

**E.S.TR.A. S.p.A.**

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Economic and Administrative Index no. 0505831

**2022 SUSTAINABILITY REPORT**  
**CONSOLIDATED NON-FINANCIAL STATEMENT 2022**  
pursuant to Articles 3 and 4 of Italian Legislative Decree no. 254 of 2016

**OFFICERS**

**Board of Directors**

*Chairperson and CEO* Alessandro Piazzi

*Director and General Manager* Paolo Abati

*Director* Giovanni Grazzini

*Director* Roberta De Francesco

*Deputy Director* Anna Scrosta

**Board of Statutory Auditors**

*Chairperson* Rita Pelagotti

*Statutory Auditor* Alessandro Mannelli

*Statutory Auditor* Michele Pietrucci

**Independent Auditors**

EY S.p.A.

**CONSOLIDATED NON-FINANCIAL STATEMENT 2022**  
pursuant to Articles 3 and 4 of Italian Legislative Decree no. 254 of 2016

Letter to Stakeholders.....	5
<b>1. The Group .....</b>	<b>6</b>
<b>1.1 History .....</b>	<b>6</b>
1.2. Vision and Values of the Estra Group.....	8
1.3 Strategic guidelines .....	8
1.4 Organisational model.....	10
<b>2. Stakeholders and Value created by the Group .....</b>	<b>13</b>
2.1 Targets and results.....	13
2.2. Introduction .....	13
2.3 Stakeholders and Stakeholder Engagement .....	14
2.4 Materiality Analysis and SDGs.....	16
2.5 Value generated and distributed .....	27
2.6 Investments .....	28
2.7 Innovation, research and development .....	28
2.8 The European Taxonomy .....	31
<b>3. Governance.....</b>	<b>44</b>
3.1 Targets and results.....	44
3.2 Corporate Governance and Control Boards.....	45
3.3 Responsible business management .....	50
3.4 Certifications.....	57
3.5 Risk management .....	58
<b>4. The Environment .....</b>	<b>65</b>
4.1 Targets and results.....	65
4.2 Environmental policy .....	68
4.3 Energy Consumption.....	69
4.3.1 Methane consumption .....	69
4.3.2 Electricity consumption .....	71
4.3.3 Vehicle consumption .....	73
4.4 NOx and PM10 emissions produced .....	74
4.5 Waste generated .....	75
4.6 Environmental mitigation .....	76
4.6.1 Energy efficiency of offices .....	77

4.6.2 Electric mobility .....	77
4.6.3 Replacement of asbestos roofing .....	77
4.7 Energy production from renewable sources .....	77
4.8 Energy production from non-renewable sources .....	80
4.9 Self-consumption of electricity from renewable sources .....	81
4.10 Energy efficiency .....	81
4.11 CO <sub>2</sub> emissions .....	82
4.11.1 Emissions produced .....	82
4.11.2 Emissions avoided .....	83
<b>5. Our people .....</b>	<b>85</b>
5.1 Targets and results .....	85
5.2 Responsible HR management .....	87
5.2.1 Employment .....	87
5.2.2 Protected categories .....	91
5.2.3 Contracts and remuneration .....	92
5.2.4. New hires and terminations .....	94
5.3 Employee well-being .....	98
5.3.1 Diversity and equal opportunities .....	98
5.3.2 Work-life balance .....	101
5.3.3. Welfare .....	102
5.3.4. Internal communications .....	103
5.4 The development of human capital .....	104
5.4.1. Skills development and enhancement of human capital .....	104
5.4.2. Internships .....	107
5.5 Workers' rights and protections .....	108
5.5.1 Employee participation and consultation on occupational health and safety .....	109
5.5.2. Employee health .....	110
5.5.3. Occupational accidents .....	111
5.5.3 Freedom of Association .....	114
<b>6. Customers and the Community .....</b>	<b>115</b>
6.1 Targets and results .....	115
6.2 Relations with customers .....	116
6.2.1 Our customers in figures .....	117
6.2.2 Privacy .....	120
6.2.3 Social bonus and instalments .....	121
6.2.4 Online utility bills, customer area and app .....	122

6.3 Quality, security and service continuity .....	123
6.3.1 Customers served in branch and by call centres .....	123
6.3.3 Complaints and queries .....	125
6.3.4 Settlements.....	127
6.3.5 Disputes with customers .....	127
6.3.6 Quality of the gas distribution service .....	128
6.3.6.1 Standards.....	128
6.3.6.2 Inspections.....	131
6.4 Relations with institutions, the community and the region .....	132
6.4.1 Dialogue with local and national institutions .....	133
6.4.2 Local community development initiatives .....	133
<b>7. Suppliers.....</b>	<b>140</b>
7.1. Targets and results .....	140
7.2 Sustainable supply chain management.....	141
7.2.1. Supplier assessment and monitoring.....	141
7.2.2 Supplier Register .....	143
7.2.3 Tender procedures .....	145
7.3 Value of supplies .....	148
7.3.1 Our suppliers in figures.....	148
7.3.2 Contracts and procurements .....	151
<b>Note on methodology.....</b>	<b>153</b>
<b>GRI Content Index .....</b>	<b>157</b>

## Letter to Stakeholders

The war in Ukraine, which began in February 2022 and has yet to come to an end, has negatively impacted sustainability in at least two ways. Firstly, it shifted Europe's attention from the climate crisis to the war, and secondly, it led to the sharp and, at times, unchecked rise in energy prices, with serious financial consequences for businesses and households alike.

The National Recovery and Resilience Plan (NRRP), through which the Italian Government intends to manage the funds of the NextGenerationEU instrument, appears to be progressing more slowly than initially planned. From our side, the NRRP Work Group began working in 2022, with the principle purpose of identifying and seizing the funding opportunities that the NRRP presented.

The Estra Group's strategy to promote sustainable development is embodied in our 2023-2027 Strategic Plan and is built on three long-term strategies (Sustainability, Digital and Human).

The Estra Group aims to align its economic targets with social and environmental objectives in the regions in which it operates.

The Sustainability dimension focuses on targets on decarbonisation, the increased use of renewable energy and infrastructure resilience, with a view to reducing CO<sub>2</sub> emissions.

For the Estra Group, technological and digital evolution is essential to strengthening the Group's sustainable economic model.

Meanwhile, the Human dimension aims to promote and enhance human capital by combining employee well-being with excellent performance.

These trajectories intersect with eight of the seventeen Sustainable Development Goals (SDGs) approved by the United Nations aimed to be achieved by 2030. These eight SDGs are illustrated in our 2023-2027 Strategic Plan and range from Affordable and clean energy (Goal 7) and Industry, innovation and infrastructure (Goal 9) to Climate Action (Goal 13) and Decent work and economic growth (Goal 8).

It is no coincidence that the directly generated and distributed economic value for employees in 2022 increased from €41.8 million to €46.6 million thanks to the recruitment of new resources during the year. The Group's supply data also illustrates how the Estra Group is connected to its local region and the opportunities that it offers. In 2022, 60.3% of Italian supplies were sourced from suppliers in Central Italy, the region in which the Estra Group was founded and has developed over the years. These increased from €151 million in 2021 to €194.8 million in 2022.

We know that to confront the environmental and social challenges before us, we need to pool the resources and capacities of the Estra Group with those of local businesses operating in the regions we serve.

General Manager  
Paolo Abati

# 1. The Group

## 1.1 History

Estra S.p.A. was established in 2009 through the merger of three public utility companies: Consiag di Prato, Coingas di Arezzo and Intesa di Siena. At the end of 2017 the company Viva Energia di Ancona also joined the Group.

The Estra Group, which serves 759,761 gas and electricity customers and generated a total consolidated revenue of € 1,766,057 million in 2022, is one of the leading energy operators in Italy, with a particularly significant presence in Central Italy. The Group predominantly operates in Tuscany, Marche, Umbria, Abruzzo, Molise, Campania, Calabria and Apulia.

On 31 March 2022, Estra S.p.A. acquired a 75% stake in Bisenzio Ambiente S.r.l., a special waste management company.

Bisenzio Ambiente owns a treatment facility for hazardous and non-hazardous special waste in the form of liquid and pumpable sludge, located in the municipality of Campi Bisenzio in the province of Florence. The facility occupies an area of 5,000 square metres, can process 186,000 tonnes of liquid waste per year at full capacity, and has a total storage capacity for incoming waste of 1505 cubic metres.

On 14 September 2022, Estra S.p.A. finalised the 100% acquisition of Ecocentro Toscana S.r.l., a non-hazardous waste treatment and recovery company.

Ecocentro Toscana S.r.l. owns a facility located in Montemurlo, in the province of Prato, which specialises in the treatment and recovery of waste from street sweeping, sewage cleaning and desanding processes. The plant is highly specialised and uses exclusive technology: in fact, there are only 17 plants that specialise in the treatment of street sweeping waste.

The two acquisitions are in line with the Estra Group's strategic plan, consolidating the Group's position in the various phases of the integrated waste supply chain and following on from the previous acquisitions of Ecolat S.r.l. and Ecos S.r.l.

The information contained in the NFS refers to the companies consolidated on a line-by-line basis considered in the Consolidated Financial Statements of the Group as at 31 December 2022, not including Ecocentro Toscana, a small company which was acquired three months prior to the end of 2022. Data for the Company will be reported from the next financial year.

The Estra Group, with registered offices in Prato, operates in various sectors including:

- supply and sale of natural gas and electricity;
- natural gas distribution;
- technical and operational management of telecommunications networks and marketing of the relative services;
- provision and exploitation of plants producing energy from renewable sources with particular reference to solar and biomass sources;
- design, installation and management of energy efficiency plants for businesses, apartment buildings and individual dwellings;
- treatment of solid and liquid, hazardous and non-hazardous waste;
- marketing of liquid propane gas.

To manage its activities, the Estra Group procures raw materials, goods and services from specific suppliers and monitors the quality of the services provided, generating significant indirect impacts on the local region. Depending on the specific processes in place, the internal organisation of the various Group Companies guarantees that the services provided by suppliers are executed correctly, or otherwise operates directly to provide a given service to the end customer. Group companies conduct several operating activities aimed at the supply of goods or services to the end customer, which vary according to the type of company.

The strategic planning process examines the most significant activities to gain an understanding of the costs and revenues to ensure that the long-term profitability of the companies is not affected.

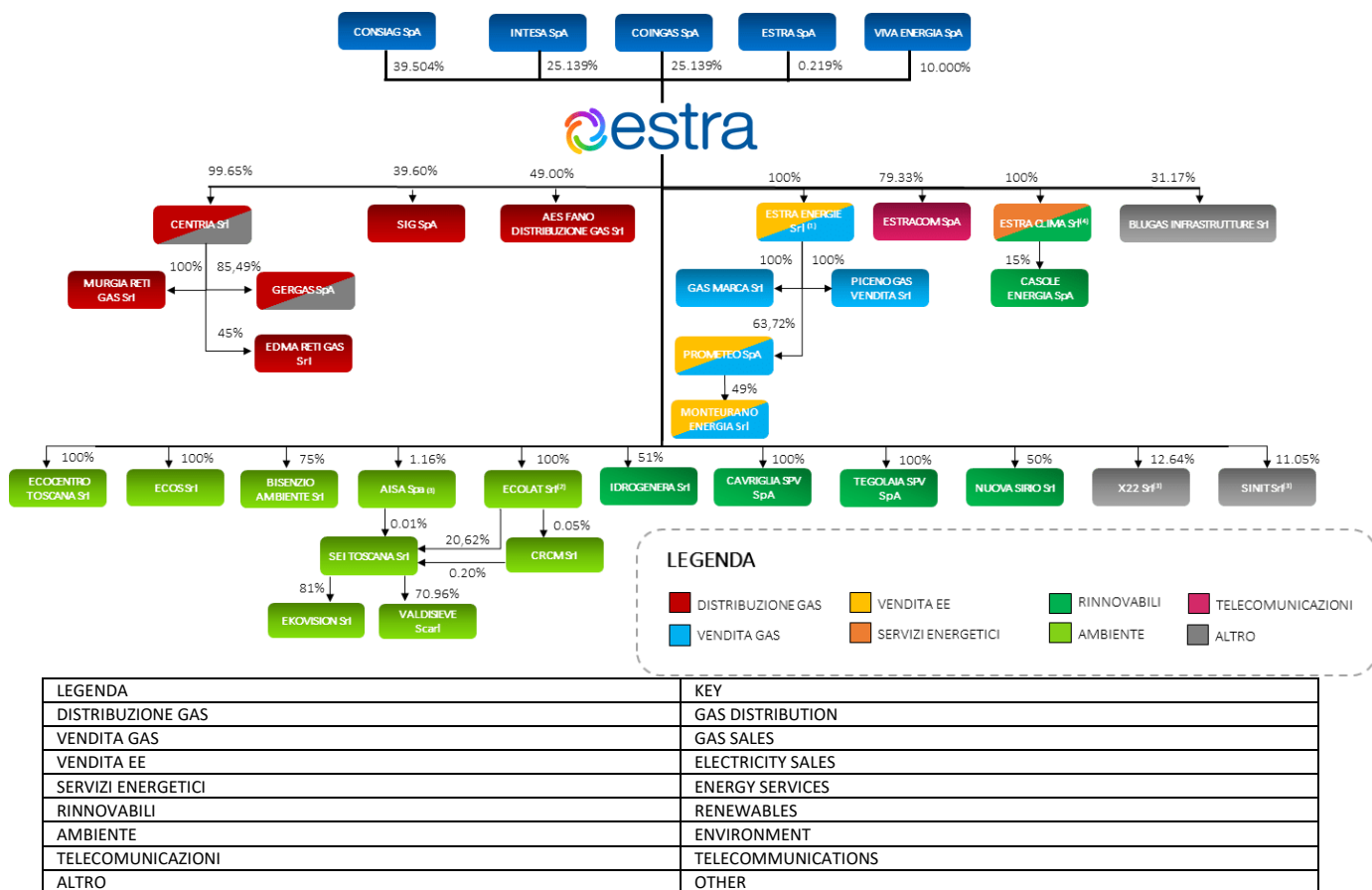
The Group aims to improve the quality of life of the citizens and businesses that live and operate in its regions of operation by providing essential services.

The goal of the business model is to make a tangible contribution to the achievement of 8 of the 17 Sustainable Development Goals of the UN 2030 Agenda.

Economic resources, the expertise of its employees and strategic initiatives are the assets that enable the Group to conduct its activities in line with its Strategic Plan and the UN Agenda, and to generate value over time.

Estra S.p.A. carries out various activities on behalf of the Group companies, such as strategic planning and organisation, financial planning and budgeting, the definition of marketing objectives and policies, disclosure and corporate reports, marketing of products/services, HR management policies, IT systems, coordination between business sectors, business management planning and control, and the definition and communication of sustainability topics.

The structure of the Estra Group as at 31 December 2022 is shown below, indicating the relevant holdings.



#### Notes:

Updated in December 2022

(1) Estra Energie holds a stake in Banca Popolare delle Province Molisane Scarl

(2) Ecolat invests in Cons.Eco

(3) Company currently in liquidation: X22 Srl, SINIT Srl, Aisa Spa

(4) Estra Clima invests in Città Metropolitana di Venezia I Smart City Srl and Città Metropolitana di Venezia II Smart City Srl

## 1.2. Vision and Values of the Estra Group

*Stay close, go far. We want to seize the challenges of a transitioning world and transform utilities into accessible and sustainable services. We want to grow by being a daily presence in the lives of people and businesses, helping communities to develop and exploring new horizons.*

This is Estra's vision and is founded on the Group's values:

### **Proximity**

We are an authentic presence in people's lives, removing the distances between us. Our relationships define who we are: "being part of" the local community is the corporate model that identifies us. Growth is the key to our role and the value that we can bring to the communities we belong to.

### **Sustainability**

We are aware that the value fed into a community doesn't disperse: it multiplies. Therefore, we focus all of our actions in the knowledge that we have to help to maintain the natural heritage for future generations. We are a credible development factor for communities because we support activities and passions that contribute to social and economic growth.

### **Accessibility**

Our services are available 24/7 and enable us to create simple and accessible opportunities. We are constantly developing the services of the future, promoting progress and growth, seeing and accepting every person as an opportunity to pursue the common good.

### **Empathy**

We recognise our connection with people, helping us to understand and assist them in the best possible way. We transform our guiding principles and intentions into real opportunities, focusing on what really matters and can make a difference. We talk to people in accessible, informal language which is naturally frank and open.

### **Care**

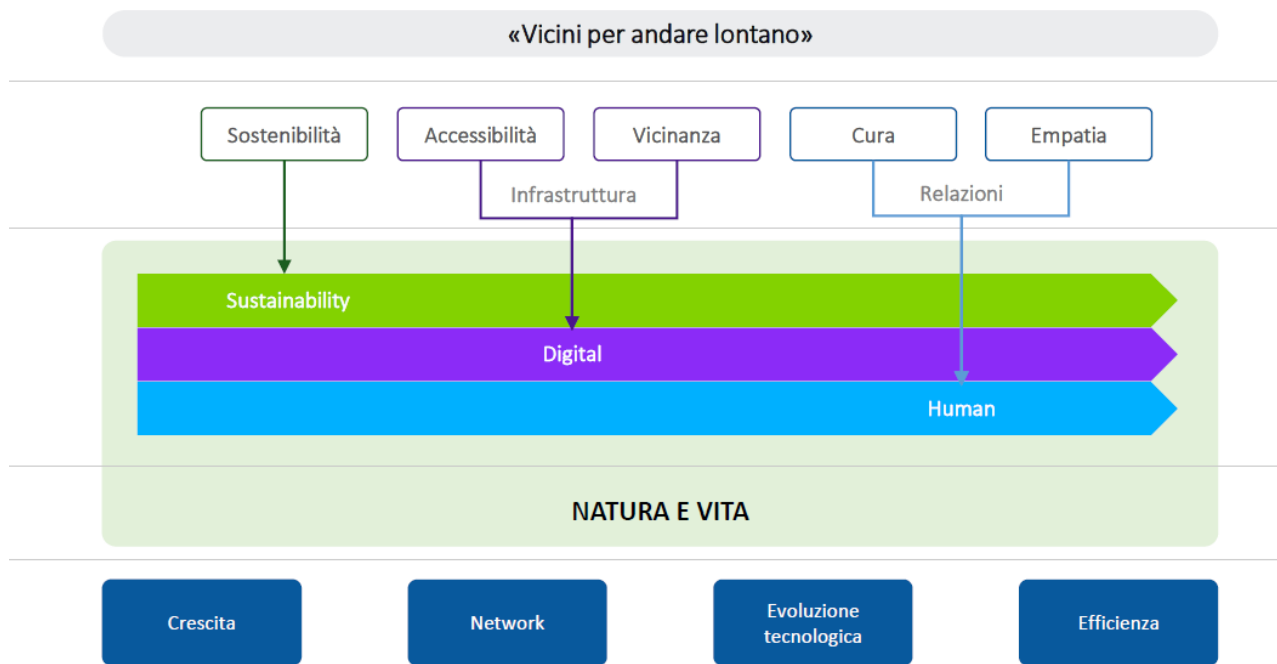
We make a difference by promoting and protecting people's peace of mind, providing primary services and building trust. We are committed to learning and understanding the everyday needs and diverse requirements of people in order to maintain long-lasting relationships. To do this, it is essential to interact with each individual and respond to them with determination and commitment every day.

## 1.3 Strategic guidelines

The 2023-2027 Strategic Plan revolves around three long-term strategies (Sustainability, Digital and Human) imbued with the Group's Values, and is structured into four strategic pillars:

- Growth
- Technological evolution
- Network
- Efficiency





“Vicini per andare lontano”	“Stay close, go far”
Sostenibilità	Sustainability
Accessibilità	Accessibility
Vicinanza	Proximity
Infrastruttura	Infrastructure
Cura	Care
Empatia	Empathy
Relazioni	Strong Relations
NATURA E VITA	NATURE AND LIFE
Crescita	Growth
Network	Network
Evoluzione tecnologica	Technological evolution
Efficienza	Efficiency

The Estra Group aims to align its economic targets with social and environmental objectives in the regions in which it operates. In fact, the purpose of the strategy is to find the right balance between Nature and Life.

In addition to promoting the circular economy and providing green gas and electricity tariffs, the Group's Sustainability strategy includes activities aimed at improving energy efficiency and reducing consumption, incentivising electric mobility to meet decarbonisation targets, and increasing the use of renewable energy sources. A substantial part of this work involves actions to increase infrastructure resilience to reduce CO<sub>2</sub> emissions.

The Digital strategy is linked to the use of digital technologies to innovate or transform business processes, increasing the competitiveness and efficiency of the corporate model. For Estra, technological and digital transformation is essential to the consolidation of its sustainable economic model, whose strategy extends to the development of cloud, mobile, analytics and big data technology.

The aim of the Human strategy is to forge a link between people inside and outside the organisation, and to promote choices able to simultaneously support the achievement of certain performance levels and guarantee the well-being of the Group's stakeholders, enhancing human capital and thus promoting organisational engagement and individual commitment.

## 1.4 Organisational model

Each Group Company is governed by its own Board of Directors and represented by a Chairperson.

Depending on the specific nature of the company and considering the range of challenges it may be called upon to face, the underlying structural model may be structured in:

- Divisions
- Departments
- Functions
- Activities

The Division comprises multiple Departments and is supervised by a Department Manager, who is responsible for ensuring its continuous interaction and liaison with the General Management of Estra Spa.

The Department is composed of one or more Functions, which are overseen by a single representative who is responsible for:

- the coordination, management and control of activities within the Department;
- providing analyses and proposals concerning the organisation of the workforce in terms of planning and/or in relation to the actual needs of the various departments;
- maintaining functional relations with the Division, with other Departments and with external offices;
- budgeting: preparing the budget, periodic deviation analyses, performance evaluation; - preparing reports for the Division and the Department, planning and control, proposing and implementing any necessary corrective actions, etc.;
- activities related to requests for supplies, works and services from third parties;
- formulating employee training proposals;
- preparing reports for matters within the responsibility of the Board of Directors;
- any other activities they deem necessary to guarantee the proper functioning of the functions under their management.

Functions are the organisational and operating units tasked with delivering services or managing support activities.

In line with the general organisation approach adopted, at this level programmes (or parts of programmes) are developed and implemented through the organisation and coordination of related or complementary technical and professional skills, as well as through the optimal definition of operational procedures.

Departments and Functions can be structured into basic organisational units called Activities. These ensure that the various tasks assigned to them according to their specific role are performed.

Each Activity is characterised by the effective communication of information and experience among operators, by the presence of complementary roles that ensure a high level of exchange and renewal of expertise and qualifications, and by the empowerment of each employee, guaranteeing that work is performed in a continuous manner and in line with the adopted schedules and targets. Each Activity is assigned to a manager and/or a coordinator who is responsible for ensuring that it operates correctly, with a view to improving business integration mechanisms and decision-making processes by optimising operational skills and collaboration between the various company Functions. At Estra S.p.A., three technical advisory committees have been established:

- the Management Committee, chaired by the General Manager of Estra;
- the Business Review Committee, chaired by the CEO of Estra;
- the Strategic Committee, chaired by the Chairperson of Estra.

To ensure their effective operation, for each matter under discussion the committees are supported by company structures with specific responsibilities and areas of expertise, as described in the various company organisational charts.

In view of the positions held by their members, these three committees are responsible for decision-making processes and monitoring the management of the organisation's impacts on the economy, the environment and people. Their competence with regard to the organisation's impacts is related to their role.

All committee members are executive members (there are no independent members) appointed by the Estra Board of Directors when it approves the structure, organisation and functions of the Company.

Committee members remain in office until there is a change to the organisational structure, which must be approved by the Board of Directors.

Only directors who are members of the Strategic Committee, which are appointed by the Shareholders' Meeting of Estra Spa, are stakeholders, whereas none of the members of the committees represents a company group.

The *Management Committee* is responsible for:

- enabling the sharing of strategies and relative actions within the Group;
- introducing methods of coordination between the organisational structures of the Parent Company and the Operating Companies;
- ensuring that priority projects are monitored;
- guaranteeing that business decisions and changes to the operational models are implemented, and identifying corrective actions and improvements;
- suggesting possible actions to resolve intercompany and interdepartmental issues.

The Management Committee is chaired by the General Manager and consists of the Deputy General Manager, the Division Managers of the Estra Group and the Strategic Business Unit (SBU) Managers.

The General Manager, the Deputy General Manager, and the SBU Environment and SBU Market Managers are members of various Boards of Directors of the Estra Group. There are seven men on the Committee.

The Business Review Committee is responsible for:

- analysing and commenting on the trends of each business area, considering the targets outlined in the budget and the business plan;
- identifying and analysing the progress of the main initiatives of the SBU;
- highlighting the main concerns regarding each SBU and proposing measures to improve performance, financial position and economic results.

The Business Review Committee is chaired by the CEO and is composed of directors from each Group Company, the Planning and Control Officer, and the Strategy and Business Development Officer.

The CEO, the directors of Centria and Estra Clima, the Planning and Control Officer, and the Strategy and Business Development Officer are on the Board of Directors of various Estra Group companies. There are five men and two women on the Committee.

The Strategic Committee discusses the general guidelines of the Company and verifies the proper coordination of activities and general management performance.

The Strategic Committee is chaired by the Chairperson of the Estra Group and is composed of the CEO, the General Manager, the appointed directors, the Deputy General Manager and the Strategy and Business Development Officer.

The CEO, the General Manager, the Deputy General Manager and the Strategy and Business Development Officer are on the Board of Directors of various Estra Group companies. There are five men and two women on the Committee.

In 2022 the NRRP Work Group, which was formally established on 31 December 2021, began to operate.

Its main task is to identify and seize the funding opportunities offered by the National Recovery and Resilience Plan (NRRP).

The Work Group comprises the Guidance Committee and the Project Manager who coordinates a Technical Project Team, composed of 18 employees, which is appointed from time to time to develop each Project. The Guidance Committee identifies the key topics for the development of project proposals and targets. The Project Manager and the Guidance Committee report to the Management Committee which oversees the activities and assigns priorities in line with the Business Plan and the Strategic Plan. The Guidance Committee

is composed of the Strategy and Business Development Officer, the Head of the Research Centre and the Intercompany Innovation Officer.

In 2022 the Estra Group Covid-19 Management Committee continued to operate. Composed of the HSE, Workers' Safety and Trade Union representatives of all Group Companies and the Management representative, the Committee monitored the evolution of events in order to ensure compliance with the regulations issued in response to the evolution of the pandemic to implement measures to contain the virus. As of the end of the government emergency on 31 March 2022, it is no longer necessary to verify compliance with the security procedures adopted by the company by means of specific checklists.

As of 1 September 2022, with the signing of the second-level agreement for the introduction of Remote or Agile Working, it is no longer necessary to record monthly in-person attendance at the various offices.

Up until 31 March 2022, employees were required to present a Green Pass at workplaces and Covid tests were carried out on all personnel of Group Companies and at the main offices.

Despite the end of the emergency, the Covid-19 Management Committee, working in collaboration with the company Divisions, opted to continue the Self-Service measures adopted, such as the workstation sanitation procedures and the availability of hand sanitiser.

FFP2 face masks are still provided at office entrances on request, even though masks are no longer mandatory in the workplace. 45,115 masks were distributed to employees.

As of 1 November 2022, with the expiry of the Covid-19 Shared Workplace Safety Protocol, certain measures have been maintained to protect workers, especially those considered vulnerable or high risk. Particular focus has been given to the protection and safeguarding measures established for public-facing commercial activities. These include protective shields in customer-facing areas, regulated access based on the area and number of employees, Covid-19 emergency signs, sanitising products, hand sanitising products available for customers, contactless infra-red thermometers, surgical and FFP2 facial masks, specific workstation sanitising kits, additional cleaning and sanitisation of premises, and technological systems.

Eight notices signed jointly by the Committee and the General Manager were sent to the entire workforce to raise awareness and reiterate the provisions adopted to contain the virus, including three safety briefings containing updates on the Covid-19 emergency and recommended conduct.

## 2. Stakeholders and Value created by the Group

### 2.1 Targets and results

#### Targets for 2023

Estra SpA

Blue Eco Line. In 2022 a Memorandum of Understanding was signed for the construction of an automated plant for the collection of floating waste on the San Rocco canal in the Grosseto area, involving not only the Region of Tuscany, the Municipality of Grosseto, and the Land Reclamation Consortium, but also Blue Eco Line - a start-up selected in last year's EQube edition - and Estra, which, as the start-up's accelerator, offered to fund the construction of its first plant. The River Cleaner designed by Blue Eco Line is a pilot system designed to intercept and collect plastic waste to prevent it from flowing into the sea and reduce marine pollution.

Estra SpA

Energy Coaching. Developed in collaboration with Midori, a start-up selected by Estra's Equebe project, the Energy Coaching project is currently in the testing phase. In 2023 the service will be integrated into the Estra App and available to electricity customers.

Estra SpA

E-Qube. Continuing the trend of previous years, launch a new format of Estra's Vertical Acceleration and Innovation Programme in 2023. The aim is to launch 3 Ongoing Calls, or 3 scouting cycles, aimed at selecting start-ups to be entered into Estra's Acceleration and Open Innovation programmes.

#### Targets for 2023-2024

Estra SpA

Rifò. In 2022 a partnership was agreed with Rifò, a start-up selected during last year's Equebe programme, aimed at installing containers at Estra's offices to collect old pairs of jeans to be recycled into yarn that will be used to make new garments. The aim for 2023-2024 is to expand the jeans collection service to Estra's main stores, enabling customers to play an active role in the regeneration project.

#### Targets for 2024

Estra SpA

Launch and implement the XI Connect project.

### 2.2. Introduction

Estra S.p.A. (hereinafter also "Estra"), having issued an unsecured and non-convertible bond loan on the regulated market of the Dublin Stock Exchange on 28 November 2016, having completed the placement of a bond admitted for listing on the regulated market of the Dublin Stock Exchange on 14 April 2022, and having dimensional characteristics in terms of employees, financial position and net revenue over the thresholds provided for by Article 2, paragraph 1, is subject to the application of Italian Legislative Decree no. 254 of 30 December 2016 "Implementation of Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014, amending Directive 2013/34/EU concerning the disclosure of non-financial information and information on diversity by certain large undertakings and groups" (hereinafter the "Decree").

This Consolidated Non-Financial Statement (hereinafter the "NFS") of the Estra Group as at 31 December 2022 has been prepared in compliance with the provisions of Decree no. 254/16, as amended, and is a

separate document to the Directors' Report on Operations, as provided for by the Decree (Article 5, paragraph 3b).

