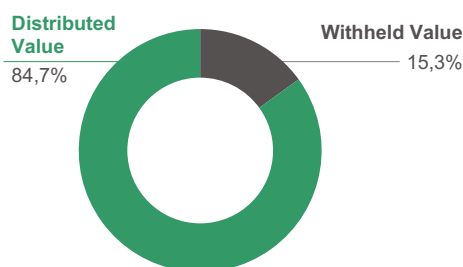
Economic value generated and distributed

The Income Statement illustrated below is prepared based on the consolidated income statement for the reporting period, highlighting the economic value directly generated by Doxee and its distribution to internal and external stakeholders. The value generated refers to Doxee's net revenues (Revenues, Other operating revenues, net of credit losses), while the economic value distributed includes costs reclassified by stakeholder category and any dividends distributed.

The economic value retained relates to the difference between economic value generated and distributed and includes amortization and depreciation of tangible and intangible assets, provisions and deferred tax assets and liabilities.

Economic value (in thousands of Euros)	2019	2020	2021	2022
Economic value generated	19.393.933	21.018.750	23.616.080	28.745.993
Suppliers - Operating costs	8.796.295	8.449.420	9.946.832	13.682.182
Human resources - Personnel costs	6.018.314	6.997.283	8.001.451	10.119.590
Banks and other financial institutions - Financial charges	166.529	634.126	-59.957	171.983
Tax authorities - Taxes	408.730	691.602	226.137	378.488
Dividends distributed - Shareholders	0	0	0	0
Economic value distributed	15.389.868	16.772.431	18.114.463	24.352.243
Economic value retained	4.004.065	4.246.319	5.501.617	4.393.750

DOXEE GENERATED VALUE
IN 2022



DISTRIBUTED ECONOMIC VALUE (%)
CALCULATED ON THE GENERATED VALUE)



Relations with the territory

Social Responsibility

During 2022, the following non-profit entities were supported:

- **Agesci Modena:** Associazione Guide e Scouts Cattolici Italiani – Modena Area
- **Wonder Società Cooperativa:** Wonder is a Type B Social Cooperative, created to allow disabled persons to join the working world, to hold a job in an environment that guarantees them their dignity and a working environment that is engaging and welcoming for all workers.
- **Caritas Diocesana di Modena:** Caritas Diocesana Modenese is the specific entity of the Modena-Nonantola dioceses created by the Bishop to promote and coordinate charity and assistance initiatives.
- **Charitas:** ASP Charitas is a social services agency dedicated to care and assistance for persons with serious and very serious psychological-physical disabilities, meeting their needs for assistance, education, rehabilitation, healthcare, psychological and spiritual support.
- **Stilescout:** This association, founded clearly and specifically on the values of scouting, as defined nationally and internationally, aims to: guarantee to the future recipients that the stories collected will not be lost, promote the value of the stories collected, also making them available using modern methods, guide the cultural and human heritage that it oversees towards the future, unite the various situations of being a scout in the town and area of Modena has been in the past and is in the present.
- **Porta Aperta ODV:** Porta Aperta is an association of volunteers in Modena which has fought against poverty and inequality since 1978. It performs 'low threshold' activities, including: assistance points, soup kitchens, medical clinics and distribution of medicines, shower services, distribution of clothing and food, on-the-street legal assistance, road unit.

Moreover, the following schools were supported through donations of furniture being disposed of, resulting from the renovation of offices and/or through the support in career day activities: Galileo Galilei Comprehensive of Campagnola Emilia (RE), Senior High School and Technical Institute of Corni (MO), University of Ferrara and Fermi Institute of Modena.



06 Focus on people

GRI 102-8 GRI 401-1 GRI 401-3 GRI 405-1

Personnel policies

Doxee is a Company of people. Each individual is considered a valuable element of growth, through which the Company itself grows and generates value. Doxee's model, based on the sharing of corporate and personal goals, is reflected in the high degree of empathy and involvement that people have with customers. Direct and efficient bonds are created between Doxee's personnel and customers' personnel. This is the foundation of Doxee's soul, which combines passion for technology and services, passion for methodologies and organization and constant striving for improvement. The Doxee vision is reported in the Doxee's High Level Policy, disseminated within the company through the internal knowledge management system and, externally, through the corporate website.

The "growth of people" is one of the Company's core values, which is constantly emphasized to employees, starting from the recruiting and onboarding phases and throughout their stay in the Company, thanks to targeted initiatives.

