creactives

SUSTAINABILITY REPORT 2025

Index

Letter to stakeholders

Dear Stakeholders,

Creactives Group S.p.A. has long regarded sustainability as an integral part of responsible growth and long-term value creation. Our business exists to help large organisations improve the quality of their data — and better data leads to better decisions, less waste and a more responsible use of resources along entire supply chains. In 2025 we decided to give this conviction a clear structure, launching a comprehensive ESG programme, supported by Up2You, a specialised third-party consultancy, to consolidate our commitment across the Environmental, Social and Governance dimensions.

The first step was to understand where we stand and what matters most. We analysed the positioning of companies operating in the IT services sector and engaged our stakeholders directly, listening to their expectations and priorities in order to identify the sustainability topics most relevant to the company's future development.

We then turned to measurement — the discipline at the heart of everything we do. We collected data on our Scope 1, Scope 2 and Scope 3 emissions, leading to the preparation of our first Carbon Footprint Report. In parallel, we gathered the data and analyses required to produce this Sustainability Report, with the aim of increasing transparency and strengthening the quality of our ESG disclosure.

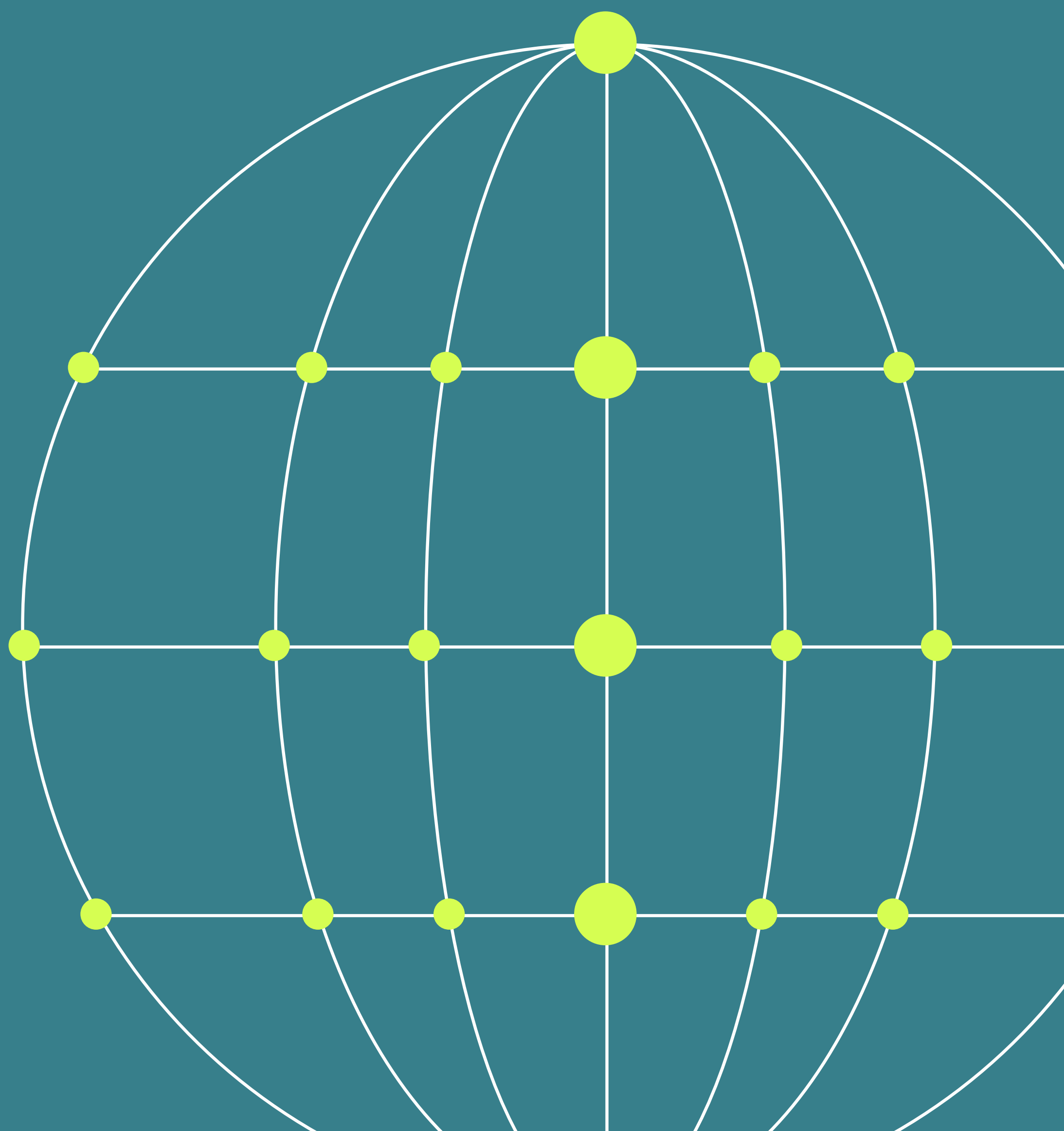
Before the availability of this Sustainability Report we also went through EcoVadis assessment and obtained a score of 71/100 placing our company among the top 35% of companies assessed by EcoVadis in the last 12 months: a further step towards giving international visibility to Creactives Group S.p.A.'s sustainability commitment and making our ESG performance increasingly measurable and comparable. This attention extends beyond our own operations to our value chain. We select market-leading IT service providers with recognised ESG credentials and commitments, including investments in carbon credits exceeding the footprint associated with the services they deliver to us.

This report marks the beginning of a journey, not its destination. We will continue to strengthen our ESG performance with seriousness, competence and a long-term perspective, aware that sustainability matters ever more to our clients, partners, suppliers and people — and to all the stakeholders who share our value chain. Thank you for accompanying us on this path.
Sincerely,

Creactives Group S.p.A.

Paolo Gamberoni
CEO

01. Our company



01. Our company

1.1 The identity of Creactives

Creactives Group S.p.A. is an Italian company that develops AI-based software solutions for data management in procurement and supply chain processes. Its story began in 2000 as a consulting firm dedicated to cost reduction: working in close contact with the spending processes of large industrial organizations, Creactives Group S.p.A. recognized how the quality of information at the source can affect results, and from that insight it began to build a technology of its own. Over the past twenty years the company evolved from consulting into a technology-driven model, establishing itself as a recognized leader in master data governance and spend optimization. In 2020 the enterprise completed its stock market listing, a step that accompanied the growth of the following years and strengthened the structure of the group. In January 2025 Creactives S.p.A. was merged by incorporation into Creactives Group S.p.A., consolidating into a single entity the activities and competences developed over time.

The company is based in Verona, where both software development and commercial activities take place. Creactives operates in a predominantly international market, generating 95% of its turnover abroad and the remainder in Italy. Consistent with this international profile, Creactives Group S.p.A.'s quality and security processes are certified to internationally recognized standards: ISO 9001 for quality management, ISO/IEC 27001 for information security, ISO/IEC 27017 for cloud security and ISO/IEC 27018 for the protection of personal data in the cloud.

