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Who we are: our relationship with sustainability

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Founded in 2014 as 4cLegal, **4c Group** has grown into a provider of cutting-edge digital and consulting solutions for **businesses**, **public institutions**, and **professional firms**. The Group's activities span **four key areas**: technology (**4cLegal**), sustainability (**4cFuture**), communication (**4cBranding**), and applied artificial intelligence (**4cAi**).

Through **4cLegal**, we deliver innovative solutions such as **digital platforms** that help private and public organizations procure professional services with greater efficiency, transparency, and accountability. Our flagship platform, **4cLegal Enterprise**, enables organizations to compare service providers based on expertise, experience, and costs. This approach reflects our forward-thinking vision for the legal market: over the years, 4cLegal has evolved to offer tailored services for corporate legal departments and law firms, creating a marketplace where **professionalism and merit** take center stage.

For over five years, sustainability has been an integral part of the Group's mission. Our analysis of digital comparative procedures for procuring legal services—highlighted as a distinctive feature of sustainable corporate governance—has led major organizations such as **Duferco Energia** and **IBSA Farmaceutici** to include legal procurement solutions "powered by 4cLegal" in their **Sustainability Reports**.

Building on this expertise, we have expanded our scope to address **Environmental**, **Social**, **and Governance** (**ESG**) sustainability within the legal sector. Since 2021, we have offered businesses and professional firms the opportunity to validate their ESG policies and position themselves as truly sustainable organizations through our **ESG Qualification services**, an enhanced evolution of our earlier ESG Accreditation.

In September 2024, as part of a strategic rebranding, we officially launched **4cFuture**, dedicated to promoting sustainability in business and society through events, networking opportunities, and editorial initiatives.

Crowning these efforts, in November 2024, **4c**, the Group's holding company, achieved **B Corp certification**, underscoring our commitment to sustainability and reinforcing our role as a leader in this critical field.

ESG Qualification What it is and how it works

In a regulatory landscape increasingly focused on sustainability, organizations are now required to integrate ESG principles into their processes and strategies. Since the **Corporate Sustainability Due Diligence Directive** came into force on **July 26, 2024**, professional firms must position themselves as **ESG-compliant operators** to collaborate with businesses that will soon be obligated to conduct **rigorous ESG due diligence** across their entire supply chain.

The **ESG Qualification** service enables professional firms to highlight their sustainable practices and behaviors through a **transparent** process validated by an **independent third party**. This initiative aims to build a community of professional firms that meet specific sustainability criteria and position themselves as leaders in the ESG transition.

The entire validation process (see slide 11 for details) is **digital** and takes place on a dedicated section of the platform **panel.4clegal.com**. Each firm designates a representative to submit and validate the firm's **sustainability self-declarations**, which detail the **ESG policies** implemented internally. These self-declarations are reviewed by 4cLegal team to ensure formal and substantive adequacy. They are then verified by a relevant stakeholder—someone with a direct relationship with the firm and capable of confirming the accuracy of the specific self-declaration. Stakeholder identities and their organizational affiliations remain strictly confidential under our procedures and are never disclosed.

Once the stakeholder confirmation is obtained, the process is successfully completed, and the firm is **qualified for that specific policy**.

The ESG Qualification does not aim to create a **ranking** of professional firms. Instead—responding to requests from numerous corporate clients of 4cLegal—it seeks to provide credible insights to businesses looking to select professional firms with a strong commitment to sustainability.

Our Sustainability Certificates

Each professional firm selects the sustainability elements it wishes to validate – starting from a list of "ESG items" (see slides 7-10)– and provides all the relevant information for their evaluation and confirmation by the stakeholders.

The self-declarations of sustainability that will result as «validated» are represented in **Sustainability Certificates**, valid for one year: the Firm can use them freely in its communication to the market.