Recruitment – Management and development

Recruitment processes play a crucial role at Doxee, where they drive the selection of talent that contributes to the Company's growth. There are several stages and activities to assess candidates, both in terms of technical skills and soft skills and alignment with Company values. An initiative to improve this process is currently underway, involving the adoption of new dedicated tools and the strengthening of the HR area.

Once the selection process has been successfully completed, the candidate is accompanied during his or her induction into the Company by an onboarding process, which is also being strengthened through the creation of standard content differentiated by professional profile, planning periodic feedback meetings, as well as the adoption of a software tool that facilitates the use of such content.

Regarding the performance evaluation, Doxee has defined a structured performance management process linked to the achievement of economic company objectives that provides for the disbursement of financial incentives distributed to the entire Company workforce.

Diversity, equal opportunities and welfare

As a tool for work-life balance, Doxee's policies include the use of smart-working in the form of remote work. The tool in question was expanded and applied to an extended scope as a result of the COVID-19 emergency.



Nonetheless, during 2022, with the effective return to in-office work, Individual Smart Working Agreements were entered into, to continue to provide the option to also work from other workstations, to ensure greater work-life balance.

To allow employees to return to the office, after the period of remote working that was necessary due to the health situation, in a work environment that complements smart working operating methods, during 2021, Doxee redesigned its offices at the Modena headquarters, according to criteria that combine sustainability aspects with new needs related to integration of remote work with working from the office, increasingly conceived as a space for sharing, teamworking and aggregation. New spaces have been designed, the break area has been redesigned and expanded and energy consumption has been reduced thanks to the adoption of LED lighting systems powered exclusively from renewable sources. The renovation works were completed during 2022.

Various initiatives have been devised with the goal of improving the Company's working environment. An employee engagement plan is defined annually, which includes initiatives in the area of well-being, such as agreements with swimming pools and gyms, online yoga courses, provision of Company smart lockers, discounts on purchases from affiliated suppliers (e.g. corporate benefits) and affiliated restaurants located near the offices, and free use of the machines for dispensing hot beverages in the company. In 2021, an Amazon voucher was issued to all employees to allow them to purchase products with the aim of also installing their workstations at home. In 2022, this initiative was extended to new hires on permanent contracts, once they passed their trial periods.

The plan also includes events dedicated to relationship management, such as contests and corporate and small group team building activities, together with specific activities aimed at improving internal communication from a 360-degree perspective.

Doxee supports the principles of equal opportunity and respect for diversity and it rejects any form of discrimination.

In order to respond positively to the personal and family needs of its employees, flexible working hours are available and part-time work is facilitated.

In the area of welfare, all Doxee employees benefit from daily meal vouchers (irrespective of the working methods used) and health insurance, which allows access to specialist services at affiliated facilities at discounted rates, as well as several additional insurance policies that cover the employee in case of serious events or simple injuries. A specific policy COVID-19 was activated in 2021 and confirmed in 2022.

Finally, the transformation of Doxee into a Benefit Corporation determines, by its nature, as well as by the inclusion of a dedicated Specific Public Benefit Purpose, an increase in equal opportunities and greater welfare, as evidenced by the extension of the Employee Engagement program aimed at strengthening the relative values, internal communication, welfare and relational development.

Employees

Number of employees	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
	33	94	127	38	104	142	53	140	193

Doxee had 193 employees as of December 31, 2022, of which 53 women and 140 men. In accordance with the positive trend that started in 2020, an increase in employees has also been recorded for 2022, with 51 new hires. This **significant increase in human resources of 36%** on 2021, primarily dictated by the development of the business and the acquisitions by the Group, was made possible thanks to the Company's ability to quickly organize remote work, using technology also for recruiting and onboarding processes.

With regard to the ages of employees, Doxee is gradually investing in the **employment of young people**: the company population comprises 21% of people under age 29 (**+46% compared to 2021**), and **65%** aged 30 to 50, and the remaining 13% of people over 50.

Number of employees	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Up to 29 years old	3	22	25	5	23	28	10	31	41
From 30 to 50 years old	27	53	80	30	65	95	39	87	126
Over 50 years old	3	19	22	3	16	19	4	22	26
Total	33	94	127	38	104	142	53	140	193

Forms of employment

Number of employees	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Employees by contract type / gender									
Permanent	31	92	123	36	103	139	47	138	185
Fixed-term	2	2	4	2	1	3	6	2	8
Total	33	94	127	38	104	142	53	140	193

Historically, the Company has always made limited use of fixed-term contracts, which in the vast majority of cases have been regularized.