It is within this profile that Creactives Group S.p.A. presents its sustainability report, prepared on an individual basis in accordance with the voluntary VSME standard for the period from July 2024 to June 2025. Creactives Group S.p.A. is a joint-stock company (società per azioni) classified under NACE/ATECO code 62.90.09 (other information technology service activities); in the reporting period it recorded a balance sheet total of €9,936,701 and a turnover of €6,636,765. Its purpose is to set out, in a structured and transparent manner, the company's approach to sustainability and the impacts of its activities on the environment, on its people and on the economic context in which it operates.

1.2 Company structure

Creactives Group S.p.A. is governed by a Board of Directors of five members: two executive, one non-executive and two independent, currently all men. Reflecting a company whose turnover is generated almost entirely abroad, they bring extensive international experience, together with a deep knowledge of the sectors, products, services and geographies in which Creactives Group S.p.A operates. This combination of competences allows them to identify and assess the impacts of the company's activity.

The appointment of the Board is the responsibility of the shareholders' meeting. The selection criteria include independence, the perspective and approval of stakeholders and competences of an ethical, moral and technical nature, in order to balance managerial soundness with accountability at the top of the organization.

This framework is complemented by the company's approach to ethics and control. Creactives Integrated Security Management System, accessible to all employees, contains many policies that provide the foundation to ESG. A code of conduct, available to all employees, and referred to in the hiring contract, sets out the behavior expected in relations with stakeholders, while the fairness and transparency of commercial practices and contracts are ensured through legal reviews carried out by dedicated advisors.

An Inclusion policy is in place in order to guarantee inclusion of employees independently from gender, age, nationality (our employees come from 14 different nationalities), disabilities, religion, political orientation, etc. and provides the foundation of a well designed anti-harassment management system.

A Responsible procurement and Supply chain policy is in place and a Supplier code policy to be distributed to our suppliers to manage a responsible supply chain.

1.3 Our business model and value chain

Creactives Group S.p.A's business model is based on the development and delivery of software solutions for spend optimization and for the governance of material and service master data of large corporations. Through artificial intelligence the company helps organizations to structure, enrich and harmonize the data relating to purchasing and the supply chain. The final objective is turning fragmented information into a reliable basis for more efficient purchasing decisions.

The offering is structured into three main areas.

Solution	Description
Material & Service Master Data Governance	It uses artificial intelligence to bring order to material and service master data: starting from the data already present in the client's management systems, Creactives AI, combined with Knowledge Engineering, automatically categorizes and normalizes Customer material master data-eliminating duplicates and harmonizing descriptions, under industry-specific taxonomies to obtain clean, structured, and reliable data. creates a Digital Twin of your materials and services data, giving Customers a real-time, accurate, and enriched view of their Procurement & Supply Chain landscape. It provides Multi-lingual and cross-ERP Data Governance to maintain a consistent and reliable information asset over time that becomes the single point of truth for item Masters. It ensures data readiness for SAP S/4HANA migration, reducing risks and accelerating digital transformation initiatives
Spend Analytics	Creactives AI It reconstructs company spending in an organized way and makes it readable by purchasing category, business area and supplier, providing a solid basis for analyzing costs and identifying room for efficiency. Clean and structured Spend data empowers procurement teams to identify savings opportunities, optimize supplier consolidation, and enforce contract compliance - turning insights into real business impact.
Procurement Guidance Automation	Creactives' AI-powered Data Assistants bring real-time, intelligent guidance directly inside your ERP and Procurement systems, ensuring that every purchase request is categorized, structured, and optimized from the start reducing Free-Text Orders, Improving Data Accuracy and Accelerating Decision-Making

These solutions are aimed at clients operating in a wide range of sectors, including industrials, basic materials, public utilities, oil & gas, Energy, Automotive, Food and Beverage, Chemical, Pharmaceuticals, and many other industry sectors. Downstream, the services offered are used by companies in numerous industrial fields, from oil & gas to manufacturing, from energy to automotive and on to chemicals and pharmaceuticals.

Upstream, the company's supply chain is composed mainly of providers of software development, hosting and information security services, including the security operation centers that oversee data protection. Over the past years, significant efforts have been made to ensure that the sustainability statement fully covers both the upstream and downstream value chain.

Along this value chain, the value Creactives Group S.p.A delivers rests on data quality. By improving the accuracy of master data and the visibility of spend, the company's technology helps clients cut inefficiencies and make better use of their resources, as explored in the chapters dedicated to the material topics.

02.

Our approach to sustainability

02. Our approach to sustainability

For Creactives Group S.p.A, sustainability is closely connected to the nature of its business. The company's technology exists to make large organizations more efficient, and greater efficiency in purchasing, inventory and processes translates directly into a more responsible use of resources. During the reporting year the company gave structure to this connection: it measured its emissions, engaged its stakeholders and identified the topics on which to concentrate its reporting and its efforts.

2.1 Our sustainable development strategy

Creactives Group S.p.A treats sustainability as an extension of the discipline that defines its work. Better data supports better decisions, and better decisions reduce waste and consumption along supply chains. This is the value the company delivers to its clients, and it is now the perspective it applies to itself. Many of the international partners and clients that the company serves pursue their own ESG objectives across their supply chains, and the company regards the quality of procurement and supply chain data as a concrete lever through which it can contribute to those objectives, with the responsibility that this role entails.

Alongside these steps, a number of concrete practices are already in place, on both the environmental and the social side. They range from the measures that re-

duce consumption and waste in the offices, to the priority given to environmental sustainability and renewable energy in the selection of its cloud providers and data centers, to the flexibility and welfare arrangements that support its people and the code of conduct that defines its ethical standards. These practices are described in the chapters dedicated to the material topics, and they form the basis on which Creactives Group S.p.A intends to progressively develop policies and objectives, in a logic of continuous improvement.

2.2 Our main stakeholders

Engaging its stakeholders is an essential part of defining Creactives Group S.p.A.'s sustainability strategy. During an initial workshop, leadership and department heads identified the parties that have an interest in the company's activities or are affected by them, and classified them according to the criterion of influence and dependence.

Specifically, influence measures the extent to which each stakeholder can affect the company's objectives and decisions, while dependence measures the extent to which the stakeholder is in turn affected by its operations.

The analysis identified eleven categories of stakeholders.