The entities included in the 2022 NFS are: Estra S.p.A., Estracom S.p.A., Estra Clima S.r.l., Estra Energie S.r.l., Gergas S.p.A., Centria S.r.l., Prometeo S.p.A., Piceno Gas Vendita S.r.l., Caviglia SPV S.p.A., Tegolaia SPV S.p.A., Gas Marca S.r.l., Murgia Reti Gas S.r.l., Idrogena S.r.l., Ecolat S.r.l., Ecos S.r.l., Edma Reti Gas S.r.l., Bisenzio Ambiente S.r.l.

The information contained in the NFS refers to the companies consolidated on a line-by-line basis considered in the Consolidated Financial Statements of the Group as at 31 December 2022. A company falls under the scope of the non-financial reporting requirement if the ownership of the company's capital exceeds 50%. Although consolidated for the last three months in the income statement of the Consolidated Financial Statements (and for the entire year in Shareholders' Equity), Ecocentro Toscana is not included within the reporting boundary of the NFS as it is a small company acquired in the final quarter of 2022 (end of September 2022). The company will be integrated into the reporting boundary of the NFS as of 2023.

In the preparation of its NFS, Estra has applied the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards) based on the "In accordance" approach.

The data have been gathered from the various management departments of Estra, making use of the business management systems, specific software and numerous reports. The company department responsible for the preparation of the NFS has ensured the necessary coordination and prepared this document.

This NFS was approved by the Board of Directors of Estra on 27 April 2023 and has been subject to limited review by EY S.p.A. The NFS is published in the section titled "Investor Relations" of the Company website (<https://corporate.estra.it/>).

On 12 July 2020 Regulation (EU) 2020/852 on the European Taxonomy, published in the Official Journal of the European Union on 22 June 2020, came into force. The Estra Group complies with the provisions established by the Regulation and the information regarding taxonomy-aligned economic activities is reported in the paragraph on "The European Taxonomy" found in this chapter.

### 2.3 Stakeholders and Stakeholder Engagement

Estra dedicates numerous feedback, engagement and communications initiatives to its various stakeholders, with the principle aim of promoting debate on important topics in order to inform organisational policies and strategies.

These initiatives aim to optimise human resources, maintain constant dialogue with communities and the region and care for customers, as well as paying due attention to shareholders and suppliers.

The initiatives were aimed at the stakeholders identified in 2020, which were assigned levels of priority through an analysis involving the company's senior management and key stakeholders. At the end of the analysis, the following list of Estra Stakeholders was compiled:

- Personnel
- Customers and users
- Shareholders and members (including indirect member municipalities)
- Suppliers (including strategic consultants)
- Lenders (including banks and investors)
- Environment
- Bodies and Institutions (including Local Authorities, Universities and Trade Unions)
- Community and region

After its first issue published on 3 December 2020, throughout 2022 all stakeholders were sent a copy of the quarterly newsletter ImprontaEstra, a specific point of contact with shareholders, municipalities, customers, suppliers, environmental and consumer associations, financial and social institutions, employees and banks. The aim is to establish a channel of dialogue to enable Estra to communicate periodically with its

stakeholders, providing updates on the Group's initiatives, objectives and results on the topic of sustainability and allowing stakeholders to get in touch with Estra.

In fact, the same stakeholders play an active role in the editorial project, using their specific skills to contribute regular columns and features that characterise the various issues of the newsletter. The newsletter aims not only to inform and update stakeholders on the projects and initiatives that are closely linked to Estra's commitment to sustainability, but also to contribute to the promotion and development of a comprehensive cultural of sustainability able to share and enhance ideas and best practices from the outside world. In 2022 a special issue of ImprontaEstra was released, entitled *"10 Words, Challenges and Opportunities to build a sustainable future together"*.

As well as the digital version, an actual physical hard copy was produced, expanding the horizons beyond Estra and painting a picture of the world in which we live. Consequently, contributions were requested from leading and authoritative voices from outside the Group, creating value and interest for the entire readership. The newsletter touched on various important aspects of sustainability, including the environment, diversity&inclusion, the circular economy and innovation. For each topic, the guest article was accompanied by a description of Estra's response and activities in that particular area.

The ImprontaEstra special edition was distributed online to all of our main stakeholders, and paper copies were delivered to all Group employees and made available in offices open to the public.

The main stakeholder engagement initiatives of the Estra Group carried out in 2022 are described below.

Stakeholder	Initiatives in 2022	Frequency/events 2022
Shareholders and members	Shareholders' meeting and meeting with indirect members <sup>1</sup>	18
Customers	Newsletter to subscribers to the customer area	monthly
	Broadcast of Estra TV visible to the public on office screens	monthly
	Prato – Agreement with ARCI for the installation of photovoltaic panels on club roofs	12.12.2022
	Meeting with Tuscany Consumers Associations	29.6.2022
	Meeting with Marche Consumers Associations	1.7.2022
Personnel	The Valore in Circolo internal communications project: a journey into sustainability in seven stages, from June to October, aimed at providing a first-hand account of Estra's commitment to sustainability through the projects and activities described in the Sustainability Report. News about the Group's economic, social and environmental performance is posted in the Valore in Circolo section of the company Intranet.	7 communications
	Centria 4 Safety newsletter	4
	Sicurezza in Estra newsletter	4
	News bulletins on the Intranet	122
Community and region	Impronta Estra newsletter	3
	Posts published on Facebook, Twitter, LinkedIn	192
	Articles published on the company website	122

<sup>1</sup> The data includes the meetings of Estra shareholders, and the meetings of each Estra shareholder with its own shareholders, in which topics relating to the Estra Group were discussed (Consiag, Coingas, Intesa and Viva Servizi).

	Press conferences	10
	Press releases	79
	Regional and local 60-second radio and TV news bulletins	every fortnight
<b>The Institutions</b>	E-vehicle charging stations opened in Capolona (AR)	26.5.2022
	E-vehicle charging stations opened in Castiglione Fiorentino (FI)	24.6.2022
	E-vehicle charging stations opened in Montespertoli (FI)	20.12.2022
	Public Wi-Fi system installed at Signa (FI)	2.2.2022
	Conference to present the results of the energy poverty survey in Prato	21.1.2022
<b>Lenders</b>	Investigations	9 investigations launched in 2022, all successfully concluded. One of these was concluded in March 2023.
<b>Environment</b>	Tree-planting in collaboration with Mosaico Verde in Follonica (GR), Italy on 23/03/2022, Arezzo on 06/04/2022 and in Macerata on 07/04/2022.	3
	Educational projects on environmental topics	2

Moreover, on 14 September 2022 a conference was held, both in-person and online, during which the members of the NFS Work Group presented the main topics of the 2021 Sustainability Report. All Group stakeholders were invited to attend.

## 2.4 Materiality Analysis and SDGs

The Global Sustainability Standards Board - GSSB (an independent operating board of the Global Reporting Initiative - GRI) launched a review of the GRI Standards, the global point of reference for sustainability reporting and used by the Estra Group to prepare its Non-Financial Statement.

As such, as of 1 January 2023 (reporting for FY 2022) organisations that annually report their sustainability performance according to the GRI Standards are required to publish their report according to the 2021 update of the GRI Standards.

The most substantial changes regard the identification of material topics, or rather the topics that represent the Company's most significant impacts. This process is based on three core concepts:

- **IMPACT:** defined as the effect - actual or potential, positive or negative - that an organisation has or could have on the economy, the environment and on people, including impacts on human rights;
- **DUE DILIGENCE:** the process through which the organisation identifies, prevents, mitigates and considers how to confront its negative impacts;
- **STAKEHOLDERS:** individuals or groups that have interests that are affected or could be affected (positively or negatively) by an organisation's activities, or whose actions could reasonably impact the ability of the organisation to successfully implement its strategies and meet its goals. Following the new materiality approach defined by the new GRI Standards, the Estra Group conducted its materiality analysis according to the following phases and methods:

### 1. Analysis of the internal and external context

A precise and structured analysis of the relevant material topics for competitors and reference companies in other sectors was conducted. A qualitative analysis and comparison of the most important external documents and test scenarios was carried out, including, for example, Italian



Legislative Decree 254/2016, the GRI Standards and other publications, national and international Sustainable Development Goals, the UN Global Compact, European energy policies and megatrends, with particular focus on the energy crisis, energy security and climate action, and Italian and international academic literature. Key internal documents were also reviewed: Enterprise Risk Management 2021, Integrated Marketing and Communication Plan 2022, Strategic Plan and Business Plan 2021-2025. The Group's activities and its value chain were mapped. Furthermore, the Estra Group is already actively working to assess the risks and opportunities presented by climate change and plans to integrate them in a dual materiality perspective in the near future.

### **1. Identification of Group impacts**

Following the GRI Standards and starting from the research carried out, the analysis of internal documents and the benchmarking activity, the actual and potential negative and positive impacts on the economy, the environment and people, including impacts on human rights, deriving from the Group's activities were identified, adopting a broad and non-selective approach. Each impact was linked to the activities carried out by the organisation and the partners involved along the supply chain. These impacts were reviewed and certified by the General Manager. Once the suggestions of the General Manager had been taken into account, the definitive list was produced, containing 27 impacts and their description, including the nature of the impact and whether it is positive, negative, actual or potential.

### **2. Evaluation of the significance of the impact**

By engaging with internal stakeholders (Management Committee, BoD of Estra SpA, Senior Management, Sustainability Work Group) and external stakeholders (environmental associations, shareholders and members, customers, consumer associations, bodies and institutions, lenders and suppliers/consultants), the significance of each identified impact was assessed. The engagement method was tailored to each stakeholder category based on their importance and level of understanding of the Group.

All stakeholders involved were asked to give a score from 1 to 5 to each of the 27 impacts identified, where 1 means "not relevant" and 5 means "very relevant". To obtain meaningful results, the stakeholders were invited to differentiate the relevance of the impacts presented to them using the 1-5 scale. Different weight was given to the opinions of the various categories of Stakeholders involved, depending both on their relevance and their level of understanding of the Estra Group.

### **3. Prioritisation of the most significant impacts and grouping into topics**

A table was developed which, for each impact, shows the average score assigned by the internal and external stakeholders, and the average overall score. The average overall score ranged from 2.4 to 4.5. Impacts that earned a score of 3.9 and above were classified as "very relevant". Impacts with a score of less than 3 were classified as "not relevant". The other impacts were defined as "relevant". Only significant and very significant impacts were considered.

The impacts identified as significant or very significant were then grouped into 13 topics. The table below shows the material topics, ordered from most important to the least important, based on the score attributed, accompanied by a description of each topic and highlighting whether they were deemed "very relevant" or "relevant". The "position" column shows the order of the topics based on the scores received. The topics that received the same score share the same position.

Position	Topics	Description of topic and relative impacts	GRI indicator	Materiality
1	Infrastructure, networks and business continuity	<p>The continuity of the gas distribution service depends on the maintenance and control of the infrastructure and the network, especially its resilience. The Group is committed to carrying out these activities regularly and in accordance with the regulations, with the aim of reducing and preventing the risk of accidents to persons and property and service outages. Furthermore, thanks to the fibre optic network, businesses and citizens can access innovative technological services. The Estra Group is committed to investing in grid maintenance to guarantee business continuity.</p> <p>These measures minimise the risk of possible faults or outages, guaranteeing service efficiency and safeguarding users' access to energy.</p>	203 – Indirect economic impacts	Very relevant
2	Data protection and cyber security	<p>The Group collects data on customers, suppliers and other organisations with which it deals.</p> <p>To process this data and information, and to manage the network in the most efficient way possible, technological solutions such as cloud technology and smart metering is used.</p> <p>The adoption of these tools increases the risk of data leaks and cyber attacks. To minimise the potential negative impacts, Estra has adopted tools able to guarantee the privacy and protection of data stored on company systems.</p>	418 – Customer privacy	Very relevant

3	Employment, development and enhancement of human capital	<p>The Group's HR recruitment and selection processes impact employment levels and employment stability in the regions in which the Group operates.</p> <p>Employment is protected through policies that promote professional well-being, with the aim of improving motivation, performance and retention.</p> <p>The Group attracts, develops and enhances human capital mainly through training activities, career progression opportunities, the remuneration policy, and by guaranteeing a healthy work-life balance.</p>	<p>202 – Market presence</p> <p>401– Employment</p> <p>404 – Training and education</p>	Relevant
3	Region, community, and creation of sustainable economic and financial value	<p>By focusing on its activities, the Group creates value both for stakeholders interested primarily in the Group's financial results (e.g. shareholders, employees, local authorities), and for all of the other partners and stakeholders (suppliers, lenders and consumers). In this regard, the employment that the Group generates through its business is important. Moreover, the Group contributes to the development of the regions in which it operates through activities and initiatives, such as sponsorships, donations, projects with schools and sports associations, and competitions.</p>	<p>201 – Economic performance</p> <p>204 – Procurement practices</p> <p>413 – Local communities</p>	Relevant

4	Quality, competitive prices and customer-oriented approach	<p>The quality of the Group's customer service is mainly linked to the work carried out by operators at call centres and branches, by retail advisors and representatives, by emergency gas operators, by the engineers who carry out the work, and by those who manage the Group's various digital channels. Service quality is monitored by specific reports that contain data on compliance with set standards and the complaints process. Customer satisfaction depends not only on price, but on the quality of the provided services. The costs of the serviced offered by the Group are linked to economic and financial evaluations, except for the costs of gas and electricity. For these raw materials, the price is set on the international market and, for customers on the regulated market, is formally defined by the Italian Energy Authority (ARERA) along with the remuneration of the methane gas distribution business.</p> <p>The quality and safety of the methane gas distribution service and the telecommunications network are guaranteed by the constant surveys and the remote control technology used to manage the plants. These actions are aimed at minimising the risks to customer safety and reducing the negative impacts related to service outages.</p>	416 – Customer health and safety	Relevant
4	Protection of the rights, health and safety of employees	<p>The Estra Group protects the rights of its workers, including the right to freedom of association. Moreover, the health and safety of its employees is guaranteed through specific procedures, guidelines and regulations that are regularly updated. The Estra Group implements an internal control system to manage and prevent occupational accidents and professional illnesses, and promotes a series of initiatives to increase employee engagement in risk prevention measures. Maintaining robust relations with the trade unions that represent workers is a fundamental part of protecting employees' rights, health and</p>	<p>402 – Labor/Management Relations</p> <p>403 – Customer health and safety</p>	Relevant

		safety. However, despite all of the risk management measures and procedures adopted, occupational accidents do occur to both employees and contractors. Given the operational nature of the work carried out, the risk can be reduced but not entirely eliminated.		
5	Responsible supply chain management	To incentivise the adoption of quality standards and ethical and sustainable practices across the entire supply chain, the Group uses the information present in its Supplier Register and adopts social and environmental selection criteria in specific supplier selection tender processes.	308 – Supplier Environmental Assessment  414 – Supplier Social Assessment	Relevant
6	Promotion of diversity and inclusion	The Group is committed to respecting the principles of inclusion, equal opportunities and non-discrimination through the adoption of HR recruitment and management policies on topics such as welfare, skills development and awareness-raising. Violation of these principles can result in discrimination based on people's characteristics, leading to labour disputes.	405 – Diversity and Equal Opportunity  406 – Non-discrimination	Relevant
6	Energy transition and climate action	The Estra Group plays an active role in the energy transition and climate action, through: -the generation of electricity and heat from renewable sources using a biomass plant, various photovoltaic plants, a hydroelectric power plant and a wind power plant; - design and management of energy efficiency services (energy performance diagnosis of buildings, replacement of boilers, installation of heat pumps, installation of thermal insulation in apartment buildings); - installation of e-vehicle charging stations; - offer of green gas and electricity tariffs to customers as well as technological solutions to monitor usage and promote good energy saving practices, such as the installation of smart thermostats.	302 – Energy  305 – Emissions	Relevant

		The Group generates direct and indirect GHG gas emissions from its gas distribution activities, internal consumption and fuel consumption linked to the company fleet. The vehicles also release polluting emissions (PM10 and NOX).		
7	Ethics, integrity and anti-corruption	The Group's ethical approach to business includes compliance with laws and regulations, the adoption of procedures to report unlawful conduct, and anti-corruption policies implemented throughout the supply chain (suppliers, human resources and customers). Unethical business practices increase the risk of improper or unlawful conduct, with consequent negative impacts for stakeholders and on the company's reputation.	205 - Anti-corruption	Relevant
7	Transparent, clear and truthful communication and marketing strategies	The Group is committed to adopting correct and transparent communication and marketing practices towards its existing and potential customers. These communications can be driven through advertising campaigns or by call centres, stores, retailers, digital channels and the media. Failure to adopt transparent and correct practices (such as unclear clauses and/or financial terms and conditions) can make customers more vulnerable and worsen the situations of users in energy poverty. This would also have a negative impact on customer loyalty and numbers, and could drive away potential new customers.	417 – Marketing and Labeling	Relevant
7	Digital transformation, innovation and smart cities	Digitalisation is intrinsic to the activities carried out by the Group's workforce and its relations with customers and suppliers are managed using digital tools. Research, development and innovation, including the digital transformation, impact all business areas, and take on particular relevance in the gas distribution, telecommunications and environmental services sectors. Further, the Estra Group is playing an active role in the development of smart cities, offering services such as Wi-Fi	There are no GRI indicators associated with this topic.	Relevant

		connections, cabling with FTTH (Fiber to the home) broadband networks, video surveillance and remote control technology, sustainable mobility and the Internet of Things (smart meters, smart thermostats, etc.).		
8	Circular economy, waste reduction and recovery	In the management of its business, the Group generates special and non-special, hazardous and non-hazardous waste, of which more than 90% is recovered. Through its own corporate activities (such as the management of real estate and the procurement of goods and services), the Group can incentivise the implementation of good circular economy practices, helping to reduce waste by extending product life cycles. Moreover, it is able to promote positive practices linked to the circular economy by developing and implementing educational projects and initiatives.	306 – Waste	Relevant

The table clearly shows that the most relevant topics identified are those related to “Infrastructure, networks and business continuity”, which represents Estra Group's core asset, and “Data protection and cyber security”, which is drawing growing interest and attention among stakeholders.

The third most relevant topic is “Employment, development and enhancement of human capital”, tied with “Region, community, and creation of sustainable economic and financial value”, demonstrating the strong link between sustainability and the creation of value over time, safeguarding and developing the knowledge, skills and abilities of its human capital.

Comparing the 2020 Materiality Analysis with the outcome of the 2022 analysis, two new material topics emerged in 2022:<sup>2</sup>

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<sup>2</sup> Please note that:

- “Service quality and safety and customer satisfaction” incorporates the previous material topic “Quality and safety and customer satisfaction”, and also includes aspects relative to access to energy and green tariffs;
- “Data protection and cyber security” incorporates the previous material topic “Privacy and data protection”, and also includes aspects relative to network security;
- “Energy transition and climate action” incorporates the previous material topic “Energy efficiency, renewable energies and sustainable mobility” and has absorbed some aspects of the previous topic “Reduction of internal consumption and waste”, now incorporated into the “Circular economy, waste reduction and recovery” topic;

- “promotion and inclusion of diversity”, which in the previous analysis was not considered as a standalone topic and instead was incorporated into the topic “Protection of the rights, health and safety of employees”;
- “infrastructure, networks and business continuity”, the previous analysis was included in the topic “Service quality and safety and customer satisfaction”, in 2022 has been divided between “Quality, competitive prices and customer-oriented approach” and “Infrastructure, networks and business continuity”.

The following topics identified in the NFS 2021 as material are no longer included:<sup>3</sup>

- Risk management and the ability to react to changing scenarios;
- Integration of sustainability aspects in company strategies;
- Stakeholder relations and dialogue.

Estra Group's material topics contribute to the achievement of 8 of the 17 Sustainable Development Goals. The 8 Goals reflect the values that guide corporate action:

- Goal 5: Gender equality
- Goal 7: Clean and accessible energy;
- Goal 8: Decent work and economic growth;
- Goal 9: Businesses, innovation and infrastructure;
- Goal 10: Reducing inequalities;
- Goal 11: Sustainable towns and cities;
- Goal 12: Responsible consumption and production;
- Goal 13: Fight against climate change.

The Strategic Plan 2023-2027 is based on the same eight goals and identifies People, Sustainability, and Digital as strategic pillars, as well as climate change, tech transition, and human centricity as long-term trajectories.

In addition to promoting the circular economy and providing green gas and electricity tariffs, the Group's climate change strategy includes activities aimed at improving energy efficiency and reducing consumption, incentivising electric mobility to meet decarbonisation targets, and increasing the use of renewable energy sources. The measures to increase infrastructure resilience (green building, reduction of gas network leaks, revamping of plants) play a major role.

The strategic direction related to the tech transition intends to use digital technologies to innovate or transform business processes, increasing the competitiveness and efficiency of the corporate model. For Estra, technological and digital transformation is essential to the consolidation of its sustainable economic model, whose strategy extends to the development of cloud, mobile, analytics and big data technology.





The human centricity dimension intends to create a link between people inside and outside the organisation to simultaneously support the achievement of certain performance levels and guarantee the well-being of the Group's stakeholders, enhancing human capital and thus promoting organisational engagement and individual commitment.





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- “Transformation, innovation and smart cities” incorporates the previous material topic “Innovation, research and development”, and also includes the possible impacts of digitalisation and the development of smart cities.

<sup>3</sup> Although the topic “Anti-competitive behaviour” has been identified as material in the new Materiality Analysis, the data nonetheless reports on GRI disclosure 206-1 “Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices” to ensure continuity with previous years.



SDGs	Material topics that contribute to achieving the SDGs
 <p><b>7</b> ENERGIA PULITA E ACCESSIBILE</p>	<ul style="list-style-type: none"> <li>• Energy transition and climate action</li> <li>• Circular economy, waste reduction and recovery</li> </ul>
 <p><b>8</b> LAVORO DIGNITOSO E CRESCITA ECONOMICA</p>	<ul style="list-style-type: none"> <li>• Protection of the rights, health and safety of employees</li> <li>• Employment, development and enhancement of human capital</li> </ul>
 <p><b>9</b> IMPRESE, INNOVAZIONE E INFRASTRUTTURE</p>	<ul style="list-style-type: none"> <li>• Responsible supply chain management</li> <li>• Digital transformation, innovation and smart cities</li> <li>• Quality, competitive prices and customer-oriented approach</li> <li>• Region, community, and creation of sustainable economic and financial value</li> <li>• Infrastructure, networks and business continuity</li> </ul>
 <p><b>11</b> CITTÀ E COMUNITÀ SOSTENIBILI</p>	<ul style="list-style-type: none"> <li>• Digital transformation, innovation and smart cities</li> <li>• Region, community, and creation of sustainable economic and financial value</li> </ul>

		<ul style="list-style-type: none"> <li>• Circular economy, waste reduction and recovery</li> <li>• Quality, competitive prices and customer-oriented approach</li> <li>• Transparent, clear and truthful communication and marketing strategies</li> <li>• Data protection and cyber security</li> </ul>
		<ul style="list-style-type: none"> <li>• Energy transition and climate action</li> <li>• Circular economy, waste reduction and recovery</li> </ul>
		<ul style="list-style-type: none"> <li>• Protection of the rights, health and safety of employees</li> <li>• Ethics, integrity and anti-corruption</li> <li>• Promotion of diversity and inclusion</li> </ul>

The table below shows the relationship between the topics of Decree no. 254/2016 and the material topics identified in the NFS:

Scope of Decree 254/2016	NFS Topics
Fight against active and passive corruption	Ethics, integrity and anti-corruption
Personnel	Protection of the rights, health and safety of employees Employment, development and enhancement of human capital Promotion of diversity and inclusion
Social	Quality , competitive prices and customer-oriented approach Region, community, and creation of sustainable economic and financial value Digital transformation, innovation and smart cities Data protection and cyber security Transparent, clear and truthful communication and marketing strategies Responsible supply chain management

	Infrastructure, networks and business continuity
Environment	Circular economy, waste reduction and recovery Energy transition and climate action
Human rights	Protection of the rights, health and safety of employees Promotion of diversity and inclusion

## 2.5 Value generated and distributed

Determining the economic value directly generated and distributed is a key factor for the Estra Group, as it represents an opportunity to express and translate in monetary terms the wealth produced and distributed in the region and, therefore, to its stakeholders.

This indicator represents a tool that can be used to interpret the values expressed in the annual report in a different way, eschewing the traditional single-stakeholder logic to embrace a multi-stakeholder approach. Through its core business, Estra creates value both for stakeholders interested primarily in the Group's financial results (e.g. shareholders, employees, local authorities), and for all of the Group's other partners and stakeholders (suppliers, lenders and consumers).

### *Economic value directly generated and distributed (2020-2022)*

<i>(Thousands of Euro)</i>	<b>2020</b>		<b>2021</b>		<b>2022</b>	
<b><i>Economic value generated directly</i></b>	<b>765,337</b>		<b>1,066,243</b>		<b>1,780,409</b>	
<b><i>Economic value distributed to Stakeholders</i></b>	<b>697,179</b>		<b>990,753</b>		<b>1,715,821</b>	
<i>Suppliers</i>	617,344	88.5%	902,068	91%	1,622,276	94.6%
<i>Personnel</i>	39,230	5.6%	41,856	4.2%	46,595	2.7%
<i>Shareholders and lenders</i>	18,984	2.7%	27,257	2.8%	30,329	1.8%
<i>Local Authorities</i>	19,498	2.8%	17,496	1.8%	14,273	0.8%
<i>Community and region</i>	2,123	0.3%	2,076	0.2%	2,348	0.1%
<b><i>Economic value withheld by the Group</i></b>	<b>68,158</b>		<b>75,490</b>		<b>64,588</b>	

The economic value generated directly in 2022 is 1,780 million. This 67% increase on 2021 is due to the joint impact of gas balancing activities and the exponential increase of the cost of gas itself, mainly as a consequence of the international geopolitical situation. Revenue from sales of electricity also increased, mainly due to the higher volumes of electricity sold to end customers and the increase in sales tariffs.

Most of the value produced - 1,622 million - was distributed to local and national suppliers, representing 94.6% of total value. The 80% increase is closely linked to the increase in revenue.

Value distributed to the workforce was € 46.5 million, up 11.3% due mainly to the expansion of the workforce following the entry into the scope of consolidation of the new companies Bisenzio Ambiente and Edma Reti Gas, as well as the wage increases provided for in the CCNL.

€ 30.3 million was allocated to shareholders and lenders in dividends and financial charges. This result, which marked a 11.3% increase on 2021, is essentially due to the higher financial charges which rose from €10 million in 2021 to €14 million in 2022. Dividends fell from €17.3 million in the previous year to €16 million in 2022.

In 2021 there was a €3.2 million decrease in value distribution to the Public Administration, due to lower income taxes in the year.

In line with the previous year, € 2.3 million were distributed to local communities and the region in sponsorships (to sports, cultural and social institutions), donations and membership fees.

The economic value withheld by the Group amounts to 64.6 million. This is a reduction of 14.2% compared to 2021, due to the lower profit for the year, despite the increase in non-monetary costs which represent an effective indicator of the Group's self-financing capacity.

## 2.6 Investments

In 2022, the Group's investments totalled € 90.5 million, down by 7.4% compared to 2021. This reduction relates to investments in industrial development, which mainly regard M&A transactions, and fell from €71 million in 2021 to €58.8 million in 2022. Despite this, it remained the most significant investment category and represents 65% of total investments. The 9.1% increase in investments in innovation compared to the previous year is also of note, and is mainly attributable to the purchase of IT systems and smart meters. Also noteworthy in the innovation segment is €666,000 that was allocated to new investments on renewable energy and new businesses.

The following table shows the breakdown of investments made in the 2020-2022 three-year period.

<b>Investments</b> <i>(Thousands, €)</i>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Industrial development	24,174	71,019	58,838
Innovation	12,588	16,390	17,886
Services	6,472	6,828	4,489
Tangible and intangible assets	3,657	3,591	9,356
<b>Total</b>	<b>46,891</b>	<b>97,828</b>	<b>90,569</b>

The Estra Group's particular focus on its infrastructure should also be noted: in this regard, investments in the development, maintenance and modernisation of the gas distribution network rose from €26.5 million in 2021 to €31.6 million in 2022, an increase of 19.2%.

## 2.7 Innovation, research and development

Innovation is one of the Estra Group's key pillars, directing its activities and investments and involving all sectors and Group companies.

The main innovation, research and development projects conducted in 2022 were as follows:

### E-QUBE

"E-qube Startup&idea Challenge" is a call aimed at start-ups promoted by Estra in collaboration with the start-up accelerator Nana Bianca and StartupItalia, which founded and organises the StartupItalia Open Summit.

The 174 entries received in the digital&energy category were assessed by a panel of experts who selected the three winning projects, which will receive a grant of €60,000 and will be entered into a 16-week acceleration programme conducted by Estra and Nana Bianca.

72% of the projects developed by innovative start-ups and as-yet unincorporated teams came from Italy, specifically Lombardy (26%), Tuscany (16%), Lazio (15%) and Emilia Romagna (10%). The other applications came from elsewhere in Europe.

The winning projects in the second edition of E-qube were:

- Rifò (<https://rifo-lab.com/>), based in Prato. Rifò presented an innovative solution for the sustainable and responsible management of overproduction and overconsumption in the fashion sector, involving the recovery of waste fabric that is then transformed into new garments.
- Blue Eco Line (<https://blueecoline.com/>), based in Florence. Blue Eco Line presented an innovative solution to reduce marine plastic pollution by positioning a floating barrier on one side of the river which intercepts plastic waste in the water course.
- Ener2crowd (<https://www.ener2crowd.com/it/home>), based in Milan. Ener2crowd specialises in the promotion of sustainable investments and presented the first Energy Lending Crowdfunding platform in Italy.

The collaborations sparked with the start-ups selected in this year's E-Qube have led to several projects which are currently under development. In 2022 a Memorandum of Understanding was signed for the construction of an automated plant for the collection of floating waste on the San Rocco canal in the Grosseto area, involving not only the Region of Tuscany, the Municipality of Grosseto, and the Land Reclamation Consortium, but also Blue Eco Line and Estra, which, as the start-up's accelerator, offered to fund the new plant. The River Cleaner designed by Blue Eco Line is a pilot system designed to intercept and collect plastic waste to prevent it from flowing into the sea and reduce marine pollution. Also in 2022 a partnership was agreed with Rifò aimed at installing containers at Estra's offices to collect old pairs of jeans to be recycled into yarn that will be used to make new garments.

#### **ENERGY COACHING**

The Energy Coaching project was launched in collaboration with Midori, a previous winner of the E-qube challenge, aimed at giving customers the power to monitor their electricity consumption as well as offering tips on how to limit their carbon footprint. The energy coaching service is currently in the test phase. In 2023 the service will be integrated into the Estra App and available to electricity customers.

