



Standard Ethics Rating [corpSER]: **EE-**  
 Long Term Expected corpSER [4y to 5y]: **EE+**

**Issuer:** Centotrenta Servicing SpA  
**Listing:** Not listed on the stock exchange  
**ISIN:** Not listed on the stock exchange  
**Market Capitalisation:** -  
**Sector:** Financials  
**Industry:** Financials  
**Type of rating:** Corporate Standard Ethics Rating [SER]  
**Date:** 23<sup>rd</sup> May 2021  
**Expiry Date:** 3<sup>rd</sup> May 2022  
**Last action:** -  
**Previous corpSER:** -  
**Type of document:** Rating Report

Level of Compliance

EEE	EEE-	EE+	EE	EE-	E+	E	E-	F
Full	Excellent	Very strong	Strong	Adequate	Non-compliant	Low	Very Low	Lowest level

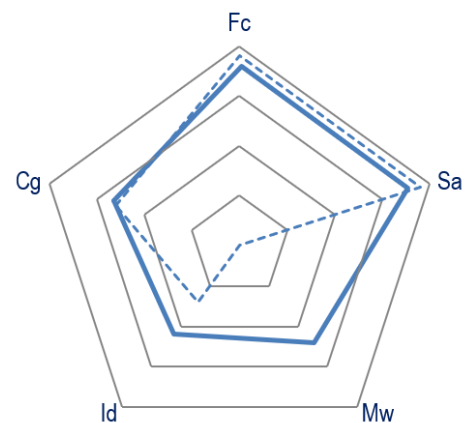
Investment Grade	Lower Investment Grade	Non-investment Grade
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Summary

Centotrenta Servicing performs all the servicing functions connected to the management of securitisation transactions. It is active on the Italian market. It has played different roles in over 200 transactions. Centotrenta Servicing is a financial intermediary acting exclusively in the provision of services and is not normally involved in the commercial stages of the sale of receivables and the notes issued: rather, it plays the role of “Guarantor” in the execution of the processes.

The Company was originally a family-owned firm and this connotation has contributed to ensuring an adequate corporate management, good strategic continuity and control over transactions. In recent years, the Company has extended its relations to cover a broader range of stakeholders. Although it does not yet undertake a proper ESG reporting procedure, it has begun to test and implement social impact programmes and has adopted corporate policies and procedures of an ethical nature. At present Centotrenta Servicing is implementing a process aimed at improving its corporate governance, its risk management, its reporting procedures and all its policies, to bring them in line with sustainability strategies.

Snapshot (adj.)



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## BACKGROUND, METHODOLOGY, RATING

New elements – such as the evolution of the Internet – have created open and transparent financial markets, in which growing segments of the population participate. This has resulted in:

- greater attention to **extra-financial** factors, both tangible and intangible, with repercussions on the level of trust and credibility of issuers;
- new assessments of the quality and long-term durability of listed financial products, related to both companies (stocks, bonds, green bonds) or institutional issuers (such as government bonds).

Standard Ethics has ascertained that we have reached the end of the classic financial era, which was focused exclusively on economic variables. Despite their fallibility and volatility, regulated markets have evolved and are proving to be the most important and independent system in assessing the long-term **sustainability**<sup>1</sup> of numerous human activities.

The Standard Ethics Rating helps refine the strategies, language and ways in which an issuer operates on the market.

### STANDARD ETHICS

Standard Ethics Ltd (SE) is a Self-Regulated Sustainability Rating Agency<sup>2</sup> that issues Non-Financial Solicited Ratings to companies and sovereign nations. The Standard Ethics® brand has been around since 2004 in the world of “sustainable finance” and ESG (Environmental, Social and Governance) studies.

Standard Ethics is supervised by internal control and audit offices. The composition of the Board complies with the international guidelines on diversity of nationality, professional skills, independence and gender equality.

### STANDARD ETHICS RATING

The Standard Ethics Rating, which has been put to the test over the last 15 years, is a Solicited Sustainability Rating (SSR). It has 3 main characteristics:

- **Solicited:** it is issued only at the request of an applicant, by means of a direct, bilateral and regulated agreement.
- **Standard:** it is always comparable to other ratings, as the methodology and issuance parameters are aligned to pre-established guidelines, and the algorithm takes into account the size and typology of the issuer.
- **Independent:** in order to remain third party to investors, Standard Ethics does not provide any individual investor with advice, analysis or data regarding companies under rating, it does not use the data gathered for asset.