Internal

Board of Directors

Management

Employees

Shareholders

External

Suppliers

Clients

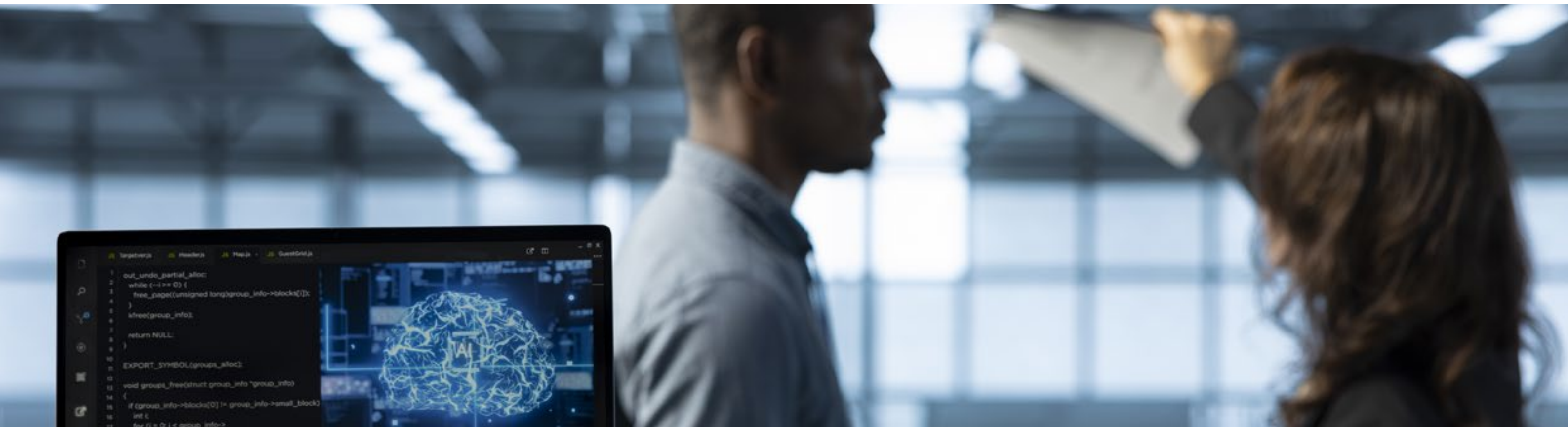
Regulatory Bodies

Banks and Credit Institutions

Media and Publications

Partners

Competitors



Positioning these categories along the two axes produces a matrix divided into four quadrants, each associated with a different engagement approach.

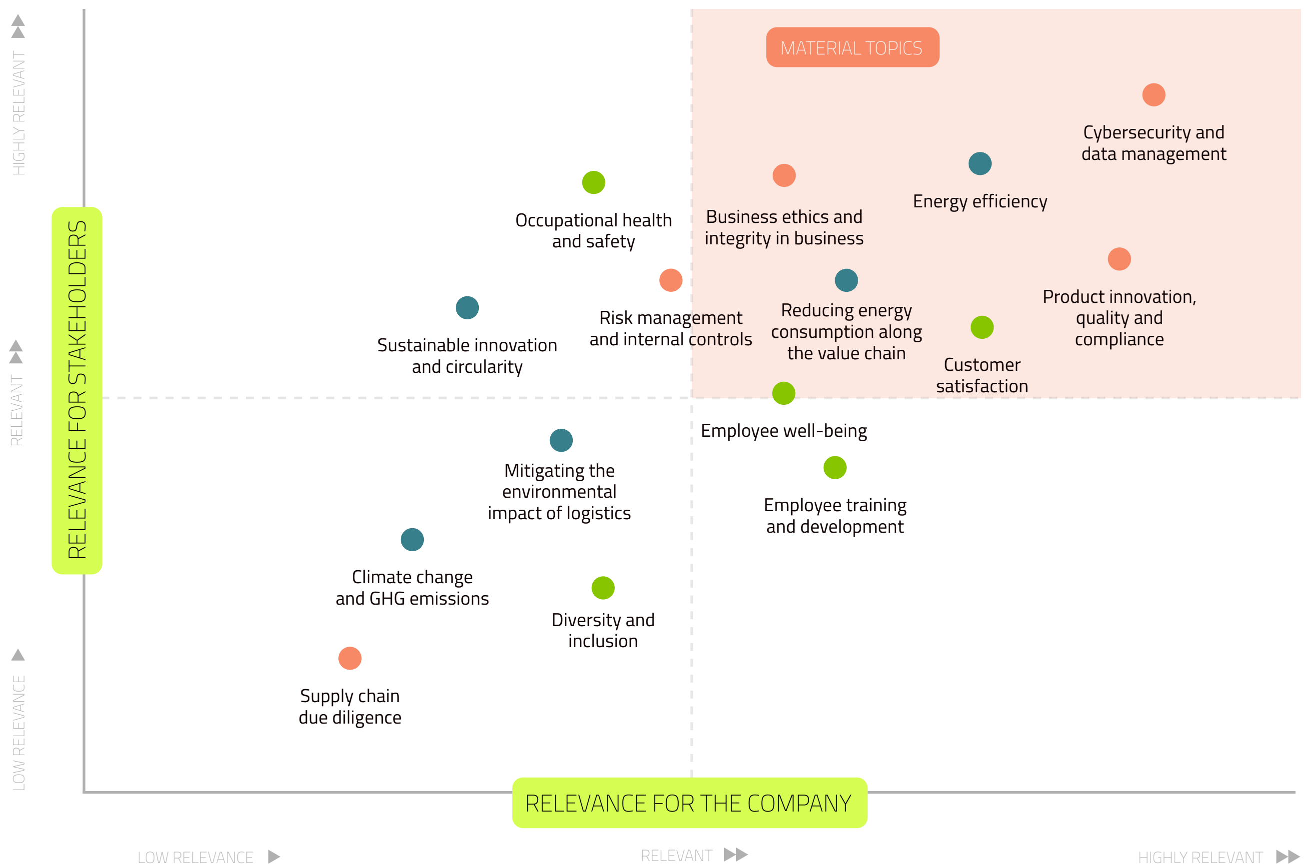
These same stakeholders were then invited to take part in the materiality survey described in the following section.

2.3 The materiality analysis process

The topics addressed in this report were selected through an impact materiality analysis, which identifies and prioritizes the environmental, social and governance issues most significant for the company and for its stakeholders. In preparing this voluntary report, Creactives Group S.p.A referred to the VSME standard published by the European Financial Reporting Advisory Group (EFRAG).

The process began with an analysis of the context, in which the company examined its own activities, values and existing practices and carried out a benchmarking exercise on sector trends and on the approach of comparable companies, in order to map the topics potentially relevant to its business. A workshop involving leadership and department heads then translated this overview into a first list of the impacts, actual and potential, that Creactives Group S.p.A generates or may generate, and into the related material topics. These topics were submitted to stakeholders through a survey, which collected eighty-three responses. Respondents rated the importance of the three ESG pillars, environmental, social and governance, for the company on a scale from one to five, and then prioritized the topics within each pillar. The responses of the groups closest to the company, namely executives, managers and shareholders, were distinguished from those of the other stakeholders, namely employees, suppliers, partners and clients, so that both perspectives were represented in the final mapping.

The results were mapped onto a materiality matrix, which positions each topic according to its relevance for the company and for its stakeholders. By setting a materiality threshold, the topics with the highest scores were confirmed as the priority areas on which this report is built.