#### **SMART HYDRO GRID FOR ENERGY TRANSITION AND DECARBONISATION**

The project presented by Centria S.r.l., in collaboration with Techfem S.p.a., Regas S.r.l., Università della Calabria and Creta Energie Speciali S.r.l., as part of the public call for research projects in the hydrogen sector, was selected by the Italian Ministry of Ecological Transition and is among the 15 core research projects eligible for NRRP funding.

The project is the only one on the list of projects eligible for funding that focuses on "Smart integrated management systems to improve the resilience and reliability of smart hydrogen-based systems". The three-year project is being incorporated into the integrated management of multi-energy systems aimed at enabling sector coupling and guaranteeing resilience and reliability of hydrogen-based infrastructures. As part of the project, Centria, the Estra Group's main natural gas distribution company, will develop a blended gas network management model using hydrogen, based on specific tests conducted in the pilot sites and on micro-grids, analysing the scenarios and market opportunities. In fact, in the coming years energy operators will be called upon to play a decisive role in the energy transition with the aim of supporting the development of renewable energy sources and promoting new uses of traditional assets to improve efficiency and service levels.

#### **LARGE SCALE SYSTEM APPROACH FOR ADVANCED CHARGING SOLUTIONS - XL CONNECT** (certified as eligible for funding in 2022, launched in 2023)

The development of electric mobility and e-vehicle charging technologies is at the centre of a three-year project funded by the European Union (European Climate, Infrastructure and Environment Executive Agency - CINEA). Estra and the Università di Firenze will fund the project until 2026, along with 22 European partners coordinated by VIV - Virtual Vehicle Research, an R&S centre based in Graz (Austria).

XL-Connect, an acronym of “Large scale system approach for advanced charging solutions”, is a research and innovation project launched with the aim of optimising the entire charging chain - from the supply of energy to the end user - considering the scenario of a growing e-mobility sector (the number of battery-powered e-vehicles is due to reach 30-40 million by 2030 in the EU).

These development forecasts represent a major challenge for the energy system, but at the same time offer an opportunity to use innovative technologies, such as vehicle-to-grid systems, that will enable the vehicle charging system to store energy, thus increasing grid stability.

The general goal of XL-Connect is to deliver clear benefits to all interested parties. The project has the scope to have major direct impacts on the region, informing plans to install charging stations and contributing to renewable energy initiatives to optimise system efficacy. This will benefit the network operator, companies that supply energy to private customers and businesses, and last but not least, users of electric vehicles.

A survey of user behaviour and the analysis of the energy system and the grid represent the core research behind the project, aimed at creating forecasting models that can predict the behaviour of future e-vehicle owners and fleet operators, as well as identify shortcomings on the electricity network and energy system.

The development of advanced charging technology and control mechanisms will form the basis for the evaluations/virtual and physical demonstrations conducted in four European countries (Belgium, Germany, Italy and Portugal).

Parallel to this, a smart charging simulator will be developed which, by incorporating the results of the demonstrations, will be able to illustrate the impact of these technologies and engage all interested parties: energy suppliers, grid operators, charging station operators, suppliers of e-vehicle components and accessories, and a vehicle manufacturer.

#### **REVAMPING OF THE ECOLAT PLANT**

The works included the construction of two plants: one for the valorisation of cellulose fractions; the other for the valorisation of heavy and light multi-materials.

The plants both feature advanced automation systems and the technology includes high quality machines with advanced separation capabilities. The new hub represents an ambitious infrastructure project to select and pre-clean waste fractions from separated waste collection, with a view to their subsequent transfer to companies along the supply chain.

The selection and pre-cleaning processes are extremely important for the subsequent recovery/re-use of the fractions and to make a significant contribution to the circular economy.

It is no coincidence that Ecolat was the company to carry out this modernisation, given that the company, having acquired new handling equipment, as well as a latest-generation machine to reduce the number of shipments, has been granted important authorisations aimed at optimising the treatment of separated waste.

Thanks to the revamping project, which involved total investments of over €6 million (some of which were funded by the Industria 4.0 grants), Ecolat can achieve the highest quality standards for separated waste with greater efficiency. These can then be transferred to other supply chain operators, in line with the provisions of the latest ANCI - CONAI agreement.

In total, the revamping project increased the productivity of the line, improved the quality of the fractions leaving the plant (plastic, tetrapak, aluminium, tin and glass), helped to improve the activities carried out by line operators and improved the micro-climatic conditions of the working environment, and transformed the existing line into a versatile system able to efficiently process the fractions delivered to the plant.

#### **BIM & DIGITAL TWIN**

This project involves using a laser scanner to survey and produce the cloud of points on the PoP network in Prato. The PoP (Point of Presence) is a network access point, provided by Estracom, capable of routing traffic to the end users that are connected to it. The project is the evolution of a software system called “Digital Twin” and the relative BIM “as-built” modelling of the PoP in REVIT and OpenBIM formats.

## 2.8 The European Taxonomy

Regulation (EU) 2020/852 (also “EU Taxonomy Regulation” or “Taxonomy” or “Regulation”), adopted in June 2020, introduced the taxonomy of sustainable business activities - a Europe-wide classification of business sectors and activities that can be considered environmentally sustainable - into the European legislative system.

In particular, it is a tool for reporting business activities and financial product in order to provide businesses and investors the opportunity to disclose information about their commitment to the transition to climate neutrality.

An economic activity is considered compatible with the taxonomy if it contributes to at least one of the six environmental targets established in the regulation and does not obstruct the achievement of any of the others (“Do No Significant Harm” clause).

To meet the regulatory requirements of EU Regulation 2020/852 and subsequent delegated acts<sup>4</sup>, and to identify the economic activities potentially able to contribute to the climate change mitigation and adaptation goals, in 2021 the Group identified the Taxonomy-eligible activities and, in 2022, the Taxonomy-aligned activities, verifying compliance with the substantial contribution criteria defined in the annexes, the “Do No Significant Harm” criteria, and the minimum safeguards.

This series of analyses was carried out by a cross-departmental work group composed of Sustainability, Planning and Control, Administration and the competent functions of the Group's various business lines.

The first step involved the verification and validation of the eligible economic activities identified in 2021, confirming the 2021 list. Furthermore, following the approval by the European Commission of the Complementary Climate Delegated Act on 09 March 2022, which, under strict conditions, extends the economic activities covered by the taxonomy to nuclear power and gas, two new activities have been included on the list of eligible activities: “High-efficiency cogeneration of heat/cool and electricity from gaseous fossil fuels” and “Generation of heat/cool from gaseous fossil fuels in an efficient district heating and cooling system”.

In 2022, an eligibility analysis was conducted on the economic activities of the two new companies to enter the scope of consolidation of the NFS, Edma Reti Gas and Bisenzio Ambiente, with regard to the climate change mitigation and adaptation goals, analysing and evaluating the NACE codes and verifying the descriptions of the activities contained in the annexes.

As regards those activities identified as eligible for the taxonomy, the criteria (job specifications, cost centres, CoGe accounts, Profit...) necessary for the identification of the turnover, CapEx and OpEx KPIs required by the Regulation and identified in 2021 for the individual activities were also verified and confirmed in 2022.

The tables below show the complete list of eligible economic activities for the two goals of climate change mitigation and climate change adaptation.

*Table of eligible business activities of the Estra Group - Climate Change Adaptation Target*

Activity code	Description of business activity	Company	Climate change adaptation
5.5	Collection and transportation of non-hazardous waste in tranches separated at source	Ecolat, Ecos	X

*Table of eligible business activities of the Estra Group - Climate Change Mitigation Target*

<sup>4</sup> Delegated regulation (EU) 2021/2139 of 4 June 2021 (Climate Delegate Act), and relative annexes I and II on climate change mitigation and adaptation targets, and Delegated regulation (EU) 2021/2178 of the Commission of 6 July 2021, as amended.

Activity code	Description of business activity	Company	Climate change mitigation
4.1	Electricity production by solar/photovoltaic technology	Estra Clima	X
4.3	Electricity production from wind energy	Estra Clima	X
4.5	Electricity production from hydroelectric energy	Idrogenera	X
4.15	District heating/cooling distribution	Estra Clima	X
4.16	Installation and operation of electric heat pumps	Estra Clima	X
4.20	Co-generation of heat/cooling energy and electricity from bioenergy	Estra Clima	X
4.30	High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	Estra Clima	X
4.31	Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system.	Estra Clima	X
5.9	Recovery of materials from non-hazardous waste	Ecolat	X
6.4	Management of personal transporters and bicycles	Estra Energie	X
7.3	Installation, maintenance and repair of energy efficiency devices	Estra Clima	X
7.4	Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	Estra, Estra Energie, Estracom	X
7.5	Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	Estra Clima, Centria, Gergas, Murgia Reti Gas, Edma Reti Gas	X
7.6	Installation, maintenance and repair of renewable energy technology	Estra Clima	X
8.1	Data processing, hosting and related activities	Estracom	X
9.1	Close-to-market research, development and innovation	Estra, Centria	X
9.3	Professional services related to the energy performance of buildings	Estra Clima	X

The second phase of the process focused on analysing the criteria for the contribution to the “Climate change mitigation” and “Climate change adaptation” targets. This assessment was carried out by verifying compliance with the technical screening criteria established by the Commission for each target and activity in the Climate Delegated Act.

Next, an evaluation was conducted to verify that the activities do no significant harm to the other environmental targets identified by the EU Taxonomy by analysing the DNSH specified in the Climate Delegated Act.

As regards the minimum social safeguards, while the Estra Group guarantees compliance in the performance of all of its activities, to date it has not defined any specific policies in line with the provisions of the EU Taxonomy, i.e., using the principles defined by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the relative principles of the ILO (International Labour Organisation). As a result, none of the Group's activities can be defined as Taxonomy-aligned, but merely eligible.



However, a project was launched in the final months of 2022 aimed at implementing a Group Policy on Human Rights, an Anti-corruption Policy and an update to the Code of Ethics and Conduct, as well as the establishment of an Ethics Committee, in order to align with the provisions of the EU Taxonomy. As a result of this comprehensive analysis, the summary tables below show the non-eligible, eligible and aligned economic activities for 2022 for the three KPIs: Turnover, CAPEX and OPEX

## Summary table - Turnover

					Criteria for substantial contribution						Criteria for doing no significant harm									Category	
					Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Minimum safeguards	Proportion of turnover aligned to the Taxonomy 2022	Proportion of turnover aligned to the Taxonomy 2021	Enabling activity	Transitional activity
Description of economic activity	Taxonomy code		€	%							YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	%			
A.1. Eligible and aligned activities																					
TOTAL A.1 Eligible and aligned activities			0	0%														0%			
A.2. Eligible but not aligned activities																					
Electricity production by solar/photovoltaic technology	4.1	Estra Clima	2,334,053	0.13%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO				
Electricity production from wind energy	4.3	Estra Clima	1,025	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO				
Electricity production from hydroelectric energy	4.5	Idrogena	8,589	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI			SI	NO				
District heating/cooling distribution	4.15	Estra Clima	2,932,653	0.17%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		SI	SI	NO				
Installation and operation of electric heat pumps	4.16	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	NO			NO				
Co-generation of heat/cooling energy and electricity from bioenergy	4.20	Estra Clima	2,017,874	0.11%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		NO	SI	NO				
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	Estra Clima			NO	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO				

Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system.	4.31	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecolat	113,121	0.01%	NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecos	7,281,015	0.41%	NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Recovery of materials from non-hazardous waste	5.9	Ecolat	4,236,588	0.24%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO				SI	NO				
Management of personal transporters and bicycles	6.4	Estra Energie			SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO			NO				
Installation, maintenance and repair of energy efficiency devices	7.3	Estra Clima	29,684,670	1.67%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO			SI		NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estra Energie Estra			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estracom			SI	NO	N.A.	N.A.	N.A.	N.A.							NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Centra Gergas Murgina			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				

Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Edma Reti Gas			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Estra Clima	89,590	0.01%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of renewable energy technology	7.6	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Data processing, hosting and related activities	8.1	Estracom	89,000	0.01%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI			NO				
Close-to-market research, development and innovation	9.1/9.2	Centra Gargas Murgia			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI	SI	NO	NO				
Professional services related to the energy performance of buildings	9.3	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
<b>TOTAL A.2 Eligible but not aligned activities</b>			<b>48,788,178</b>	<b>2.76%</b>																	
<b>TOTAL A.1 + A.2.</b>			<b>48,788,178</b>	<b>2.76%</b>																	
<b>B. Taxonomy non-eligible activities</b>																					
Non-eligible activities			1,728,067,697	97.24%																	
<b>TOTAL B. Taxonomy non-eligible activities</b>			<b>1,728,067,697</b>	<b>97.24%</b>																	
<b>TOTAL A + B</b>			<b>1,776,855,875</b>																		

Summary table - CAPEX

					Criteria for substantial contribution						Criteria for doing no significant harm									Category	
			Capex 2022	Proportion of Capex 2022	Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Minimum safeguards	Proportion of CAPEX aligned to the Taxonomy 2023	Proportion of CAPEX aligned to the Taxonomy 2024	Enabling activity	Transitional activity
Description of economic activity	Taxonomy code		€	%							YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	%			
A.1. Eligible and aligned activities																					
TOTAL A.1 Eligible and aligned activities			0	0%														0%			
A.2. Eligible but not aligned activities																					
Electricity production by solar/photovoltaic technology	4.1	Estra Clima	530,408	1%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO				
Electricity production from wind energy	4.3	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO				
Electricity production from hydroelectric energy	4.5	Idrogenera			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI			SI	NO				
District heating/cooling distribution	4.15	Estra Clima	325,481	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		SI	SI	NO				
Installation and operation of electric heat pumps	4.16	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	NO			NO				
Co-generation of heat/cooling energy and electricity from bioenergy	4.20	Estra Clima	135,203	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		NO	SI	NO				
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	Estra Clima			NO	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO				

Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system.	4.31	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecolat			NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecos	170,310	0%	NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Recovery of materials from non-hazardous waste	5.9	Ecolat	4,298,059	5%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO				SI	NO				
Management of personal transporters and bicycles	6.4	Estra Energie			SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO			NO				
Installation, maintenance and repair of energy efficiency devices	7.3	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO			SI		NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estra Energie Estra	91,401	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estracom			SI	NO	N.A.	N.A.	N.A.	N.A.							NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Centria Gergas Murgina	8,039,786	9%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				

Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Edma Reti Gas	2,124,834	2%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of renewable energy technology	7.6	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Data processing, hosting and related activities	8.1	Estracom			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI			NO				
Close-to-market research, development and innovation	9.1/9.2	Centria Gergas Murgiana	98,704	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI	SI	NO	NO				
Professional services related to the energy performance of buildings	9.3	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
<b>TOTAL A.2 Eligible but not aligned activities</b>			<b>15,814,186</b>	<b>17%</b>																	
<b>TOTAL A.1 + A.2.</b>			<b>15,814,186</b>	<b>17%</b>																	
<b>B. Taxonomy non-eligible activities</b>																					
Non-eligible activities			74,754,175	83%																	
<b>TOTAL B. Taxonomy non-eligible activities</b>			<b>74,754,175</b>	<b>83%</b>																	
<b>TOTAL A + B</b>			<b>90,568,361</b>																		

## Summary table - OPEX

					Criteria for substantial contribution						Criteria for doing no significant harm								Category	
					Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Climate change mitigation	Climate change adaptation	Water and water resources	Circular economy	Pollution	Biodiversity	Minimum safeguards	Proportion of OPEX aligned to the Taxonomy	Enabling activity	Transitional activity
			OpeX 2022	Proportion of OpeX 2022							YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	%		
Description of economic activity	Taxonomy code		€	%																
A.1. Eligible and aligned activities																				
TOTAL A.1 Eligible and aligned activities			0	0%													0%			
A.2. Eligible but not aligned activities																				
Electricity production by solar/photovoltaic technology	4.1	Estra Clima	794,215	0.05%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO			
Electricity production from wind energy	4.3	Estra Clima	6,046	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO		NO	NO			
Electricity production from hydroelectric energy	4.5	Idrogena	13,633	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI			SI	NO			
District heating/cooling distribution	4.15	Estra Clima	3,631,708	0.22%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		SI	SI	NO			
Installation and operation of electric heat pumps	4.16	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	NO			NO			
Co-generation of heat/cooling energy and electricity from bioenergy	4.20	Estra Clima	2,164,277	0.13%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	SI		NO	SI	NO			
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	Estra Clima			NO	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO			



Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system.	4.31	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		SI	SI		NO	SI	NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecolat	41,562	0%	NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Collection and transportation of non-hazardous waste in tranches separated at source	5.5	Ecos	2,774,961	0.16%	NO	SI	N.A.	N.A.	N.A.	N.A.				SI			NO				
Recovery of materials from non-hazardous waste	5.9	Ecolat	4,153,322	0.25%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO				SI	NO				
Management of personal transporters and bicycles	6.4	Estra Energie	535	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO		NO			NO				
Installation, maintenance and repair of energy efficiency devices	7.3	Estra Clima	18,384,155	1.10%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO			SI		NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estra Energie Estra	136,675	0.01%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of e-vehicle charging stations in buildings (and in building parking spaces)	7.4	Estracom			SI	NO	N.A.	N.A.	N.A.	N.A.							NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Centra Gargas Murgina			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				

Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Edma Reti Gas			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of instruments and devices to measure, regulate and control energy performance in buildings	7.5	Estra Clima	55,144	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Installation, maintenance and repair of renewable energy technology	7.6	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
Data processing, hosting and related activities	8.1	Estracom	40,000	0%	SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI			NO				
Close-to-market research, development and innovation	9.1/9.2	Centria Gergas Murgia			SI	NO	N.A.	N.A.	N.A.	N.A.		NO	NO	SI	SI	NO	NO				
Professional services related to the energy performance of buildings	9.3	Estra Clima			SI	NO	N.A.	N.A.	N.A.	N.A.		NO					NO				
<b>TOTAL A.2 Eligible but not aligned activities</b>			<b>32,196,233</b>	<b>1.92%</b>																	
<b>TOTAL A.1 + A.2.</b>			<b>32,196,233</b>	<b>1.92%</b>																	
<b>B. Taxonomy non-eligible activities</b>																					
Non-eligible activities			1,642,628,366	98.08%																	
<b>TOTAL B. Taxonomy non-eligible activities</b>			<b>1,642,628,366</b>	<b>98.08%</b>																	
<b>TOTAL A + B</b>			<b>1,674,824,599</b>																		

Turnover was calculated as the portion of net revenues obtained from products and services associated with the economic activities aligned with the taxonomy (numerator), divided by total net revenues (denominator). Turnover includes revenues reported in line with the reference international accounting standard (IAS/IFRS).

Capital expenditure (CapEx) includes, as denominator, capital gains on property, plant and equipment and intangible assets during the year before depreciation, write-downs and any other revaluation, including those deriving from value redeterminations and reductions for the year in question, and excluding changes to fair value. It also includes gains on property, plant and equipment and intangible assets resulting from business combinations. The numerator corresponds to the part of capital expenditure included in the denominator relative to assets or processes associated with economic activities aligned with the taxonomy, or which are part of a plan aimed at expanding the economic activities aligned with the taxonomy or allowing the eligible economic activities to align with the taxonomy, or which are relative to the purchase of products deriving from the economic activities aligned with the taxonomy.

Operating expenditure (OpEx) includes, as denominator, non-capitalised direct costs related to research and development, building renovation measures, short-term leasing, maintenance and repairs as well as any other direct expenses related to the daily maintenance of property, plants and machinery, by the company or by third parties to which these tasks are outsourced, necessary to ensure continuous and effective operation. The numerator includes the part of operating expenditure included in the denominator that either relates to assets or processes associated with economic activities aligned with the taxonomy, or which aim to expand economic activities aligned with the taxonomy or to allow eligible economic activities to align with the taxonomy, or which are relative to the purchase of products deriving from economic activities aligned with the taxonomy and individual measures that allow the activities aimed at achieving low carbon emissions or reduced greenhouse gas emissions.

### 3. Governance

#### 3.1 Targets and results

Targets for 2022	Results in 2022
Estra Group To analyse and implement the Group Governance, Risk and Compliance platform.	<i>Target partially achieved</i> The target has been redefined to aim at the implementation of a management system for Regulation 231, to be completed by 2024. Software previewed in early 2023.
Estra Group To define an Anti-corruption Compliance Programme, initially for Companies that have adopted the 231 Model, inspired by the values and principles defined in the Code of Ethics, with the aim of establishing a general code of conduct to be adopted by the Group's Directors, managers and employees, as well as by third parties.	<i>Target partially achieved</i> In 2022 the Group began to prepare the new Code of Ethics, which will incorporate the rules of conduct and two new policies on Anti-corruption and Human Rights. Once complete, the Boards of Directors will be required to approve the documentation which shall then be shared within and outside the Group.
Estra Group To extend the list of Companies that have adopted the Model pursuant to Italian Legislative Decree 231/2001 to companies operating in the environmental sector that conduct relevant activities and are averagely structured.	<i>Target partially achieved</i> In September 2022 work began to implement the Model pursuant to Italian Legislative Decree 231/2001 for the company Ecos, while the company Bisenzio was tasked with preparing the Model. The goal of preparing and adopting Models 231 for both companies by 2023 is confirmed.
Estra Group To consolidate the current ERM process and update the Group risks: to proceed with the annual review of the ERM Model to ensure its continued alignment with the strategic plan and the evolution of the reference markets	<i>Target partially achieved</i> In 2022 the top risks of the Estra Group were analysed and emerging risks were assessed.
Estra Group To assess computerised risk management systems: to launch research projects to develop a computerised risk management system.	<i>Target partially achieved</i> Currently being implemented. Once the emerging risks assessment is completed and the risk assessment is updated, a risk management IT system will be trialled.
Murgia Reti Gas To extend the whistleblowing platform to the company Murgia Reti Gas.	<i>Target achieved</i>

#### Targets for 2023

Estra Group

To introduce a new risk assessment metrics, such as interconnectivity and speed, to complement traditional probability and impact assessment metrics.

Estra Group

To align the Whistleblowing regulation to the European Directive and provide whistleblowing training for employees of companies that have adopted the 231 Model.

Estra Group

To provide training on anti-corruption policies and procedures to government bodies.

Estra Group

To define the cultural and ethical risk targets: to integrate cultural and ethical risk assessments in order to identify opportunities for improvement in processes, practices and employee training.

Murgia Reti Gas srl

UNI EN ISO 14001 and Emas certification

## Targets for 2023-2024

Centria

To transition to certification ISO 27001:2022 - Information Security Management Systems

## Targets for 2023-2025

Estra Group

To implement software dedicated to managing the Occupational Safety Management System and IMS.

To consolidate the new Neta information system and implement improvements to make processes faster, safer and more efficient.

To adopt the Neta system in all Estra Group companies.

## 3.2 Corporate Governance and Control Boards

In 2022 there were 82 members on the Estra Group's governance boards. With regard to gender, there is a pronounced weighting towards men, who represent 79.3% of the positions held. In terms of age, 76.8% of members are over 50 years old. Furthermore, the company's willingness to engage and motivate its employees has led to 31.7% of employees sitting on the Boards of Directors of Group companies.

The table below summarises the key information of the governance boards for the last three years (2020-2022).

		2020	2021	2022
	Composition			
Number of members		72	70	82

Women		18	15	17
Men		54	55	65
<b>Age</b>				
<b>29 or under</b>				
Women		0	0	0
Men		0	0	0
<b>From 30 to 50 (inclusive)</b>				
Women		8	5	5
Men		15	14	14
<b>Over 50 years</b>				
Women		10	10	12
Men		39	41	51
<b>Average age</b>				
Women		50	51	52
Men		56	56	57
Overall average age		54	55	56

As regards educational level, the data in 2022 were unchanged on the previous year: 96.3% of members hold a diploma or a degree. In particular, 35.4% hold a senior high school diploma, while 61% have a university degree. In gender terms, 64.7% of women are university graduates, compared to 60.0% of men.

As regards seniority<sup>5</sup>, in 2022 there was an increase in the number of roles from 102 in 2021 to 115. This is due to the expansion of the scope of consolidation of the Estra Group. Of these, 55 were characterised by a seniority of below three years, 38 with seniority between three and six years, and 24 with seniority of over six years. For both genders, the prevalent level of seniority was less than six years (93 out of 117).

With regard to the Board of Directors of Estra S.p.A., the ordinary Shareholders' Meeting is responsible for the appointment and revocation of the Board of Directors and defining the fee payable to them, the appointment of the Board of Statutory Auditors, and the party assigned the independent audit and whatever else is provided under article 2364 of the Italian Civil Code. The Shareholders' Meeting is responsible for adopting rules that govern the operation of shareholders' meeting operations, where deemed necessary.

Estra S.p.A. is governed by a Board of Directors consisting of 5 members. The shareholders Consiag S.p.A.", "Intesa S.p.A.", "Coingas S.p.A." and "Viva Energia S.p.A." each have the right to nominate one director.

Candidates members of the Board of Directors, whether nominated by shareholders or not, must possess specific expertise and professional qualifications in terms of offices held, functions previously performed, professional activities carried out or comparable activities. In addition to these requirements, directors that are not nominated by shareholders must also meet the requirements of autonomy and independence pursuant to Art. 2399 (1) of the Italian Civil Code. 70% of the directors nominated to serve on the various Boards of Directors of Group companies within the scope of consolidation have specific expertise and knowledge of the reference scenario. As regards the gender diversity of the Board of Directors of the Parent Company, despite not being a listed company Estra nonetheless undertakes to comply with Law 120 of 12 July 2011, under which at least one third of roles must be allocated to women.

In the case of Estra S.p.A., the Chairperson of the Board of Directors is not a senior executive of the organisation.

Each member of the BoD informs the other directors and the Board of Statutory Auditors of any interest they may have in a given operation of Estra S.p.A., declaring the conflict of interest with regard to the matter

<sup>5</sup> Seniority is calculated considering the total number of roles, not the number of members of the governance bodies.

in question and explaining the reason. The conflict of interest shall be duly noted in the minutes of the Board meeting and thus shall also be made aware to employees who receive, as a result of their role, the minutes of the items on the agenda of the Board meeting in which the director declared the conflict of interest.

As such, stakeholders are made aware of all conflicts of interest declared, including those relative to:

- i) membership of more than one Board of Directors;
- ii) cross-shareholdings with suppliers and other stakeholders;
- iii. existence of majority shareholders (whose vote is decisive for the attainment of a majority at a Board meeting).
- iv) related parties, their relations, transactions and outstanding balances.

The performance of the Estra S.p.A Board of Directors, also with regard to the management of the Group's impact, is assessed each year in the Shareholders' Meeting during the presentation of the Consolidated Financial Statements and the Consolidated Non-Financial Statement. At such time, the economic impacts are illustrated, making reference to the content of the Consolidated Financial Statement and the impact on the environment and people described in the Consolidated Non-Financial Statement. Therefore, the Shareholders - as Stakeholders themselves - are involved in approving the results for the year.

The BoD is responsible for assessing the performance trends in the year. It approves the results presented to the Shareholders' Meeting and provides strategic guidance. With regards to the impact assessment, the various tasks are assigned to each manager, according to the organisational chart approved by the BoD and the duties performed. The organisational chart defines the Group's organisational structure, identifies the managers, their collaborators and the duties they are required to perform.

Furthermore, at the end of each term of office (every three years), the Shareholders assess the performance of the Estra Spa Board of Directors and decide whether or not to change the composition of the Board. Currently, the performance of the highest governing body is not assessed on sustainability targets.

Directors' remuneration is established by the Shareholders, who decide:

- the annual fixed component of remuneration proportional to the net profit for the year;
- the maximum bonus that can be awarded upon the approval of the Financial Statements, which can be redefined at that time and may vary according to the different roles of the directors;
- the maximum annual remuneration for the offices that the directors hold.

The fee for appointees is set by the Board of Directors at the time of their appointment. The fee must remain within the maximum limits established by the Shareholders, varies depending on the various roles, and always complies with the limits established by statutory provisions.

The remuneration of senior managers is based on the CCNL tables and a performance appraisal system that has been designed and structured around the Group's strategic guidelines. The model is aimed at managers as well as other senior personnel of Estra Spa and relative Group companies.

The performance assessment process is based on indicators divided into the following three categories:

- Group economic performance indicators;
- Role indicators;
- Management skills.

The Group economic performance indicators are quantitative indicators that refer to the achievement of the primary targets of the Company and/or the Group. (e.g., EBIT and EBITDA of the Group or Company). The indicator is calculated on a scale, using the budget as the benchmark.

Role indicators are specific indicators for each position and role which are defined each year by the direct line manager and confirmed by the Management Committee. These may be structured as:

- Performance targets: these are normally expressed in quantitative terms and indicate personal goals linked to the roles and duties carried out (e.g., *reduce budget spending*);
- Effectiveness targets: these are normally expressed in quantitative terms and indicate specific goals for the relevant business area; they are used to optimise the resolution of problems arising within that area (e.g., *increase case processing speeds on the IT systems*);
- Efficiency targets: these are normally expressed in quantitative or qualitative-quantitative terms and are mainly linked to product or service quality metrics (e.g. *rework changes made by the IT systems*).

Managerial skills are assessed by individual indicators that consider the conduct of the assessee in the performance of their role within the organisation, with the aim of ensuring a positive organisational climate, collaboration and a trajectory towards achieving targets. The model is composed of four key assessment areas, with the aim of providing a qualitative evaluation of soft skills:

- Promote continued professional development;
- Guarantee quality;
- Promote cooperation and inclusion;
- Adopt a forward-looking outlook.

The weightings attributed to the indicators depend on the role in question, with different weightings according to the level of responsibility of the assessee. The indicators are broken down differently according to the position held (General Manager, Executives, Other).

In this process, targets are assigned using a top-down approach, starting with senior management. In the months prior to the preparation of the budget, the Human Resources Service begins the process to assign the targets for the coming year. This is based on a discussion about the targets between the person that sets them (assessor) and the recipient of the MBO (assessee). Specifically, role-specific targets and the relative weightings are set each year and are assigned and approved in a formal meeting, based on the level of responsibility and the role of each assessee. In this phase, as well as the role-specific targets, the pool of MBO recipients and the financial bonuses to be awarded to the assessee are identified. The Management Committee, supported by the Human Resources department, approves the pool, the bonus value and the role-specific targets assigned to the assessee by senior management of the Group Companies.

Within the first six months of each year, the targets for the previous year are certified and assessed at a final meeting between the assessee and assessor, verifying the level of achievement of the assigned targets and relative indicators. During this phase, management skills may be evaluated in a two-stage assessment involving both the direct supervisor and the Manager of the Group Company, in order to reduce the subjectivity associated with the evaluation of soft skills.