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<sup>1</sup> Standard Ethics synthesizes Its vision in three cornerstones of **sustainability**:

1. *Sustainable development policies are about the generations of the future; they have taken on a global dimension; and they are implemented on a voluntary basis. It is up to the main supranational organisations, officially recognised by nations across the globe, to establish the definitions, guidelines and strategies related to sustainable development through science.*

2. *Economic entities do not define the guidelines, goals and strategies on sustainability: they pursue them to the extent deemed possible.*

3. *Measuring the sustainability of economic entities means providing comparable and third-party data on their overall compliance with international guidelines.*

<sup>2</sup> In the absence of supervisory bodies and international legislative standards for ESG solicited ratings to corporates, Standard Ethics has, since the beginning of its activity, been **self-regulating applying the models of credit rating agencies**. In the main: Standard Ethics' clients are the companies that apply for a rating (Applicant-pay Model); in order to remain third party to investors, Standard Ethics does not provide any individual investor with advice, analysis or data regarding companies under rating.

- management advisory services (to banks or funds) and it does not share it with third parties.

In short, the Standard Ethics Rating indicates the level of compliance by companies (and sovereign nations) in the field of sustainability on the basis of documents and guidelines published by:

- the European Union (EU);
- the Organisation for Economic Cooperation and Development (OECD);
- the United Nations (UN).

Standard Ethics uses an analyst-driven rating process, meaning the analysis performed does not require applicants to fill out forms and questionnaires or to provide any documents other than those already available and that Standard Ethics does not use artificial intelligence or software either in data analysis or in decision-making.

## SE ANALYSIS UNIT

According to the methodology, guidelines and procedures of Standard Ethics, the Analysis Unit working on this rating has carefully analysed the following areas based on the set-up of the Client (the areas have been divided into about 220 analysis points):

1. MARKET AND COMPETITORS (13 analysis points)
2. MARKET AND DOMINANT POSITIONS (10 analysis points)
3. CONTRACTS, FINANCING AND PUBLIC AID (7 analysis points)
4. MARKET DISTORTIONS, FAVOURITISM & CORRUPTION (8 analysis points)
5. OWNERSHIP, SHARE CAPITAL AND SHAREHOLDERS (8 analysis points)
6. INTERNAL VOLUNTARY RULES ON DIRECTORS (8 analysis points)
7. INDEPENDENCE AND CONFLICTS OF INTEREST (12 analysis points)
8. PROTECTION OF NON-CONTROLLING (MINORITY) SHAREHOLDERS AND APPOINTMENT OF DIRECTORS (7 analysis points)
9. COMMUNICATION, INFORMATION AND TRANSPARENCY (5 analysis points)
10. TRANSPARENCY OF BOARD OF DIRECTORS AND EXECUTIVE GROUPS (9 analysis points)
11. INTERNAL VOLUNTARY RULES ON MANAGEMENT (10 analysis points)
12. DIRECTORS AND CONFLICTS OF INTEREST (13 analysis points)
13. DISCLOSURE AND TRANSPARENCY (22 analysis points)
14. PARTICIPATING AND VOTING IN GENERAL SHAREHOLDERS' MEETINGS (5 analysis points)
15. HIRING POLICIES AND HUMAN RESOURCE MANAGEMENT (11 analysis points)
16. HEALTH AND SAFETY IN THE WORKPLACE (16 analysis points)
17. ADAPTING TO CHANGES (6 analysis points)
18. ENVIRONMENT (17 analysis points)
19. CONSUMERS AND QUALITY (9 analysis points)
20. SCIENCE AND TECHNOLOGY (4 analysis points)
21. LOCAL COMMUNITIES (3 analysis points)
22. BUSINESS PARTNERS (9 analysis points)
23. HUMAN RIGHTS (6 analysis points)
24. EUROPEAN STRATEGIES (2 analysis points)

RESEARCH OFFICE AND RATING COMMITTEE

The Research Office compiles a Final Report and issues a rating based on its review of the work of the Analysis Unit.  
 The Rating Committee analyses the conformity of the collected data and the ensuing conclusions and it approves the issued rating.  
 Chinese Walls between the Analysis Unit, the Research Office, the Rating Committee and all other company offices ensure maximum transparency. A Compliance Officer oversees all steps and processes.