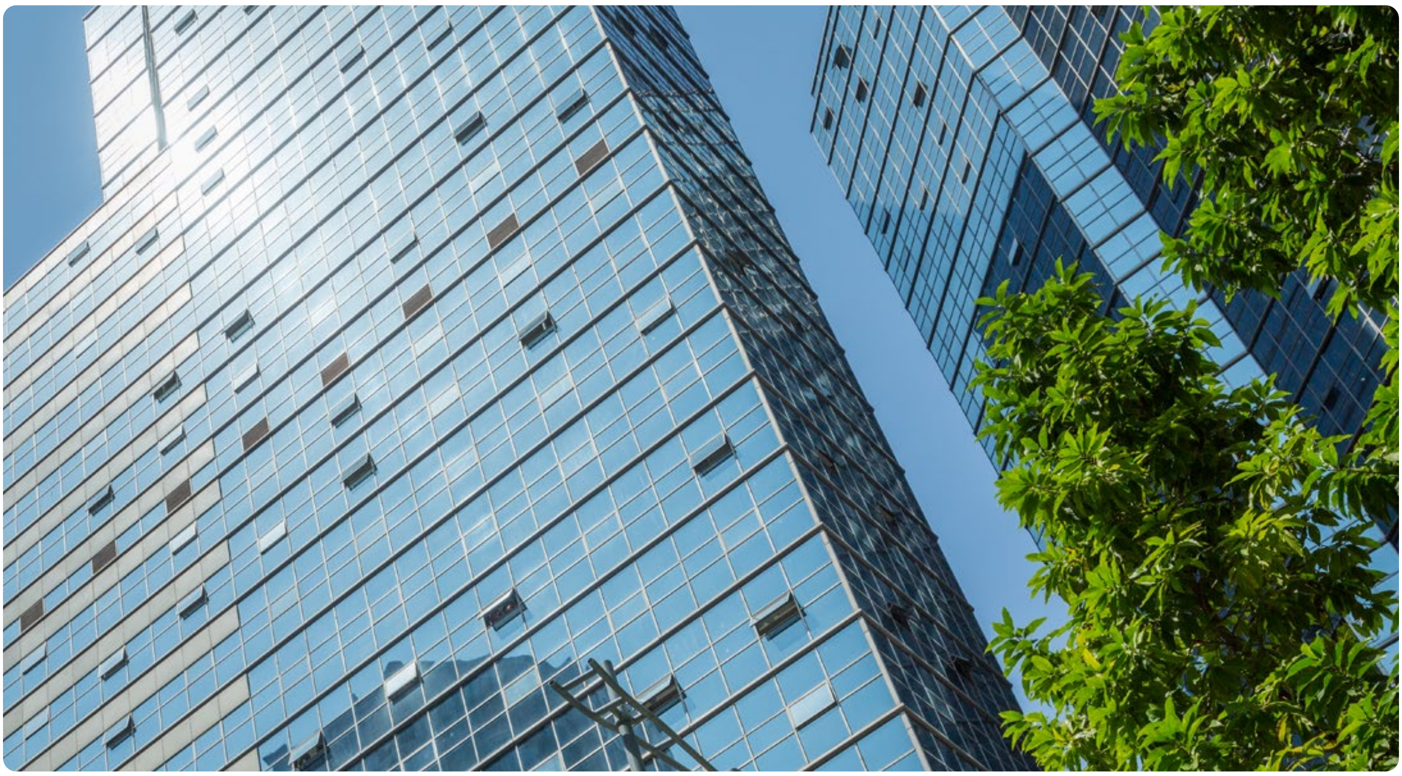


2.4 Our material topics

The materiality analysis confirmed seven material topics, distributed across the three ESG pillars. For each of them the table below summarizes the main impacts and a short description, reworded from the outcomes of the analysis.

Environmental topics

Material topic	Impact	Description	SDGs
Energy efficiency	Optimization of energy consu-mption; adoption of efficient cloud solutions	Reducing consumption in offices, data centers and indirect activities through monitoring, efficiency measures and lower-intensity technologies. IT infra-structure can generate significant consu-mption if it is not optimized or powered by renewable sources.	7,13
Reducing energy consumption along the value chain	More efficient supply chain through AI; lower indirect (Scope 3) emissions	Applying digital and AI solutions to improve transport, storage, production and maintenance, lowering overall energy intensity and the indirect emissions associated with suppliers and partners.	9,12,13



Social topics

Material topic	Impact	Description	SDGs
Employee wellbeing	Work-life balance; welfare and support programs	Flexible hours, smart working and welfare initiatives that improve health, motivation and quality of life. Heavy workloads or poor organization can negatively affect wellbeing, productivity and retention.	3,8
Customer satisfaction	Reliability, performance and continuous support	Quality, ease of use, integration with existing systems and ongoing assistance that maximize value for the client. Performance or integration issues can generate costs, disruption and loss of trust.	9

Governance topics

Material topic	Impact	Description	SDGs
Information security and data management	Protection and resilience of information systems; regulatory compliance	Technical and organizational measures to ensure the security, integrity and availability of company and client data, preventing and managing cyber attacks, in compliance with applicable regulations such as the GDPR.	9,16
Business ethics and integrity	Ethical governance and prevention of improper practices	Codes of conduct and control systems to ensure transparency, fairness and accountability in business activities and relationships.	9
Innovation, quality and product compliance	Continuous, responsible innovation; quality and regulatory compliance	Ongoing development of solutions that respond to evolving needs and increase value for the client, together with reliability and respect for technical and regulatory standards, particularly in regulated contexts.	16

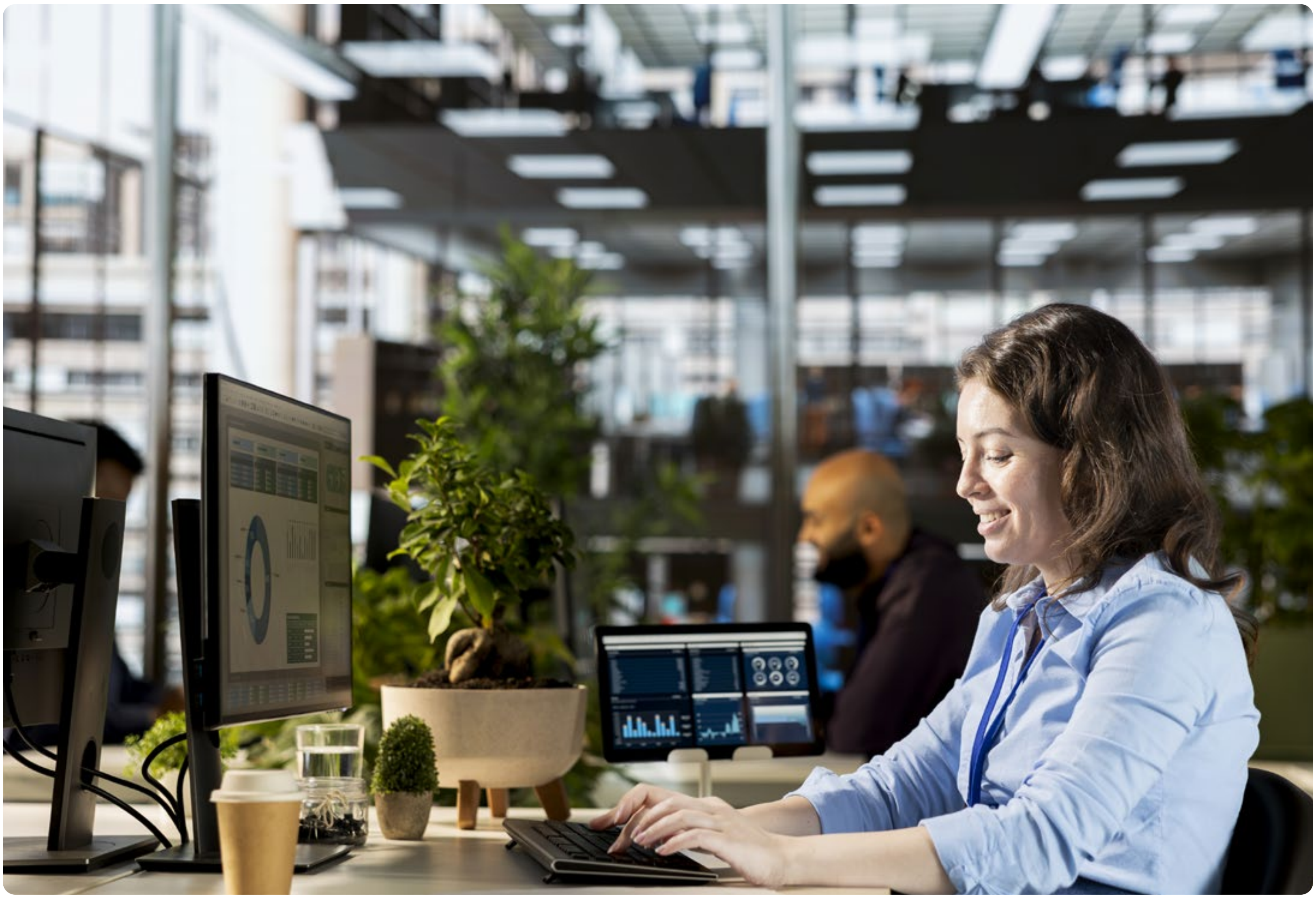
The remaining topics evaluated during the analysis, such as logistics impact mitigation, sustainable innovation and circularity, climate change and GHG emissions, training and development, health and safety, diversity and inclusion, risk management and supply chain due diligence, fell below the materiality threshold. Some of them are nonetheless addressed in this report, where the VSME basic module requires disclosure or where the company already has relevant information to share.