Specifically, 137 employees (48 women and 89 men) have been awarded MBOs, accounting for 17% of the total number of employees. More than half were assigned to office workers (53%), followed by middle managers (29 %) and executives (18 %). Evaluation is concerned with both performance and a person's professional growth. Particularly evaluated are adaptability, problem-solving skills, simplification, effective planning of work within predetermined timeframes, leadership, inclusiveness and collaboration in the sense of having an overall view of the organization and pursuing common goals, as well as innovation aptitude and the capacity to ensure results.

### ***Sustainable Development Knowledge on the Governing Bodies***

The Directors of Estra Spa are responsible for ensuring that the Non-Financial Statement is prepared and published in compliance with the provisions of Italian Legislative Decree 254/2016. To meet this obligation,



the Directors act according to criteria of professionalism and due diligence. The Directors present the Non-Financial Statement to shareholders at a specific Shareholders' Meeting.

The Board of Directors of Estra Spa is therefore responsible for approving the information contained in the Non-Financial Statement. The Board also approves the material topics identified for the purposes of the NFS. The NFS and the material topics are entered onto the Agenda of the Meeting of the Board of Directors and, following a presentation given by the competent function and the resulting discussion, during which requests for clarifications can be made, are approved by the Board. The NFS of the Estra Group and the material topics presented over the years have always been approved without objection by the Board of Directors.

As required by law, the audit of the Non-Financial Statement is carried out by a function authorised to carry out this activity, which is specifically designated by the Board of Directors.

It is therefore important to develop the skills and experience of the Boards of Directors of Estra Spa and other Group Companies on matters of sustainable development.

These skills were developed on several occasions in 2022. The members of the Boards of Directors of Group Companies attended a conference on 14/09/2022 which illustrated the main topics of 2021 Sustainability Report published by the Estra Group. The Board of Directors of Estra Spa had the opportunity to explore topics related to sustainability, approving the 2021 NFS and the 2023-2027 Strategic Plan which focuses on three key strategies (Sustainability, Digital, Human) all related to environmental and social sustainability. Board members from Group Companies were also able to participate in the conference on 21/01/2022 on the results of the energy poverty survey and the possible countermeasures. This topic is closely linked to the social aspects of energy management.

Below are the topics discussed by the Boards of Directors of certain Group companies related to sustainable development.

### **Estra Board of Directors**

*Acquisition of the Ancona office* For this acquisition a Sustainability Due Diligence process was conducted. The aim of the due diligence process is to provide a preliminary assessment of the level of sustainability of the site, highlighting strengths, weaknesses and possible areas of intervention on energy and environmental sustainability and liveability. The analysis was based on the indications of leading international green building protocols such as LEED, BREEM and WELL, which represent an objective and standardised method to assess the sustainability of buildings or developments.

According to the outcome of the analysis, based on its current situation the building will have to undergo a thorough renovation that incorporates requirements of sustainability and circular economy in construction.

The margins for improvement for the major renovation project are:

- accessibility and transport: possibility to reduce car-dependency at the site;
- efficient water consumption: the redevelopment will help to improve water services and reduce consumption; covered areas and the large external yard area offer the opportunity to consider water recovery systems;
- energy efficiency: in this case, the need for radical intervention also presents an opportunity for a complete overhaul of the current systems, with improvements in terms of energy saving and efficiency. As the project can be defined as a "major redevelopment", the new asset must be an NZEB (Nearly Zero Energy Building);
- building comfort: the large windows provide good natural light in many areas of the building. The outside green space, which will also be redeveloped, will add to the well-being and comfort of the occupants;
- health and well-being: the building is currently disused; as such, this indicator refers to the design phase of the renovation project.

*"Large scale system approach for advanced charging solutions" project - (XL-Connect)* - Funded by the European agency CINEA as part of the Horizon programme (call: HORIZON-CL5-2021-D5-01-03). The aim of the project is to optimise the entire e-vehicle charging cycle, from the supply of energy to the end user, to deliver benefits for all interested parties by identifying a more effective and efficient charging system both in terms of the technology used and the consumption model.

Estra is a member of the participatory foundation *"Ricerca e Innovazione Economica ETS"* (abbreviated to *"R.INNOVA ETS"*), registered in Venafrò (IS). The foundation aims to carry out actions in the public interest to support and strengthen the socio-economic system with innovative projects in the green and digital fields, mainly in the Molise Region and to a lesser extent across Italy.

#### **Boards of Directors of Estra - Energie - Centria**

*#RiParto* - Department for Family Policies (PCM). "Company welfare programmes aimed at encouraging mothers to return to work, increasing birth rates and supporting a healthy work-life balance" The aim of the project is to support mothers and encourage the return to work after maternity leave, and to promote a healthy balance between work and family life through financial and logistical support, training and guidance.

#### **Estracom Board of Directors**

*EUI – Innovative Actions (EUI-IA)* and Expression of Interest on behalf of the municipality of Prato in the "Building and Renovating for Circularity and Carbon Neutrality" call launched by the European Urban Initiative. The European Commission has set up the European Urban Initiative (EUI) programme, which has published its first call for innovative actions, aimed at supporting local governments' pilot projects to transform cities through concrete interventions aligned with the key values of the NEB, i.e., sustainability, inclusiveness and aesthetics. The projects must make an active contribution to at least one of the specific targets of the EU 2021-2027 Cohesion Policy for a greener, more connected, social and inclusive Europe.

#### **Centria Board of Directors**

*"SmartHydroGrid for Energy Transition and Decarbonisation"* Participation in the MITE call and subsequently award of funding in the selection of project proposals for hydrogen research and development activities to be funded under the National Recovery and Resilience Plan (NRRP). Centria submitted its application in partnership with Techfem S.p.A., Regas S.r.l., Università della Calabria and Creta Energie Speciali S.r.l.

*Call Horizon Europe HORIZON-JTI-CLEANH2-2022-06-02* - The aim is to create a small-scale hydrogen valley which, thanks to the production of electricity from photovoltaic systems and a waste treatment plant, will enable the production of green hydrogen to be used as an energy carrier for local companies and for local public transport. The municipality of Arezzo (lead partner) asked local utility companies to provide extra support to deliver the project. Centria, in partnership with 15 other companies, presented the project entitled "ARH2V".

*Artificial Intelligence, Blockchain and Internet of Things Fund* - The Fund aims to pursue the economic and industrial policy objectives - including in the research, development and technological innovation fields - of the Transition 4.0 Plan, and to increase the competitiveness and productivity of the economic system so that digital innovation processes can generate smart, sustainable and inclusive growth, in line with the development goals set by the European Union. Operating in partnership with Techfem S.p.A., Università della Calabria and Aramis, Centria presented the "Smart Pipeline Manager" project.

### **3.3 Responsible business management**

#### **Management Model and Governance Policies**

##### ***Management Model***

Since their foundation, all Estra Group Companies have adopted Organisational, Management and Control Models pursuant to Italian Legislative Decree 231/2001 (the “231 Model”) and a Code of Ethics, which together constitute a system of corporate prevention and control able to prevent the commission of the offences provided for by the Decree. The number of Group Companies to have adopted the 231 Model has increased over the years, and today includes the following Companies: Estra, Estra Energie, Prometeo, Centria, Gergas, Murgia Reti Gas, Edma Reti Gas, Estra Clima, Estracom, Ecolat, Gas Marca and Piceno Gas Vendita.<sup>6</sup>

The Supervisory Bodies (SB) constantly monitor the implementation of, and compliance with, the 231 Models, with independent powers of initiative, intervention and control that extend to all company sectors and departments.

In 2022 no updates were made to the existing 231 Models and no new 231 Models were approved.

Please note that the companies Ecos and Bisenzio Ambiente outsourced the preparation of the Code of Ethics and the 231 Model, and that the companies Estra and Edma Reti Gas outsourced the updating of the Code of Ethics and the 231 Model to take into account the new predicate offences introduced into Italian Law in 2022.

In 2023, updates will be made to the 231 Models of the other companies of the Estra Group, based on the expected impacts on the Models of the introduction of the new predicate offences.

### ***The Internal Whistleblowing System***

Estra and other Group Companies that have adopted a 231 Model have updated their Models to consider the provisions introduced by Law 179/2017<sup>7</sup>, concerning the adoption of a digital reporting channel capable of protecting the identity of those who report unlawful conduct relevant to the predicate offences, protecting the entity's integrity, preventing retaliatory or discriminatory acts, whether direct or indirect, and implementing sanctions against those who violate the measures to protect the whistleblower. The web app (MY WHISTLEBLOWING) adopted by the Group enables users to access the platform exclusively with the use of unique access codes. All reports and data entered into the software are encrypted and the identity of the whistleblower is only visible to the Supervisory Bodies, who represent the sole recipients of the reports. The tool also enables anonymous reporting. The Bodies have drafted and approved a regulation that provides for a preliminary investigation linked to the report which protects the identity of the whistleblower.

In 2022, no reports were received through this platform, which is used by all companies that have adopted a 231 Model.

The Group also has additional internal channels available to employees, consisting of dedicated e-mail addresses, for reports on specific areas such as data protection, human resources, internal communication (through the corporate Intranet), health and safety (near-misses), the integrated management system, and the Estra training platform for call centre operators and public offices.

Finally, in 2023, the Estra Group will organise a training course on whistleblowing aimed at all employees. This training course should have been held in 2022 but was postponed for one year as Italy only implemented EU Directive 2019/1937 on 15 March 2023. The new legislation will enter into force on 15 July 2023 and the course will not be held until after this date, when the content to be delivered is confirmed. According to the new law, whistleblowing reports will no longer only have to concern breaches of the 231

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<sup>6</sup> With reference to the boundary of the NFS, please note that the companies Cavriglia, Tegolaia and Idrogenera have not adopted a MOGC as they do not have employees and were established exclusively for the purpose of managing renewable energy plants.

<sup>7</sup> Please note the recent publication of Legislative Decree 24 of 10/03/2023 (the “Whistleblowing Decree”), which came into force on 30/03/2023 with effect from 15/07/2023, and which introduces new regulations on whistleblowing and the protection of whistleblowers.

Model but may also concern breaches of EU law such as legislation on public procurement, financial services, product and transport safety, money laundering prevention, personal data protection and environmental protection. The training will therefore be aimed at all Group employees and not only those employed by a company that has adopted a 231 Model.

### ***Activities of the Supervisory Body***

The supervision and control of the 231 Models is entrusted by each Company to a Supervisory Body (SB) granted independent powers of initiative and control, to which periodic reports are submitted. The SBs make their assessment on the basis of the checks carried out during the audit, aiming to monitor compliance with the Model, according to the regulations approved by the same.

The Supervisory Body of Estra, Estra Energie, Estra Clima, Estracom, Prometeo, Centria and Gergas is composed of 4 members, 3 of which are external and one of which is internal. The Supervisory Body of Ecolat, Murgia Reti Gas and Edma Reti Gas is composed of two members, one internal and one external, while Piceno Gas Vendita and Gas Marca established monocratic Supervisory Boards, with the role entrusted to a single internal member.<sup>8</sup>

In 2022 the Supervisory Bodies held regular meetings, held at least once a month, and carried out document checks (data streams coming from the management departments of the companies) and audits of areas considered to be most at risk of the commission of “231 Offences”.

A total of 75 audits were carried out, divided as follows:

- human resources: 31
- health, safety and environment: 22;
- compliance with internal regulations: 10;
- supplier assessment: 4;
- accounting cycle (services/consultancies): 3;
- administration and budget: 2;
- grants and subsidies: 1;
- procurement code: 1;
- contractual verification: 1.

In 2022 there were no records of breaches to the Organisational, Management and Control Model.

The main audits conducted by the Internal Audit department in 2022 were “operational audits”. In fact, audits were conducted on the application of recent service orders which outlined specific procedures for the management of expense reimbursements, the use of credit cards, and the way in which consultancy services are assigned to external professionals.

The purpose of the audits was to examine the proper management of expense reimbursement requests received and the application of the procedures concerning the use of credit cards (both “personal” and “corporate” cards), and to analyse the way in which services were instructed to external professionals and to verify the presence of the requirements needed to be able to proceed with the instruction (registration on the Supplier Register, potential conflicts of interest).

### ***Policies and procedures***

Many Group Companies<sup>9</sup> have adopted certified management systems such as ISO 9001, ISO 14001, ISO 45001, SA 8000, ISO 27001, each supported by a specific policy. Furthermore, a Data Protection Policy was defined and can be consulted on the website [www.estra.it](http://www.estra.it).

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<sup>8</sup> In 2022, Ecos and Bisenzio Ambiente did not adopt a 231 Model or a Supervisory Body.

<sup>9</sup> This extends to the following Companies: Bisenzio, Centria, Ecolat, Ecos, Edma, Estra Clima, Estra Energie, Estra, Estracom, Gergas, Murgia, Prometeo.

Policy implementation is the responsibility of the various departmental managers who, according to the organisational chart, are responsible for obtaining, maintaining and implementing the various certifications. Each policy translates into operating procedures and guidelines which transform the indications contained in the documents into concrete actions. Estra has developed specific tools to monitor performance (also in terms of sustainability and environmental conservation), such as environmental impact assessments, analytical controls, internal audits and the monitoring of regulatory compliance.

The Policies are updated to respond to changes to national regulations and to the external context.

Training on certifications and data protection is mandatory and is provided on an ongoing basis.

The measures implemented to ensure the responsible management of company activities include operating procedures to assign tasks to consultants and professionals, which state that:

- professionals/consultants must be registered on the Estra Supplier Register.
- for contracts of over € 40,000.00, market research must be carried out and at least three quotes must be acquired; if this is not the case, the manager must provide specific reasons.
- any conflicts of interest must be reported in writing by the person requesting the service to their direct superior for appropriate assessment.
- In the case of appointments subject to the Public Procurement Code for contracts that exceed the legal threshold for direct appointment, the legal provisions in force must be followed.
- prior to validating the issued invoices, the department requesting the service must verify the effective performance of the services by commissioning a report from a consultant.

Please note that in early 2023 works began to revise the Code of Ethics and to draft two new policies on anti-corruption and human rights.

### ***Anti-corruption***

The anti-corruption policy of the Estra Group is characterised by the principles that underpin the Code of Ethics adopted by Estra S.p.A. and by the Companies that have adopted a 231 Model. The Code of Ethics prohibits the pursuit of the company's interests by unlawful methods, as well as favouritism, collusion, the payment of tangible and intangible benefits and any other act aimed at influencing or rewarding actions by private or public third parties.

In the 2020-2022 period, no cases of corruption were reported nor found.

All new employees receive information about the existence of the Code of Ethics and the 231 Model which can be consulted on the employee platform, and receive basic training on the 231 Decree within three months of commencing employment.

Finally, employees are constantly informed of any updates to the 231 Models or changes resulting from organisational and/or regulatory changes, which they can consult in the relevant section of the company Intranet.

The table illustrates the anti-corruption training provided to Estra Group employees by professional level and location.<sup>10</sup>

*Employees who received anti-corruption training, subdivided by category and site*

	2020	2021	2022
<b>Number of employees trained on</b>	440	166	45

<sup>10</sup> In order to improve reporting and ensure alignment with international standards, unlike the data published in previous Non-Financial Statements, the table refers only to Group employees, excluding agency workers.

<b>anti-corruption</b>			
Messengers	1	1	0
Manual workers	93	25	18
Clerical workers	326	85	23
Middle managers	20	34	4
Managers	0	21	0
Percentage of total employees	59.8%	21.8%	5.5%
<b>Geographical distribution</b>			
Arezzo	15.9%	10.2%	6.7%
Prato	43.6%	47.0%	17.8%
Siena	34.3%	23.5%	4.4%
Ancona	2.3%	2.4%	4.4%
Other areas	3.9%	16.9%	66.7%

\* This does not include managers who are members of Company Management Bodies.

In 2022, 45 employees (36 men and 9 women) received training on anti-corruption, representing 5.5% of the workforce, a significant decrease on the previous year when training was provided to 166 employees. The decrease in the number of employees who received anti-corruption training is explained by the high number of employees who received online training on this topic during the Covid-19 pandemic.

Anti-corruption training was aimed at managers, clerical workers and manual workers. In line with previous years, clerical workers received the most training and represented over half of those trained. The portion represented by manual workers who received training rose significantly in 2022 from 15.1% in the previous year to 40%.

In terms of geographical distribution, unlike in previous years when the majority of employees trained in anti-corruption were concentrated in the Group's traditional locations of Arezzo, Prato and Siena, in 2022 a significant number of employees were trained in other locations such as Bari and Foggia. In 2022, anti-corruption training also involved 12 agency workers.

The anti-corruption policies and procedures are notified to all members of the Management and Control bodies (Board of Directors and Board of Statutory Auditors) of the companies that have adopted the Management Model and the Code of Ethics.

As regards anti-corruption training provided to members of the governance bodies, please note that the data provided refers to members of the Boards of Directors and Committees that approved the update to the 231 Model to members of the Board of Directors of Murgia Reti Gas, as this company adopted the 231 Model and the Code of Ethics at the end of 2021. In 2022 no Group companies made updates to the Model. The data in the table for 2022 refers to members of the BoD of Murgia.

*Members of the management bodies who have received anti-corruption training*

2020			2021			2022		
Total members (no.)	Total members trained (no.)	%	Total members (no.)	Total members trained (no.)	%	Total members (no.)	Total members trained (no.)	%
72	8	11%	70	52	74.3%	82	5	6.1%

As regards members of the management bodies who received information on anti-corruption procedures, this data corresponds to the members who were present and approved the interim report of the Supervisory Body relative to the first six months of 2022.

*Members of the management bodies who have been informed of anti-corruption policies and procedures*

2020			2021			2022		
Total members (no.)	Total members informed (no.)	%	Total members (no.)	Total members informed (no.)	%	Total members (no.)	Total members informed (no.)	%
72	53	74.0%	70	49	70.0%	82	60	73.2%

The 231 Management Model and the Code of Ethics are distributed to all employees of the relative Group companies at the time of approval or amendment, as well as all new employees hired by Companies that have adopted a 231 Model. The table shows the number of Estra Group employees that were shown the Model or were informed of updates to the same, divided by level of qualification.<sup>11</sup> In 2022 no new Models were approved and no existing Models were updated; consequently, no updates were provided to employees. However, Murgia Reti Gas adopted a 231 Model at the end of 2021 which was distributed to 29 employees. These are joined by 77 new employees at the other Group Companies that have adopted 231 Models and the Code of Ethics, for a total of 106 employees. Of these, 51 are employed by Companies acquired by the Estra Group during the year. If agency workers are also taken into account, the number of workers who received training on the Model 231 and the Code of Ethics during 2022 rises to 135.

<i>Employees who were informed of updates to the 231 Model and Code of Ethics by classification</i>	2020	2021	2022
Managers	11	11	1
Middle managers	14	28	4
Clerical workers	154	377	53
Manual workers	10	152	48
Messengers	3	2	0

Although the Estra Group has not adopted a formal procedure to inform suppliers of anti-corruption policies and procedures, all suppliers that receive authorised purchase orders and those that receive orders under contract from companies that have adopted the Management Model and Code of Ethics are expressly required to acknowledge the latter. Failure to comply may result in claims for damages and/or the termination of the contractual relationship.

The tables below demonstrate the number of suppliers required to acknowledge the 231/2001 Model and the Code of Ethics of the Group, distinguishing between those that received purchase orders and those than received orders under contract for the 2020-2022 period.

All suppliers who received purchase orders were required to acknowledge, share and accept the principles of the 231/2001 Model and the Code of Ethics.

The numbers of suppliers who received purchase orders rose significantly in the three-year period, increasing by 24.1% between 2021 and 2022. The number of suppliers who received contracts remained the same in the last two years, as did the percentage of those who were required to acknowledge the Code of Ethics (56.4% in 2022).

Total number of suppliers required to acknowledge the 231/2001 Model and the Code of Ethics	
	Total number of suppliers
2020	2,349*

<sup>11</sup> Unlike the data published in previous NFSSs, in line with the GRI reporting standards the data only refer to employees. Agency workers are not included in the data.

2021	2,405**		
2022	2,520***		
Purchase orders			
	Total number of suppliers	Total number of suppliers required to share and accept the principles of the 231/2001 Model and the Code of Ethics	Percentage of suppliers required to share and accept the principles of the 231/2001 Model and the Code of Ethics
2020	768	768	100%
2021	831	831	100%
2022	1,031	1,031	100%
Orders under contract			
	Total number of suppliers	Total number of suppliers required to acknowledge the 231/2001 Model and the Code of Ethics	Percentage of suppliers required to acknowledge the 231/2001 Model and the Code of Ethics
2020	588	297	50.5%
2021	736	420	57.1%
2022	742	421	56.7%

\* Suppliers with trading agreements exclusively with Gas Marca, Piceno Gas Vendita (not managed by the Estra S.p.A. Procurement and Tender Service) and Murgia Reti Gas (which has not adopted a Code of Ethics) are excluded. In addition to this total there were 124 suppliers who acknowledged the Code of Ethics in view of purchase orders or orders by contract signed in the course of 2020 but for which no payment had been received as at 31/12/2020.

\*\* Suppliers with trading agreements exclusively with Gas Marca, Piceno Gas Vendita (not managed by the Estra S.p.A. Procurement and Tender Service), Murgia Reti Gas (which has not adopted a Code of Ethics) and Ecos (acquired in 2021 and which does not distinguish between purchase orders and orders under contract) are excluded. In addition to this total there were 112 suppliers who acknowledged the Code of Ethics in view of purchase orders or orders by contract signed in the course of 2021 but for which no payment had been received as at 31/12/2021.

\*\*\* Suppliers with trading agreements exclusively with Gas Marca, Piceno Gas Vendita, Ecos and Bisenzio (not managed by the Estra S.p.A. Procurement and Tender Service) and that do not distinguish between purchase orders and contract orders are excluded. There were 136 suppliers who acknowledged the Code of Ethics in view of purchase or contract orders signed in the course of 2022 but for which no payment had been received as at 31/12/2022.

All potential suppliers participating in negotiated or public tender procedures with all Group Companies that have adopted a 231 Model are required to issue a statement regarding the salient points of the 231 Model. All such potential suppliers must declare:

- 1) to have acknowledged the Code of Ethics and the Organisational, Management and Control Model of (name of Company) on the website (company URL), acknowledging and accepting the principles contained therein, as well as the condition that failure to comply may result in the termination of the contract and claims for compensation by (name of company), in cases where conduct in breach of the Code of Ethics results in harm, including independently of the termination of the contractual agreement;
- 2) to be aware that the Company (name) has adopted an Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 and has appointed a Supervisory Body to monitor the adequacy and the effective application of the Model;
- 3) to comply in full with Italian Legislative Decree no. 231/2001;
- 4) to not employ citizens of non-EU countries without the proper residence permits;
- 5) to not allow, in the course of its activities, any conduct that may fall within the scope of the types of offence referred to in Italian Legislative Decree no. 231/2001 by (name of Company), as well as conduct that, although not intentionally aimed at committing an offence, may potentially constitute a criminal offence referred to in Italian Legislative Decree no. 231/2001;
- 6) to have never been called to trial (as legal representative) for the offences referred to in Italian Legislative Decree no. 231/2001.



These declarations are reflected in all contracts deriving from tender procedures and the conduct of all suppliers and Group employees is monitored by the Supervisory Body.

In 2022 there were no cases of contract termination or non-renewal with partners due to breaches related to corruption.

### 3.4 Certifications

The Group considers certifications, which represent a fundamental element of the policies of the Estra Group, to be essential to governing and improving internal processes in order to optimise the efficiency and reliability of the management system as a whole. Consequently, integrated management systems have been adopted at company and, sometimes, inter-company level. The certifications apply to various fields: quality management, corporate social responsibility, occupational health and safety, the environment, and data protection.

Number and type of certifications <sup>12</sup>	2020	2021	2022
ISO 9001 Quality	9	9	11
SA8000 Social accountability	1	1	1
ISO 14001 Environmental management system	8	9	11
ISO 45001 Occupational health and safety management system	9	10	11
ISO/IEC 27001 Information security standard	3	3	3
ISO 55001 Asset management system	1	1	1
ISO50001 and CEI11352 Energy management	2	1	1
Other industry-standard quality certifications: UNI EN ISO 18295 parts 1 and 2 (contact centre services), UNI EN ISO 3834-2 (fusion welding of metallic material), UNI 11024 (welding of polyethylene pipes) and UNI 11632, ISO IEC 17025 (accreditation of testing laboratories)	4	4	4

The number of certifications increased as Bisenzio Ambiente and Edma Reti Gas entered the reporting boundary in 2022.

With regards to the regulations, Centria, Edma Reti Gas and Ecos hold the EMAS certification while Estra Clima holds (CE) 303/2008 certification. Estracom, Estra Clima and Centria are SOA-certified.

97.6% of the Group's employees work to quality certification standards (ISO 9001), 96.5% to environmental certification standards (ISO 14001) and, finally, 98.8% to occupational safety standards (ISO 45001). It is

<sup>12</sup> The ISO9001, ISO14001 and ISO45001 certifications are held by Estra S.p.A., Estra Energia, Ecolat, Estra Clima, Estracom, Centria, Gergas and Prometeo. Murgia Reti Gas holds the ISO 9001 and ISO 45001 certifications. Bisenzio Ambiente and Edma Reti Gas hold certifications ISO9001 and ISO14001. Edma Reti Gas also holds certification ISO 45001. Ecos holds the ISO 14001 and ISO 45001 certifications; the "Information security standard ISO/IEC 27001" is held by Estra, Centria and Estracom. Centria holds the "ISO 50001 Energy management" and "SA 8000 Social accountability" certifications, while the CEI 11352 certification is held by Estra Clima.

worth noting that all Estra Group Companies hold at least two of the three certifications. Furthermore, 27% of employees work to the standards of certification SA8000.

### 3.5 Risk management

Since 2018, Estra has adopted an integrated risk management model (Enterprise Risk Management - ERM) inspired by international best practices which involves, each within their level of competence, the company management and governance bodies. According to reference guidelines and best practices, the main objective of ERM activities is to ensure the optimal identification, measurement, management and monitoring of company risks.

The Estra Group is investing in activities to consolidate and develop its ERM model, with the aim of supporting senior management in the identification of the company risks and the methods through which these can be managed, as well as identifying any relative mitigation measures.

In fact, in light of current market conditions, we believe that corporate governance must evolve towards a strategic and directional risk management model in order to support the definition or redefinition of sustainable management strategies and to prevent new crises in corporate control systems.

In 2022, Estra began to update its Risk Assessment to take into account the ongoing crisis between Russia and Ukraine which, after the Covid-19 pandemic, represents an unprecedented disruption of continuity. Furthermore, the sanctions imposed by western governments - first the EU and then the US - on Russian individuals and businesses represent a major challenge for companies that hold direct or indirect relations with Russia.

The speed at which events are evolving, particularly in the energy sector, challenges the smooth functioning of company processes and the robustness of the internal control systems.

As such, the Risk Management function aims to protect the Company and explore new opportunities and competitive advantages to promote and facilitate “conscious” and “informed” decision-making at all company levels.

The Risk Management function is therefore called upon to provide assurance on the risks associated with the transformation, but also to advise on how to design or strengthen a potentially “weakened” internal control system by conducting a cost-benefit analysis.

The Risk Management process established by Estra is structured into four phases:

1. Assessment: update of the “Corporate Risk Profile” through the identification and probability assessment of Emerging and Top Risks.
2. Consolidation:
  - a. establishment of Business Cases for the main risks identified, i.e., detailed fact sheets detailing the causes and consequences of the risk.
  - b. Development of methodological tools to improve information on risks, especially on cause/consequence, impact dimension and mitigation actions.
3. Monitoring: the analysis of a set of indicators identified in order to dynamically monitor the possible effect of the risk on corporate targets and performance. By analysing several indicators, it is possible to monitor the development of specific risks periodically or on an ongoing basis.
4. Reporting: reporting the information collected during the monitoring and strategic planning phases to Senior Management, Control Bodies and leading Stakeholders. The aim is to establish a continuous reporting stream of the most significant new risks and provide dynamic data on their evolution.

For each risk identified, an action plan is defined aimed at managing/reducing/eliminating the risk, depending on the most appropriate management strategy. The action plan is based on the analysis of the cause and consequences of the risk.

The Group Risk Management function conducts an analysis of all company risks but concentrates in particular on strategic risks with a potential impact on business continuity. Risks of a more operational nature are monitored by the Risk Management function, but managed directly by the relevant functions.

### ***Non-financial risks***

The corporate risks panel also extends to topics relating to sustainability. The non-financial risks mapped according to the aforementioned process are described below.

Regarding the risk associated with climate change, it should be noted that for the Estra Group, this is an economic risk, and the main action taken to manage the risk (medium-term diversification of the business in the environmental services sector) has resulted in costs of € 20,173,000 for the acquisition of companies operating in the waste cycle during the three-year period 2020-2022.

