



CORPORATE DONATION POLICY

Welcome to TESISQUARE®

CONNECTING PEOPLE, TECHNOLOGY,
AND PROCESSES IN A COLLABORATION SQUARE

Review and approval

ACTION	FUNCTION	NAME	DATE
Approved	CDA	-	20/12/2024
Verified	Legal Manager	Alessandro Cassinelli	25/10/2024
Drafted	Consultant	Laura Echino	25/10/2024

Update

VERSION	DATE	NOTES
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1. RECIPIENTS

This policy document, which also defines a procedure for donations, applies to TESISQUARE S.p.a. and its subsidiaries (collectively, "TESISQUARE") and to the directors, officers, and employees of these entities, as well as to those acting in the name or on behalf of these entities.

2. POLICY

In compliance with the Environment, Social, and Governance (ESG) policies currently being formalized, and in application of the principles of honesty, legality, and responsibility towards the community provided for in the Code of Ethics, TESISQUARE recognizes the importance of contributing to the well-being of society through concrete actions of social responsibility.

Donations made by TESISQUARE to third parties must be aligned with corporate values, intended for worthy and clearly identified beneficiaries, who must ensure ample transparency and visibility in the management of funds, and must ultimately have a real social impact, as further specified in paragraph 3 below.

3. PRINCIPLES

TESISQUARE is a company that, due to its size, activities, and geographical reach, plays a significant role in the development and well-being of communities. TESISQUARE's community investment activities reflect its commitment to promoting social and economic development both locally and globally, integrating the company and enhancing its reputation within the social fabric of the communities in which it operates.

Corporate donations must meet the following criteria:

Alignment with corporate values: donations must be consistent with the corporate values of sustainability, social innovation, and community engagement approved by TESISQUARE. Every donation must contribute to promoting a positive and lasting impact on civil society, particularly in the areas where our company operates, with specific reference to the main territories of activity and potential co-participation in national and international emergencies.

Eligible beneficiaries: in line with the previous point, the beneficiaries of donations must belong to one or more of the following categories:

- **Charitable organizations:** Organizations whose purpose is to achieve philanthropic objectives.
- **Non-Governmental Organizations (NGOs):** NGOs operating in fields such as education, healthcare, environmental protection, and other relevant social causes.
- **Schools and training institutions:** School and university institutions, both public and private, that require support for educational projects, scholarships, or infrastructure.
- **Cultural and sports associations:** Associations that promote cultural and sporting activities, with particular attention to those that include disadvantaged segments of the population.

- **Local recreational and promotional associations:** Non-profit organizations operating with the aim of promoting recreational, artistic, or social activities, designed to foster inclusion and community participation, offering spaces and recreational initiatives to improve well-being and social cohesion.
- **Activities for the construction and expansion of healthcare and educational facilities:** Activities, constituted in any form (including as a company), aimed at improving access to education and healthcare through the construction or expansion of schools, hospitals, clinics, and other essential facilities useful for the community.

Transparency and accountability: beneficiaries must demonstrate transparency in the management of funds and must be able to provide clear reports on their use. Projects that offer public reporting mechanisms will be favored.

Social impact: the donation must contribute to supporting the activities of the recipient entities and significantly improve the living conditions of the recipients, ensuring the rights of inclusion and excluding any action/initiative that could generate the violation of equal opportunity principles. Projects showing potential for long-term impact and capable of leading to positive and lasting change in the community will be prioritized.

4. PROCEDURE

4.1. Donations committee

The Donations Committee is an internal company body responsible for managing and approving donation requests, as well as monitoring the donations made. The committee is composed of members selected from the company's managers and employees who possess specific expertise in finance, legal matters, and corporate social responsibility.

The TESISQUARE Donations Committee is composed as follows:

- President of the Committee, Member of the Board of Directors (BoD);
- Head of Finance or Delegate;
- Head of Legal or Delegate.

The aforementioned members are responsible for applying the principles of this policy, availing themselves, where appropriate, of technical or specialized advice from external professionals.