In 2022, **96% of employees were hired on a permanent contract and 92% were employed full time.**

Numerous employees were hired under apprenticeship contracts and through internships and student placements programs, also thanks to collaboration with local institutions. In 2022 there were 13 interns, of which 7 women and 6 men, 4 more people than in 2021.

Number of employees	2020			2021			2022		
Employees by type of employment / gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
Full-time	22	91	113	28	101	129	44	133	177
Part-time	11	3	14	10	3	13	9	7	16
Total	33	94	127	38	104	142	53	140	193

The use of part-time work is facilitated within the Company as a means of balancing work and private life (work-life balance) and to reconcile work with personal and/or family needs.

Diversity

	2020			2021			2022		
Employees by category / gender	Women	Men	Total	Women	Men	Total	Women	Men	Total
Senior managers	-	6	6	-	6	6	-	12	12
Managers/Employees	33	88	121	38	98	136	53	128	181
Total	33	94	127	38	104	142	53	140	193

The prevalence of male staff is significantly influenced by the fact that certain courses of study in technical and scientific disciplines are currently more popular with men than with women. On the other hand, some company functions, such as Marketing and Administration, see a clear prevalence of females.

	2020			2021			2022		
Employees by category / gender %	Women	Men	Total	Women	Men	Total	Women	Men	Total
Senior managers	-	4,8%	4,8%	-	4,2%	4,2%	-	6,2%	6,2%
Managers/Employees	25,9%	69,3%	95,2%	26,8%	69,0%	95,8%	27,5%	66,3%	93,8%
Total	25,9%	74,1%	100,0%	26,8%	73,2%	100%	27,5%	72,5%	100%

The ageing of the population recorded in 2021 was due to the significant decrease in turnover in the last few years, and the high number of young people hired in previous years made it necessary to introduce more experienced staff, in order to rebalance the composition of the teams. In 2022, the employment of young people once again marked the growth of Doxee's workforce, with 25 additional employees under age 29.

	2020				2021				2022			
Employees by category/ age bracket	Fino a 29 anni	Da 30 a 50 anni	Oltre 50 anni	Totale	Fino a 29 anni	Da 30 a 50 anni	Oltre 50 anni	Totale	Fino a 29 anni	Da 30 a 50 anni	Oltre 50 anni	Totale
Senior managers	-	2	4	6	-	1	5	6	-	4	8	12
Managers/Employees	25	78	18	121	21	101	14	136	46	117	18	181
Total	25	80	22	127	21	102	19	142	46	121	26	193

Employees by category/ age bracket %	2020				2021				2022			
	Up to 29 years old	From 30 to 50 years old	Over 50 years old	Total	Up to 29 years old	From 30 to 50 years old	Over 50 years old	Total	Up to 29 years old	From 30 to 50 years old	Over 50 years old	Total
Senior managers	-	1,6%	3,1%	4,7%	-	0,7%	3,5%	4,2%	-	2,1%	4,1%	6,2%
Managers/ Employees	19,7%	61,4%	14,2%	95,3%	14,8%	71,1%	9,9%	95,8%	23,8%	60,6%	9,3%	93,8%
Total	19,7%	63,0%	17,3%	100%	14,8%	71,8%	13,4%	100%	23,8%	62,7%	13,4%	100%

Parental leave (maternity)

	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Number of employees who have taken parental leave, by gender	5	2	7	4	1	5	1	0	1

The data reported refer only to Doxee IT

Turnover

	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
New hires									
Up to 29 years old	2	6	8	3	8	11	6	6	12
From 30 to 50 years old	5	11	16	4	10	14	8	17	25
Over 50 years old	-	-	-	-	1	1	-	1	1
Total	7	17	24	7	19	26	14	24	28

Recruitment figures have shown an upward trend for several years now. In 2022 there were a total of 28 new hires: 12 people under age 29, 25 aged between 30 and 50 anni and one person over age 50.

	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Terminations									
Up to 29 years old	-	1	1	-	4	4	2	4	6
From 30 to 50 years old	-	4	4	3	9	12	-	3	3
Over 50 years old	-	-	-	-	-	-	-	-	-
Total	-	5	5	3	13	16	2	7	9

	2020			2021			2022		
	Women	Men	Total	Women	Men	Total	Women	Men	Total
Reason for termination									
Voluntary departures		5	5	3	12	15	2	7	9
Dismissal	-	-	-	-	1	1	-	-	-
Total	-	5	5	3	13	16	2	7	9

In the last few years, all terminations have occurred through voluntary resignations. There are no cases of redundancy incentives or mobility plans due to corporate crisis.