Scope of the Decree	Description of Risk	Management Method
ENVIRONME NT	Changes to climatic conditions and/or extreme weather events with negative impacts in terms of reducing gas/energy demand	<p><b>CURRENT WASTE TREATMENT ACTIVITIES</b></p> <ul style="list-style-type: none"> <li>• Business Plan In the Business Plan, Climate Change is identified as one of the three long-term trajectories targeted by the new structure, values and strategic pillars of the Estra Group. This trajectory has been linked to the Sustainable Development Goals: <ul style="list-style-type: none"> <li>- Goal 7: Affordable and Clean Energy: Access to renewable, safe and widely available energy sources for all;</li> <li>- Goal 11: Sustainable Cities and Communities: Making cities safe, inclusive, resilient and sustainable;</li> <li>- Goal 12: Responsible Consumption and Production: Reversing current consumption trends and promoting a more sustainable future;</li> <li>- Goal 13: Climate Change: Regulating and reducing emissions and promoting renewable energy;</li> </ul> </li> </ul> <p>One of the objectives of the Estra Group defined in the Business Plan is the medium-term corporate business diversification strategy (e.g. water, waste), aimed at transforming the Group into a leading national multi-utility company and green and digital services provider with a differentiated business model.</p> <ul style="list-style-type: none"> <li>• Commercial Policies <ul style="list-style-type: none"> <li>- Increasing the fixed component of tariffs to mitigate variability/reduce gas consumption;</li> <li>- Cross-selling strategies, with the aim of reducing dependency on the gas market and increasing the sales portfolio on the electricity market;</li> <li>- Quantitative analyses comparing operating margin trends with gas and electricity consumption.</li> </ul> </li> </ul> <p><b>CAUSE OF RISK</b> Climate change is manifesting itself in</p>

		<p>significant increases in average annual temperatures as a result of CO<sub>2</sub> emissions mainly generated by human activities. In turn, rising temperatures generate extreme weather events, such as increased precipitation, rising sea levels, desertification, heavy snowfall or low solar radiation.</p> <p><b>CONSEQUENCES</b></p> <ul style="list-style-type: none"> <li>- Higher operating costs (e.g., insurance costs);</li> <li>- Gradual reduction of gas demand for domestic heating (PNIEC 2019), resulting in tighter business margins;</li> <li>- Need to restructure the business model;</li> <li>- Electrification of consumption and use of renewable resources to replace fossil fuels in the long term (target to achieve carbon neutrality by 2050) (PNIEC 2019);</li> <li>- Need to continue to guarantee adequate supplies from conventional sources by pursuing security and continuity of supply (PNIEC 2019) in the event of extreme weather events.</li> </ul> <p><b>TARGET</b></p> <ul style="list-style-type: none"> <li>- Draw attention to the financial risk associated with climate change in order to focus the Group's strategic decisions on Climate Change;</li> <li>- Provide for, update and monitor the development of mitigation models is planned, updated and monitored, in order to manage the effects of these changes (e.g. scenario analyses or stress tests aimed at testing the resilience of the Group's portfolios and business models), including through the definition of metrics to assess the financial risks and opportunities linked to the climate, such as the TCFD Recommendations;</li> <li>- Research and development into alternative energy sources was strengthened with a view to further diversifying the business.</li> </ul>
	<p>Failure to comply with environmental legislation and standards (e.g. minimum vital flows, emissions, waste management and associated records, noise levels, etc.)</p>	<ul style="list-style-type: none"> <li>• Certification system: UNI ISO 14001-2015</li> </ul>

<b>HUMAN RIGHTS</b>	<p>Presence among the Group's pool of suppliers of counterparties which are qualitatively or quantitatively inadequate or not in line with the Group's ethical principles and code of conduct</p> <p>Failure to respect human rights in relations with personnel and suppliers</p>	<ul style="list-style-type: none"> <li>• In the context of the Group's quality certifications, specific supplier certification and procurement management procedures have been adopted</li> <li>• Supplies must comply with the ethical principles and code of conduct of the Group, signing a specific clause to declare acceptance of the Code of Ethics and the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01</li> <li>• Allocation to the SBU "Regulated Market" of the consolidated central procurement department for distribution companies</li> <li>• The Code of Ethics of the Estra Group upholds the respect for human rights as a fundamental value in dealings with Stakeholders</li> <li>• Use of certified and regional suppliers in most cases</li> </ul>
<b>PERSONNEL</b>	<p>Staff organisational and development model incompatible with the Group's strategic objectives (e.g. Human Centricity)</p> <p>Failure to comply with regulations, standards and Occupational Health and Safety law (Italian Legislative Decree no. 81/2008)</p>	<ul style="list-style-type: none"> <li>• The Human Resources department is responsible for: <ul style="list-style-type: none"> <li>○ providing assistance in the application of the strategic guidelines of Group companies</li> <li>○ providing assistance on employment, position, performance and potential reviews</li> <li>○ providing support to company management in the design and creation of organisational models and the preparation of the relative documents associated with the various departments</li> </ul> </li> <li>• Specific training programmes aimed at management and high-level personnel were launched.</li> <li>• Certification system: OHSAS 18001, adopted by Group Companies</li> </ul>
<b>CORRUPTION</b>	<p>Infringements of the Code of Ethics, laws, regulations and company procedures, including anti-corruption legislation (Italian Legislative Decree no. 231/2001) by Group companies, its trade partners, agents or other subjects acting in its name or on its behalf, which may involve the risk of criminal or civil sanctions or otherwise cause harm to the Group's reputation</p>	<ul style="list-style-type: none"> <li>• Adoption and distribution of the Code of Ethics and the Organisational, Management and Control Model pursuant to Italian Legislative Decree no. 231/01</li> <li>• Activities performed by the Supervisory Body</li> <li>• In the context of the Group's quality certifications, specific supplier certification and procurement management procedures have been adopted.</li> <li>• Adoption by Estra Energie and Prometeo of the Self-regulation protocol for unsolicited contracts.</li> </ul>
<b>SOCIAL</b>	<p>Loss of reputation among Stakeholders</p>	<ul style="list-style-type: none"> <li>• The Sustainability, Stakeholder Relations and Press Office department carries out the</li> </ul>

		<p>following activities:</p> <ul style="list-style-type: none"> <li>○ based on a specific Regulation, it oversees relations with the media;</li> <li>○ internal communications</li> <li>○ it oversees and coordinates projects in order to promote sustainability and CSR practices among Group employees and in the Group's areas of operation;</li> <li>○ it actively works with Stakeholders through participatory engagement projects, following a sustainable approach and considering economic, social and environmental aspects.</li> </ul>
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The Board of Directors of Estra S.p.A. identifies the risk/impact management strategies in line with the strategic objectives. The Risk Management function supports the Board of Directors and the Management in making informed decisions which enable the effective management of risks/impacts that can compromise the capacity to achieve the company's strategies and objectives.

The risk identification process conducted by the Estra Group does not involve engagement with stakeholders. Any critical issues that emerge from feedback from stakeholders are notified by the relevant functions and may be considered when updating the risk map.

Impacts are identified by the Risk Management service and are based on the ERM of the Estra Group, also identifying the persons in charge of managing the impacts. The ERM is presented to the Board of Directors of Estra S.p.A. which approves it and delegates the management of impacts to the relevant departments.

The Board of Directors of each company approves the relative organisational structure, which identifies the managers, middle managers, and employees with management responsibilities who, according to their different functions, are required to manage the impacts.

The Board of Directors may also appoint one or more executive committees, determining the number of members and the relative powers, which include impact management.

The Risk Management process also provides for the preparation of a report to be presented to the Board of Directors at least on an annual basis or, where necessary, in response to specific events. Furthermore, each manager tasked with managing a specific impact reports to the Board of Directors when the issue is particularly important or requires a decision from the directors.

In 2022 critical issues that could have had a negative impact on customers and suppliers which were notified to the Board of Directors of Estra S.p.A. mainly concerned energy prices and the migration to the new management system (from SAP to NETA).

On 27 May 2021, ANAC notified Estra S.p.A. and other parties that it had initiated proceedings with regard to the appointment of Mr Francesco Macrì as Chairman of the Company. The proceedings were initiated in order to ascertain whether the appointment of Mr Macrì to the Board of Directors was subject to the prescriptions pursuant to Italian Legislative Decree no. 39 of 8 April 2013 referring to appointments with the public administration and entities under public control ("Decree 39"), and if subject to these requirements, whether any non-compliance had occurred. More specifically, the investigation relates to Mr Macrì's potential ineligibility as a member of the Board of Directors of Estra S.p.A. at the time of his appointment, based on his recent appointment as municipal councillor for the Municipality of Arezzo.

On 22 November 2021, ANAC notified Estra S.p.A. of its decision to cancel the appointment of Mr Francesco Macrì as Chairman of Estra S.p.A. with immediate effect.

On 26 November 2021, the Board of Directors appointed as its Chairman Mr Alessandro Piazzi, formerly Chief Executive Officer of Estra S.p.A., and passed a resolution to challenge the ANAC decision before the relevant courts. More specifically, the Directors believe that Decree no. 39 should not apply to Group companies. The Decree refers mainly to the appointment of directors and officials, on the assumption that is supported by legal advice received, that Estra S.p.A. does not qualify as a Company under public control in terms of this legislation. The first hearing relating to Estra's challenge of the ANAC decision was held on 14 June 2022 before the Lazio Regional Administrative Court.

With ruling no. 13057 of 13/10/2022, the Lazio Regional Administrative Court rejected the appeal brought by Estra S.p.A. against ANAC against Francesco Macrì, Coingas S.p.a. and the Municipality of Arezzo for the annulment of Resolution 744 of 10 November 2021 adopted by ANAC and any other prior or connected acts. Assisted by its legal team, the Company appealed the ruling before the State Council, with the hearing taking place on 4 April 2023.



## 4. The Environment

### 4.1 Targets and results

#### Targets and results

Many of the following targets, which are part of the Group's 2023-2027 strategic plan, are aimed at reducing internal energy consumption and, consequently, at reducing emissions. Measures that have already been carried out or are planned for the future in order to achieve this target are listed below.

Targets for 2022	Results in 2022
<b>Consumption and Energy efficiency</b>	
Estra Siena office: improve the energy efficiency of the air conditioning unit, LED lighting, and solar energy system.	<i>Target partially achieved</i> The installation of photovoltaic panels planned as part of the renovation project launched in 2021 are currently being completed.
Estra Completion of the renovation of the Ex Sori area at the Prato office, including the installation of energy-efficient lighting and air-conditioning systems.	<i>Target achieved</i>
New management of technological plants using remote software: implementation of the remote management system at the Prato, Arezzo, Siena and Sesto Fiorentino stores. Arezzo: remote management of the water system and fire prevention pressurisation system.	<i>Target partially achieved</i> The installation of hardware for the remote control system in Prato has been completed. The works are scheduled for full completion in 2023.
Centria Improve energy consumption relative to the management of M&R room boilers through the implementation of electronic systems, installing systems with energy efficiency measures (insulation, pumps, pre-heating systems and heat exchangers). The installation and operation of energy efficiency systems for five M&R stations is planned for 2022.	<i>Target achieved</i>
Estra spa Continue the energy efficiency policy at the Arezzo office, with the replacement of windows and vertical insulation panels and the installation of underfloor insulation with hot/cold insulation panels.	<i>Target not achieved</i> The works are not yet underway but are in the planning stage.
Estra Complete the replacement of the lights in the Prato and Arezzo offices with LED lamps.	<i>Target achieved</i> Lighting replaced along the walkways, building courtyard, canteen area and some offices.
Estra Group Increase the digitalisation of documents with the	<i>Target partially achieved</i> With regard to the legal aspect, a feasibility

adoption of new management methods at Group level.	study has been carried out and the document should be produced in 2023.
Centria Replacement of 8 asbestos roofs: 5 outside of Tuscany; 1 in Prato; 1 in Arezzo.	<i>Target partially achieved</i> The tendering procedures were launched in 2022.
<b>Electric mobility</b>	
Estra Group Launch of project to lease electric cars, distributed through corporate channels.	<i>Target not achieved</i> The project was paused due to internal restructuring.
Estra Group Introduction and availability of sustainable mobility vehicles in the Group's fleet (e.g., electric scooters, e-bikes, electric kick scooters).	<i>Target not achieved</i> The project was paused due to internal restructuring.
Estra Group Continue the implementation of sustainable mobility sharing services, expanding in new regions or developing new partnerships (e.g. kick scooter sharing).	<i>Target not achieved</i> The project was paused due to internal restructuring.
Estra Group Private sector e-mobility offer: 200 installations of private charging infrastructure.	<i>Target partially achieved</i> Two projects were completed.
Estra Group E-mobility for local authorities: 50 authorisations for the installation of new public charging stations.	<i>Target partially achieved</i> Two concessions were obtained.
Estra Group Participate in at least five tender procedures for the installation of charging stations on public land in indirect member municipalities.	<i>Target achieved</i>
Estra Group Renew the vehicle fleet with the introduction of 100 vehicles with the latest type of approval.	<i>Target partially achieved</i> The degree to which the target was achieved was more than satisfactory (70%).
<b>Waste</b>	
Ecolat Increase the efficiency of the ML plant to improve the quality of treated waste.	<i>Target achieved</i> Revamping of the multi-material plant to improve the quality of the processed material.
Ecos Increase the efficiency of the mineral fibre volume reduction process.	<i>Target achieved</i> Installation of a new press to reduce mineral fibre volume.

## Targets for 2023

Estra Group

Renovation of the Ancona office according to sustainability, circular economy and digitalisation criteria: achievement of the executive project.

Estra Group  
Digitalisation of one of the Group's main offices.

Bisenzio Ambiente Srl  
Reduce the potential risk of odorous emissions.

Estra Clima  
Completion of the preliminary revamping of the biomass co-generation plant in Calenzano.

Estra Clima  
Completion of the revamping of the co-generation plant in Ancona.

Estra Clima  
Completion of the revamping of the co-generation plant in Mattioli.

Estra Clima  
Development of at least one energy community.

Centria  
The installation and operation of energy efficiency systems for three M&R stations is planned for 2023.

Gergas  
Improve the efficiency of the REMI Grosseto thermal power plant with latest-generation boilers and replace heat exchangers to significantly reduce methane gas for self-consumption.

Gergas  
Installation of photovoltaic panels on the roof of the company premises sized to maximise electricity production, making the building almost energy-independent.

Gergas  
Replacement and conversion of heat generators installed at the company premises from natural gas to electric.

Estra Group  
Installation of 20 e-vehicle charging stations.

## **Targets for 2023-2024**

Estra Group  
Optimise energy consumption at the Arezzo, Siena and Prato offices through the gradual separation of energy utilities in order to reduce consumption and enable energy usage to be allocated more effectively.

Ecolat  
Monitor and optimise the production (qualitative and quantitative) of the new paper and cardboard plant and revamp the multi-material plant.

Ecolat  
Improve the structural efficiency of the buildings and boundaries owned by Ecolat.

Ecolat

Conduct feasibility studies for new plants to optimise the processing and storage of other special waste.

Edma Reti Gas

Replacement of 2 asbestos roofs.

#### **Targets for 2024**

Estra Clima Srl

Completion of the revamping of the biomass co-generation plant in Calenzano.

#### **Targets for 2023-2025**

Estra Group

Dematerialisation of occupational safety and management system documentation. Feasibility analysis and commissioning.

Estra Group

Introduction of the Mobility Manager role and drafting of the PSCL.

Estra Group

Improve and guarantee occupational safety, prevention and health and the mobility needs of the Estra Group.

### **4.2 Environmental policy**

Despite its purely commercial vocation, in recent years the Estra Group has been developing businesses in areas such as waste management, leading the Group have an increasingly robust environmental vision. In this respect, although Estra does not have a formalised environmental policy, except for those present in all ISO 14001-certified Group companies, it has in fact integrated environmental considerations into an integrated management system which is promoted and shared by all Group companies and personnel. In this regard, Estra has developed specific tools to monitor performance (also in terms of sustainability and environmental conservation), such as environmental impact assessments, analytical controls, internal audits and the monitoring of regulatory compliance.

The Group has adopted management system such as ISO 14001, ISO 50001, UNI CEI 11352, EMAS and Regulation (CE) 303/2008. The Companies certified according to 14001 are those whose activities have the greatest environmental impact: Ecos, Ecolat, Estra Clima, Centria, Gergas, Estracom, and as of 2022, the new companies Bisenzio Ambiente and Edma Reti Gas.

The Estra Group:

- ensures the maintenance over time of the certification of its Environmental Management System by a certified third-party body. The certification concerns all Group companies that have significant environmental impacts, except sales companies;
- is committed to ensuring the continuous improvement of environmental performance, guaranteeing compliance with the reference laws and regulations;
- aims to reduce the use of natural resources for the performance of its activities, through internal and external processes aimed at reducing emissions;

- where possible, aims to reduce the amount of waste produced, particularly hazardous waste, prioritising waste recovery processes over disposal;
- constantly monitors the potential environmental risks associated with its activities and manages its plants through audits, assessments and improvement measures;
- informs and raises awareness among employees to promote a better understanding of the topics related to environmental protection;
- informs and raises awareness among its suppliers and contractors regarding the Group's environmental management approach;
- promotes actions and processes aimed at minimising energy use in offices and at sites, as well as the consumption of the company fleet by renewing vehicles with more technologically efficient and environmentally friendly alternatives;
- is committed to raising awareness about sustainability and sustainable development among residents in the municipalities in which it operates;
- helps to reduce the use of energy resources per unit of gas introduced into the grid through regular plant maintenance;
- manages its construction sites with a view to reducing pollution and always in compliance with applicable laws and regulations;
- identifies and implements measures able to reduce and prevent environmental incidents and the relative consequences for the environment and for residents.

The Estra Group aims to reduce its impact in terms of energy consumption by focusing on the implementation of alternative energy generation processes from renewable sources, and promotes the adoption of an integrated waste disposal cycle. The Group has long led the way in the use of energy efficiency solutions with the aim of optimising and reducing the consumption of the business and its customers.

In 2022, following an audit by ARPAT (the Regional Environmental Protection Agency of Tuscany) at the Ecos office in 2021, three sanctions were issued regarding procedural issues, which came to a total of €33,527.

### 4.3 Energy Consumption

Energy consumption at the Estra Group can be categorised as follows (not including methane leaks):

- methane gas consumption;
- electricity consumption
- vehicle fuel consumption.

Consumption from renewable energy sources (the sum of self-consumption from renewable sources and electricity consumption from photovoltaic sites) amounted to 12,397 GJ while consumption from non-renewable sources amounted to 182,235 GJ. for a total of 194,632 GJ.

As in 2020, the energy intensity index was calculated in the previous two-year period, comparing the Group's total internal energy consumption (methane, electricity, diesel and petrol) and the total number of Estra Group employees. In 2022 the energy intensity index was 237 gigajoules. The figure stood at 245 gigajoules in 2021, with the decrease of 3.2% resulting mainly from the decrease in methane gas consumption, as discussed in the next section.

#### 4.3.1 Methane consumption

Most of the Estra Group's methane consumption derives from the operation of the M&R rooms and the power plants, particularly the co-generation plants. The Estra Group uses methane gas to heat its offices, branches, warehouses and retail stores.

The consumption data also includes methane leaks caused by environmental events and physical leaks, or rather “normal” leaks associated the gas distribution process.

The table shows the summary of total methane gas consumption as described above; the data do not include methane leaks since they do not represent actual consumption and will be dealt with separately at the end of the paragraph. The aggregated data show an overall decrease of 9.6% compared to methane gas consumption in 2021. In general terms, plants represent 68.5% of total methane consumption (compared with 71% in 2021), while the remaining third relates to gas distribution to M&R stations (28.2%) and for use of offices, stores and branches (3.4%).

Looking at the data in more detail, methane consumption at offices, stores and branches was in line with the 2021 data. In particular, the biggest reduction was in plant consumption, which fell by 12.8% compared to 2021 consumption. This essentially stems from the consumption of the co-generation plants analysed at the end of the paragraph. For the first time, in 2022 881 cubic metres of methane gas consumption of the offices, branches and stores derived from “green” gas supply tariffs, which guarantee the offsetting of CO<sub>2</sub> from gas consumption through the financing of international projects that develop renewable energy and aim to combat climate change.

*Methane consumption of the Estra Group (net of leaks)*

	2020		2021		2022	
	m <sup>3</sup>	Gigajoule	m <sup>3</sup>	Gigajoule	m <sup>3</sup>	Gigajoule
Methane consumption at sites, offices and stores	205,186*	7,239	122,095*	4,308	118,496*	4,252
Methane consumption - gas distribution	883,422	31,168	1,008,813	35,592	994,923	35,703
Methane consumption plants	2,257,554	79,649	2,773,716	97,859	2,417,951	86,768
<b>Total</b>	<b>3,346,162</b>	<b>118,056</b>	<b>3,904,624</b>	<b>137,759</b>	<b>3,531,370</b>	<b>126,723</b>

\* For stores/offices whose data is not directly managed by Estra and for which accurate data was not available, estimates have been made based on known consumption data, adjusted to the surface area of the office.

Methane consumption by Ecolat in 2022 was 1,335 cubic metres, compared to 1,777 in the previous year. In line with previous years, 85% of consumption in 2022, or 1,135 cubic metres, represents actual plant consumption, while the remaining 15% is accounted for by the office. As in the previous year, the calculation was estimated on the ratio of office staff to plant personnel. With regards to Bisenzio Ambiente, which entered the reporting boundary in 2022, the methane consumption of 1,534 cubic metres derives from the plant itself, as the site is not supplied with methane gas.

Before being entered into the grid for use, the methane gas is heated, decompressed and regulated using specific infrastructure known as M&R (metering and regulation) stations. The activity carried out by these systems is essential to the distribution process and uses methane gas.

Overall, in 2022 methane gas consumption for the gas distribution process was more or less unchanged, recording only a slight decrease of 1.4% compared to 2021. This was due the addition of the newly acquired company Edma Reti Gas, without which the reduction would have been 10.6%.

The Estra Group has 5 co-generation plants, which can be divided by source as follows:

a) renewable source

- the biomass co-generation plant in Calenzano, fed by wood chips, with an electrical output of 799 kW and a thermal output of 4,500 kW;

b) non-renewable source

- the trigeneration plant in Sesto Fiorentino, fuelled by methane, with an electrical output of 1,605 kW, a thermal output of 1,596 kW and a cooling output of 561.6 kW;
- the Malizia co-generation plant in Siena, fuelled by methane, has an electrical output of 135 kW and a thermal output of 210 kW;
- the Mattioli co-generation plant in Siena, fuelled by methane, has an electrical output of 520 kW and a thermal output of 876 kW.
- the Termas co-generation plant at Ancona, fuelled by methane, is equipped with a plant with three heat generators and two co-generation plants, for a total electrical output of 3,000 kW and a total thermal output of 19,000 kW.

As shown in the table below, the co-generation plants recorded a decrease in methane consumption of 12.8% compared to 2021: in terms of volume, this fell from 2,772,206 cubic metres in 2021 to 2,415,282 cubic metres in 2022. The decrease was due to the lower production of electricity due to a fault at the Ancona plant. The plant was only operational in January, but the heat supply service was safeguarded through the use of boilers to compensate for the technical fault.

Specifically, methane gas consumption at the renewable energy plant fell by 26.5% as a result of maintenance work carried out in the last two years, which also made the plant more efficient by optimising methane consumption.

With regard to methane-powered plants, the decrease was smaller but still significant (-10.1%) due to the above-mentioned technical fault at the Ancona plant.

The table below shows the breakdown of this consumption.

#### *Methane consumption of co-generation plants*

	2020		2021		2022	
	m <sup>3</sup>	Gigajoule	m <sup>3</sup>	Gigajoule	m <sup>3</sup>	Gigajoule
Plant fuelled by biomass	403,246	14,227	466,481	16,458	342,818	12,302
Plants fuelled by methane	1,853,074	65,378	2,305,725	81,348	2,072,464	74,370
Total	2,256,320	79,605	2,772,206	97,806	2,415,282	86,672

Information on methane leaks, which are included in the data for total methane consumption of the Group, is provided below.

The data for methane leaks refer to Centria and the new company that entered the reporting boundary in 2022, Edma Reti Gas; Murgia Reti Gas and Gergas did not record any methane leaks caused by environmental events. In 2022 there were five environmental events, mainly caused by third parties, which resulted in methane leaks totalling 44,780 cubic metres.

Normal methane leaks, or rather those that are associated with the gas distribution service provided by Centria, Gergas, Murgia Reti Gas and Edma Reti Gas, amount to 2,820,915 cubic metres; when leaks due to environmental events are factored in, the total amounts to 2,865,694 cubic metres.

#### **4.3.2 Electricity consumption**

The Estra Group's electricity consumption stems from consumption from the grid (and to a lesser extent from photovoltaic systems) for:

- offices and retail stores (offices, branches and stores);
- co-generation, photovoltaic and wind plans, and plants operated by companies in the gas distribution sector (Centria, Gergas, Murgia Reti Gas, as of 2022, Edma Reti Gas). the waste sorting and valorisation plants operated by Ecolat, Ecos' industrial waste storage and treatment plant, and

the special, hazardous and non-hazardous waste treatment plant in liquid and pumpable sludge operated by Bisenzio Ambiente which entered the reporting boundary in 2022.

Total electricity consumption by the Estra Group increased by 29.1% compared to 2021. This is due to several converging factors, particularly the acquisition of the special waste treatment plant operated by Bisenzio Ambiente and the new gas distribution plants operated by Edma Reti Gas, which entered the reporting boundary in 2022. As well as the impact of the new companies, it is also worth noting that the increased consumption of electricity by the co-generation plants, as noted below, also led to a pronounced increase in energy use.

The most significant consumption component concerns sites, offices and stores. In this regard, in 2022 a total of 3,782,440 kWh was consumed by offices, stores and branches, marking a further increase on 2021 (+6.6%) due to the effect of the broader reporting boundary. This consumption mainly relates to lighting, power and office air conditioning and includes, in the case of the Prato, Arezzo and Siena sites, the energy consumption of four electric vehicles owned by the Estra Group. With regard to electricity consumption at offices, branches and stores, it is noted that 17.9% (678,349 kWh) relate to the 100% certified and renewable "Scelta Pura Luce" tariff. The data are in line with the previous year.

The offices in Arezzo and Prato are partly supplied with renewable energy produced by the photovoltaic systems installed on the roofs of the respective offices. Unlike the other photovoltaic plants, these systems are not owned by the Group. During the three years, consumption from this renewable resource increased exponentially, partly due to favourable weather conditions and but also as a result of the maintenance work carried out which enabled the plants to be used more efficiently.

*Electricity consumption of the Estra Group\**

	2020		2021		2022	
	kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
Electricity consumption from the grid	7,136,870	26,693	7,059,254	25,413	9,066,584	32,640
of which and offices, branches and stores	3,687,949	13,277	3,549,324	12,778	3,782,440	13,617
Solar electricity consumption by offices	74,588	269	307,424	1,107	444,520	1,600

\* The table does not include internal consumption of electricity produced by the renewable energy plants managed and operated by the Group, which is reported in section 4.9 "Self-consumption of electricity from renewable sources".

In 2022 electricity consumption from the grid by co-generation plants rose compared to 2021. The 39% increase is exclusively due to the electricity consumption of methane-powered plants, which rose from 1,297,622 kWh in 2021 to 1,923,513 kWh in 2022. This is partly due to the increase in extreme weather events, as a particularly hot summer meant that the plant used electricity to produce cooling energy for an extended period of time. Additionally, the Ancona plant, which did not produce electricity, had to purchase electricity from the grid to meet its needs.

However, the consumption of the biomass co-generation plant fell by 16.5% compared to 2021 as a result of the optimisation and maintenance works carried out in the previous two years, which not only allowed for the production of more electricity (as reported in section 4.7), but also allowed for better efficiency in terms of consumption.

*Electricity consumption from the grid - co-generation plants*



	2020		2021		2022	
	kWh	GJ	kWh	GJ	kWh	GJ
Plants fuelled by biomass	211,914	763	214,012	770	178,633	643
Plants fuelled by methane	1,520,967	5,475	1,297,622	4,671	1,923,513	6,925
Total	1,732,881	6,238	1,511,634	5,442	2,102,146	7,568

In 2022, electricity consumption from the grid by photovoltaic plants - particularly the main plants at Caviglia and Tegolaia - increased by 23.9% compared to 2021 due to the increase in electricity production from renewable sources in 2022, as discussed in section 4.7.

#### *Electricity consumption from the grid - photovoltaic plants*

2020		2021		2022	
kWh	GJ	kWh	GJ	kWh	GJ
379,051	1,365	281,142	1,012	348,341	1,254

Electricity consumption at the Centria, Gergas, Murgia Reti Gas and Edma Reti Gas (acquired in 2022) plants, which are generally small in scale and composed of metering and regulation stations, remote meter reading systems and power supplies for the cathodic protection of pipelines, increased by 9.9% compared to 2021. This increase is largely due to the entry into the reporting boundary of the company Edma Reti Gas, whose electricity consumption from the grid totalled 82,238 kWh.

#### *Electricity consumption from the grid of the Centria, Gergas, Murgia Reti Gas and Edma Reti Gas plants*

2020		2021		2022	
kWh	GJ	kWh	GJ	kWh	GJ
826,810	2,977	860,481	3,098	945,623	3,404

In 2022 the wind generators in Sardinia consumed 134 kWh.

Finally, the three waste management companies Ecolat, Ecos, and Bisenzio Ambiente acquired in 2022 collectively consumed 1,887,473 kWh of electricity. As regards the companies Ecolat and Ecos, the division of electricity consumption is as follows:

- Ecolat's consumption was divided as follows: 24,697 kWh (4%) by offices, 592,734 kWh (96%) by the plant.

Ecos' consumption was divided as follows: 22,914 kWh (5%) by offices, 435,371 kWh by the plant.

Data for Bisenzio Ambiente were estimated using previous electricity consumption data recorded when the plant was not operational, and therefore refer to office consumption only. Using this method, from the plant's total consumption of 859,368 kWh, office consumption is estimated to be 70,000 kWh.

### **4.3.3 Vehicle consumption**

The Group has a fleet of 385 vehicles. The increase in the number of vehicles compared to 2021 (+40) is mainly due to the entry into the reporting boundary of the gas distribution company Edma Reti Gas.

The vehicle fleet consists of trucks for carrying out the operational activities of the engineering teams, cars used for employee travel, unlicensed vehicles (electric and conventional) for moving goods within the waste management and treatment plants, a scooter and six electric cars (+2 compared to 2021).

All of the Group's electric vehicles, both the vehicles and unlicensed electrical machinery operated by Ecolat and Ecos, are recharged on the premises, so their consumption is included in the electricity consumption reported in the "Electricity consumption" section of this chapter.

In total, the group owns 59 vehicles (+12 compared to 2021). The remaining 326 vehicles are all leased, reflecting the Group's continued policy of leasing rather than purchasing vehicles. This decision helps to reduce the Group's environmental impact thanks to the progressive replacement of vehicles with latest-generation models, and provides employees with an increasing level of safety and protection thanks to new and technologically advanced vehicles.

#### *Vehicle fleet*

	2020	2021	2022
Number	323	345	385
Distance travelled (km)	5,971,324	7,725,495	7,326,575

Despite the increase in the overall number of Group vehicles, the mileage recorded in 2022 fell slightly (- 5.2% compared to 2021) but diesel and petrol consumption all increased (12.7% diesel, + 34.2% petrol) partly due to the increase in the number of unlicensed Group vehicles (up from 10 in 2021 to 18 in 2022).

Methane consumption refers to the only two methane and petrol bi-fuel vehicles that joined the fleet with the acquisition of Edma Reti Gas.

	2020		2021		2022	
	L	GJ	L	GJ	L	GJ
Diesel	444,917	15,991	543,169	19,544	612,406	22,036
Petrol	14,165	445	19,689	646	26,431	867.5

	2020		2021		2022	
	m <sup>3</sup>	GJ	m <sup>3</sup>	GJ	m <sup>3</sup>	GJ
Methane	0	0	0	0	202	7

With regard to fuel source, 90.7% of company vehicles are powered by diesel, 5.7% by petrol, 3.1% are electric and 0.5% (one vehicle) is bi-fuel (methane and petrol), in line with 2021.

The petrol consumption shown in the table includes consumption relating to the operation of two generators at the Prato site aimed at ensuring, when necessary, the energy self-sufficiency of the server and telecommunications system. Due to the negligible amount of petrol consumed, it was not possible to separate the data regarding the consumption of the generator and the generator units from that of vehicles. Diesel consumption also includes the consumption of a generator owned by Bisenzio Ambiente and used for the plant's fire protection system.