S.E. ALGORITHM OF SUSTAINABILITY ©

Standard Ethics has developed a **proprietary algorithm** based on five “standards” and a premium variable - “k” - to process the data provided by the Analysis Unit ( $F_{CEU}$ ;  $Sa_{EU-OECD}$ ;  $Mw$ ;  $Id_{EU-OECD}$ ;  $Cg_{UN-OECD-EU}$ ). The balance between the five "standards" is the final pre-assessment underlying the rating.

**$F_{CEU}$  = Fair competition.** Main areas: Fair competition, including analysis of dominant positions, market distortions, cartels. Factors that can affect the other variables (Sources: the EU, and the main OECD regulators).

**$Sa_{EU-OECD}$  = Shareholders’ agreements.** Main areas: Shareholders’ agreements, rights of minority shareholders, access to information (Sources: the EU and OECD, and the main OECD regulators).

**$Mw$  = Market weight.** Main areas: Shareholding structure, weight and type of major shareholders, potential conflicts of interest in relation to other variables (Sources: mainly OECD regulators).

**$Id_{EU-OECD}$  = Independent directorship.** Main areas: Structure and quality of boards and executive groups, ESG Risk and Control Management system, Risk Analysis. This standard is most likely to mitigate the risks associated with other variables and can increase the "k" variable. (Sources: the EU and the OECD).

**$Cg_{UN-OECD-EU}$  = Corporate Governance and Sustainability.** Main areas: Overall assessment of applicant’s ESG strategies and corporate governance (in terms of shareholding structure and sustainability) by weighting the various elements also in relation to the balance of the other variables (Sources: the EU, OECD and UN).

**k = Sustainability at Risk (SaR).** Statistical projections:

©
$\frac{(F_{CEU} + Sa_{EU-OECD} + Id_{EU-OECD} + Mw * f(Sa_{EU-OECD}) * f(Id_{EU-OECD}) + Cg_{UN-OECD-EU} * f(F_{CEU}) * f(Id_{EU-OECD}))}{10} + k$

ISSUED RATING

Corporate Standard Ethics Rating [<sup>corp</sup>SER]: **EE-**  
Long Term Expected <sup>corp</sup>SER [4y to 5y]: **EE+**

ALGORITHM – INPUT  
VALUES (**SUMMARY**)

The values for each standard are between **0 and 2**.  
Assigned and input values are as follows:

**Fc**<sub>EU</sub> = 1.9

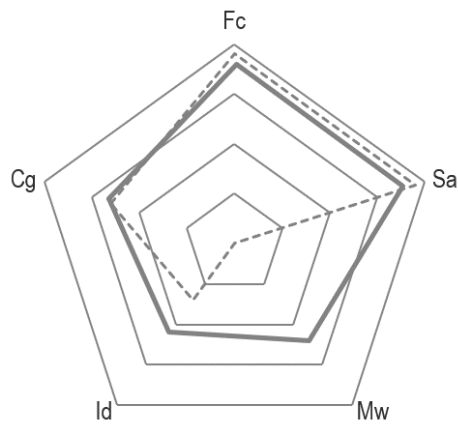
**Sa**<sub>EU-OECD</sub> = 1.9

**Mw** = 0

**Id**<sub>EU-OECD</sub> = 0.7

**Cg**<sub>UN-OECD-EU</sub> = 1.3

The values are subsequently adjusted by the algorithm.  
See final diagram below:





## CENTOTRENTA SERVICING REPORT

### 1. MARKET AND DOMINANT POSITIONS

Centotrenta Servicing performs all the servicing functions connected to the management of securitisation transactions. It is active on the Italian market. It has played different roles in over 200 transactions. Centotrenta Servicing is a financial intermediary acting exclusively in the provision of services and is not normally involved in the commercial stages of the sale of receivables and the notes issued: rather, it plays the role of “Guarantor” in the execution of the processes.

The Company was originally a family-owned firm and this connotation has contributed to ensuring an adequate corporate management, good strategic continuity and control over transactions. In recent years, the Company has extended its relations to cover a broader range of stakeholders. Although it does not yet undertake a proper ESG reporting procedure, it has begun to test and implement social impact programmes and has adopted corporate policies and procedures of an ethical nature.

At present Centotrenta Servicing is implementing a process aimed at improving its corporate governance, its risk management, its reporting procedures and all its policies, to bring them in line with sustainability strategies.