	2020			2021			2022		
Turnover rate	Women	Men	Total	Women	Men	Total	Women	Men	Total
Positive turnover new hires	-	6,1%	4,6%	23,3%	22,1%	22,4%	32,6%	19,0%	22,5%
Negative turnover new hires	26,9%	20,7%	22,2%	10,0%	15,1%	13,8%	4,7%	5,6%	5,3%
Overall turnover	26,9%	14,6%	17,6%	13,3%	7,0%	8,6%	27,9%	13,5%	17,2%

Training and skills development

GRI 404-1

For the definition of training plans, a skill assessment process is followed, which maps the skills needed to cover the various Company positions. Through assessment activities, the actual skills of the staff are then detected in order to identify gaps and define the training paths necessary to fill them. To support training processes, a [Learning Management System](#), tool is used, through which courses are organized, attendance is recorded and surveys are carried out to assess training.

For employees identified as talented, personalized professional development paths are defined, which include specific training courses.

A total of 4,145 hours of training were provided during 2022 (3,928 hours in 2021), which mainly involved Managers and Employees.

The training plan increased the number of hours provided compared to 2021, in line with the growth in the workforce.

	2020			2021			2022		
Average training hours*	Women	Men	Total	Women	Men	Total	Women	Men	Total
Senior managers	-	-	-	-	38,7	38,7	-	6	6
Managers/ Employees	28,8	14,4	18,3	38,0	23,0	27,2	22,9	31,4	28,8
Total	28,8	14,4	18,3	38,0	23,9	27,7	22,9	29	27,3

*The data reported refer only to Doxee IT

Occupational health and safety

GRI 403-9

Doxee is committed to complying with all regulations that allow for the protection of the health of workers in the workplace, through the continuous activity of Company departments specifically appointed for this purpose. Collaborators must scrupulously comply with the current Company regulations and, in any case, with the legal requirements concerning personal safety and health protection.

Every year, the head of the prevention and protection service (RSPP) is appointed/renewed and the workers' health and safety representative (RLS) is trained and updated. Every year a meeting is held between the employer, the RSPP, the RLS and the occupational physician in order to examine and document risk assessment, the trend in injuries, verification of individual protection devices and training.

During the onboarding phase, each new employee is asked for a certificate of participation in courses as per Legislative Decree 81/2008. In case the new employee does not have any certification or the training already completed has expired, the general and/or specific safety course is organized within the Company.

For all existing employees, a refresher course is held every year. Among the various training activities, there is also that of First Aid and Fire Fighting. During 2022, 384 hours of training were dedicated to topics on occupational health and safety.

Injuries

No injuries occurred in 2022.

07 Environmental responsibility

Doxee's goal is to improve performance while respecting the natural environment. The Company is aware that the production of ICT solutions has an impact on the environment and it is committed to constantly reducing these impacts by adopting the best possible practices.

Doxee is ISO 9001:2015, ISO 27001:2013, ISO 14001:2015 and ISO 37001:2016 certified and is accredited on the AgID Marketplace for the Long Term Digital Preservation Service at the Modena headquarters/ operating unit, in Via Virgilio 48/8, and the Milan operating unit (data center), in Via Caldera 21, for products delivered through its own platform, the Doxee Platform, available in Software-as-a-Service (SaaS) or On-Premise mode.

Environmental Policy

The Management, aware of its role and its obligations towards the natural environment in which it operates, has undertaken a path to improve its performance, with a view to developing valuable and sustainable services that are in compliance with regulations and able to meet the demands and expectations of its stakeholders.