Total diesel consumption data includes the fuel used by the unlicensed machinery operated by Ecolat (8 unlicensed vehicles and 1 shredder) and Ecos (9 vehicle: 4 diesel-powered and 5 electric). These vehicles operate exclusively within the plants as forklifts, loaders and cherry-pickers and are essential to the plant's activities.

#### 4.4 NOx and PM10 emissions produced

In 2022, total NOx and PM10 emissions rose slightly (3.8%) compared to 2021.

The figure refers exclusively to nitrogen oxides and their mixtures (NOx), as emissions of PM10 (particulate matter) were negligible.

*NOx and PM10 emissions produced by vehicle use*

tonnes	2020		2021		2022	
	NO <sub>x</sub>	PM10	NO <sub>x</sub>	PM10	NO <sub>x</sub>	PM10
<b>Diesel</b>	3.457801	0.237709	3.246316	0.000118	3.360433	0.000123
<b>Petrol</b>	0.032170	0.005117	0.039948	0	0.049156	0.000001
<b>Methane</b>	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total</b>	3.489971	0.242826	3.286264	0.000118	3.409589	0.000124

#### 4.5 Waste generated

Waste generated in 2022 is characterised by three key aspects. Firstly, the amount of waste generated fell. In fact, in 2022 there is a 5.8% reduction in total waste, from 795,918 kg in 2021 to 749,662 kg in 2022, despite the entry of two new companies into the reporting boundary. A significant amount of waste was disposed of in 2022 as a result of warehouse clearance activities, particularly from the warehouse at the Siena site which was completely cleared in continuation of the works started in 2021. Note that the total waste does not include 1,010,770 kg of refuse produced by the Bisenzio Ambiente Company's processing activities.

The second characteristic to be mentioned is the increase in the volume of hazardous waste. In fact, compared to 2021 hazardous waste increased fivefold, although the quantities in absolute values remained small, rising from 11,234 kg in 2021 to 55,219 kg in 2022. This increase is largely due to the waste generated by Ecos and Bisenzio Ambiente.

The third characteristic to emerge from the waste analysis regards the percentage of waste sent for recovery, which fell from 94% in 2021 to 81% in 2022. This reduction is partly due to the increase in the amount of hazardous waste, as this category is harder to recover or can only be partly recovered, and consequently must be disposed of. Additionally, a residual portion of non-hazardous waste could not be sent for recovery due to its specific nature.

Another key element when considering the Group's waste is the biomass co-generation plant. This plant generates three main types of waste: fly ash, bottom ash and water used to extinguish bottom ash. The impact of this waste on total waste is significant (47.8% in 2022). In 2022 the waste produced by the plant totalled 358,000 kg, compared to 489,120 kg in 2021 and 236,560 kg in 2020. Therefore, waste produced by the plant fell by 26.8%. This decrease was due to the process to standardise the Calenzano plant's waste storage process which had not been done in previous years and had resulted in ash accumulating over multiple years.

Paper consumption fell (-4.6%) from 9,415 kg in 2021 to 8,978 kg in 2022.

The paper consumption figure refers to paper purchased net of remaining stock. This is because the management system for recording print-outs issued through badge authorisation (PaperCut) does not extend to all Group Companies (Gergas, Edma Reti Gas, Bisenzio Ambiente are not included in this management system).

*Waste generated by the Estra Group*

<b>Kg</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Total general waste	471,525	795,918	749,662
Total non-hazardous waste	469,215	784,684	694,443

Total hazardous waste	2,310	11,234	55,219
Total waste sent for recovery	441,162	746,892	608,874
Total waste sent to landfill	30,363	49,026	140,788
Total non-hazardous waste sent for recovery	439,672	741,377	598,220
Total non-hazardous waste sent to landfill	29,543	43,307	96,223
Total hazardous waste sent for recovery	1,490	5,515	10,654
Total hazardous waste sent to landfill	820	5,719	44,565

### ***We printed, we planted***

Companies can act on their commitment to environmental protection in several different ways, including through the management of in-house printing and the relative paper consumption.

With this in mind, the Estra Group has signed up to the PrintReleaf certification system. PrintReleaf's automated global reforestation platform measures the Group's paper consumption and offsets the number of trees cut down to produce it by the planting the equivalent number of trees through a network of certified reforestation projects around the world (Brazil, Dominican Republic, India, Ireland, Madagascar, Mexico and the USA).

These reforestation projects help to reduce the Group's environmental impact, planting trees in parts of the world that need them the most.

Subsequently, PrintReleaf activates an eight-year auditing process to monitor the progress and survivability of the planted trees through the company SGS International, the world's leading testing, inspection and certification company.

In 2022 Estra offset the equivalent of 4,297,862 standard sheets of paper by planting 515 trees through the PrintReleaf system.

The 2022 figure is up from 2021, as the number of printers connected to the PrintReleaf system has increased to reach 100% of the Group's printer fleet at the end of 2022 (excluding those of the companies not managed through the Group's management system, as mentioned above), but also due to an increase in the number of employees at the offices and locations, with a consequent increase in printing demand.

## **4.6 Environmental mitigation**

The Estra Group's environmental impact mainly relates to the consumption of electricity and methane gas to supply its offices, M&R stations and energy production plants, and the fuel required to power its fleet of company vehicles.

This impacts are mitigated through energy efficiency processes that the Estra Group implements both internally, e.g., by improving the efficiency of its M&R stations and offices, and externally, by implementing services to improve the energy efficiency of businesses, apartment blocks and other residential buildings in order to deliver both energy and financial savings.

In fact, climate change and sustainability represent two strands of the Group's strategy for developing its business with a view to promoting the energy transition and achieving Net Zero.

These two strategies involve activities to promote the circular economy and provide green gas and electricity tariffs, actions to improve energy efficiency and reduce consumption, incentivising electric mobility to meet decarbonisation targets, and increasing the use of renewable energy sources. The measures to increase infrastructure resilience (green building, reduction of gas network leaks, revamping of plants) also play a major role in ensuring a sustainable gas supply and reducing CO2 emissions.

#### 4.6.1 Energy efficiency of offices

The Estra Group is continuing to pursue energy efficiency measures at its offices. With regard to the completion of works on the photovoltaic system at the Siena office, which began in 2021, the company that owns the building is in the process of completing the installation of all the planned panels. At the Prato office, the building owner has formally completed the renovation of the “Ex Sori” area, including the upgrading of the lighting and air-conditioning system. Finally, at the Arezzo office, the insulation works planned for 2022 are currently being discussed with the building owner.

With regard to the replacement of traditional lighting with LED lamps, works to install the LED system in the company canteen in Arezzo and replace the lighting systems in the new Estra Clima offices are complete.

#### 4.6.2 Electric mobility

One of the Group's goals is to monitor and seize the potential opportunities presented by the development of the electric mobility market by managing the charging networks across the region.

In 2022, this resulted in the installation of 6 new charging pools in Tuscany (1 in Capolona, 2 in Castiglion Fiorentino and 3 in Montespertoli), in addition to the 24 previous installations. As at the end of 2022 the Group has 30 stations in Tuscany and the Marche region.

In 2022 the charging stations supplied 191,504 kWh of electricity, all from certified renewable energy, for a total of 14,280 recharging sessions.

The charging stations are active 24 hours a day and feature two 22 kw, type 2 (rapid charging) sockets. To “fill up”, Estra has developed a rapid and innovative charging system based on two elements: a credit card and the dedicated app available for IOS and Android systems. To activate and manage charging and mobile payments, users must simply connect to the wireless hotspot at the e-charging station, download the “Estra ricarica” app and sign up. The app has various functions, including the option of viewing all Estra charging stations on an interactive map. The service is also available to non-customers.

The Group's commitment to e-mobility also extends to private recharging through offers to install wallboxes aimed at domestic customers and businesses.

#### 4.6.3 Replacement of asbestos roofing

The monitoring and analysis of asbestos roofing on the Group's M&R rooms continues constantly in order to assess and reduce the risks associated with the use of the hazardous material. This commitment is implemented by Centria, which operates in the gas distribution sector, and in 2022 also involved Murgia Reti Gas, another distribution company belonging to the Group.

The works planned for the 2022-2023 period by Centria are still ongoing. In particular, in 2022 tender procedures were held and works were commenced to dispose of 8 asbestos roofs (5 outside the Tuscany region, 2 in the Arezzo area and 1 in Prato). The works are scheduled for completion by 31/12/2023. The works were entrusted to companies registered on the national register of environmental operators for category 10A and, as they concerned asbestos-containing materials, were conducted in compliance with the safety measures envisaged by current environmental protection and occupational health and safety law. As regards Murgia Reti Gas, in 2022 three asbestos roofs were replaced. All of the roofs were completely removed and replaced with materials that offer excellent impermeability, protection and structural stability. The old roofs were completely disposed of.

#### 4.7 Energy production from renewable sources

Even in a complex scenario like the situation in 2022 - which was characterised on the one hand by pronounced instability and volatility on the energy market and, on the other, by the outbreak and persistence of the war between Russia and Ukraine, both of which had major economic and social

repercussions - Estra stayed true to its constant commitment to generate value and growth in the medium and long term in all areas of its business, adopting an integrated and synergetic approach between business units, and basing its actions on three long-term strategies: the sustainability strategy, the digital strategy and the human strategy.

In fact, despite the fact that the reduction in the availability of gas supplies from Russia impacted the way in which natural gas is procured, the Group managed to operate seamlessly thanks to a careful procurement policy. This evolving scenario, which is also discussed in the Report on Operations, has been very closely monitored by the Group's directors, evaluating the potential negative impact and, where possible, identifying appropriate risk mitigation actions.

The Estra Group has been diversifying its energy sources for many years. Renewable energy largely derives from photovoltaic production which is facilitated thanks to the installation of several plants located in various Italian regions, with the largest photovoltaic plants such as Cavriglia and Tegolaia located in Tuscany. The biomass plant in the Municipality of Calenzano (FI) also makes a significant contribution to the production of energy from renewable sources, particularly thermal energy.

The table below provides a summary of the electricity produced from all renewable sources owned by the Group. The breakdown of the various renewable sources follows a consolidated trend in line with the three-year period: 84.6% of the Group's energy production in 2022 referred to solar, 15.1% to biomass and 0.3% to hydroelectric.

*Total electricity produced from renewable sources\**

	2020		2021		2022	
	kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
<b>Photovoltaic</b>	27,857,303	100,286	25,976,776	93,516	27,221,629	97,998
<b>Biomass</b>	4,311,626	15,522	4,265,743	15,357	4,869,711	17,531
<b>Wind</b>	2,220	8	2,184	8	662	2
<b>Hydroelectric</b>	84,409	304	62,737	226	84,427	304

\* The table shows the amount of electricity produced by photovoltaic, biomass, wind and hydroelectric systems; electricity generated from photovoltaic and wind sources and sold was 26,780,202 kWh in 2020, 24,959,831 kWh in 2021 and 25,198,438 kWh in 2022; electricity generated from biomass and sold was 2,970,868 kWh in 2020, 2,963,833 kWh in 2021 and 3,306,080 in 2022; electricity generated from hydroelectric sources and sold was 82,721 kWh in 2020, 61,598 kWh in 2021 and 83,927 kWh in 2022.

**Photovoltaic**

In 2022, electricity production from photovoltaic systems was 27,221,629 kWh. The figure is in line with the 2020 financial year as certain plants recorded faults in 2021 which reduced production. Please note that like other renewable sources, photovoltaic production is susceptible to general weather trends. 70% of the energy from photovoltaic systems is produced at the Cavriglia and Tegolaia plants, which in 2022 produced 12,626,696 kWh and 7,918,496 kWh respectively.

**Wind**

Electricity is produced from the two wind farms owned by Estra Clima in Sardinia. These plants experienced several faults and malfunctions in 2022. Despite this, they produced 662 kWh of wind energy.

**Hydroelectric**

Hydroelectric energy is produced by Idrogenara. In 2022 there was a considerable increase of 48.4% compared to the previous year: this was because the plant returned to full operation and was optimised following an incident in 2021. The production of 84,427 kWh represents the highest peak recorded in the

three-year period. Consequently, electricity sold to the national grid fell from 61,598 in 2021 to 83,927 in 2022.

### **Biomass**

The biomass plant in Calenzano generates electricity and thermal energy using an ORC turbine. The energy is mainly used to operate the turbine itself, the biomass boiler and the district heating pumps; any surplus energy is transferred to the national grid.

In 2022 electricity production from biomass rose by 14.2% compared to 2021. This is mainly due to the extraordinary maintenance carried out in the previous two years, which enabled the plant to produce electricity continuously despite its age.

The Calenzano biomass plant produces thermal energy which is used to supply hot water and heating to several public and private buildings. In 2022 there was a 6.3% reduction compared to 2021; as such, production levels are similar to those in 2020. The decrease in the production of thermal energy from biomass is mainly due to the optimisation of the plant, which allowed it to produce more electricity (as mentioned above) at the expense of a slight reduction in thermal energy.

#### *Thermal energy produced from the biomass plant\**

2020		2021		2022	
kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
17,494,171	62,979	18,562,500	66,825	17,392,650	62,614

\*The thermal energy transferred was 6,126,697 kWh in 2020, 6,365,617 kWh in 2021 and 6,897,015 kWh in 2022.

In 2022, cooling energy produced by the biomass co-generation plant increased by 21.9% (+240,950 kWh), while cooling energy transferred increased by 17.3% (+152,478 kWh) compared to the previous year.

#### *Thermal energy produced from the biomass co-generation plant\**

2020		2021		2022	
kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
1,018,400	3,666	1,101,570	3,966	1,342,520	4,833

\*The cooling energy transferred was 910,343 kWh in 2020, 880,957 kWh in 2021 and 1,033,435 kWh in 2022.

### **Green energy**

In 2019 the Estra Group expanded its range of green products and services, creating gas and electricity tariffs for domestic and business customers to meet the demand of market and consumers who are increasingly conscious of the environment and the responsible management of their energy consumption.

In fact, new electricity tariffs were created using 100% renewable energy certified with Guarantee of Origin certificates, which guarantee full compliance with international standards and the origin of the source, and new gas tariffs that offset the CO<sub>2</sub> generated by customers' gas consumption by funding international renewable energy and climate action projects.

For these tariffs, the Estra Group signed a three-year agreement with AzzeroCO<sub>2</sub>, a company owned by Legambiente and Kyoto Club specialising in sustainability and energy, and launched a structured offsetting programme for CO<sub>2</sub> emissions generated during the combustion phase of the Group's methane gas sales. The emissions are offset through the purchase of CO<sub>2</sub> credits on the voluntary market from certified Gold Standard international renewable energy projects selected for their exemplary social, environmental and economic characteristics and which comply with the leading internationally recognised auditing standards.

In 2022 the Group launched various promotional and communication campaigns about its green products, which led to a direct rise in the number of people signing up for these tariffs.



At the end of 2022 there were 97,763 active electricity contracts (+59.6% compared to 2021) for a total consumption of 100% renewable GoO-certified energy of around 249 million kWh. There were 327,597 active gas contracts at the end of 2022 (+33.8% compared to 2021), for a total consumption of around 190 million cubic metres. Total emissions generated by this consumption were offset through the purchase of carbon credits on the voluntary market.

## Mosaico Verde

Since 2020 Estra has supported “Mosaico Verde”, a national campaign to redevelop and protect the landscape launched by AzzerCO<sub>2</sub> and Legambiente which provides for the reforestation and restoration of urban and suburban green areas.

The initiative aims to reduce CO<sub>2</sub> emissions and protect the landscape in order to deliver benefits for local authorities while also mitigating the environmental impact on the region, ensuring a positive impact in both social and environmental terms.

In fact, by participating in the project, companies give back the value they have received from the region in the form of urban regeneration projects, with the aim of increasing the social welfare of the local community and protecting natural resources.

Redevelopment projects are carried out in urban and/or suburban areas, respecting the requirements of environmental sustainability and current regulations on landscape constraints, ensuring the conservation of biodiversity and improving the landscape.

Estra carried out its first reforestation projects in 2020 and 2021 in the municipalities of Civitella in Val di Chiana (AR), Calenzano (FI), Ancona, Arezzo, Follonica (GR) and Macerata. In 2022 another three areas were identified for future reforestation work: Vasto (CH), Pesaro (PU) and Pratolino Park (FI). In 2022 arrangements were made with the municipal authorities and bodies to define projects scheduled for completion in early 2023.

## 4.8 Energy production from non-renewable sources

The Estra Group supports its renewable energy production with more conventional production methods based on non-renewable sources, via four methane-powered co-generation plants owned by Estra Clima and located in Sesto Fiorentino, Siena and Ancona. The plants contribute to the production of electricity, thermal energy and cooling energy.

The table below shows a marked decrease in electricity production between 2021 and 2022, with a reduction of 66.3%. This is largely due to a fault at the Ancona plant which meant that electricity was only produced in January. The plant was restored to full operational capacity through the installation of a new co-generator, but this only entered into service in 2023. This decline in electricity production, which reached its lowest level in the entire three-year period, was also partly due to the revamping process at the Mattioli plant, which allowed it to continue to produce heat (and thus thermal energy) but not electricity.

Thermal energy production was generally in line with 2021, with only a slight reduction of 2.3%.

Finally, cooling energy, which is only produced at the Sesto and Calenzano plants, decreased by 12.7%. The reduction can be attributed to the fact that cooling energy users are generally private customers who have opted for a more conservative approach to energy management in response to the steep rise in energy prices.

Consequently, during the year the total amount of energy transferred was 20% lower than in 2021.

*Energy production by the co-generation plants in Sesto Fiorentino, Siena (Malizia plant and Mattioli plant) and Ancona, owned by Estra Clima\**

	2020	2021	2022
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	kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
<b>Electricity</b>	990,952	3,567	2,501,692	9,006	841,358	3,029
<b>Thermal energy</b>	16,381,440	58,973	18,732,062	67,435	18,303,840	65,894
<b>Cooling energy</b>	490,342	1,765	743,646	2,677	649,392	2,338

\* The table shows the amount of electricity, thermal energy and cooling energy produced by non-renewable sources; transferred electricity from non-renewable sources was 631,341 kWh in 2020, 2,126,986 kWh in 2021 and 743,875 kWh in 2022; transferred thermal energy from non-renewable sources was 11,434,993 kWh in 2020, 14,810,433 kWh in 2021 and 12,673,044 kWh in 2022; transferred cooling energy from non-renewable sources was 408,618 kWh in 2020, 619,705 kWh in 2021 and 622,482 kWh in 2022. Cooling energy was generated and transferred by the Sesto Fiorentino plant only.

#### 4.9 Self-consumption of electricity from renewable sources

Some of the electricity produced by the Group's plants is self-consumed by those same plants. In 2022 consumption from photovoltaic plants increased by 41.1% compared to 2021. This is not only due to increased production but stems in particular from the progressive deterioration of power factor correction components used in transformers, which increases electricity losses and causes higher energy consumption.

##### *Self-consumption of electricity by photovoltaic systems*

2020		2021		2022	
kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
979,746	3,527	1,016,945	3,661	1,435,087	5,166

The biomass power plant recorded a 20.1% increase in consumption compared to 2021 as a result of the increased electricity production in 2022.

##### *Self-consumption of electricity by biomass systems*

2020		2021		2022	
kWh	Gigajoule	kWh	Gigajoule	kWh	Gigajoule
1,401,893	5,047	1,301,197	4,684	1,563,631	5,629

Self-consumption of electricity by the hydroelectric plant was estimated at 500 kWh. In this regard, as of 2022 the amount of energy withdrawn from the grid can be reported separately to self-consumed energy.

#### 4.10 Energy efficiency

The energy efficiency initiatives carried out by the Estra Group through the company Estra Clima involved several projects in 2022, such as the interventions with the ESCO formula initiatives, the installation of co-generation plants and public lighting projects, the latter launched in partnership with the municipality of Calenzano in 2019.

Over the three years, Estra Clima has constantly pursued its project to replace traditional boilers for residential customers with condenser boilers equipped with external temperature control sensors. The table below shows how this activity has progressively increased over the three-year period. The number of boiler replacements rose from 379 in 2021 to 426 in 2022, an increase of 12.4%. This consistent growth across the three years is directly linked to the debt transfer contract formula, which provides for income tax breaks of 50% or 65% for those who purchase a condenser boiler, with the possibility of transferring the credit to the supplier (in our case Estra Clima) without having to wait 10 years to recover the overall benefit.

As regards apartment renovations and reconditioning measures, 28 projects were carried out in 2022, a 75% increase on the 16 conducted in 2020. Given the complex nature of the works compared to a simple boiler replacement, this increase across the three years is due to the end of the pandemic, which enabled many projects in apartment buildings that had been reduced to a minimum in 2020 to be continued.

*Number of projects carried out*

Type of project	2020	2021	2022
Apartment renovation and reconditioning	16	22	28
Replacement of domestic boilers	313	379	426

#### 4.11 CO<sub>2</sub> emissions

Although it has yet to define specific targets to reduce greenhouse gas emissions by 2030, when conducting its business the Estra Group considers the energy, digital and ecological transitions to be decisive factors for its customers and the communities in which it operates. As such, it aims to strengthen its commitment to the circular economy, renewable energy, the creation of Renewable Energy Communities, e-mobility, the production of alternative renewable energies (hydrogen and biomethane) and energy efficiency.

##### 4.11.1 Emissions produced

The Group's emissions derive from the following:

- methane and electricity consumption for use at sites, offices and plants;
- methane consumption to heat the M&R stations on the gas distribution network;
- gas leaks and energy loss from production and distribution plants;
- vehicle fuel consumption.

As refined by the reference standards, emissions are divided into:

- Scope 1: direct CO<sub>2</sub> emissions produced, originating from sources owned or controlled by the company;
- Scope 2: indirect CO<sub>2</sub> emissions deriving from the company's activities, originating from the use of electricity taken from the grid.

There is also a third emissions category, Scope 3, which includes all other indirect emissions generated by a company's value chain. The Estra Group is not yet structured in a way that enables these emissions to be monitored, but it intends to conduct an analysis to understand the feasibility and timeframes of doing so.

Scope 1 emissions increased by 12.3% from 58,728 tonnes of CO<sub>2</sub> in 2021 to 65,947 tonnes of CO<sub>2</sub> in 2022. Emissions data also include physical methane leaks associated with the gas distribution activity, as well as classic methane leaks caused by environmental events. The impact of these emissions on total Scope 1 emissions in 2022 was 87%.

Combustion emissions fell by 5.8% in 2022 compared to the previous year. This stems from the general reduction in methane gas consumption, which was severely affected by the shutdown of the Ancona co-generation plant. In fact, the Group's co-generation plants, especially those fuelled by methane, are responsible for 47.2% of all combustion emissions.

Diesel emissions rose by 12.7% from 1,451 tonnes of CO<sub>2</sub> in 2021 to 1,636 tonnes in 2022.

In line with the provisions of the GRI standards, the table below records separate data for Scope 1 emissions deriving from methane leaks.

*Total Scope 1 emissions*

CO <sub>2</sub> (tonnes)	2020	2021	2022
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Scope 1 emissions - from combustion	7,848	9,233	8,701
Scope 1 emissions - from methane	43,470*	49,495	57,246

\* As connection data for Murgia Reti Gas was not available, emissions relating to physical leaks have been estimated.

The data for Scope 2 emissions (calculated according to the location-based and market based approach) was the highest observed in the three-year period. This is due to the increase in the general consumption of electricity, resulting in particular from the acquisition of the new companies Bisenzio Ambiente and Edma Reti Gas which operate particularly energy-intensive plants. As a result, emissions calculated according to the location-based method increased by 28.4% compared to 2021, while those calculated according to the market-based method increased by 31.2% compared to the previous year.

The table below compares total Scope 2 emissions in the 2020-2022 period, calculated according to the location-based and market-based approaches.

#### *Total Scope 2 emissions*

CO <sub>2</sub> (tonnes)	2020	2021	2022
Scope 2 emissions - Located Based	2,398	2,224	2,856
Scope 2 emissions - Market based*	3,194	2,918	3,830

\*Consumption relating to the "Scelta Pura Luce" tariff has been excluded.

#### **4.11.2 Emissions avoided**

Emissions avoided relate to:

- energy efficiency measures;
- energy production from renewable sources (mainly photovoltaic).

Total emissions avoided (tonnes)

Total emissions avoided (tonnes)	CO <sub>2</sub>
2020	14,391
2021	13,204
2022	13,961

The figures derive from the fact that in 2022:

- the amount of CO<sub>2</sub> emissions avoided due to energy efficiency measures increased by 68.9% from 389 tonnes in 2021 to 657 tonnes in 2022 thanks to CO<sub>2</sub> savings enabled by apartment renovation and redevelopment projects and the replacement of boilers in domestic residences, which both increased significantly in 2022.
- avoided emissions thanks to the production of renewable energy, which totalled 10,136 tonnes of CO<sub>2</sub>, increased by 6.2% compared to 2021 due to the increase in electricity production from photovoltaic plants.

As highlighted in the table below, the most significant portion of emissions avoided relate to the production of electricity from photovoltaic systems.

Emissions avoided through the production of electricity from renewable sources (tonnes)

	2020	2021	2022
	CO <sub>2</sub>	CO <sub>2</sub>	CO <sub>2</sub>
Electricity production from photovoltaic systems	9,360	8,183	8,575
Electricity production from biomass systems	1,449	1,344	1,534

Electricity production from wind systems	0.7	0.7	0.2
Electricity production from hydroelectric systems	28	20	27

- As well as renewable electricity production, the emissions avoided calculation also considers the production of thermal energy from biomass (3,124 tonnes) and cooling energy (44 tonnes).

In total, emissions avoided through energy production from renewable sources stood at 13,304 t of CO<sub>2</sub> in 2022, compared to 12,813 tonnes in 2021. If emissions avoided through energy efficiency measures are also included, this figure rises to 13,961 tonnes of CO<sub>2</sub>, as shown in the table.

## 5. Our people

### 5.1 Targets and results

Targets for 2022	Results in 2022
<p>Estra Group</p> <p>Implementation of Basic Training delivered remotely for new hires and continuous updates on privacy and data protection.</p> <p>Definition of a continuous and broad-reaching training plan for employees and collaborators delivered remotely.</p> <p>Creation and publication of specific content.</p>	<p><i>Target partially achieved</i></p> <p>Training on the Inspiring platform due for completion in 2023.</p>
<p>Evaluation of knowledge and skills gaps and the need for updates of company personnel on the topic of privacy resulting from internal audits, reports and changes to regulations and legislation.</p> <p>Analysis of training requirements for updates and continuous training on important topics, evaluation of the content and planning and delivery of the training.</p>	<p><i>Target achieved</i></p>
<p>Estra Group</p> <p>Restructuring of the MyEstra portal: completion of design and implementation of new portal.</p>	<p><i>Target partially achieved</i></p> <p>The design of the new Intranet portal was carried out in May and June with two participatory co-planning workshops and a presentation event. Between September and December the wireframes and graphics were designed, a technical analysis of the requirements of the new portal was produced, and preliminary work began to select the platform provider.</p>
<p>Estra Group</p> <p>Implementation of a human resources IT system (Talentia) with a "Selection" form to collect and process applications via the "work with us" section of the website.</p>	<p><i>Target achieved</i></p> <p>Selection notice published with new application methods in December 2022.</p>
<p>Estra Group</p> <p>Activity of the DE&amp;I Work Group: publication of a strategic D&amp;I document following the outcome of the employee survey held in late 2021 - start of awareness-raising/information campaign aimed initially at employees and then managers.</p>	<p><i>Target achieved</i></p> <p>Continuation of works - Priority-setting workshop held with Group Managers in November 2022 - Work on the Action Plan with MIDA started.</p>
<p>Estra Group</p> <p>Implementation of employee engagement activities: Company awards to reward everyday actions that best represent the Group's values, promote company volunteering initiatives/company volunteering day,</p>	<p><i>Target partially achieved</i></p> <p>Award not held. Company volunteering initiatives: food collection days in the Prato, Arezzo and Ancona offices in cooperation with Caritas; organisation of blood donation for Centria</p>

encourage colleagues to save energy at work and in their own homes (when working remotely) through a set of guidelines.	colleagues and roll-out of the initiative to the whole Group. Encourage colleagues to save energy: organisation of the “ <i>PER NOI DI ESTRA Piccole grandi azioni</i> ” project and the “Re-Think Your Jeans” recycling project.
Estra Group E-learning refresher training on privacy legislation and the Privacy Organisational Model, and information aimed at Group employees. Planned involvement of around 500 employees.	<i>Target achieved</i> 477 employees were involved in a data protection course, with learning assessment and the issuing of a certificate.
Estra Group E-learning training for new hires (2021 and 2022) on privacy and the Group's privacy policy.	<i>Target achieved</i>

### Targets for 2023

Estra Group  
Select a platform for the new MyEstra portal and upload content.

Estra Group  
Approve a new early retirement plan through contract expansion.

Estra Group  
Continue data protection training for employees who have not yet taken part in the specific FAD course, with learning assessment. Target participation of 370 employees.

Estra Group  
Implementation of Basic Training delivered remotely for new hires and continuous updates on privacy and data protection. Definition of a continuous and broad-reaching training plan for employees and collaborators delivered remotely on the Inspiring platform. Creation and publication of specific content.

Estra Group  
Anti-corruption training:  

- Refresher training on corporate responsibility pursuant to Legislative Decree 231/2001 following the update to the 231 Model to incorporate the new offences;
- Basic training for new employees pursuant to Legislative Decree 231/2001;
- Training on policies and procedures to government bodies.

Estra Group  
Adoption of a structured “on-boarding” procedure.

### Targets for 2023-2024-2025

Estra Group  
DE&I Work Group: create the “inclusion manifesto”, plan the presentation event and develop the action plan.

## Targets for 2023-2024

Estra spa, Estra Energie Srl, Estra Prometeo spa, Estracom spa, Estra Clima Srl

Develop training content on data protection, specifically on: “data processing for in-store operators”, and delivery to relevant recipients via the FAD platform (target participation of 100 employees and/or collaboration).

## 5.2 Responsible HR management

The human capital of the Estra Group represents the intangible yet fundamental bedrock of the company's performance and the primary source of its competitive advantage. As such, the Group's employees are considered a key area in which to invest resources in continuous training and to inspire corporate welfare based on skills and growth opportunities. Developing organisational knowledge is the key to that unique ability to generate innovation according to a continuous process of incremental growth, and this forms the basis of the Estra Group's approach to developing its human capital.

### 5.2.1 Employment

In 2022 there were 821 employees working for the Estra Group.<sup>13</sup> In addition to these, there were 32 agency workers, for a total workforce of 853 people. As shown in the table below, the number of employees has progressively increased over the three years, by 8% in the last two years and 11.5% over the entire three-year period. The number of agency workers belonging to the Group has also increased from 13 resources in 2020 to 26 in 2021 and finally to 32 in 2022. The increase in the number of people working for the Estra Group - from 749 in 2020 to 821 in 2022 - is due to the policy to acquire new companies and the new hires made in the course of the three years.