03. Environmental protection

03. Environmental protection

As an office-based software company, Creactives Group S.p.A. has a contained direct environmental footprint. The activities with the greatest environmental relevance are the energy that powers the offices and the digital infrastructure on which the products rely, together with the indirect effects connected to the supply chain and to business and commuting travel. Consistent with this profile, during the year the company had no sites located in or adjacent to areas sensitive for biodiversity, it is not required to and does not track direct emissions of pollutants to air, water or soil, and its water use is limited to ordinary office consumption, amounting to 529 cubic meters. The principles of the circular economy are applied through the everyday practices described in the sections below.

This chapter opens with the measurement of the company's greenhouse gas emissions, which gives an objective picture of where its impact is concentrated, and then addresses the two environmental topics that emerged as material, energy efficiency and the reduction of energy consumption along the value chain.



3.1 Climate change and GHG emissions

Although climate change was not selected as a material topic, Creactives Group S.p.A. considered it important to measure and report its greenhouse gas emissions, both for transparency towards its stakeholders and as the factual basis for any future reduction strategy. The calculation was carried out in line with the GHG Protocol Corporate Accounting and Reporting Standard, the most widely used international reference for corporate emissions accounting.

The inventory covers the reporting period from July 2024 to June 2025 and includes direct emissions (Scope 1), indirect emissions from purchased energy (Scope 2) and other indirect emissions along the value chain (Scope 3).

Scope	Emissions (tCO_2 eq)
Scope 1	37.24
Scope 2 (location-based)	9.98
Scope 3	195.94
Total	243.16

Direct emissions (Scope 1) amount to 37.24 tCO_2 eq and come almost entirely from company vehicle fuel, which represents about 98% of the total, with a residual share from refrigerant gases. The company does not consume natural gas or other direct fuels for its own operations. Indirect emissions from purchased electricity (Scope 2) amount to 9.98 tCO_2 eq on a location-based basis, the figure used in the overall total, and to 14.48 tCO_2 eq on a market-based basis.

Finally, Scope 3 accounts for around 81% of the total, which is typical of an organization whose direct operations are limited and whose impact is concentrated in its supply chain and in the mobility of its people.

These indirect emissions along the value chain are distributed as follows.

Scope 3 category	Emissions (tCO_2 eq)
Purchased goods and services	114.19
Employee commuting	47.80
Business travel	15.72
Fuel- and energy-related activities	10.89
Use of sold products (AWS hosting)	6.82
Capital goods	0.45
Waste generated in operations	0.07
Total	195.94

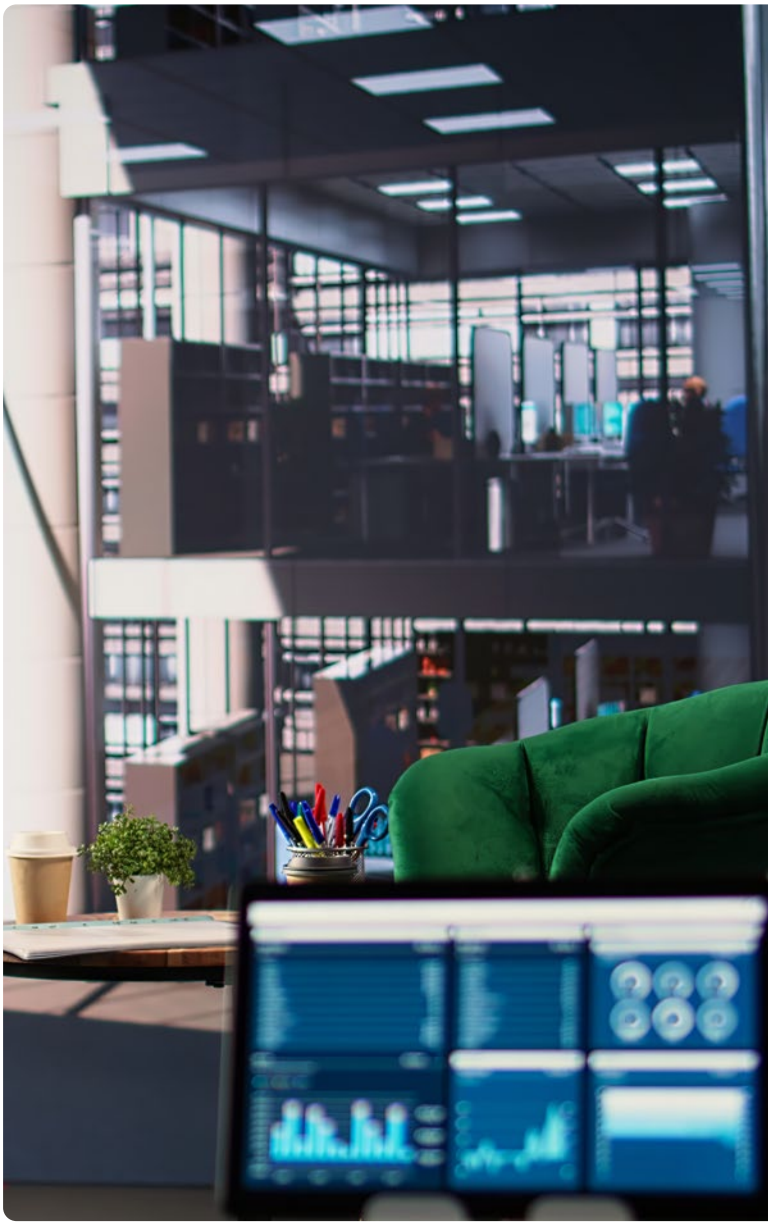
As the table shows, the largest share of emissions comes from purchased goods and services and from the way people move, between commuting and business travel. These results indicate where future reduction efforts can most usefully be directed, namely procurement choices, mobility and the energy profile of the digital services used by the company.