### 2. PUBLIC CONTRACTS, FUNDING AND AID

The Company does not appear to have received any significant amount of public aid, nothing capable of giving rise to distortions of free competition.

### 3. MARKET DISTORTIONS, FAVOURITISMS AND CORRUPTION

The Company does not supply public utility services.

Its Code of Ethics<sup>3</sup> contains provisions on respecting the rights of individual persons, including on avoiding **favouritism**.<sup>4</sup> Furthermore, the Code of Ethics contains clear references to the Global Compact, to the OECD Guidelines and to the United Nations Principles on **Combating Corruption**.<sup>5</sup>

The Company has not adopted any voluntary measures – beyond that which is required by law – on issues relating to tax avoidance or aggressive tax policies.<sup>6</sup>

In line with other aspects that are well regulated by Italian laws,<sup>7</sup> Centotrenta has also introduced its own specific **Regulation** governing the process of reporting violations (“**Whistleblowing**”).<sup>8</sup>

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<sup>3</sup> In compliance with national Law no. 231/2001, regulating the administrative liability of legal persons, companies and associations, pursuant to Article 11 of Law no. 300, dated 29 September 2000, which transposed and implemented the following international laws in compliance with **Article K.3 of the Treaty on European Union**: Convention on the Protection of the European Communities' Financial Interests (PFI Convention, Brussels 26 July 1995); Protocol on the interpretation by the Court of Justice of the European Communities (Brussels, 29 November 1996); Convention on the fight against corruption (Brussels, 26 May 1997); OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (Paris, 17 December 1997).

<sup>4</sup> Source: Code of Ethics 2015, page 10.

<sup>5</sup> Source: Code of Ethics 2015, page 6.

<sup>6</sup> The Special-Purpose Vehicles (SPV) used by the Company are – to all intents and purposes – tax-neutral.

<sup>7</sup> Procedures relating to whistleblowing are addressed in national legislation by Law no. 179, dated 30 November 2017 (“Provisions for the protection of persons reporting crimes or infringements that they have become aware of while employed in a public or private setting”) and have been “imported” into the protocols making up the Models implemented pursuant to Legislative Decree no. 231/2001. This law addresses the fight against corruption by regulating a fundamental aspect: the protection of person(s) reporting the breach. The issue of whistleblowing was addressed by the European Commission in 2018, following the campaign to collect comments and suggestions from public opinion that ended on 29 May 2018. The European Union’s fundamental act is Directive 2019/1937, dated 23 October 2019, aimed at providing protection for persons reporting breaches of Union law. The Directive entered into force on 16 December 2019 and must be transposed by Member States by 17 December 2021. In Italy it is the task of the Government to implement this Directive, in compliance with the criteria and principles established by Article 23 of Law no. 53, dated 22 April 2021, delegating to the government the duties of transposing European directives. It is therefore to be expected that the Italian legislation will be revised over the next few months.

<sup>8</sup> Source: Regulation on reporting violations (“Whistleblowing”), pages 3 ff.

4. VOLUNTARY  
INTERNAL RULES ON  
OWNERSHIP

The Company's **share capital** amounts to € **3,000,000** and is divided into **3,000,000 shares**, with a nominal value of € 1 each. **Centotrenta Management S.r.l.** owns 72.6% of shares; the remainder is held by **Alessandra Boselli** and **Elisabetta Bironi**,<sup>9</sup> with 13.7% each. The share capital of Centotrenta Management S.r.l. is in turn owned – again in identical quantities – by Alessandra Boselli and Elisabetta Bironi.

The Company was originally a family-owned firm.

There are no provisions granting specific rights or obligations for different categories of shareholders, nor are there any plans to introduce any.<sup>10</sup>

5. OWNERSHIP AND  
CONFLICTS OF  
INTEREST

No shareholder is a public authority exercising regulatory powers over the market, nor does any shareholder play a significant role within competing companies operating on the same market.

The Company has adopted a specific **Regulation on Conflicts of Interest**.<sup>11</sup>

6. NON-CONTROLLING  
SHAREHOLDERS  
(MINORITY) PROTECTION  
AND DIRECTORS  
APPOINTMENT

There are no minority shareholders, which justifies the absence of voluntary internal regulations governing and facilitating shareholder participation in ordinary and extraordinary shareholders' General Meetings.