With the exception of agency workers, all employees are hired directly. In 2022, 92 workers were seconded from one Group company to another.<sup>14</sup> Secondment refers to a temporary assignment from an employee's normal place of work to another site that requires the services of the employee concerned.

As regards contracting agreements, 100% of employees are covered by the reference National Collective Labour Agreement (CCNL); of these, 92.8% are covered by second-level agreements<sup>15</sup>, enabling them to operate with greater autonomy and flexibility through the integration and strengthening of various economic and legislative schemes regulated by the CCNL (which constitute first-level agreements). In 2022 the trade union agreement which amended the amount of reimbursement allowed for meal expenses during transfers was confirmed.

*Total number of employees\**

2020	2021	2022
736	760	821

*Total number of employees and agency workers\**

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<sup>13</sup> Unlike the data on human resources published in previous Non-Financial Statements, the indicators included here distinguish between employees and agency workers, in line with the GRI Standards. For comparison and clarity purposes, many of the indicators used in 2020 and 2021 have been restated.

<sup>14</sup> Please note that in 2022 two employees were legally employed by a company outside the reporting boundary (Viva Servizi) but operated within a company that falls within the boundary of this document.

<sup>15</sup> The remaining 7.1% is composed of Ecos, Ecolat and Bisenzio employees who have not signed second-level agreements.

2020	2021	2022
749 (13 agency workers)	786 (26 agency workers)	853 (32 agency workers)

*\* Data calculated using the full-time equivalent (FTE) method. This method is used in order to represent employment situations such as that at the Estra Group where the total work of certain employees is sometimes shared between companies falling within the scope of the Consolidated Financial Statement and this Non-Financial Statement and those not considered within this scope. This HR management policy promotes a positive cross-contamination of skills and experiences between the various Group companies, growing professional expertise and standardising operating and management approaches within the various companies of the Group.*

In terms of the number of employees per area of activity, in 2022 the number of personnel engaged in the sale of gas and electricity fell, while there was an increase in the number of those operating in the distribution of gas, methane and LPG and in general services, carried out by the parent company Estra SpA on behalf of the other Group companies. This was mainly down to an organisational change that led to the creation of the “Group Sales Division” managed by Estra SpA, which led to the transfer of certain employees from the sales companies of the Parent Company to the new unit. The purpose of this new department is to optimise and standardise the Group's sales policies. In particular, 38.7% of employees operated in the gas, methane and LPG sectors, 26.7% are in general services and 22.8% are involved in gas and electricity sales. The increase in the number of employees involved in environmental services is due to the acquisition of Bisenzio Ambiente Srl, which was finalised during the year and which has 10 employees and one agency worker. Bisenzio Ambiente owns a treatment facility for hazardous and non-hazardous special waste located in the municipality of Campi Bisenzio (Florence).

In line with previous years, there is a clear gender distribution trend across the Group's various areas of activities. In percentage terms, men continue to represent the dominant gender in the gas, methane and LPG distribution sector (86.5%), energy services sector (66.7%) and environmental services sector (63.8%), due to the nature of these activities which have historically had a significant majority of male workers. Gender representation in the general services sector is fairly even (50.2% women), while the gas and electricity sales sector is mainly composed of women (62%). Effectively, two out of three women work in the general services or gas and electricity sales sectors, while one in two men work in the gas, methane and LPG distribution sector.



Number of employees by sector	2020	2021	2022
Distribution of gas, methane and LPG	273	275	318
Energy services	22	21	27
Gas and/or electricity sales	226	232	187
Telecommunications	13	13	12
General services	176	180	219
Environmental services	27	41	58

The 32 agency workers are mainly involved in sales (12 people) and environmental services (10 people). In particular, these are manual workers who work at plants and clerical workers who perform administrative functions such as gas and electricity billing (e.g., issuing bills and managing the related print-outs according to the billing cycles provided, and managing receipts). Others are involved in metering activities, such as the management of gas consumption readings sent by distribution companies, relations with distribution companies, including agreements for unscheduled readings, analysing the consistency of readings against past consumption, managing changes to devices, and operating in the natural gas balancing service. Finally, some agency workers operate at the type-approval office, which involves verifying that the incoming waste types correspond to the treatment authorisations held by the plant, or in the energy efficiency sector.

With regards to the breakdown of employees by professional level, the number of managers and messengers remained broadly the same, while the number of employees at other levels increased; in particular, the number of manual workers rose by 18% in the last two years. Overall, 66.7% of employees are clerical workers and 23.8% are manual workers. In line with 2021, 91.7% of managers - 22 out of 24 - in the Group originate from the Estra Group's native regions of Tuscany and Marche. With regard to agency workers, 23 are clerical workers and 9 are manual workers.

Number of employees by professional level	2020	2021	2022
Managers	21	23	24
Middle managers	40	44	50
Clerical workers	516	524	548
Manual workers	156	165	195
Messengers	3	4	4

As regards the gender representation at each professional level, the percentages generally remained stable over the course of the three years. The fairly even gender balance in clerical roles is contrasted with an over-representation of men in management roles (20 men and 4 women) and middle management roles (38 men and 12 women), as well as in the manual sector. 90.9% of women are clerical workers, against 53.1% of men. Considering the 32 agency workers, 23 carry out clerical roles (11 women and 12 men) and 9 are manual workers (1 woman and 8 men).

Breakdown of employees by qualification and gender	2020		2021		2022	
	Men	Women	Men	Women	Men	Women
<b>Managers</b>	18	3	19	4	20	4
<b>Middle managers</b>	31	9	33	11	38	12
<b>Clerical workers</b>	264	252	260	264	278	270
<b>Manual workers</b>	145	11	153	12	184	11
<b>Messengers</b>	3	0	4	0	4	0

The table below shows that there was a significant increase in the number of employees working in the Ancona and Florence offices in 2022 compared to the previous year, which increased more than twofold due to the acquisition of the companies Edma Reti Gas and Bisenzio Ambiente. Ancona, Arezzo, Prato and Siena firmly remain the Group's historical locations of operation. It is therefore no surprise that, when considering employee data at the regional level, 77.3% of employees work in Tuscany and 13.8% in Marche. The agency workers mainly work in Tuscany, specifically in Prato, Grosseto (Ecolat) and Siena. In 2021, the Group's offices were expanded to include the office in Florence following the acquisition of Ecos S.r.l. while in 2022 there were no changes as the new companies acquired in 2022, Edma Reti Gas and Bisenzio Ambiente, operate respectively in Ancona and Florence.

Number of employees by location	2020	2021	2022
Ancona	35	35	88
Arezzo	99	99	101
Ascoli Piceno	17	18	18
Bari	17	17	14
Campobasso	1	2	2
Caserta	3	3	3
Chieti	1	1	2
Cosenza	1	1	1
Florence		13	30
Foggia	10	12	11
Grosseto	40	41	39
Isernia	14	15	14
L'Aquila	1	1	1
Lucca	2	2	2
Macerata	6	8	7
Modena	7	5	3
Naples	2	2	2
Palermo	1	1	1
Perugia	3	3	3
Prato	274	276	281

Reggio Calabria	3	3	3
Rieti	6	5	5
Siena	184	189	182
Teramo	9	8	8

The average seniority of Group employees is 15 years, 9 months, falling to 15 years, 2 months if agency workers are also accounted for. When divided by gender, the average length of service of male employees is 16 years, 3 months, and 14 years, 11 months for women, falling to 15 years, 8 months and 14 years, 4 months if including agency workers.

As regards the educational level of the entire workforce, there was a reduction in the number of workers holding primary or secondary school certificates. In 2022, only 16.4% of employees (15.8% compared to 2020) held one of the two basic educational certificates. The majority of employees hold high school diplomas while 33.8% have a degree.

Gender representation remains largely unchanged: 94.3% of women employees hold a high school diploma or above (137 out of 309 women have degrees) compared to 73.9% of men (151 out of 544 have degrees). It was not possible to obtain data on educational level for 25 workers (19 employees and 6 agency workers). These related to 10 Italians and 15 people of non-Italian origin employed at Ecolat, Ecos and Bisenzio Ambiente, the Group's environmental services companies. The table below shows the percentage distribution of educational level for Estra Group personnel, considering both employees and agency workers.

Level of qualification of employees and agency workers	2020	2021	2022
Primary or secondary school certificate	16.7%	16.7%	15.8%
High school diploma	47.7%	47.1%	47.5%
Degree	34.2%	34.7%	33.8%

### 5.2.2 Protected categories

In 2022, 45 Estra Group employees belonged to protected categories: 39 people with legal disabilities and 6 orphans and/or widows/widowers. There were no agency workers belonging to protected categories. Specifically, these regarded 32 men and 13 women with an average age of just under 50 years and 52 years respectively (the general average age is 50 years) who, in line with the previous two-year period, mainly hold clerical roles (75.6%). Considering the professional level, the breakdown of employees in protected categories remained largely unchanged, as shown in the tables below. Furthermore, more than 2 out of 3 employees in protected categories work in the Group's historical sites in Tuscany - Arezzo, Prato and Siena (75.6%).

	2020	2021	2022
People with legal disabilities	38	37	39
Orphans and/or widows/widowers	6	5	6

	2020	2021	2022
Women	14	12	13
Men	30	30	32

	2020		2021		2022	
Middle managers	1	2.3%	1	2.4%	1	2.2%
Clerical workers	35	79.5%	32	76.2%	34	75.6%
Manual workers	5	11.4%	5	11.9%	6	13.3%
Messengers	3	6.8%	4	9.5%	4	8.9%

### 5.2.3 Contracts and remuneration

One of the cornerstones of the Estra Group's approach to HR management is its commitment to offering positions that provide employment stability and continuity, in line with the Group's policy strategies and the ethical principles that inspire them.

Considering Group employees only (not including agency workers), 98.9% of workers - 812 out of 821 - are employed on permanent contracts, up on the 97.2% recorded in 2021. Only 0.3% of workers are employed on fixed-term contracts, rising to 1.5% if considering men employees only.

Breakdown of employees by contract type and gender	2020	2021	2022
<b>Permanent</b>	<b>726</b>	<b>739</b>	<b>812</b>
Men	456	456	516
Women	270	283	296
<b>Temporary</b>	<b>10</b>	<b>21</b>	<b>9</b>
Men	5	13	8
Women	5	8	1

As regard agency workers in 2022, three employees (all men) were hired on permanent contracts while the other 29 are on fixed-term contracts. The table below shows the composition and percentage distribution by contract type considering the entire workforce, confirming a clear preference for permanent contracts.

Breakdown of employees by contract type and gender (employees and agency workers)	2020		2021		2022	
<b>Permanent</b>	727	97.1%	742	94.4%	815	95.5%
<b>Temporary</b>	22	2.6%	44	5.6%	38	4.5%

In 2021, 4 clerical workers (3 women and 1 man - the latter of which left the company during the year) with an average age of 30 had their contracts converted from fixed-term to permanent. In 2022 the number of contracts that were transformed from fixed-term to permanent contracts rose to 20 (4 women and 16 men, with an average age of 35).

As regards the remuneration policies, the CCNL tables for the relevant sector are applied. The table below shows the data on the ratio of women's to men's pay, considering both the annual basic salary and the total annual salary, divided by professional level. The indicators remained generally unchanged over the three years. Middle managers have highest level of parity, while the gender pay gap is more pronounced among manual workers. This is mainly due to the lower levels of experience of women compared to men, as well as their shorter length of service. Furthermore, all 11 female manual workers are employed on part-time contracts, while only 3.8% of men (7 out of 184) do not have a full-time contract.

Annual basic salary*: ratio of	2020	2021	2022
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remuneration of women to men			
Managers	95%	93%	91%
Middle managers	98%	98%	97%
Clerical workers	91%	92%	92%
Manual workers <sup>16</sup>	-	-	64%

Annual total salary*: ratio of remuneration of women to men	2020	2021	2022
Managers	87%	87%	84%
Middle managers	93%	92%	92%
Clerical workers	89%	89%	90%
Manual workers <sup>16</sup>	-	-	45%

\* For 2020 and 2021 the table does not include data from the companies Ecolat and Ecos which apply different contracts to those of other Group companies. Data for 2022 refers to the entire corporate reporting boundary.

In 2021, the ratio of the annual total remuneration of the highest paid person to the median annual total remuneration of all other employees was 6.5. This ratio rose to 7.23 in 2022. Moreover, over the two-year period the annual total remuneration of the highest paid employee increased by 10.3%, while the median remuneration of other employees fell by 0.6%.

As regards variable incentive remuneration, the Group has adopted a formalised Management by Objectives (MBO) procedure which aims to improve the Group's performance and to encourage personnel to engage in setting targets. This system was implemented in 2022, paying close attention to the strategic guidelines of the Estra Group, and is aimed at managers and other senior roles.

The performance assessment process is based on indicators divided into the following three categories:

- Group economic indicators;
- Role indicators;
- Management skills.

The MBO model centres on three key principles:

1. simplicity in the structure and application of the model;
2. design of the model according to leading practices;
3. configuration of the model according to the Group structure and the roles included in the scope of the model.

The model enables the trend of the main indicators for each role to be monitored, identifying best performance, and is used to define the bonus linked to the achievement of the established targets. The number of employees who were formally assigned targets was consistent in the 2021-2022 period, decreasing from 124 people to 120. The number of employees who were assigned sustainability-related targets rose from 10 in 2021 to 14 in 2022. Compared to 2021, the number of sustainability-related targets increased. The targets mainly concerned environmental performance, such as redevelopment and restructuring measures and the reduction of emissions. Bonuses awarded under the MBO scheme in 2022 totalled € 990,684 in 2022.

<sup>16</sup> Data for 2022 and 2021 is not available as the companies Ecos and Ecolat, the only Group companies that employ women in manual roles, were not included in the calculation.

Furthermore, in June 2022 a second-level agreement was signed on the performance bonus for the 2022-2024 three-year period, aimed at all Group employees except for those employed at environmental services companies, i.e., Ecolat, Ecos and Bisenzio Ambiente. This bonus was subject to the achievement of clear and well-defined profitability, productivity, efficiency, quality and sustainability targets. In particular, sustainability targets concerned the reduction of internal energy consumption and the average number of print-outs per employee. In 2022, € 1,704,947 in performance bonuses was disbursed to employees.

#### 5.2.4. New hires and terminations

The Estra Group devotes a lot of attention to selecting its personnel. Recruitment follows a formal procedure that defines the principles and methods, which can be consulted on the website.

Nearly 100 resources were hired in 2022. There was constant growth throughout the three-year period, increasing from 16 to 98 resources. Of these, 64.3%, or 63 new hires, resulted from the acquisition of the companies Edma Reti Gas and Bisenzio Ambiente. The other hires regarded 9 people who were transferred from temporary contracts to permanent contracts, 6 resulting from the recruitment and subsequent termination of contracts during the year, and 20 are effectively new hires recruited via the external selection process. The presence of workers hired in 2022 whose contracts were terminated in the same year was mainly due to the fact that the companies Ecos and Ecolat, which operate in the environmental services sector, used agency workers.

Looking at the figures in more detail, the vast majority of new hires were man (83.7%). In 50.0% of cases, new hires were in the 30-50 age bracket, while 9.2% were 29 or under. The average age was 45 years, 6 months. 55.1% of new hires were in the Ancona area, followed by Florence (22.4%) and Prato (11.2%). The high percentage of new hires in Ancona and Florence was due to the acquisition of Edma Reti Gas and Bisenzio Ambiente. As regards the professional level of new hires, half entered into clerical roles (49) while the other half were manual workers (43). All women that joined the company entered into clerical roles. In terms of educational level, except in rare cases most new hires held a high school diploma as a minimum. In 2022 the recruitment rate at both aggregate level and by gender was 0.12: for every 100 Group employees, 12 were hired.

In 2022, as regards contract agreements, 71.4% of new hires were covered by the CCNL and also signed second-level agreements. In terms of the employment relationship, 88 out of 98 new hires were employed on permanent contracts and only three were hired on part-time contracts.

Considered the data on new hires based on employee age, a significant increase in the number of employees over 30 years of age is apparent, with a significant increase in the middle age bracket (+21 resources) and in the over-50 age bracket (+30 resources). The increases in the other two age brackets are also notable, as shown in the table below. In terms of gender, the majority of new hires in all three ages brackets were men. The trends described above are also perfectly reflected in the recruitment rate by age bracket, as shown below.

New hires (subdivided by gender and age)	2020	2021	2022
<b>Total</b>	16	50	98
Men	9	31	82
Women	7	19	16
<b>New hires by age</b>			
29 or under	8	13	9
Between 30 and 50 (inclusive)	6	28	49
Over 50 years	2	9	40

<b>Recruitment rate*</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Total</b>	0.02	0.07	0.12
Men	0.02	0.07	0.16
Women	0.03	0.06	0.05
<b>Recruitment rate by age**</b>			
29 or under	0.22	0.34	0.25
Between 30 and 50 (inclusive)	0.01	0.07	0.11
Over 50 years	0.01	0.03	0.12

\* Calculated as number of new hires/total employees by gender

\*\* Calculated as number of new hires /total employees by age

As for the 20 new hires selected through the external recruitment process in 2022, there are 19 men and 1 woman, with an average age of around 37 years. All but one of the new hires are based in the Group's offices in Tuscany. As regards the composition by professional level and gender, 45% of new hires were employed as clerical workers, while 50% were hired as manual workers. Conversely, 30% hold a degree while 45% hold a high school diploma. As regards contract type, 3 out of 4 new hires are employed on fixed-term contracts, mainly on a full-time basis (90%). The tables below show the key characteristics of new hires and the relative recruitment rate.

<b>New hires (subdivided by gender and age, not including agency workers)</b>	<b>2022</b>
<b>Total</b>	20
Men	19
Women	1
<b>New hires by age</b>	
29 or under	6
Between 30 and 50 (inclusive)	12
Over 50 years	2

<b>Recruitment rate*</b>	
<b>Total</b>	0.02
Men	0.04
Women	0.003
<b>Recruitment rate by age**</b>	
29 or under	0.17
Between 30 and 50 (inclusive)	0.03
Over 50 years	0.01

\* Calculated as number of new hires/total employees by gender.

\*\* Calculated as number of new hires/total employees by age.

In 2022, in addition to the 98 new hires there were 34 new agency workers, for a total of 132 new hires. The new agency workers were 20 men and 14 women, with an average age of 32 and, in most cases, involved new hires. 85.3% were employed in environmental services or gas and electricity sales, as clerical or manual workers.

To provide a complete and comprehensive picture of new hires in the three years, the table below shows the data for both employees and agency workers.

<b>New hires (subdivided by gender and age)</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Total</b>	27	89	132
Men	14	61	102
Women	13	28	30
<b>New hires by age</b>			
29 or under	13	31	28
Between 30 and 50 (inclusive)	11	47	60
Over 50 years	3	11	44

<b>Recruitment rate*</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Total</b>	0.04	0.11	0.15
Men	0.03	0.12	0.19
Women	0.05	0.09	0.10
<b>Recruitment rate by age**</b>			
29 or under	0.32	0.61	0.55
Between 30 and 50 (inclusive)	0.03	0.11	0.13
Over 50 years	0.01	0.04	0.12

\* Calculated as number of new hires/total employees by gender.

\*\* Calculated as number of new hires and agency workers/total employees and agency workers by age.

In 2022 there were 38 contract terminations, up on the 26 terminations in 2021 and on the 25 in 2021. Contract terminations regarded 27 men and 11 women, with an average age of just over 51 (48 for women and almost 53 for men), mainly employed as clerical workers (21 resources) and manual workers (15 resources), with full-time contracts (92.1%) and fixed-term contracts (23.7%). Compared to the previous year, in 2022 contract terminations increased in the 30-50 and over-50 age brackets. The reasons for the terminations were mainly retirement (15 employees) and resignation (14 employees).

The general staff turnover rate shows minimal fluctuations over the three-year period and stood at 0.05 in 2022: for every 100 employees there were 5 contract terminations.



Contract terminations (subdivided by gender and age)	2020	2021	2022
<b>Total</b>	25	26	38
Men	14	22	27
Women	11	4	11
<b>Number of contract terminations by age</b>			
29 or under	1	5	2
Between 30 and 50 (inclusive)	8	7	13
Over 50 years	16	14	23

Turnover rate*	2020	2021	2022
<b>Total</b>	0.03	0.03	0.05
Men	0.03	0.05	0.05
Women	0.04	0.01	0.04
<b>Turnover rate by age**</b>			
29 or under	0.03	0.13	0.06
Between 30 and 50 (inclusive)	0.02	0.02	0.03
Over 50 years	0.06	0.05	0.07

\* Calculated as number of contract terminations/total employees by gender

\*\* Calculated as number of contract terminations/total employees by age

The table below shows the trend of contract terminations in the 2020-2022 period, considering the entire workforce of the Estra Group, including both employees and agency workers.

Contract terminations (subdivided by gender and age)	2020	2021	2022
<b>Total</b>	39	50	83
Men	23	36	58
Women	16	13	25
<b>Number of contract terminations by age</b>			
29 or under	8	13	19
Between 30 and 50 (inclusive)	14	21	41
Over 50 years	17	16	23

Turnover rate*	2020	2021	2022
<b>Total</b>	0.05	0.06	0.10
Men	0.05	0.05	0.11
Women	0.06	0.05	0.08
<b>Turnover rate by age**</b>			
29 or under	0.20	0.25	0.37
Between 30 and 50 (inclusive)	0.03	0.05	0.09
Over 50 years	0.06	0.05	0.06

\* Calculated as number of contract terminations of employees and agency workers/total employees and agency workers by gender

\*\* Calculated as number of contract terminations of employees and agency workers/total employees and agency workers by age

### 5.3 Employee well-being

The Estra Group aims to enhance and celebrate its personnel by guaranteeing inclusion and protecting diversity, with the aim of making a substantial contribution to workers' well-being. It achieves this by:

- complying with legal requirements on anti-discrimination as enshrined in Italian Legislative Decree 198 of 11 April 2006, "Code of equal opportunities between men and women, pursuant to Article 6 of Law 246 of 28 November 2005", and by protecting sensitive personal data through the implementation of the provisions of Italian Legislative Decree 196 of 30 June 2003;
- striving to implement the most appropriate and innovative methods to enable people to achieve a healthy work-life balance;
- adopting typical company welfare mechanisms (e.g., flexible benefits);
- promoting a corporate culture through two main approaches: firstly, the adoption of organisation and operation models aimed at forging relationships and collaborations founded on constant exchange and reciprocal growth, and secondly, the adoption of an internal communication system able to overcome physical and technological barriers to increase the accessibility and quality of information;
- the implementation of training initiatives aimed at optimising employees' aspirations and offering greater career opportunities.

#### 5.3.1 Diversity and equal opportunities

Over the years, the Estra Group has shown an active commitment to social inclusion and the promotion of diversity in all its forms. In this regard, in 2019, along with other members of Utilitalia (the Italian Federation of Water, Environment and Energy Companies), the Group signed the Utilitalia Agreement "*La Diversità fa la Differenza*" promoted by the federation with the aim of enhancing and managing diversity in the individual businesses. By signing the agreement, the companies commit to adopting a Diversity&Inclusion approach that includes:

- the implementation of inclusive company policies that, following a top-down logic, start from the top and then radiate to all organisational levels below, permeating the entire organisation;
- the introduction of staff selection and recruitment methods based exclusively on professional and human skills able to meet the Group's needs, thus ensuring an approach that does not discriminate on gender, age, culture or ability grounds;
- the adoption of organisational models that offer the possibility for a healthy work-life balance, while also strengthening and improving company welfare;
- the introduction of more transparent and objective mechanisms in staff appraisal and career advancement processes, as well as in the related incentive and reward schemes;
- engaging staff as much as possible in the processes to define training initiatives to meet specific training needs;
- the implementation of an adequate annual monitoring system able to verify and objectively report on the levels achieved in diversity management;
- reporting of company progress in terms of diversity and the adoption of policies both within and outside the company to raise awareness on the importance of the inclusion measures adopted.

The aim is to create good practices based on the diversity management experiences adopted by the companies that signed the pact, identifying possible improvement measures and new policies in order to incorporate diversity increasingly into company strategies and to enable companies to seize the benefits of good diversity management. With this in mind, the federation is also developing an index that will represent

a transparent and unambiguous tool for measuring the performance and improvements achieved by companies in the area of diversity management.

Last year, the work group of the Estra Group participated in the training course entitled “INCLUSION MANAGEMENT: designing a strategy to promote inclusion in the company”. This event represented an important opportunity to define the essential elements that should characterise the Group's inclusion strategy in line with its value system. In fact, in 2021, following the work of the Utilitalia “Diversity and Inclusion” Commission, which had led to Estra SpA, as the Parent Company, signing the “*La diversità fa la differenza*” agreement in 2019, a work group was set up with the aim of promoting Diversity and Inclusion. Furthermore, in November 2021 the company took part in a research project entitled “*Valorizzare le differenze in azienda*”, promoted by the MIDA Society in collaboration with the Catholic University of Milan, which asked the company to complete a questionnaire. 268 Group employees filled out the questionnaire and were included in the sample on which the results of the survey were based. In 2022, a workshop was organised with the members of the Management Committee and the directors of the special-purpose vehicles to identify, based on the mapping carried out by MIDA, the macro-areas on which to focus the Group's D&I project. During the workshop, members of the Diversity&Inclusion work group collaborated with managers to identify key areas of intervention and to prioritise actions. The work group then participated in a second, more operation-oriented workshop, again moderated by MIDA, during which concrete actions to introduce D&I issues within the macro-areas identified in the previous workshop were identified. Finally, the work group worked in collaboration with MIDA to develop the wording of the Company Diversity&Inclusion Manifesto, a document containing the Estra Group's value statements on diversity management in the company. The Manifesto will be presented during a hybrid launch event which is currently being organised. A training programme on D&I issues aimed at managers is currently under consideration.

During 2022, as in the previous two years, no cases of discrimination occurred within the Estra Group.

Given the types of activities carried out by the Estra Group, the workforce has always been characterised by a pronounced predominance of men, however it is mainly the methane gas distribution sector, rather than other activities such as environmental services, that traditionally tends to attract men rather than women. Women represent the majority of workers in administrative and clerical roles.

The gender balance has remained stable over the three years. In 2022 men represented 63.8% of the workforce against 36.2% for women, similar to the figures in 2021 when 61.7% of employees were men against 38.3% for women.

If the Group's agency workers are also taken into account, in 2022 the workforce comprised 544 men and 309 women, an increase on the 489 men and 297 women in 2021 and 468 men and 281 women in 2020. Specifically, the number of women rose by around 10% between 2020 and 2022, while the number of men rose by just over 16%.

Employees by gender	2020	2021	2022
Men	461	469	524
Women	275	291	297

In terms of employee age, the average age is just over 47. Around 1 employee in 2 is aged between 30 and 50. The gap between male and female employees is widest in the under-30s (1 woman for every 4 men) and smallest in the over-50s bracket, which has 108 women employees and 239 men. As regards agency workers, the majority (15 resources) are 29 or younger. The average age of agency workers is 35.

Employees by age	2020		2021		2022	
29 or under	36	4.9%	38	5.0%	36	4.4%

Between 30 and 50 (inclusive)	426	57.9%	424	55.8%	438	53.3%
Over 50 years	274	37.2%	298	39.2%	347	42.3%

In 2022, 157 employees submitted requests for and were granted parental leave. The number of requests was about the same for men and women, with 81 requests (51.6%) submitted by women.

Employees granted parental leave by gender	2020	2021	2022
Men	30	58	76
Women	47	73	81

The table below shows the types of request for parental leave. In 2022 61 employees took advantage of the permissions provided for by Law 104, which protects minors and family members of children suffering from certain illnesses; meanwhile, 53 employees took advantage of the permissions regulated by Law 53 of 2000, under which, in the event of serious family circumstances, including illness and serious ill health, workers may agree upon alternative ways of working with their employer. Unlike in the previous two years, in 2022 one agency worker also benefited from parental leave. In 2020 and 2021, the period of the Covid-19 pandemic, many employees who were unable to perform their professional tasks remotely requested Covid-19 parental leave in order to manage the suspension of in-person learning in schools. This considerable increase, which is more or less equal across the genders - is due to the high number of hourly parental leave requests.

Employees who took parental leave (maternity/paternity)	2020	2021	2022
Number of employees who took mandatory maternity leave (including early maternity leave)	10	12	14
Number of employees who took optional maternity leave	26	47	47
Number of employees who took mandatory paternity leave (including early paternity leave)	12	17	12
Number of employees who took optional paternity leave	6	1	1
Number of employees who took COVID-19 parental leave	51	2	1

In 2022, a total of 29,468 hours of leave were taken by employees. In particular, there was a significant increase in mandatory and optional hourly maternity leave, while hourly paternity leave decreased. In addition to the types shown in the table, there were 539 hours of hourly parental leave and 8,240 hours relating to Law 104 and 873 to Law 53.

Hours of parental leave divided by type	2020	2021	2022
Optional maternity	3,974	5,070	9,401
Mandatory maternity (including early maternity)	4,837	4,950	9,569
Optional paternity	312	76	8
Mandatory paternity, including early paternity	429	931	806
COVID-19 parental	5,045	66	32

After a sharp decline in 2020 due to fewer requests were received from Group Companies for more qualified professional profiles to meet organisational needs, the number of promotions grew in absolute terms in 2021 (156 promotions). The increase is mainly due to the higher number of requests for more qualified profiles, which returned to pre-pandemic levels. In 2022, 120 people (14.6% of total employees) benefited from promotion.

In line with 2021, promotions were generally even across the genders, as shown in the table below. More than a fifth of female employees were promoted to a higher level.

As regards professional level, 80% of promotions regarded clerical workers, followed by manual workers (15.9%) and managers (2.5%). Of the 120 employees who received promotion, 8 were on part-time contracts and 3 belonged to protected categories. Furthermore, 56.7% hold a degree while 37.5% hold a high school diploma. One agency worker was also promoted.

Promotions by gender and % of total employees	2020	2021	2022
<b>Men</b>	17	78	64
% of total employees (men)	3.7%	16.6%	12.2%
<b>Women</b>	11	77	56
% of total employees (women)	4.0%	26.5%	18.9%
<b>Total promotions</b>	28	155	120
% of total employees	6.1%	20.4%	14.6%

### 5.3.2 Work-life balance

In 2022, 90.3% of employees were on full-time contracts; the remaining 9.7% were employed on a part-time basis, with an average of 30.5 hours per week. The table shows that the number of staff on part-time contracts has remained unchanged, while the number of employees on full-time contracts has constantly increased. With regards the gender, men are mainly on full-time contracts (97.7%) while 22.9% of women are on part-time contracts. As far as agency workers are concerned, in 2022 only 3 out of 32 workers were on part-time contracts.