3.2 Energy efficiency

Energy efficiency is the first of the material environmental topics. For a software company the energy that matters most is the energy consumed in the offices and, above all, by the digital infrastructure that supports its products. For this reason, when the company selects cloud service providers and data centers, environmental sustainability and the use of renewable energy sources are a priority consideration in the choice.

Within its offices the company has introduced a set of practical measures that reduce consumption and waste, from charging stations for electric vehicles and separate waste collection to a purified water dispenser combined with reusable bottles provided to employees in order to limit the use of plastic. These actions reflect the circular economy principles to which the company adheres, centered on waste reduction, the use of non-virgin raw materials and the circularity of the resources employed; in the same logic, the accessories for coffee and beverages are purchased in recyclable materials. During the reporting period the company generated about 1,150 kilograms of non-hazardous waste, of which around 1,000 kilograms were destined for recycling or reuse and 150 kilograms for disposal, and no hazardous waste.

During the reporting period Creactives Group S.p.A consumed approximately 31.7 MWh of electricity in its offices, of which around 8 MWh from renewable sources and around 24 MWh from non-renewable sources. This level of consumption is consistent with the Scope 2 result reported above and reflects the office-based and partly remote nature of the company's work. On the product side, technical measures adopted during software development, such as the optimization of database access, the design of relational tables and the creation of indexes for the most demanding queries, help to contain the computing power required and the related energy use of the servers. Creactives Group S.p.A sees energy efficiency as an area to develop further in a structured way, in particular as regards the more direct measurement of the energy footprint of the cloud infrastructure that supports its products and the definition of related objectives, in line with the path of continuous improvement set out in this report.



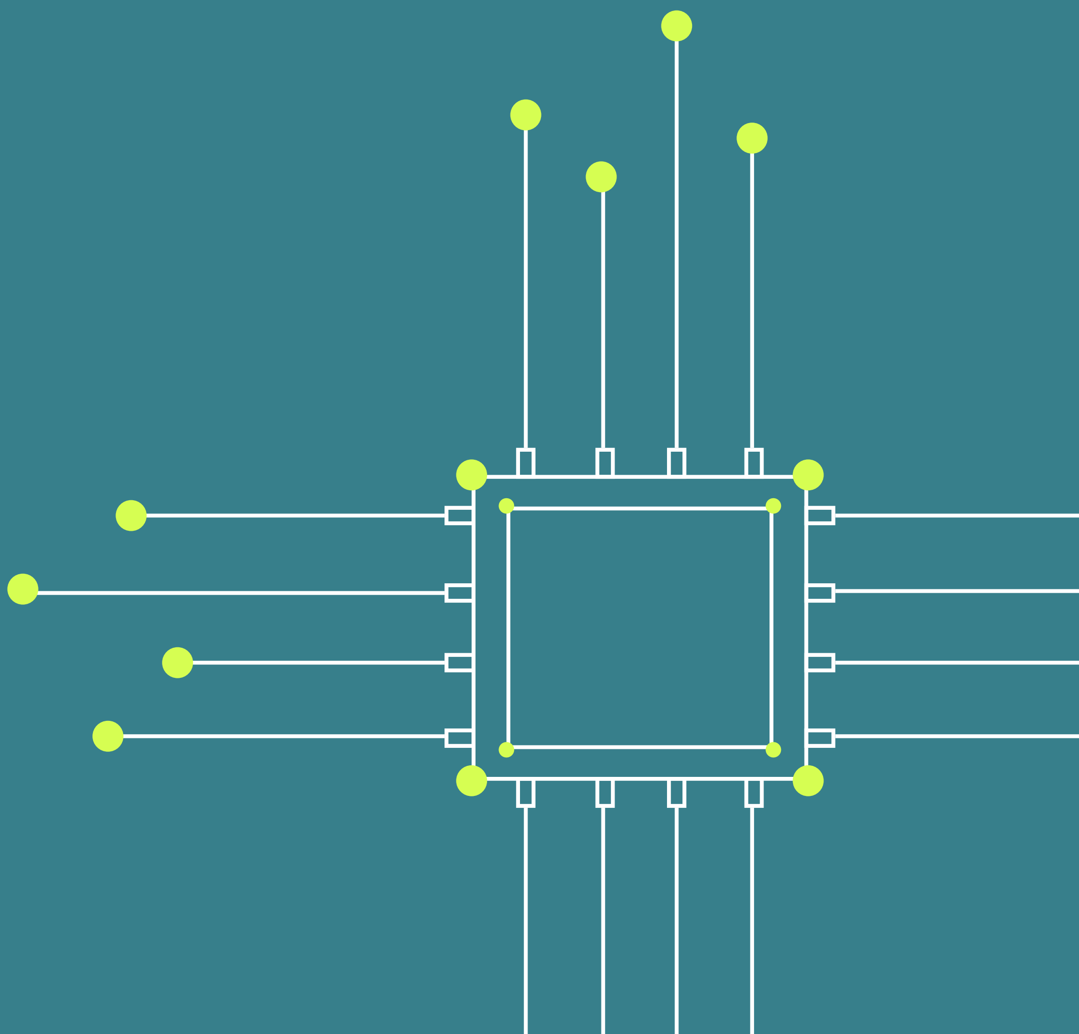
3.3 Reducing energy consumption along the value chain

The second material environmental topic looks outward, to the value chain, and it is where the company's technology can make its most significant contribution. By improving the quality of master data and the visibility of spending, Creactives Group S.p.A.'s solutions help client organizations to plan purchases, logistics, storage and production more efficiently. In particular, the functionalities of these solutions make it possible to identify and reduce duplicate materials, which are one of the main sources of waste for large organizations. A more efficient management of these processes can lower energy intensity and, with it, the indirect emissions associated with suppliers, transport and production along the supply chain. This is, in essence, the positive impact identified in the materiality analysis: the use of artificial intelligence and data to support decisions that reduce the energy footprint of the activities downstream of the company's work. The same attention extends to the company's own technology suppliers, since its main providers are certified operators that hold the relevant ESG certifications and invest in carbon credits exceeding the consumption associated with the services supplied to Creactives Group S.p.A.

It is an impact intrinsic to the business model, and one that the company intends to describe in increasingly concrete terms as the relevant indicators become available.

04.

Commitment to people



04. Commitment to people

The people who work at the company are the foundation of a company whose value lies in knowledge and innovation. Their wellbeing, their growth and the quality of the relationship the company builds with them are conditions for creating value over time, and they are treated as such. This chapter addresses the two social topics that emerged as material, employee wellbeing and customer satisfaction, and presents the information on the workforce required by the VSME basic module.

4.1 Employee wellbeing

At the end of the reporting period Creactives Group S.p.A. employed seventy people, all on permanent contracts and all based in Italy. Employee turnover during the year stood at 8%, a level consistent with a stable workforce.

Employees	Men	Women	Total
Permanent contracts	46	24	70
Temporary contracts	0	0	0
Total	46	24	70

The company supports the wellbeing of its people through a combination of flexibility and welfare. Smart working and flexible hours help to reconcile professional and personal life, while a company welfare scheme that includes purchase vouchers is complemented by health coverage and meal vouchers. These measures aim to sustain health, motivation and quality of life, in line with the impacts identified for this topic in the materiality analysis.