The activation of the validation process takes place against a cost of \in 750 + VAT (for the validation of up to 3 sustainability elements) or \in 2,000 + VAT (for the validation of up to 10 elements) or \in 3,500 + VAT (for the validation of unlimited elements). The cost is independent of the outcome of the validation process and remunerates the commitment and the support and control activities in the validation envisaged by 4cLegal and in favor of the Firm.

Firms that have validated at least one sustainability item have other advantages, detailed on p. 14.

For a description of the activities covered by the cost of issuing, see p. 13. In addition, if interested, the Firm can discuss a communication plan to be developed with **4cBranding**.

ESG Qualification: The Process



ACCESS

After activating its area, the Firm evaluates the ESG elements on which it will start the validation process

DESCRIBE

The Firm describes / attaches the relevant information in relation to the ESG elements selected and provides the contacts of the stakeholders, to activate the confirmation procedure. The validation procedure is individual for each element

VALIDATE

Our Team carries out a formal and adequacy check on the individual self-declarations entered

CONFIRM

Once they pass our tests, selfdeclarations must receive confirmations from the required stakeholders. Once all the confirmations have been received, the selfcertification is validated

COMMUNICATE

Each validated selfdeclaration is valued in annual 'diplomas'

List of sustainability elements: Environmental area ___

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The **Environmental area** of the list of sustainability elements contains **7 validable elements**:

#	Element	Stakeholders who can confirm this
ΕΊ	Adoption and concrete implementation of a separate collection system	1 Partner with power of representation of the Firm 1 Associate 1 Staff Member
E2	Adoption and concrete implementation of a policy for the disposal of electronic waste	1 Partner with power of representation of the Firm 1 Staff Member
E3	Adoption and concrete implementation of a policy for the minimal use of paper / printing	1 Partner with power of representation of the Firm 1 Staff Member
E4	Adoption and concrete implementation of a policy for the use of certified recycled paper	1 Partner with power of representation of the Firm 1 Staff Member
E 5	Adoption and concrete implementation of a plastic-free policy	1 Partner with power of representation of the Firm 1 Staff Member
E6	Adoption and concrete implementation of energy saving programs and preference for renewable energy sources at various levels (policy for limiting consumption, LEED certification for the office (s) of the Firm, purchases of "green" goods and services, etc.)	1 Partner with power of representation of the Firm 1 Staff Member
E 7	Adoption and concrete implementation of a policy that promotes sustainable mobility of the people who work in the Firm, with consequent reduction of CO2 emissions	1 Partner with power of representation of the Firm 1 Associate 1 Staff Member

List of sustainability elements: Social Area ____

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The **Social area** of the list of sustainability elements contains **8 validable elements**:

#	Element	Stakeholders who can confirm this
S 1	Adoption and concrete implementation of a policy that pursues gender equality and inclusion. It is necessary to indicate evidence of the results achieved (e.g. significant percentage of female partners out of the total, presence of workers with disabilities)	1 Partner with power of representation of the Firm 1 Female Partner
S2	Implementation of training and refresher programs on sustainability issues	1 Partner with power of representation of the Firm 1 Associate 1 Staff member
S3	Adoption and concrete implementation of a policy that provides for the enhancement of young talents and the transparent regulation of career paths	1 Partner with power of representation of the Firm 1 Associate
S4	Adoption and concrete implementation of a policy that provides for periodic climate surveys and the possibility of filing internal complaints	1 Partner with power of representation of the Firm 1 Associate 1 Staff member
S 5	Adoption and concrete implementation of a parenting support policy	1 Partner with power of representation of the Firm 1 Associate
S6	Participation of the Firm in pro bono initiatives / support to non-profit organizations / annual donations and the like	1 Partner with power of representation of the Firm 1 Beneficiary of the initiatives
S7	Adoption and concrete implementation of policies that favor a "work life balance"	1 Partner with power of representation of the Firm 1 Associate
S8	Adoption and concrete implementation of a policy that pursues health and safety in the workplace in order to guarantee sustainable development and which aims to minimize any significant risk to health and safety	1 Partner with power of representation of the Firm 1 Associate

