

Standard Ethics Ltd (SE) is a Self-Regulated Sustainability Rating Agency 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

Although there is no urgency in **providing an ESG** (Environment, Social, Governance) report due to the Company’s low environmental impact and limited social impact, **Centotrenta has developed a sustainability strategy in line with international guidelines**. It is focused on governance and risk management. In 2022 the Company also aligned governance tools, like the Code of Ethics, some company welfare aspects and some management areas to its sustainability strategy.

The Company is not listed on the stock exchange and therefore there are no details on minority shareholders. However, Centotrenta has formally adopted the principle of Comply-or-Explain and provides adequate disclosure about its organization.

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 (FcEU; SaEU-OECD; Mw; IdEU-OECD; CgUN-OECD-EU). The balance between the five "standards" is the final pre-assessment underlying the rating.

FcEU = Fair competition.

SaEU-OECD = Shareholders’ agreements.

Mw = Market weight.

IdEU-OECD = Independent directorship.

CgUN-OECD-EU = Corporate Governance and Sustainability.

k = Sustainability at Risk (SaR).

Centotrenta does not provide public utility services. In compliance with Italian laws, the Company **has put in place a whistleblowing and reporting management policy**, which also includes the reporting of potential wrongdoings. In addition, the risk of bribery has been identified and sufficiently addressed in the Company’s Organisation, Management and Control Model.

The Company’s Code of Ethics addresses the issue of favouritism. Taxation complies with applicable laws.

The Code of Ethics, which was reviewed in 2022, is aligned with EU and international Sustainability strategies. In the Code the Company makes explicit reference to the Global Compact principles, to the Universal Declaration on Human Rights and incorporates the Sustainability principles defined in the ILO, OECD and UN Conventions. In addition to the Code of Ethics **the Company has adopted an ethical guidance document called the “130 Dictionary of Value-based Competencies”**. The members of the Board act in accordance with the principles set out in the Code of Ethics, the main tool containing voluntary ethical and behavioural standards, in Model 231 and in the internal Code of Conduct as well as with the powers assigned to them by the Articles of Association. The Company’s Board of Directors has 9 members and they are all Italian citizens.



Centotrenta Servicing S.p.A.
Sede Legale: Via San Prospero, 4 – 20121 Milano

Codice fiscale, Partita IVA e n. di iscrizione al Registro Imprese di Milano 07524870966
Capitale Sociale euro 7.000.000 (interamente versato)
Tel. 02.45472239 Fax 02.72022410
Indirizzo PEC: 130servicing@legalmail.it - E-mail: info@130servicing.com
Iscritta all’Albo Unico degli Intermediari Finanziari con il n. 13

Centotrenta aims to play a significant role in the green securitisation market. The Company has recently adopted measures in this respect.

As already mentioned, the protection of human rights with reference to the United Nations Sustainable Development Goals (SDGs) is expressly addressed in the Code of Ethics. In addition, it makes explicit reference to the principles set out in the United Nations Universal Declaration of Human Rights and in the ILO Conventions.

Centotrenta Servicing performs all the servicing functions relating to the management of securitisation transactions. It operates on the Italian market and is subject to supervision. **Centotrenta has been, and is, involved in a variety of roles in many securitisation transactions and is an important player at national level. Although there is no urgency in providing an ESG (Environment, Social, Governance) report due to the Company's low environmental impact and limited social impact, Centotrenta has developed a sustainability strategy in line with international guidelines.** It is focused on governance and risk management. In 2022 the Company also aligned governance tools, like the Code of Ethics, some company welfare aspects and some management areas to its sustainability strategy. The Company is not listed on the stock exchange and therefore there are no details on minority shareholders. However, Centotrenta has formally adopted the principle of Comply-or-Explain and provides adequate disclosure about its organisation.



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