On remuneration, all employees are covered by a national collective bargaining agreement, specifically the National Collective Labour Agreement (CCNL) for the metalworking and engineering industry, and pay is set according to its scales for each job level. The company monitors its gender pay gap and reports it openly as an indicator to keep under observation over time. The figure disclosed here is calculated as the difference between the average annual remuneration of men and women by contractual level, relative to that of men; it is complemented by a role-based analysis comparing employees who perform equivalent roles. The figures below summarize the company's position on collective bargaining coverage, pay relative to the agreed minimum and the gender pay gap analysis.

On an unadjusted basis, comparing the average remuneration of women and men by contractual level, an average difference of around 20% emerges. This gap is largely explained by the different distribution of women and men across roles within those levels: women are in the majority in Administration, Data Analysis and Customer Care, while men are in the majority in IT and IT Project Management, roles which command higher market salaries. This distribution also reflects the fact that IT-oriented high schools and universities still have a majority of male students, which makes the recruitment of women into IT roles more challenging.

Market wage benchmarks show that IT roles command a wider salary range than Data Analysis and Administration roles, which explains the apparent gap emerging from a purely contractual-level analysis. A more specific role-based analysis (e.g. Data Analyst, Data Analyst Team Leader, Solution Architect Data Analyst, Enterprise Architect Data Analyst) shows no evident gender pay gap, with pay closely aligned between men and women.

Since remuneration should be compared on the basis of the actual role title — which defines a comparable content of job and responsibility — the role-based analysis does not reveal any gender pay gap. The company has nonetheless defined processes, policies and procedures to keep the gender pay gap under continuous monitoring and to guarantee gender parity. The company is equally committed to improving the balance of gender representation across all roles and seniority levels — including management positions, where women are currently under-represented — acting through its recruitment, development and succession practices and the measures set out in its Inclusion, Gender Parity and Anti-Harassment Policy (PO-04 AP-03).

Remuneration	Value
Employees covered by a collective bargaining agreement (CCNL)	100%
Annual pay relative to the CCNL minimum	Above the minimum
Gender pay gap (excluding the executive band, which currently comprises only men)	20% by contractual level, largely reflecting role distribution; no material gap on a like-for-like role basis

These commitments are formalised in the company's Inclusion, Gender Parity and Anti-Harassment Policy (PO-04 AP-03), which affirms equal opportunity regardless of gender, age, nationality, ethnic origin, religion, disability or sexual orientation (the workforce comprises fourteen nationalities) and sets out anti-harassment and anti-discrimination measures, confidential reporting procedures, protection against retaliation, and dedicated training and awareness activities.

Training is an important area of investment too. Over the year employees completed 5,552 hours of training in total, equivalent to an average of about 79 hours per employee.

Training hours by gender	Hours	Hours/person
Women	1,688	~ 70
Men	3,864	~ 84
Total	5,552	~ 79

Training is supported by a structured competency-management system. The company maintains a skills matrix for each department that maps individual competencies across cognitive, linguistic, relational and technical dimensions on a five-level proficiency scale, ranging from basic awareness to the ability to coach others. The matrix is updated annually and is used both to inform performance evaluation and to identify the training needs that feed the development plans. With regard to health and safety, the office-based nature of the company's activity entails a contained risk profile.

This profile is managed through a documented Health and Safety Policy (PO-00 AP-08), most recently updated to reflect developments in Italian health and safety legislation, which assigns ultimate responsibility to the company's directors and management and commits the company to eliminating or minimising workplace hazards as far as is reasonably practicable. Hazards are assessed and recorded in the company's risk-assessment documentation (DVR), and workers cooperate with supervisors and managers on health and safety matters.

During the reporting period the company recorded no recordable work-related accidents and no fatalities resulting from work-related injuries or ill health, consistent with the office-based nature of its activity.

Health and safety (reporting period)	Value
Number of recordable work-related accidents	0
Rate of recordable work-related accidents	0
Number of fatalities (work-related injuries and ill health)	0

4.2 Customer satisfaction

For a company that provides software and analytics solutions, the satisfaction of its clients is considered a direct measure of the value it creates. Clients look for reliable, high-performance solutions that integrate seamlessly with their existing systems and are backed by continuous support. The quality of the company's processes is certified to the ISO 9001 standard and, for cybersecurity, to ISO/IEC 27001, 27017 and 27018; annual certifications and audits are carried out to renew and maintain quality and compliance standards and to guarantee the highest level of security for Customer data and applications.

Continuous support is ensured by a dedicated organization for the group's clients, which keeps the applications aligned with the latest software releases and responds to how-to requests, anomalies and bugs. Specifically, client feedback is gathered and analyzed in a structured way: the Customer Care team manages annual satisfaction surveys, while a Customer Advisory Board provides the setting in which the strategic vision for the evolution of the products is shared with clients.

A Global Account Management organization is dedicated to customer support, with the objective of keeping data quality high, fixing problems and answering how-to questions, while a Customer Care team of Account Managers and Customer Success Managers maintains a structured and continuous dialogue with customers to gather new requirements and to monitor and facilitate the adoption of Creactives solutions.

In this way the company sustains the trust and the long-term reliability on which the relationship with its clients rests.

05.

Governance

05. Governance

For Creactives Group S.p.A., sound governance means protecting the data entrusted to it, always acting with integrity in its business relationships and continuing to innovate responsibly. The company is governed by a Board of Directors and relies on a code of conduct available to all employees and on certified management systems. This chapter addresses the three governance topics that emerged as material.

5.1 Information security and data management

Information security is the governance topic most closely tied to the nature of the business, because clients entrust the company with sensitive master data and spending information. The company's systems are protected by dedicated cybersecurity services, including a Security Operation Center that operates around the clock, and its commitment in this area is formalized through a set of international certifications: ISO/IEC 27001 for information security management, ISO/IEC 27017 for security in cloud services and ISO/IEC 27018 for the protection of personal data in the cloud. Consistent with this, security is a priority criterion when the company selects its cloud and infrastructure providers.

Service continuity and the protection of client data are governed by a business continuity plan covering the company's solutions and systems, which is tested on a regular basis so that it remains effective even in the event of serious technical failures.

5.2 Business ethics and integrity

Creactives Group S.p.A. bases its conduct on a code of conduct available to all employees, which sets out the behaviors expected in relations with the various stakeholders. Fairness and transparency in everyday commercial practices and in contractual relationships are ensured by reviews carried out, in compliance with the law, by dedicated advisors.

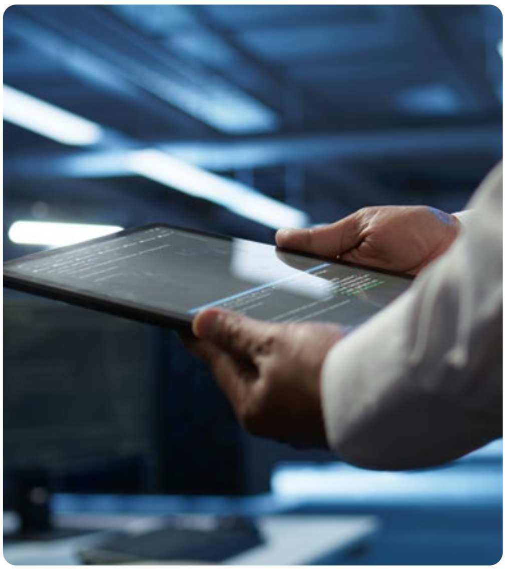
During the reporting period the company was not subject to any convictions or fines for violations of anti-corruption laws.