List of sustainability elements: Governance area ____

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The Governance area of the list of sustainability elements contains 13 validable elements:

#	Element	Stakeholders who can confirm this
G1	Existence and publication of a Charter of Values - or similar document - suitable for presenting the mission of the Firm and its distinctive positioning in the market	1 Partner with power of representation of the Firm Necessary attachment of the Charter of Values
G2	Use of digital applications for sharing information relating to cases with customers	1 Partner with power of representation of the Firm 1 Client of the Firm
G 3	Adoption and concrete implementation of a policy that provides – as an attachment to the professional notulas – an analytical detail of the professional services carried out for the client	1 Partner with power of representation of the Firm 1 Client of the Firm
G4	Adoption and concrete implementation of a policy suitable to protect the security and confidentiality of data and information, including customers, in compliance with applicable regulations and best practices	2 Partners, one of which has the power to represent the Firm
G 5	Adoption and concrete implementation of a policy suitable for the prevention of conflicts of interest	2 Partners, one of which has the power to represent the Firm
G6	Adoption and concrete implementation of a policy for the management of feedback and complaints from customers	1 Partner with power of representation of the Firm 1 Client of the Firm

List of sustainability elements: Governance area ____

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The Governance area of the list of sustainability elements contains 13 validable elements:

#	Element	Stakeholders who can confirm this
G 7	Adoption and concrete implementation of a purchasing policy that provides for procedures for the qualification and selection of traceable suppliers	1 Partner with power of representation of the Firm 1 Staff Member 1 Firm Provider
G8	Adoption and concrete implementation of a management control policy	2 Partners, one of which has the power to represent the Firm
G9	Adoption and concrete implementation of an anti-money laundering policy	2 Partners, one of which has the power to represent the Firm
G10	Adoption and concrete implementation of a policy that governs the carrying out of the selection processes of employees and collaborators structured and based on transparency and meritocracy	2 Partners, one of which has the power to represent the Firm 1 Associate
G11	Implementation of activities aimed at the Firm's clients aimed at proactively promoting awareness of sustainability issues and / or the adoption of sustainable practices and behaviors	1 Partner with power of representation of the Firm 1 Client of the Firm
G12	Existence and publication of a sustainability report of the Firm	1 Partner with power of representation of the Firm Necessary attachment of the sustainability report
G13	Existence of an organizational chart that defines each role, position, and interdependence relationship between people	1 Partner with power of representation of the Firm 1 Associate Necessary attachment of the organizational chart

How is it decided: whether a self-declaration of sustainability is validated

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The self-declaration of sustainability relating to an item will be validated (and will therefore assume the status of a self - declaration of validated sustainability) if it complies with 3 levels of control (see below). The most characterizing level of the procedure is the confirmation by the **stakeholder(s)**, which aims to qualify the mere self-declaration making it more "robust". The two additional levels of control - formal and adequacy - are conducted by 4cLegal and have the purpose of maintaining the minimum standards of **accuracy of the self -declarations** in the face of their necessary conciseness (also necessary for the possible confidentiality of the details of the policies / practices to be refers). 4cLegal does not act as a certifying body, but provides a formally and substantially solid procedure to highlight the Firms.

The premise of the process is the confirmation by the stakeholder(s): it occurs when all the stakeholders who are requested to confirm the self-declaration respond positively. An email with all the information and instructions necessary for confirmation is automatically delivered by the system to the stakeholder's email address indicated by the Firm.

- **Formal control:** The description of the practices / policies supporting the self-declaration of sustainability relating to a specific element is formally relevant to the element itself.
- Adequacy check: The description of the practices / policies supporting the self-declaration of sustainability relating to a given element is sufficiently detailed, thus allowing informed and qualifying confirmation by the stakeholder (s) involved. In addition to the instructions on the next page, 4cLegal draws up specific compilation guidelines shared with users;
- **Sample checks**: in addition to the above, 4cLegal reserves the right to carry out sample checks by directly contacting the stakeholders who have confirmed the ESG elements.