7. VOLUNTARY  
INTERNAL RULES FOR  
DIRECTORS

The Company's **Board of Directors** has 9 members: 8 of them are male<sup>12</sup> and all are Italian citizens.

The Board's composition does not meet the requirement of **gender equality**.

There are 5 **Independent Directors**<sup>13</sup> representing a **majority** on the Board of Directors.

The Company's Code of Ethics complies partially with international strategies: Centotrenta has joined the United Nations Global Compact, thereby endorsing the principles enunciated in the 1948 Universal Declaration; it acknowledges the fundamental Conventions promoted by the ILO and contributes to the fight against corruption, following the OECD Guidelines and the Anti-Corruption Principles promoted by the United Nations.

Over and above its Code of Ethics, the Company has adopted an additional ethical document called the "Dictionary of Value-based Competencies."<sup>14</sup>

<sup>9</sup> Source: Management Report on Financial Statement for year ended on 31 December 2019, page 6.

<sup>10</sup> Source: Financial Statement 2019, page 49.

<sup>11</sup> Source: Regulation on Managing Conflicts of Interest 2020, pages 2 ff.

<sup>12</sup> The following are the current members of the Board of Directors: Crostarosa Guicciardi Giovanni (Chairman); Faragò Raffaele (Managing Director); Bongiorno Mario Luigi Alberto; Cucurachi Paolo Antonio; Venerosi Pesciolini Ranieri; Angelelli Fabrizio Maria; Duso Giambattista; Coggiola Maurizio Luigi; Musile Tanzi Paola. Corporate source.

<sup>13</sup> The independence of the members of the Board of Directors is regulated by Article 22 of the Bylaws, which establishes a maximum (7) and minimum (3) number of independent Directors. From the Bylaws: "A Board member is considered Independent if he/she has not been entrusted with operational functions in the Company, and if he/she, at the same time: a) does not have either a business or a professional relationship, nor is he/she an employee of the financial intermediary, or of other companies having a controlling interest in the financial intermediary, or in any subsidiary of the intermediary, or with the members of the Board who have been entrusted with operational functions; b) is not a kin to any of the members of the Board who are entrusted with operational functions, or to shareholder(s) who are part of the controlling group, and "kin" shall mean spouse who is not legally separated, as well as family relations and kinships up to the fourth degree; c) does not own, directly or indirectly, shares with voting rights amounting to more than 5% of the share capital of the financial intermediary, nor is he/she a party to shareholders' agreements which have either the aim or the effect of exercising control over the intermediary." Source: Bylaws 2018, page 11.

<sup>14</sup> Among the objectives, the following are worthy of mention: "To create value for customers and shareholders, choosing by preference a long-term outlook, rather than a short-term one. We encourage an attitude capable of balancing risk and yield, pursuing a culture aiming at results as well as at containing environmental and social risks. We invest in the most talented human resources to foster sustainable performances." Source: Dictionary of Value-based Competencies" 2020, page 11.

## 8. DIRECTORS, CONFLICTS OF INTEREST AND RELATED COMMITTEES

The members of the Board of Directors observe the principles enunciated in the Code of Ethics, in the Organisation and Control Model (also called Model 231), and in the internal Code of Conduct, as well as in the Company's Bylaws.

In addition to the provisions included summarily in the Code of Ethics,<sup>15</sup> the Company has also adopted a specific **Regulation governing Personal Transactions**.<sup>16</sup>

The Supervisory Body (SB) is appointed by the Board of Directors. The function of the SB has been delegated to the Board of Statutory Auditors.<sup>17</sup> Although not required by law, it is customary for the Risk Management and Compliance departments to attend the meetings of the Board of Directors.<sup>18</sup>

The Board of Directors has not established either a Control Committee or a Risk Management Committee. But the Company has appointed a **Credit Committee**.<sup>19</sup>

No Directors or members of top management are parties to a Shareholders' Agreement.

There are no Board members who are also directors, managers, auditors, or advisors for other companies controlled by shareholders who are involved in national or local government institutions, judiciary bodies, or entities granting licences or supervising the market.

## 9. DISCLOSURE, TRANSPARENCY AND STAKEHOLDERS

Centotrenta has underscored in its Code of Ethics<sup>20</sup> the importance of transparency, as a founding principle within the Company and in its relations with clients.

The Company draws up its Annual Report in compliance with the provisions of the national legislation. The Company has not yet issued a voluntary Non-Financial Statement<sup>21</sup> or any other form of ESG<sup>22</sup> reporting.