Anti-corruption, reporting period	Number
Convictions for violations of anti-corruption laws	0
Fines for violations of anti-corruption laws	0

The company also operates a whistleblowing system, set out in its Whistleblowing Policy (PO-04 AP-01), through which employees, collaborators, suppliers and partners can report suspected violations. Reports may be submitted in writing through a dedicated software platform, left as a voice message, or made in a direct meeting, and are handled by an appointed Reporting Manager. The system guarantees confidentiality and protection against retaliation, in line with applicable whistleblowing legislation.

5.3 Innovation, quality and product compliance

Innovation is the reason Creactives Group S.p.A. exists, and quality and compliance are the conditions that make it trustworthy. The company's clients operate in sectors that are often subject to strict technical and regulatory requirements, and they expect its solutions to keep pace with their evolving needs while remaining reliable and compliant.



To this end the company carries out annual certifications and audits that renew and maintain its quality and compliance standards, with the ISO 9001 and ISO27001 system providing an integrated framework for quality and cyber-security management, and all its applications undergo cybersecurity penetration tests. Continuous and responsible innovation, together with the reliability of its solutions, is what allows Creactives Group S.p.A. to create lasting value for its clients.

5.4 Responsible procurement and supply chain due diligence

Although supply chain due diligence fell below the materiality threshold, Creactives Group S.p.A. already manages its supply chain through a structured governance framework and considers the topic relevant to disclose. Procurement and vendor management are governed by the Supply Chain Management and Responsible Sourcing Policy (PO-04 AP-05) and by a Supplier Code of Conduct (PO-04 AP-08), which is distributed to suppliers and is a pre-requisite for supplier selection, and which sets out the standards expected in ethical business conduct, environmental and climate performance, human rights and labour practices, data privacy, cybersecurity, and health and safety.

Suppliers are classified into four risk tiers, ranging from strategic and critical providers, such as hosting and security operation centre services, down to low-risk commodity suppliers, with the frequency and depth of assessment increasing with the tier. New strategic and high-risk suppliers complete a self-assessment questionnaire before contract award, and the Supplier Code of Conduct provides three dedicated questionnaires covering cybersecurity, ESG sustainability and health and safety. Supplier performance and compliance are recorded and reviewed in the company's supplier evaluation register, complemented by audits and continuous monitoring, with corrective action where required.

As at the most recent annual supplier review, thirty suppliers had been evaluated and all were confirmed as qualified, two thirds of them at the highest level, described as qualified suppliers with high quality and security standards, and feedback was positive for the large majority. Most suppliers were classified as low security and quality risk, with a smaller number at medium risk and four strategic cloud, connectivity and software partners at high risk.

The supplier base is broadly certified to recognised management-system standards: thirteen suppliers hold ISO 9001, eleven hold ISO/IEC 27001 and six hold ISO 14001, while individual suppliers hold ISO 45001 for occupational health and safety, ISO 37001 for anti-bribery or ISO/IEC 42001 for artificial-intelligence management. Confidentiality is protected through non-disclosure agreements and formal privacy-management arrangements with the suppliers that process personal data on the company's behalf, and for the providers with the greatest environmental relevance, namely the cloud and hardware partners, carbon-footprint reporting is tracked as part of the evaluation.

This governance is also the company's principal lever over its indirect emissions. Purchased goods and services represent the largest single category of the Scope 3 footprint reported in chapter three, so the quality of procurement decisions and the environmental profile of the selected suppliers have a direct influence on it. Responsible sourcing therefore connects the company's governance practices with the environmental impact of its value chain, and the company intends to describe this contribution in increasingly quantified terms as supplier-level ESG and carbon data become available.

Conclusion

This sustainability report brings together, with the same attention to data that defines its products, the picture of how Creactives Group S.p.A. manages its impact on the environment, on its people and on the economic context in which it operates. Measuring its carbon footprint, listening to its stakeholders through the materiality analysis and consolidating the information on its workforce, its governance and its certified systems gives a clear and current view of where the company stands and an honest sense of where it can still improve.

The picture that emerges is consistent with the nature of the business. The direct environmental impact is contained and concentrated in mobility and purchased energy, while the most significant contribution the company can make is the one embedded in its technology, which helps clients use resources more efficiently along their value chains. On the social side, Creactives Group S.p.A. offers stable and protected employment and invests meaningfully in training, while recognizing that indicators such as the gender pay gap need to be monitored over time. On governance, the protection of data, the integrity of conduct and the quality of its solutions are firmly part of the way the company works.

Building on these results, the company's commitment for the years ahead is to formalize policies and quantified targets on its material topics, to continue strengthening the quality and completeness of its disclosure and to keep the dialogue with its stakeholders open and continuous. Creactives Group S.p.A. intends to carry its path forward in the same logic of continuous improvement that characterizes its work, consolidating and improving its sustainability performance year after year.

VSME basic module content index

Pillar	VSME disclosure	Chapter
General	B1 Basis for preparation	1.1; Methodological note
General	Value chain	1.3; 5.4
General	Governance	1.2
General	B2 Practices, policies and future initiatives	2.1
Environment	B3 Energy use and GHG emissions	3.1; 3.2
Environment	B4 Pollution of air, water and soil	Not applicable
Environment	B5 Biodiversity	Applicable, but no sites in or near biodiversity-sensitive areas;
Environment	B6 Water	Partially applicable, no high water-stress areas and negligible consumption
Environment	B7 Resource use, circular economy and waste	3.2
Social	B8 Workforce, general characteristics	1.1; 4.1
Social	B9 Workforce, health and safety	4.1
Social	B10 Workforce, remuneration, collective bargaining and training	4.1
Governance	B11 Convictions and fines for corruption and bribery	5.2

Methodological note

This is the first sustainability report of Creactives Group S.p.A. It has been prepared on a voluntary basis in accordance with the Basic Module of the Voluntary Sustainability Reporting Standard for SMEs (VSME) published by the European Financial Reporting Advisory Group (EFRAG), and it covers the period from July 2024 to June 2025, in line with the company's financial year. The report is drawn up on an individual basis for Creactives Group S.p.A., and its disclosures extend to the value chain, both upstream and downstream. The reporting boundary comprises the company's single office in Verona. The material topics presented here were identified through an impact materiality analysis. The process began with an analysis of the company's context and of sector trends, continued with an internal workshop involving leadership and department heads, and was completed through a survey that gathered the views of internal and external stakeholders. The topics that scored above the materiality threshold were selected as the priorities on which this report is built.

The information was collected and processed with the support of Up2You and its proprietary platforms: Choral, used to structure the gathering of qualitative and quantitative data, and CliMax, used to calculate the carbon footprint. The greenhouse gas inventory follows the GHG Protocol Corporate Accounting and Reporting Standard, and the CliMax platform has been validated by RINA for its adherence to that standard.