



**NADELLA GROUP  
SUSTAINABILITY AND  
QUALITY POLICY**

# NADELLA GROUP SUSTAINABILITY AND QUALITY POLICY

Our policy refers to our responsibility towards society, our environment, our investors, our portfolio companies, our suppliers, our customers, our staff, and the communities in which we operate.

This policy applies to our company and its subsidiaries. Wherever possible, it also applies to suppliers and partners.

## Key elements of our Policy

Nadella is committed to running our business in a responsible and sustainable way. We manage our environmental and social impacts, whilst creating shared value for our clients, staff and shareholders.

We believe this approach brings many benefits, capturing optimization opportunities and reinforcing our brand values.

To ensure a responsible, sustainable approach to business we:

- Promote Risk-based thinking approach
- Manage and reduce our environmental impacts
- Focus on customer needs and requirements
- Encourage our suppliers to adopt a responsible approach to business
- Uphold human rights in our business and encourage our value chain to do the same
- Treat our employees fairly and protect their health and safety
- Invest in and support our communities – local, national and international
- Set targets and regularly monitor, review and report our sustainability performance as a company; and strive to improve

Our policy therefore has the following key elements:

## 1. Ensuring a Responsible Business

- Manage our business in a responsible way, operating fairly and transparently
- Comply with all applicable legislation, regulations and codes of practice, as well as voluntary commitments where appropriate
- Enforce our commitments, particularly in the areas of equal opportunities, anti-harassment, anti-corruption and bribery, anti-slavery and human trafficking
- Aim to incorporate sustainability considerations in all our business activities and decisions
- Communicate and promote our approach to sustainability within our organisation, ensuring all staff are committed to implementing and improving our ways of working, and communicating our approach externally: to key stakeholders, partners, suppliers and clients
- Procure goods and services that match our values and encourage our suppliers to adopt a responsible approach to business

## 2. Focusing on customer needs and requirements

- Conformity: identify and continuously satisfy the expressed and implicit requirements of the customer and any mandatory requirements
- Customer satisfaction: acquire structured information on customer satisfaction in order to increase it over time
- Innovation: offer to the customer innovative elements and technologies, bringing benefits in terms of total cost of ownership
- Customisation: offer to the customers dedicated solutions, that suits their specific needs
- Continuous improvement: continuously improve the quality management system and all company processes in general

## 3. Protecting the environment

Nadella recognizes the need to protect the natural environment for a sustainable future. We seek to minimise and reduce our own environmental impacts, including greenhouse gas emissions, and subsequently minimise our organisational carbon footprint.

This means using all resources wisely and minimising waste and pollution. In particular we:

- Ensure compliance with all applicable environmental legislation
- Aim to minimise resource consumption by a focus on resource efficiency
- Focus on understanding the implications of climate change for our business including risks and mitigation measures
- Assess our carbon emissions and commit to elaborate a reduction plan
- Work to reduce energy consumption in our operations by adopting energy savings measures and deploying low energy equipment where possible
- Seek to minimise the use of non-renewable resources and use low impact, sustainably sourced products and materials in our own facilities where possible
- Focus on waste prevention, ensuring any waste we produce is efficiently managed and recycled where possible in line with a circular economy approach
- Aim to manage water resources effectively, reducing consumption and reducing environmental impacts in waste-water discharges
- Encourage our staff to use low impact forms of transport
- Strive for sustainable options in our facilities, from efficient layouts to insulation to sustainable furnishings and equipment

## 4. Protecting people

Protecting people within our business means treating our employees fairly through responsible employment contracts and fair labour practices, with supporting policies and practices that are defined in our Employee Handbook. These policies include Equal opportunities, Anti-harassment and Bullying Policy, Whistleblowing Policy, Health and Safety Policy, Security Policy.

Our responsibilities to protecting people extend beyond our own employees to our clients/customers, partners and suppliers. We have a duty of care to protect people's health and safety where we work, and to flag other welfare of human rights issues where we become aware.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

## 5. Supporting Our Staff

Nadella is committed to creating an environment where all its employees are treated with dignity and respect at work and which is free from discrimination, victimisation, harassment and bullying. Such conduct is harmful to the Company's employees and its business and the Company will seek to address any form of discrimination, victimisation, harassment or bullying where it occurs in the workplace.

Nadella will continue to develop practical and inclusive ways to support and develop a happy and productive workforce both within and outside the workplace, through practical initiatives and employee benefits such as continuous training, internal communication and cross-functional and international committee to ensure information sharing and team building.

Nadella is implementing a performance management system aimed at rewarding performance and leadership and identifying and growing the talents to support also the future business evolution.

We also encourage our people to develop their learning and their careers and will aim to provide additional support in these areas for long term benefit.

**6. Supporting Communities**

We initiate and support community investment and give support to non-profit organizations to promote cultural and economic development of global and local communities.

In our working environment and operations, this means being a good citizen where we operate and joining with other businesses to improve the working environment and to identify opportunities to help our local communities.

We will support causes that we believe in and which will make a positive impact on people's lives. In the past we have supported non-profit organizations aimed at improving education, health and life conditions and we will continue to do so.

**LIVIANA FORZA  
CHIEF EXECUTIVE OFFICER  
NADELLA GROUP**