There are no explicit references to the **Comply or Explain** principle. The fact that the Company has no obligations towards the market – unlike listed companies which are obliged to comply with national regulations – reduces the significance of this principle.

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<sup>15</sup> Article 22 of the Bylaws gives the following definition, as part of the requirements on the independence of directors: "A Board member is considered Independent if he/she has not been entrusted with operational functions in the Company, and if he/she, at the same time (...) is not a kin to any of the members of the Board who are entrusted with operational functions, or to shareholder(s) who are part of the controlling group, and "kin" shall mean spouse who is not legally separated, as well as family relations and kinships up to the fourth degree (...)." Source: Bylaws 2018, page 11.

<sup>16</sup> Which "describes the rules established by Centotrenta Servicing SpA (...) aimed at regulating the transactions performed by or on behalf of Significant Parties, as personal transactions or in any case unrelated to the activities that those Significant Parties perform on behalf of the Company, assuming that such persons: a) are involved in activities which may give rise to conflicts of interest, or b) have access to privileged information or to other confidential or reserved information relating to clients or transactions with or on behalf of clients in the context of activities performed on behalf of the Company." This regulation identifies the Significant Parties, the Parties which a Significant Party is related to, and the Persons with whom the Significant Party has close ties; and, lastly, it defines the scope of application of the rules governing Personal Transactions. Source: Regulation governing Personal Transactions, pages 2 ff.

<sup>17</sup> The Board of Directors has appointed to the Supervisory Body the following members of the Board of Statutory Auditors: Francesco Balossi - Chairman; Alberto Aldrighetti; Matteo Moretti.

<sup>18</sup> There do not appear to be any formal procedures or policies on this matter.

<sup>19</sup> It was established in February 2018 and has 4 members: (2 Directors, the representative of the vehicle involved and the representative of the investor/special servicer). This Committee's task is to evaluate and monitor the UTP (Unlikely To Pay) positions, in view of possible status changes. Source: Strategic Plan 2021-23, page 16.

<sup>20</sup> Source: Code of Ethics 2015, pages 5 and 7.

<sup>21</sup> There is no obligation for small companies (below a certain threshold), or for companies not listed on the stock exchange, to issue ESG reports.

<sup>22</sup> Environmental, Social and Governance.

At present, the Company does not envisage producing any specific reporting on the **remuneration** of Board members.

#### 10. PARTICIPATION AND VOTE IN GENERAL MEETINGS

The number of shareholders is so small and the ownership structure so straightforward that it has not been necessary to adopt provisions of a voluntary nature to facilitate the General Meeting processes.

#### 11. EMPLOYMENT AND HUMAN RESOURCES SELECTION

On 31 December 2019 the Company had **44 employees**.<sup>23</sup> At the date of writing, the number of employees had increased to **72**.<sup>24</sup>

Centotrenta has implemented a meritocratic corporate welfare system.<sup>25</sup> And has also introduced a **Welfare Plan** for its employees.<sup>26</sup>

The Company's employee selection policies are detailed in the **Staff Regulation**.<sup>27</sup>

#### 12. HEALTH, SAFETY AT WORK AND SOCIAL DIALOGUE

Given its sector of activity – which does not give rise to specific problems relating to accidents in the workplace – Centotrenta has not adopted any measures beyond those which are required by law, and all those provisions appear to be implemented correctly.<sup>28</sup>

The Company provides additional health insurance services to its employees.<sup>29</sup> Furthermore, it has established a complaints office and has adopted a policy on the reporting of any violation of the Company's Code of Ethics.<sup>30</sup>

#### 13. ADAPTATION TO CHANGES

The scope of this matter, which is so central to EU and OECD programmes, is of reduced significance in the case of Centotrenta, given its size and the type and impact of its activities.

#### 14. ENVIRONMENT

Centotrenta has included principles governing conduct in matters relating to the environment in its Code of Ethics.<sup>31</sup>

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<sup>23</sup> 36 white collar employees and 8 middle management. There are no secondary premises. Source: Financial Statement 2019, page 81.

<sup>24</sup> There are 30 male employees and 42 females. Corporate source.

<sup>25</sup> The Human Resources department carries out an internal evaluation aimed at promoting the professional development of employees by organising professional training opportunities. An internal mapping is being drawn up to identify the "best performers" among the employees: they will be given further benefits, over and above the ones in the Welfare Plan. Corporate source.