In case of non-validation of the self-declaration due to problems concerning the formal control and / or adequacy of the practices / policies, 4cLegal provides feedback and is available to organize a proactive comparison with the Firms.

Some simple instructions to fill out a comprehensive self-declaration of sustainability____

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Also in light of the control levels described in the previous slide, here are some simple guidelines to consider in order to compile a comprehensive self-declaration of sustainability:

- **Fill out the self-declarations without haste.** Providing the description of practices and policies relating to complex issues such as those of the 28 elements on the list can be neither simple nor immediate, especially if you have to do a synthesis exercise by selecting and organizing the most important information. We therefore recommend doing it without rushing.
- If you already have some useful written policies, attaching them can be a good choice (but it's never mandatory). If the Firm already has written policies governing some of the items on the list, it is likely that they already contain most of the information required for a good self-declaration. You can then attach them we will keep them confidential using the description field if necessary to add further information and context.
- Be thorough, you could contribute to the improvement of the entire ecosystem of professions. The more evidence and examples are provided, the higher the likelihood that the self-declaration of sustainability will be validated. The most positive and innovative practices, policies and solutions can contribute to enriching the Community of participating firms: if you wish, you can expressly authorize us to share them, associated with the name of your firm or anonymously, at your choice.
- Where appropriate, point out how the Firm makes a real sustainability effort beyond what is due. Several elements of the list refer to areas that are regulated by law. In those cases it may be important to explain how the Firm goes beyond what is required to be not only formally compliant, but also proactively sustainable.
- Please take into consideration the compilation guidelines developed by 4cLegal to optimize the compilation work.

What costs does the price of the service cover

- **Research and development:** Elaborating the list of 28 ESG elements and taking care of future updates involves a research and development work that represents, in itself, a contribution to the ecosystem of professions and commits the hours of the members of the 4cLegal Team who dedicate themselves to it.
- Launch and maintenance of the platform: The platform hosting the ESG Qualification process has undergone a development and setup phase by the members of 4cLegal Team who have dedicated themselves to it, and needs maintenance.
- **4cLegal control and verification activities:** the validation process requires the intervention, in several moments, by collaborators of the 4cLegal Team. Our team also provides ongoing assistance throughout the validation process.
- Coordination activities and initiatives of the Community of adhering studies: as shown on page 14.
- Benefit activities of 4cLegal: A fixed sum for each fee of the 4cLegal ESG Accreditation product is allocated to charitable activities of 4cLegal (which is a Benefit Company). These activities will be fully reported in a specific space on the platform. The first project will involve the "Lega del Filo d'Oro" association.

Access to the 4cLegal accreditation system

In case of accreditation:

- Sustainability Certificate generated by the platform on request also in NFT format
- Welcome post to the Community of participating firms on the 4cFuture social channels (Linkedin)
- Presentation of the study in 4cLegal Newsletter
- Firm's ESG profile on the 4cLegal ESG HUB (<u>FIRM CARD</u>)
- ESG Community badge
- Mention in 4cFuture Magazine

"ESG Merit First" plan
Price: 750 Euro * + VAT

(for the validation of up to 3 elements);

«ESG Merit Pro» plan
Price: 2.000 E uro * + VAT

(for the validation of up to 10 elements)

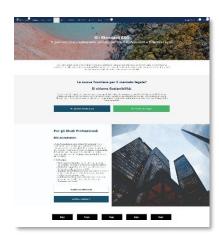
Unlimited ESG Qualification

Price: **3.500 Euro * + VAT**

(for validation of unlimited elements)

* These prices refer to products purchased offline

«Sustainability Hub »: dedicated page on the website www.4clegal.com





«4cFuture Magazine »: the periodical magazine dedicated to the sustainable legal market





« Sustainability Certificate»: 4cLegal output to enhance the good practices of the Firm validated

