

/NEVERHACK SPAIN S.L.U.

Corporate social responsibility

Policy

MGI-14

Document information

Revision Log

Date	Version	Author	Change
03/09/2025	1.0	Risk & Compliance	Drafting and revision of the policy

Approval

10/10/2025	Validated by		Head of Risk & Compliance Davide Fusco
13/10/2025	Approved by		CEO Michele Illiano

Change Log

Version	Change
1.0	First release

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1 Corporate social responsibility policy

Neverhack Italy S.p.A., together with its subsidiaries Neverhack Spain, Neverhack Mexico and Neverhack USA, actively promotes respect for internationally recognized human rights, placing at the core of its activities the protection of integrity, health, rights and well-being of its employees, as well as environmental preservation. These values represent fundamental and non-negotiable principles in the sustainable development of the organization.

Neverhack considers corporate social responsibility a strategic element for creating shared value, integrating ethical, social and environmental considerations into decision-making processes and relationships with all stakeholders.

2 Organizational commitments

To pursue the above objectives, Neverhack undertakes to:

- **manage its activities** regarding health, safety, labor rights and environmental protection in compliance with the most qualified international standards (e.g., UN Guiding Principles, ISO 26000, Global Compact);
- **communicate and disseminate relevant information** on health, safety, labor rights and the environment, promoting constructive dialogue with internal and external stakeholders and collaborating with institutional bodies, academia and civil society organizations;
- **promote the adoption of advanced technologies** to improve workplace health and safety and reduce environmental impact;
- **assess and mitigate the environmental impact** of its services and processes, encouraging the adoption of eco-sustainable practices;
- **use resources responsibly**, pursuing sustainable development that protects the environment and the rights of future generations;
- **oppose all forms of exploitation**, rejecting the use of child labor, forced labor or degrading working conditions;
- **ensure equal opportunities**, freedom of association and promote the personal and professional development of each individual;
- **oppose any form of abuse**, physical or psychological coercion, corporal punishment and offensive language;
- **comply with applicable regulations and contractual standards** regarding working hours and remuneration, ensuring decent conditions for all employees;

- **combat all forms of workplace discrimination** (gender, age, disability, ethnicity, religion, sexual orientation, etc.) and value diversity as a strategic resource;
- **foster an inclusive, fair and respectful work environment**, recognizing the fundamental contribution of women and gender minorities;
- **comply with European Regulation 679/2016 (GDPR)** on personal data protection;
- **evaluate and select suppliers and subcontractors** based on their commitment to social and environmental responsibility, promoting a responsible supply chain;
- **oppose all forms of corruption**, in any jurisdiction and context, even where tolerated or not prosecuted;
- **actively involve all levels of the organization**, ensuring that roles, responsibilities and procedures are clearly defined, communicated and understood;
- **respect and ensure compliance with the contents of the Code of Ethics**, an integral part of the company's integrated management system, drafted in accordance with ISO 9001, ISO 14001, ISO 45001, ISO 27001, and ISO 20000-1 standards.

3 Policy dissemination

This *Corporate social responsibility policy* is shared with all employees via the company intranet and is publicly available on the official website www.neverhack.com.