<sup>26</sup> All employees, including apprentices, enjoy the benefits of the Welfare Plan, which includes a fixed amount (Welfare Account), enabling them to access goods and services, including a strengthening of their health insurance. Source: Corporate Welfare Plan 2020. Furthermore, "(...) the Company has introduced Smart (or Home) Working according to each employee's type of work and specific function." Source: Staff Regulation 2020, pages 10-11.

<sup>27</sup> Source: Staff Regulation 2020, page 15.

<sup>28</sup> FRAREG provides a health monitoring service (medical examinations) for the Company's employees and organizes the training for the Company's Health and Safety Officers. The RSPP (Prevention and Protection Service Officer) is Dr. Matteo Balani, not a Company employee. The RLS (Health and Safety Officer) is Davide De Simone. The Company also has 2 Fire Prevention Officers and 2 First Aid Officers. Corporate source.

<sup>29</sup> The Company has a Plan for the reimbursement of medical expenses and a specific Plan to support those requiring organ transplantation procedures. Source: Corporate Welfare Plan 2020, pages 4 ff.

<sup>30</sup> Source: Code of Ethics 2015, page 15.

<sup>31</sup> Source: Code of Ethics 2015, page 13.

The Company has also implemented a certain number of initiatives aimed at reducing waste and improving energy efficiency on its premises.<sup>32</sup> It is also planning on introducing automation and dematerialization processes to its operations.<sup>33</sup>

#### 15. CONSUMERS AND QUALITY

The issue of ensuring protection of clients and investors is addressed in the Code of Ethics.<sup>34</sup>

The Company does not provide services of public utility. Among the services that it does provide, however, the Company does handle the securitisation of receivables from the Public Administration (**Healthcare Receivables**), and the special characteristics, social impact and critical elements do appear to be monitored.<sup>35</sup>

Centotrenta has launched a programme of **social securitisation** with innovative contents.<sup>36</sup>

Centotrenta has a complaints unit and a policy on handling complaints.<sup>37</sup>

#### 16. SCIENCE AND TECHNOLOGY

The Company has adopted a specific IT Strategy and is currently testing a procedure based on blockchain technology.

#### 17. LOCAL COMMUNITIES

All donations are accounted for in detail and reported. The process does not require the Company to describe the motivations underpinning the donation.

Interactions with the local community have been launched in relation to the above-mentioned “social securitisation” processes.<sup>38</sup>

#### 18. BUSINESS PARTNERS

Both the principles and rules of conduct in the Code of Ethics extend to all subjects entertaining relations with the Company.

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<sup>32</sup> The Company is working towards the implementation of a Plan to promote full awareness of the need to reduce consumption in general, including as relates to office equipment (personal computers, printers, servers, etc.) and the use of energy for hot and cold air conditioning. Corporate source.

<sup>33</sup> The Company has launched the HyperMast STS system, developed in partnership with IBM: this is currently still at the experimental stage. Source: IBM – Press Release, 20.02.2020.

<sup>34</sup> Source: Code of Ethics 2015, page 7. Furthermore: (...) “The relationship of trust we have installed with our clients and investors is founded on our fully transparent communication strategy, which makes it easy to understand the services offered in all their specificity: those services are also detailed in our clearly comprehensible contractual documentation and an easy-to-use website.” Source: Centotrenta Servicing Brochure 2019.

In view of the future automation of the Company’s business operations, and because of the vast amount of data which need to be processed in the most effective manner, as is called for by the securitisation market, Centotrenta has adopted the Sada Engine technology. Sada Engine is a cutting-edge solution, to satisfy the needs of clients.

<sup>35</sup> Centotrenta performs an essential role, guaranteeing the correct execution of transactions. (...) “Some companies have ruled out -- or at any rate severely limited -- their handling of this asset class, since it can lead to significant reputational risks. (...) Centotrenta has decided to stay in this asset class of Public Administration receivables but does so implementing all the strategies listed above, so as to manage risks most effectively, excluding however the option of playing the role of Arranger in these transactions, where it accepts only legal and/or financial roles.” Source: Communication on Health Receivables, 4 March 2021. The Company also recognizes the positive social impact that is generated by the management of this asset class.