The objectives characterizing the Environmental Policy are as follows:

- Comply with applicable laws, rules and regulations relating to the sector and any other requirements subscribed to by the Company;
- Effectiveness, efficiency and reliability by employing all necessary resources in order to ensure compliance with the principles of diligence and fairness;
- Employee engagement and development of skills, ensuring that human resources have a high level of professionalism with specific reference to environmental sustainability issues;
- Use products with low environmental and energy impact;
- Qualify and give preference to suppliers who act with a view toward continuous improvement of their environmental performance;
- Operate with a view to reducing the production of waste and the consumption of raw materials, preventing pollution and the risk of accidental events and providing for the disposal of waste in accordance with the regulations in force;
- Systematically renew the vehicle fleet, allowing to maintain a low environmental impact of the vehicles used;
- Disseminate the environmental culture among its employees, customers and suppliers;
- Manage natural resources and energy in a rational and sustainable manner, enhancing their use and reducing waste;
- Supervise the Company's processes with adequate tools for monitoring and controlling environmental aspects;
- Operate through an Integrated Management System in which the exchange of information and synergies between functions constitute strategic values;
- Maintain a transparent and collaborative relationship with the public authorities and/or the relevant control bodies;

- periodically re-examine the Policy, Objectives and Goals and related implementation programs and the Company Management System, and ensure its adequate visibility within the company;
- implement the activities and fulfill the obligations required by the current regulations on company Mobility Management;
- coordinate the processes and monitoring of the Environmental Management System with the activities provided regarding ESG (e.g. Sustainability Report and Impact Report)

Environmental Management System and objectives

Regarding internal issues, as evidence of the attention to environmental issues, Doxee has implemented an Environmental Management System for which it has obtained the ISO 14001:2015 Certification. In this context, specific environmental objectives have been defined, which include:

- Continued use of smart working;
- Implementation of a training plan for employees on environmental issues;
- Increased use of the cloud infrastructure already in place and that uses renewable sources, with a consequent reduction in energy costs;
- Improvement of audits of suppliers, with particular attention to those classified as “relevant” for the Environmental Management System;
- Completion and refinement of monitoring of environmental data in order to achieve objectives regarding energy consumption, waste and emissions.
- Awareness raising of clients regarding their environmental impacts in terms of consumption of resources (paper) and related CO2 emissions.
- Preparation of the Commuting Plan

In terms of energy consumption, in 2021 a contract was signed with Sorgenia for the supply of electricity produced 100% from renewable sources, with Guarantee of Origin (GO) certification. The installation of a photovoltaic system for the production of electricity at the Modena headquarters is also being assessed.

Regarding the vehicle fleet, a policy is being defined that provides for the gradual introduction of hybrid cars to replace the current ones, to be accompanied by a request for the installation of an electric charging station near the Company headquarters.

Environmental impacts: Energy and Emissions

GRI 302-1 GRI 302-2 GRI 305-1 GRI 305-2 GRI 305-3

Energy consumption

The figures shown refer to **internal energy consumption**. Figures are summarized in GJoules.

During 2022, 2,790 Gjoules of energy were consumed, of which 864 Gjoules from renewable sources with Guarantee of Origin.

Energy consumed - GJ	2019	2020	2021	2022
Electricity purchased from the grid	1,019	810	556	-
Electricity purchased with Guarantee of Origin contracts	-	-	273	864
Fuel for vehicle fleet - Diesel	1,285	1,235	821	1,560
Fuel for vehicle fleet - Petrol	-	-	115	186
Methane for heating	2	1	1	181
Total energy consumption - GJ	2,305	2,047	1,766	2,790
Of which from renewable sources	-	-	-	864

Energy consumption of the external Data Center

The primary Data Center is owned by Doxee but is physically located at the Irideos site in Milan, in Via Caldera 21. The company Irideos SpA is a leader in the supply of housing services for Data Centers and is designed and built to guarantee standards of excellence in terms of performance, security, reliability and scalability, also regarding the efficiency of energy consumption, using shared facilities.

Irideos is ISO14001 certified for its Environmental Management System. The Irideos Data Centers use energy produced from renewable sources and are equipped with certified air conditioning systems, which are able to guarantee constant temperature and humidity control, also by means of insulated corridor systems for better performance and efficiency. The electricity consumption of the primary external Data Center has been estimated for 2022 as well, with regard to the management of Doxee activities. The estimate was based on electricity consumption reports. Compared to 2021, there were no changes in consumption, as the same amount of hardware infrastructure was maintained.

Milan Primary Data Center - Energy consumed - GJ	2019	2020	2021	2022
Electricity consumption	n.a.	302	405	405

Emissions

Direct emissions: Scope 1 - Scope 2 GHG: GHG (Greenhouse Gas) emissions are reported in equivalent tons of carbon dioxide (tCO₂e). The data refers to direct (Scope 1 GHG) emissions and indirect (Scope 2 GHG) emissions associated with the production of electricity purchased from the grid.