4.2. Request to the donations committee

Anyone within TESISQUARE intending to propose a donation to a third-party entity must submit a request to the Donations Committee, providing the following information:

- **Project description:** The donation applicant must present a detailed description of the project or initiative for which the request is made, including objectives, planned activities, and timelines.
- **Documentation:** The applicant must provide proof of the legal status of the requesting organization.
- **Detailed budget:** The donation request must be accompanied by a project that

illustrates in detail how the requested funds will be used, with a breakdown of planned expenses.

- **Impact report:** The donation request must be accompanied by an estimate of the impact the project will have on the community, including (where possible) specific metrics to evaluate the success of the initiative.
- **Past reporting:** If the requesting organization has received previous donations from TESISQUARE, a report on how those funds were used and the results achieved must be provided.

Within 30 days of the decision, the Donations Committee will communicate the outcome of its evaluations to the applicant. In case of approval, details relating to the method of donation disbursement will be defined, including the timing and conditions for the use of the funds.

4.3. Operations of the donations committee

The Donations Committee meets (i) whenever one or more donation requests are received; (ii) in any case, semi-annually to monitor the progress of funded projects. Requests for approval of specific applications can also be managed by the Committee asynchronously (e.g., email, WhatsApp, etc.).

To make valid decisions, a quorum constituted by a simple majority of the committee members is required. Decisions are made by a majority of those present. In the event of a tie, the vote of the Committee President is decisive. All Committee decisions must be documented in minutes, which will be retained and made available for any internal or external review. The Committee President is responsible for preparing an annual report to be presented to the BoD summarizing the donation activities and their impact.

4.4. Autonomy limits

The Donations Committee has the autonomy to directly approve donations up to an amount of **15,000 Euros** per single request or project, within the limit of the annual budget presented and approved by the BoD.

4.5. Donations exceeding 15,000 Euros

For all donation requests exceeding the amount of 15,000 Euros, the Donations Committee must request approval from the BoD. In these cases, the Committee will have the task of:

- **Preparing a detailed report:** The report must be complete with the description of the project, the beneficiary(ies), the requested amount, and the reasons why the donation is recommended for approval. The report must include an analysis of the expected benefits and an assessment of the social impact.
- **Presenting the request to the BoD:** The President of the Donations Committee will present the report to the BoD during the subsequent board meeting, or through an extraordinary approval procedure if necessary. The presentation will also include any recommendations or conditions that the committee deems appropriate.
- **Awaiting approval:** The BoD will discuss the proposal and decide whether to approve or reject the donation. Once the decision is made, the BoD will communicate the outcome to the Donations Committee, which will then proceed with the disbursement or notification of rejection to the applicant.

4.6. Donations below 1,000 Euros

For donation requests below €1,000, decision-making autonomy is granted to the individual

members of the Donations Committee, who must nevertheless inform the Committee of the decision. In this case, the person authorizing is responsible for verifying that the donation is consistent with corporate values and the selection criteria listed in point 3 of this procedure and may, if necessary, be summoned to the BoD to account for the reasons.

4.7. Monitoring of approved donations

Economically relevant donations will be subject to monitoring to ensure that the funds are used appropriately and that the expected impact is achieved.

4.8. Donation monitoring

The Donations Committee will be responsible for the continuous monitoring of funded projects. Monitoring includes:

- **Periodic reports:** For donations that involve contributions and/or activities distributed over a more or less extended period, beneficiaries must provide periodic reports (quarterly or semi-annually) on the progress of the project and the use of donated funds.
- **On-site visits:** If deemed necessary, the Donations Committee may conduct on-site visits to verify the actual realization of the project and compliance with the declared objectives.
- **Financial reporting:** For economically relevant projects, beneficiaries must provide detailed reporting of expenditures incurred, comparing actual expenses with the approved budget.

5. DOCUMENT REVIEW

This policy and procedure document will be reviewed annually by the Donations Committee. Any changes must be approved by the BoD.

6. CONSEQUENCES OF CONTROLS

In the event of a violation of the principles of the Policy or a violation of the procedure, TESISQUARE will have the right to take action against the individual concerned, contesting a contractual breach in the manner provided by law and the contract itself.