<sup>36</sup> The project SNOWDROP (Fondo Salva Casa, a home-saving fund), launched in 2010, can be characterised as a Social Impact Bond: it offers an innovative solution to financial indebtedness. The programme’s Roadmap is organized in three stages: establishment of the Salva Casa SPV and Salva Casa ROECO; drafting of agreement between parties; securitisation. The project is addressed to a variety of subjects, including Social Housing Foundations, institutional investors, consumers’ associations and social promotion charities, banks, families, and businesses. “The project’s mission is to function as a social shock absorber that yields an income, a very balanced protection for all stakeholders. Its primary – but not only – mission is to handle receivables deriving from loans granted for the purchase of a family’s first home.” Source: Snowdrop Structured Memo, pages 2 ff.

<sup>37</sup> Source: Complaints Procedure P11, Complaints Management.

<sup>38</sup> This project has been examined with considerable interest by the Catholic University, Milan, by AMCO and the Cariplo Foundation, which has suggested that it may qualify as an “innovative social housing” project. In relation to this, Centotrenta Servicing will join the Association Social Impact Finance which has been promoting “social” transactions since 2010. Source: Strategic Plan 2021-23, page 47.

The Company's business transactions involve complicated and sensitive interactions with other entities and suppliers of different kinds, including firms engaged in recovery of receivables or in payment of services, as well as performing other functions linked to the correct execution of the transactions.

There are no special policies on ESG matters in the Company's relations to its supply chain.

#### 19. HUMAN RIGHTS

Matters relating to human rights are addressed in the Code of Ethics and in the Guidelines on Matters relating to Corporate Social Responsibility (CSR), with explicit reference to the principles enshrined in the UN's **Universal Declaration of Human Rights** and in the ILO Conventions.<sup>39</sup>

#### 20. EUROPEAN STRATEGIES

The issue of human rights is addressed in the Code of Ethics, where there is an explicit reference to the principles enunciated in the United Nations **Universal Declaration of Human Rights** and in the ILO Conventions.<sup>40</sup>

#### 21. CONCLUSIONS

Centotrenta Servicing performs all the servicing functions connected to the management of securitisation transactions. It is active on the Italian market. It has played different roles in over 200 transactions. Centotrenta Servicing is a financial intermediary acting exclusively in the provision of services and is not normally involved in the commercial stages of the sale of receivables and the notes issued: rather, it plays the role of "Guarantor" in the execution of the processes.

The Company was originally a family-owned firm and this connotation has contributed to ensuring an adequate corporate management, good strategic continuity and control over transactions. In recent years, the Company has extended its relations to cover a broader range of stakeholders. Although it does not yet undertake a proper ESG reporting procedure, it has begun to test and implement social impact programmes and has adopted corporate policies and procedures of an ethical nature.

At present Centotrenta Servicing is implementing a process aimed at improving its corporate governance, its risk management, its reporting procedures and all its policies, to bring them in line with sustainability strategies.

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<sup>39</sup> Furthermore, the Company has included the issue of human rights in its materiality matrix and has undertaken to contribute to raising awareness on "*promoting initiatives that best respond to the dissemination of practices aimed at respecting these internationally recognised rights, particularly avoiding relationships with subjects who may be implicated in violations of these rights.*" Lastly, the Company has adopted internal provisions on relationships with the supply chain, requiring all business partners to acknowledge the importance of safeguarding human rights by adopting formal regulations and policies, by committing to support and raise awareness on these issues throughout the supply chain. Source: Code of Ethics 2020, pages 4-5.

<sup>40</sup> Source: Code of Ethics 2015, page 6.

## SOURCES

*Where there are no dates,  
the most recent  
versions prevail*

The documents that have been consulted were published by the Client before the delivery of the guidelines.

The main sources are: Internal Code of Conduct, Financial Statements, ESG Reporting; Report on Corporate Governance and Company Ownership; Articles of Association; Bylaw Italian Legislative Decree 231/2001; Internal Regulations; Minutes of the Meetings of the Board of Directors with amendments to the Articles of Association; Regulations of the Shareholders' Meetings; Minutes of Shareholders' Meetings, Notices of Meetings and related explanatory reports; Various procedures including "related party transactions" and "Internal Dealing"; Documents on remuneration, qualitative and quantitative composition of top management bodies and sustainability strategies (at Group level too). Data and information given during meetings with internal functions were also used.

## Other sources

Moreover, documents supplied by national and international regulatory bodies, the national stock exchange and independent sites.





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