Since 2021, the electricity used comes from renewable sources, thanks to the specific supply contract with Guarantee of Origin (GO), an electronic certification that certifies the renewable origin of the sources used for the production of electricity.

As required by the GRI Reference Standard (GRI 305-2), Doxee calculates indirect (Scope 2 GHG) emissions from electricity consumption based on two distinct approaches:

The **market-based** approach requires determining Scope 2 GHG emissions deriving from the purchase of electricity, taking into account the specific emission factors communicated by suppliers. For the purchase of electricity from renewable sources, a zero emission factor of tCO₂e is attributed. If no specific contractual arrangements have been defined, the approach under consideration requires the use of the national residual mix emission factor, where technically applicable.

The **location-based** approach involves accounting for emissions from electricity consumption, applying national average emission factors for electricity production.

Scope 1 GHG/CO2 emissions t CO2e	2019	2020	2021	2022
Vehicle fuel				
Diesel	94	89	63	119
Petrol	-	-	9	14
LNG	-	-	-	
Emissions	94	89	71	133
Natural gas (methane) for heating or other uses				
Emissions	8	7	7	10
Other sources				
Emissions	-	-	-	
Total - Scope 1 Emissions	102	96	78	143

Scope 2 GHG/CO2 emissions - Location based t CO2e	2019	2020	2021	2022
Electricity				
Emissions	75	58	57	59
Scope 1 + Scope 2 GHG/CO2 emissions t CO2e	2019	2020	2021	2022
Total Scope 1 GHG emissions	102	96	78	143
Total Scope 2 GHG emissions - Location Based	75	58	57	59
Total	178	154	135	202

Scope 2 GHG/CO2 emissions - Market based t CO2e	2019	2020	2021	2022
Electricity				
Emissions	132	103	106	-
Scope 1 + Scope 2 GHG/CO2 emissions t CO2e	2019	2020	2021	2022
Total Scope 1 GHG emissions	102	96	78	143
Total Scope 2 GHG emissions - Market Based	132	103	106	-
Total	234	199	184	143

In 2022, Doxee appointed a new company professional, the **Mobility Manager**, who manages sustainable mobility of the company and all employees in the central offices of Modena were sent a questionnaire on their commuting methods to and from work. The main objective is to create a **Commuting Plan (CP)**, a tool for rationalizing the commutes of personnel, developed by analyzing, developing and verifying numerous aspects, which will be finalized in 2023. The plan will aim to improve employees' ability to reach the workplace and optimize their commutes. It is clear that this will create a cascading reduction in the use of private care, and thus in traffic during rush hour, the impact on the environment caused by vehicular

traffic, especially in large urban areas, and a general improvement of the well-being of employees, with positive effects also on transport costs.

Responsible use of natural resources

GRI 306-3; 306-2

Water

At Doxee water is withdrawn from the public water supply network and is mainly intended for sanitary use. Doxee's internal Data Center, given the type of activity carried out, is not large enough to absorb a significant amount of water for cooling the systems.

Waste

Waste management is carried out according to internal procedures that comply with current legal requirements. The production of waste mainly relates to electronic equipment or components thereof, for which a Waste Register for loading/unloading is kept to record collection/transport/disposal activities. There is also waste relating to paper (for office use), plastic, organic and unsorted waste. Containers for separate waste collection are present in all offices and breakout areas of the Modena headquarters.

Since 2021, with the implementation of the ISO 14001 Environmental Management System, a process of timely reporting of the Company's waste produced was initiated, which is reported below with the update for 2022. Overall, waste produced in the last year of reporting considered decreased by 48%. Specifically there was a significant decrease in unsorted waste, given that during 2021, an extraordinary cleaning of the offices was carried out in view of the full post-pandemic return, which also entailed the disposal of most of the harmful waste (e.g. lightbulbs, monitors) in 2022.

Separate Waste Collection in Modena Offices

Type	2021 Kg	2022 Kg
Plastic	25.2	11.6
Paper	70.4	97.6
Organic waste	6.4	26.9
Unsorted waste	432.0	141
Total	534.0	277.1

Special waste (WEEE, PC components, PC accessories, phones, monitors, office furniture, etc.)

Type	2021 Kg	2022 Kg
Not hazardous	1,061	1740
Hazardous (e.g. lamps, monitors)	56	160
Total	1,117	1900

GRI Content Index

Unless otherwise specified, the GRI Standards published in 2016 were used.

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GRI 300	ENVIRONMENTAL TOPICS		
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