In 2022, 8 employees successfully requested to transfer from part-time to full-time contracts (5 women and 3 men, mostly clerical workers), while 3 women and 4 men transferred from full-time to part-time.

Employees by contract type	2020	2021	2022
<b>Full-time</b>	657	679	741
<i>Men</i>	449	458	512
<i>Women</i>	208	221	229
<b>Part-time</b>	79	81	80
<i>Men</i>	12	11	12
<i>Women</i>	67	70	68

In 2022, employees continued to take advantage of remote working possibilities. As well as improving employee well-being, this working method delivers positive environmental benefits by reducing commutes. On 20 June 2022, a trade union agreement on agile working was signed, according to which all Group employees, regardless of contract type, may work remotely provided that it is compatible with the company's organisation. The document provides for individual voluntary agreements to meet workers' personal needs. It also stipulates that those who opt for this method can or must carry out 20% to 60% of

their monthly working hours remotely. In specific and/or sensitive situations, this percentage may increase up to 100%.

The analysis of the indicator reveals some interesting data: In 2022, 497 employees chose to work remotely: 261 women and 236 men, or 60.5% of the workforce. Second, most of these (62.4%) were aged between 30 and 50, performed clerical roles (91.3%), and were employed on permanent contracts (99.6%) on a full-time basis (88.5%). Finally, in 2022 a total of 278,643 hours and 37,350 days were spent working remotely. 10 agency workers were offered the possibility of working remotely, resulting in a total of 3,565 hours and 463 days of remote working.

With a view to providing a positive work-life balance, the Group has used the Cisco Webex video conferencing system for many years in order to host meetings, events and video calls with internal and external personnel and the Group's offices. While predominantly a video-conferencing tool, Cisco Webex also serves as a group management tool with file-sharing, presentation and chat functions aimed at specific work groups. The software protects the privacy and security of the data and information transmitted thanks to advanced encryption techniques. Each update to the central cloud platform is instantly available to all users. Cisco Webex can be accessed from company computers, both physically and remotely, and from the 30 conference rooms at the Ancona, Arezzo, Prato, Osimo and Siena offices. In particular, in 2022 a total of 3,045 video conferences were held, a significant increase on the 583 held in 2021, and totalling 10,270 hours.

Finally, another aspect at the heart of the Group's focus on staff policies to guarantee and protect employee well-being is the management and effective use of holiday entitlements. In this regard, part of the productivity bonus is subject to the use of annual leave within the specified contractual terms.

### 5.3.3. Welfare

Over the years the Estra Group has implemented a range of mechanisms that now characterise the company welfare system. These mechanisms have evolved over time with the aim of supporting people and meeting their needs, making a positive impact on their quality of life and on their general well-being. This has enabled the Group to translate its values into tangible actions that support the needs and aspirations of every single member of the Estra community. Naturally these mechanisms go far beyond the parental leave, life insurance policies and pension contributions required by law.

The first company welfare initiative, which dates back to Estra's very foundation, is the presence of a company canteen in each of the three main offices of the Group in Prato, Siena and Arezzo.

Subsequently, as of 2019 employees have been able to convert all or part of their annual performance bonus into the following flexible benefits available on the AON platform:

- allocation of percentage to the Pegaso Supplementary Fund;
- reimbursement of medical fees;
- reimbursement of care fees;
- reimbursement of school fees;
- vouchers
- recreation and sport.

Also since 2019, thanks to the agreement reached with trade unions on "solidarity leave" (art. 24 of Legislative Decree no. 151/2015), workers have been able to donate unspent holidays and leave to colleagues at the same company who have used their contractual allowance of holidays and leave and who are in one of the following situations:

- caring for dependent children under the age of 18 who are seriously ill and require constant care;

- caring for children over the age of 18 or the children of spouse/common law partner who are seriously ill and require constant care.

The sum of the transferred holidays goes into an “ethical bank” and the amount is based on the basic salary of each donor.

As of 2019, through the signing of a special agreement between Utilitalia and Generali S.p.A., a premature death and permanent disability policy has been established for all the company's workers for an annual contribution of €60.00 per person.

In addition, Estra gives its employees<sup>17</sup> the option to enrol in the Pegaso pension plan, which is a voluntary defined contribution plan. This is a supplementary pension fund for employees of utility companies. The future value of the participant's benefits is dependent upon the contributions made by Estra, as the employer, and the participant, as well as the fund's management and investment performance. The plan only applies to employees and excludes managers and employees of Environmental Services Companies (Ecolat, Ecos, and Bisenzio Ambiente). The employer pays a quarterly payment equivalent to 1.20 percent of the salary beneficial for employee severance indemnity (TFR) purposes for each employee who has chosen to join the Fund. Depending on their duration of service, employees are required to pay a portion of their accrued severance pay at the same rate (though they are free to choose a higher rate). During 2022, the company allocated about €240,514 to pay contributions for employees who joined, while the total amount paid by employees was €217,402. It should be noted that Estra does not utilize a distinct fund to pay pension plan obligations.

#### 5.3.4. Internal communications

MyEstra is the Group's Intranet portal used for most internal communications and, therefore, employee interaction. It is an important training tool as it enables documents to be filed and accessed with ease, and is constantly updated with news and information about the initiatives of Group Companies, as well as guaranteeing improvements in organisational and operational efficiency, optimising processes and saving time.

As of 2021 all Group workers have access to MyEstra. The figures for 2022 shown in the table only cover the period up to 28/7/2022 as there was a data collection issue from 29/07 to the end of the year that could not be resolved.

122 news items were published on the portal in 2022, of which: 43 were Estra news articles, 65 were press releases and 14 were about CRAL.

MyEstra data	2020	2021	2022
Employees and agency workers with access to the Intranet	718*	786	853
Actions carried out on the platform	114,520	89,948	35,394
Unique visitors	1,741	1,429	698
Duration of average visit	0:07:00	0:06:13	00:13:13
Downloads	3,005	1,850	1,094
Bounce rate	18%	19%	17%
No. visits to the Intranet	19,872	14,710	4,267

\* All Group employees except Ecolat personnel.

<sup>17</sup> Contributions were also factored into the calculation of contributions to and on behalf of terminated employees during 2022.

In 2021 an internal survey about MyEstra was held. MyEstra is considered the second most effective method of circulating information in the company, after email. 59.6% confirmed that they rarely use MyEstra, confirming the opportunities to expand the usage of the platform. The most popular content regarded company documents, especially those relating to news about the company and its projects. In 2022 a project was launched to design the new Intranet portal, and two co-design workshops and a final presentation event on the results were held in May and June. Between September and December a technical analysis of the requirements of the new portal was carried out and preliminary work to select the platform provider began.

## 5.4 The development of human capital

Human capital is the Estra Group's most precious resource and represents a strong competitive advantage. For this reason, the company promotes a broad range of employee training services in addition to those required by law. Training is a key driver to increasing the Group's human resources and stimulating professional growth based on their skills and aspirations. A better prepared and more skilled employee is able to deliver higher quality services while laying the foundations for a positive work environment and greater efficiency.

The Estra Group's investments in developing its human capital include the adoption of the Talentia HR data management software.

Talentia is a software used to monitor training courses carried out both internally and externally to the company, as well as to update the curriculum vitae of each employee, attaching the certificate obtained or the certificate of attendance, if issued by the training provider. Thanks to this software, it is possible to keep track of the course title, the date it was held, and the details of the participants. At the end of the year the HR service extracts and processes the training data for the previous year for each Group company. As well as providing reports, Talentia also enables the HR service to monitor the expiry dates of obligatory training certificates in order to schedule updates and refresher courses within the necessary time frames.

For each in-house training course (i.e., those organised at the company premises), a special register is produced which records the name of the trainer and the attending participants, as well as specific information on the course content and the means of verification. The selection of training programmes is strictly based on specific staff needs and follows a defined procedure. This process involves a meeting between the Department or Area Manager and the HR department, which usually takes place in January. The Managers outline the training required to enable their staff to acquire the skills to perform their assigned tasks, to grow professionally, and to consolidate a culture of quality. They also set the targets and choose the recipients of the training course. The training requests resulting from the interview are collated and transcribed in a special form. Training requests are analysed by the Manager and/or Director, who reviews the proposals and approves the training.

### 5.4.1. Skills development and enhancement of human capital

In 2022, 712 employees took part in training programmes, in line with the 716 in the previous year. of which 478 were men and 234 were women. If also including agency workers, 756 people received training. Of the 18 agency workers who received training in 2022, 11 are women and 7 are men.

In total, 29,274 hours of training were delivered, in line with the data for 2021 (29,334 hours), of which 28,953 hours were to employees and 209 were to agency workers. Specifically, considering the number of



hours of training provided to staff, 25% of all training was delivered to women. In 2022 an average of 34 hours of training per employee was offered (39 for men, 23 for women).<sup>18</sup>

Total number and average number of training hours per employee	2020	2021	2022
Total number of training hours	17,776	29,121	28,953
Average number of training hours per employee	23	37	34

Taking professional level and gender into account, 58.1% of all training hours were given to clerical workers, 28.7% to manual workers and 1.6 % to managers. Messengers were not involved in any training activities.

The extensive and varied training programmes are based on certain key categories, as follows:

- occupational health and safety training (general and sector-specific), for a total of 4,666 hours, of which 116 to agency workers. The data was down on the 5,765 hours of training delivered in 2021;
- technical and professional training aimed at the development of specific skills required for certain roles (e.g., plant management, steel welder, HR management, etc.);
- management of risks and responsibilities;
- training on Neta, the new management software;
- employment, accounting and tax;
- management (project management, risk management, etc.);
- data protection and transparency;
- team building and communication (communication techniques, conversation skills, etc.);
- IT: management and security tools, databases and analytics.

In 2022, as in the previous two-year period, short individual coaching sessions were conducted to support personal growth by helping employees to recognise and optimise their own resources. Specifically, 68 employees - 31 women and 37 men - were given the opportunity to attend an advanced Management programme, for a total of 7,627 hours. In addition to these, there was also the option to undertake postgraduate courses including the “Environmental Expert” Masters, the “Europlanning 2021-2027” Masters and the “Financial Market Analysis” Masters, which were attended by five employees, all men, for a total of 220 training hours.

In contrast to 2021, in 2022 53.8% of training hours were delivered in person. However, online learning continues to be widely used thanks to its flexibility. As regards the number of training hours delivered by professional level, in 2022 there was a significant drop in training to managers of both genders, while the data for the other levels remained more or less the same.

Average hours of training by qualification and gender	2020	2021	2022
<b>Managers</b>			
Men	164	132	20
Women	107	101	7
<b>Middle managers</b>			
Men	61	80	64

<sup>18</sup> Thanks to improvements in data collection techniques, since 2019 the data also includes employees who ceased working for company, and employees who were hired and ceased working for the company in the same year. Average training hours have been calculated based on 761 employees for 2020, 785 in 2021 and 859 for 2022.

Women	37	70	74
<b>Clerical workers</b>			
Men	19	35	37
Women	9	28	22
<b>Manual workers</b>			
Men	28	35	41
Women	4	3	16
<b>Messengers</b>			
Men	11	9	-
Women	-	-	.
<b>Total</b>			
Men	31	42	39
Women	11	29	23

Training courses aimed at enhancing employees' skills are mainly delivered by external consultants. However, certain types of courses are taught by Estra Group employees who share their skills and experience with their colleagues.

With regard to end-of-career support, such as programmes to facilitate the possible continuation of employment and/or to help manage the end of employment due to retirement or contract termination, Estra pays employee severance indemnity in line with its legal requirements. In 2022 no early retirement plans for employees who intend to retire or retraining paths for those who intend to continue working were established.

The Estra Group constantly strives to find innovative training models that are effective and stimulating for participants. One such example is the Estra Training project, initially launched in 2020 and consolidated over time. The project aims to teach innovative customer management practices by increasing self-awareness and conscious decision-making, and is aimed not only at those in the customer care sector but more generally at all employees involved in any capacity in delivering services to end customers.

The project boasts a unique and interactive knowledge base and includes both conventional technical training materials as well as more value-based content, and offers the option to co-author learning materials. This enriches the distance-learning programmes offered to call centre, branch and store operators with interactive and dynamic content that promotes continuous learning.

This new training approach is based simultaneously on a top down and bottom up model, where learning is circular and involves the active and direct involvement of all participants, where all knowledge, including experiential knowledge, is an important asset of an effective customer management approach. In this spirit, area experts are appointed in various company departments, recognising those with strong sector know-how. These area experts participate in the customer service training process by writing, reviewing and validating content and participating in networks and webinars. Meanwhile, customer services operators provide essential and valuable feedback about their experiences to the company through forums, surveys and questionnaires. Finally, mistakes are reviewed through an editorial plan and a reporting system, enabling the implementation of increasingly effective planning processes and promoting progressive and continuous self-learning over time.

The Estra Training project is an example of the successful creation of a community characterised by a collaborative atmosphere that feeds a new culture of training, based on the concept of collective responsibility towards customers and the valuable asset that they represent.

In 2022 a total of 573<sup>19</sup> call centre, branch and store representatives received training, compared to 527 in the previous year. These operators work in the following sectors: customer service (341), agencies (107) and academies (125). A total of 63 hours of training were delivered, down from the 78 hours in 2021, delivered through 217 e-learning courses and 21 webinars on various topics.

As regards e-learning programmes, there were 16,016 registered users (42,313 in 2021); the average number of registered users for each course was 120 (165 in 2021), while the average number of registered users per operator was 48 (98 in 2021). The reduction is due to the lower number of obligatory registrations as many programmes were voluntary refresher courses relating to the new management software. The average completion rate was 74%, in line with the previous year.

The webinars recorded a total of 605 registrations (1,143 in the previous year) and the average number of attendees was 28 (52 in 2021).

#### 5.4.2. Internships

The internship programme allows the Group to extend its human capital development policy beyond company borders. It represents an opportunity for young people who are either still completing their education or have graduated from high school or university and are beginning their professional careers to take on a temporary position in one of the Group's departments.

There are two types of internship: curricular or extra-curricular. Curricular internships take place during (or at the end) of an educational programme that involves a temporary post in a business for a set period of time. Extra-curricular internships are not linked to educational programmes and are applied for independently without necessarily being part of the chosen educational route.

In 2022, due to a lower volume of applications, there was a reduction in the number of internships. Compared to the 21 internships in the previous year, in 2022 there were only 9, 8 of which were given to young male high school students, undergraduates and graduates.

As noted in the table below, 3 extra-curricular internships started and were concluded within the year. These were held exclusively at the office in Prato and totalled 540 days, or 18 months, and involved young graduates with an average age of 28. The internships were supported by the Prato Job Centre. The interns worked in credit management, risk management and energy saving.

Extracurricular internships	2020		2021		2022	
	No.	%	No.	%	No.	%
Women	5	71.4	3	30.0	1	33.3
Men	2	28.6	7	70.0	2	66.7
Total	7	100.0	10	100.0	3	100.0

The number of curricular internships also fell from 11 in 2021 to 6 in 2022. These were held at the Prato and Siena offices and involved young male high school students and undergraduates with an average age of just under 20. Collectively, the internships lasted for 220 days, or 7 months. The internships were supported by senior high schools (5) and ITS (1). The interns mainly worked in the plant services sector.

Curricular internships	2020		2021		2022	
	No.	%	No.	%	No.	%
Women	7	22.2	3	27.3	0	0.0
Men	2	77.8	8	72.7	6	100.0
Total	9	100	11	100	6	100

<sup>19</sup> For privacy reasons, the accounts of operators who no longer work for the Estra Group are deleted after 6 months. The figures therefore underestimate the actual data.

## 5.5 Workers' rights and protections

One of the fundamental workers' rights is the right to a safe, hygienic and legally compliant workplace. Workers' risk exposure depends on the activities and duties they carry out. Consequently, the Group has always adopted a robust policy aimed at preventing and avoiding exposure to potential hazards which, to date, has successfully protected this basic right. One of the cornerstones of this policy is the structured system of certifications that have been acquired and maintained over time. Specifically, the companies Estra, Estracom, Estra Clima, Estra Energie, Gergas, Centria, Prometeo, Murgia Reti Gas, Ecolat, Ecos and Edma Reti Gas hold certification UNI ISO 45001 for their OH&S management system, which aims to reduce occupational risks and improve workers' safety, health and well-being.

Through both the certification system and the creation, maintenance and continuous updating of an appropriate management and control system that goes beyond mere legal compliance, the Estra Group oversees all aspects related to safety by promoting the adoption of responsible and safe practices by all those who work in the organisation, and encouraging employees to participate in risk prevention and health and safety protection protocols to protect their colleagues and third parties. To this end, a system has been adopted that enables workers to report any cases of non-compliance. Specifically, the system includes:

1) Description of processes used to identify the presence of any occupational hazards and to assess the risks in a systematic and non-systematic way, as well to apply the system of controls to eliminate the dangers and minimise risk, including: i) how the organisation guarantees the quality of these processes, including the expertise of the people who carry them out; ii) how the results of these processes are used for evaluation and improvement.

Procedures and tools	Performance indicators
<ul style="list-style-type: none"> <li>- Risk assessment document</li> <li>- Company safety organisational chart</li> <li>- Health checks and health protocols</li> <li>- Training, information and education</li> <li>- Internal emergency plans</li> <li>- Specific occupational health and safety procedures integrated in a workplace Quality-Environment-Safety management system</li> <li>- Occupational HSE management system certified according to ISO 45001</li> </ul>	<ul style="list-style-type: none"> <li>- Risk assessment pursuant to Italian Legislative Decree 81/08</li> <li>- Shared and coordinated Internal emergency management in offices occupied by multiple companies</li> <li>- Updating of plans according to current fire prevention regulations</li> <li>- Identification, training and updating of emergency, fire prevention and first aid personnel</li> <li>- Defibrillator training at the main offices where most employees operate.</li> <li>- Adoption of a schedule to ensure timely monitoring of all deadlines and obligations for local units</li> <li>- Regular meetings and interaction with trade union representatives</li> <li>- Adoption and supply of PPE (for operational workers)</li> <li>- Constant monitoring (regular safety meetings for sites, accident reports, near misses, etc.) to implement continuous improvement policies.</li> <li>- Regular training directed at all employees on SSL topics (legislation, safety initiatives, accidents, near</li> </ul>

2) The description of the tools available to Estra personnel to report actual or potential hazards in the working environment, as well as the safeguards necessary to protect said workers from retaliation. Reports must be made to the competent managers and management personnel responsible for occupational health and safety and the company HSE officer, as well as through the trade union representatives of the Group and/or the individual company (for those not covered by the Group trade union). In fact, information is provided regularly to all workers on occupational health and safety aspects, including current regulations.

3) The description of the processes by which employees may justify their removal from potentially harmful work situations, as well as an explanation of how they are protected from retaliation; in this regard, Group policy must establish procedures, operating instructions and contingency plans.

4) Description of the processes used to investigate any occupational accidents, including those to identify hazards and assess the risks relative to accidents, in order to identify corrective actions based on the list of controls and the improvements that must be carried out on the occupational health and safety management system. In this regard, as well as the measures in point (3) above, accidents, their causes and effects and any measure implemented to reduce their likelihood and the consequences are constantly monitored, with the support of the HR Service.

Reports regarding the last three points above may also be submitted to the Supervisory Body, the company doctor and the company trade union representatives, using the specific channels made available to all employees, such as the dedicated email address, the online communication channel and the relevant post boxes located in the Group's main offices, all of which guarantee anonymity. Centria, which holds the SA 8000 certification, has a dedicated representative.

As regards extraordinary operations involving the Estra Group, such as mergers, demergers or business unit transfers, the company applies a minimum notice period within which employees and their representatives must be informed of 25 days, in line with current legislation.

#### 5.5.1 Employee participation and consultation on occupational health and safety

The occupational health and safety management system of the Estra Group provides for a series of initiatives aimed at improving workers' engagement, which include the following:

- encouraging reports of near misses through online questionnaires;
- periodic occupational health and safety meetings;
- periodic meetings on managing emergencies in offices with multiple workers;
- training.

This system encompasses all employees and non-employees. The Group's four primary locations (Ancona, Arezzo, Prato, and Siena) are certified for their environmental and safety performance. All locations are subject to annual internal audits, conducted on a random basis. Audits are conducted remotely, in-person, or via document examination. However, documents are examined as part of remote and in-person evaluations as well. In 2022, internal audit controls covered 672 workers, accounting for 78.8% of the Group's total workforce. No internal audits were limited to document control, and the majority of audits were conducted on-site, i.e., in the presence of the auditee. Both remote and on-site audits include substantiation of safety devices, their maintenance, and health and safety training activities. Moreover, with the exception of Bisenzio Ambiente, all of the companies have UNI EN ISO 45001:2018 certification for Occupational Health and Safety Management Systems. This covers a total of 842 employees, or 98.7% of all employees.

The topic of safety is also covered by the *"Sicurezza in Estra"* newsletter which is emailed every three months to all employees of Estra SpA, Estra Energie, Estracom and Prometeo, and made available to all other employees on the company Intranet *"MyEstra"*. The newsletter focuses on various aspects of occupational health and safety and the integrated management system, and is designed to inform and update workers.

As provided for by law, each year the Group Companies hold an annual prevention and safety meeting attended by the workers' safety representative, company doctor, trade union representative, legal representative and appointed proxies.

Employees at the gas distribution companies are undoubtedly the most exposed to occupational health and safety risks. In particular, Centria, the Group's largest distribution company, adopts employee engagement practices, which are summarised below:

- surveys distributed via digital platforms, aimed at improving company safety systems;
- reporting of near misses using the digital platform;
- organisation of an annual meeting, attended by workers' representatives and company doctors, pursuant to Legislative Decree 81/08;
- QSA Committee meetings held every six months to review the activities relating to the SA 8000 Management System, in collaboration with workers' representatives;
- use of company network folders, where all operating documents related to the integrated management system are filed and updated;
- emailing, publication on the company Intranet and saving to the company disk drive of the quarterly newsletter "Centria4Safety", containing news and information on occupational health and safety, corporate responsibility and cyber security.

Meanwhile, Murgia Reti Gas, another gas distribution company, launches an active consultation programme with workers via a specially dedicated network folder which is used to convey safety information and directives. Gergas has implemented a regular training and information plan on safety issues that is much more stringent than the state-region agreement.

As far as occupational safety committees are concerned, Gergas has established the QSE Committee which receives any reports made by the Workers' Safety Representatives. Moreover, having obtained SA8000 certification, Centria has implemented a Social Performance Team (SPT) which organises regular meetings between Workers' Representatives and the QSE Committee focused on the Corporate Responsibility and Occupational Health and Safety Management System. Gergas, Murgia and Edma Reti Gas have not established formal Safety Committees. In 2022 the Estra Group Covid-19 Management Committee (composed of the HSE, Workers' Safety and Trade Union representatives of all Group Companies and the Management representative) continued its work to manage the pandemic emergency in the workplace and to share occupational safety procedures. This Committee has been extended until 30/06/2023 in order to establish and maintain a coordination team linked not only to the Covid-19 emergency but also more generally to align HSE procedures and actions at Group level.

### 5.5.2. Employee health

The Estra Group protects the health of its employees in several ways:

- signing of special agreements for access to health care services, such as agreements with local medical practices for the use of specialist medical services at a discounted price for employees;
- administration of flu vaccinations for workers through the industry association "Cispel Toscana" (exclusively for the Group's sites in Tuscany; provided by the Regional authorities);
- antigen and PCR tests to check for asymptomatic cases of the SarsCOV2 virus among workers.

For employees on permanent CCNL Multiservizi contracts, Ecolat has joined the supplementary health care fund ASIM, through the payment of a monthly fee of €6 per employee. Membership of the fund is marked under a separate entry on the pay slip delivered each month to employees.

The Estra Group is committed to protecting the confidentiality of its workers' healthcare data. In fact, sensitive data on employee health is a private matter and is processed exclusively by the company doctor.

The Companies support the doctor and/or the healthcare facility to plan and manage appointments (defined by the doctor) and to conduct employee health checks.

### 5.5.3. Occupational accidents

The Estra Group defines specific procedures, guidelines and regulations which are notified to all employees and regularly updated, in order to implement an internal control system to manage and prevent the risk of occupational accidents. The Group pays particular attention to training and awareness-raising on occupational health and safety, as well as specific coaching, where necessary. To summarise, the Group is committed to implementing a “culture of safety” through the promotion of four key pillars:

- the management’s commitment to safety;
- sharing concerns regarding dangers and focusing on their impact on people and work;
- the realistic and flexible use of rules, avoiding excessive paperwork;
- continuous reflection on practices through monitoring and feedback analysis.

Reducing the risk of accidents and professional illnesses are the primary goals of the Group's occupational health and safety policy. Several measures are taken to achieve these goals, including the assessment of all risks, the analysis of accidents that have occurred in the past, the analysis of near-misses reported by staff, the definition and implementation of technical, organisational and behavioural safety measures including personal protective equipment, and the verification of the implementation and effectiveness of the defined safety measures.

As well as the dangers associated with work-related stress and the prolonged use of video terminal equipment and the risks of accidents (collisions, slips, cuts, boarding and disembarking vehicles, falls, etc.) common to all Group companies, companies operating in the gas distribution, environmental services and energy sectors face specific hazards. These include: exposure to noise, methane and LPG (fire, explosion, asphyxiation), the use of work equipment (injuries, amputations), the use of electricity (electrocution), working at heights (fall from heights), mechanical material handling (falling materials from heights, crushing) and manual load handling (injuries to the musculoskeletal system), exposure to vehicle traffic (being run over), driving company vehicles (traffic accident), use of hazardous substances (intoxication, asphyxiation), the presence of several companies on the same site (interference), environments thought to be contaminated or near to contaminated areas (underground gas valve chambers), and, since last year, infection from Covid-19.

To make the above process more systematic and effective, Centria has voluntarily adopted the specific occupational health and safety certification schemes UNI ISO 45001 and SA 8000. The risk assessment process is systematised in an integrated quality, safety and environment management system procedure. Based on this procedure, each risk is analysed and quantitatively assessed, starting with the initial risk with no security measures, and then introducing the level of mitigation achieved with the security measures defined for each risk, and finally arriving at the residual risk, which must be low.

Furthermore, in 2021 Centria introduced a mobile app installed on employees’ devices to prevent the risk arising from isolated work situations, through a feature that enables users to activate a rescue procedure in the event of emergency.

In the environmental services sector, the main risks associated with working activities are:

- risks associated with night-time work;
- risks associated with noise, the potential exposure to biological and chemical agents, to erect posture and to repetitive strain;
- risk of fire;
- risk from mechanical vibrations;



- risks from handling objects and transporting loads;
- risks associated with the use of machinery and equipment relating to the waste selection and processing plant.

Ecolat, one of the Estra Group companies responsible for environmental services, has implemented a series of actions and procedures to eliminate and reduce dangers and minimise risks, such as:

- night-time work in suitably lit areas;
- employee training, information and education;
- actions to promote a culture of health and safety at work;
- use of appropriate PPE (e.g. footwear, gloves, clothing, eyewear, helmet...);
- regular maintenance and cleaning of plant machinery and equipment;
- obligation for employees to change out of work clothing and take a shower at the end of a shift;
- implementation of the laundry service for work clothing in changing rooms;
- definition of risk mitigation procedures for professional activities;
- maintenance of horizontal and vertical plant signage;
- definition of a targeted medical check-up programme for workers exposed to specific risks.

In 2022, four occupational accidents were recorded, fewer than in the last two years. However, none of the accidents affected workers on agency contracts; consequently, the summary table below only considers accidents that affected Estra Group employees. In 2022, the overall accident rate and severity rate were therefore lower than in 2021. Hours worked in 2022 amounted to 1,324,585 for employees and 45,924 for agency workers, a total of 1,370,509.

Total number of accidents (total and by gender)	2020	2021	2022
Total number of accidents	6	7	4
Men	3	4	3
Women	3	3	1

Accident rate (total and by gender)	2020	2021	2022
Accident rate*	4.97	5.59	3.02
Men	3.86	5.08	3.47
Women	6.96	6.45	2.18

\* Calculated as (no. of accidents/hours worked)\*1,000,000

Accident severity rate (overall and by gender)	2020	2021	2022
Accident severity rate*	0.07	0.07	0.02
Men	0.07	0.10	0.02
Women	0.07	0.03	0.01

\* Calculated as (Calendar days lost due to accidents/workable hours)\*1,000

Accidents involved 1 clerical worker and 3 manual workers, for a total of 22 days of convalescence (-76 compared to 2021). 25% of these accidents involved women. As for the type of accident, the recorded accidents regarded bruising to arms and legs, as well as injuries or wounds sustained during working activities.

No accidents with serious consequences (the rate of occurrence of which is, therefore, zero), or work-related deaths involving serious or very serious injuries of personnel enrolled on the company books and for which



the company's liability has been definitively established were recorded in the three-year period. The fatality rate is therefore zero.

As regards accidents to workers not employed by the Group but whose place of work is under the control or supervision of the Group (such as construction sites, works conducted at its offices and branches, customer care activities at stores and branches, etc.), Centria monitors the number of events and, as a severity index, the number of days of absence. In 2022 the number of accidents involving workers not employed by Centria which occurred in places of work under its control was 2, with a total of 19 days of absence from work (14 days and 5 days respectively).

In recent years, much attention has been given to the causes of “near misses” at work. A near miss is any work-related event that might have led to injury or death but which, due to pure chance, did not. When near misses occur it is important to consider which factors (human, technical and organisational) may have contributed to the event in order to avoid similar incidents in the future through the introduction of appropriate measures and improved processes to prevent them. The Estra Group monitors and observes near misses in order to prevent and analyse these events. To prevent these situations from recurring in the future, for each near miss a detailed analysis of the event and the associated risk is carried out and specific improvement actions are taken, such as the adoption of specific measures or equipment. Estra, Estra Energie, Estracom, Prometeo and Bisenzio Ambiente promote the reporting of near misses through online questionnaires accessible via QR-codes.

In 2022 13 near misses were reported (-5 compared to 2021). These occurred in four Companies: Ecolat (3), Estra (2), Centria (7) and Estra Energia (1). The reports regarded potential injuries associated with impact, slips, collisions, road accidents, failure to comply with HSE procedures and smoke leaks.

In the 2020-2022 three-year period no occupational illnesses of employees or former employees for which the company was declared ultimately responsible were recorded. For service companies, the potential professional illnesses are mainly linked to posture, video terminal use and, in certain cases, repeated use of company vehicles. In the case of operating companies, workers are divided into Administrative, Technical and Operational staff to enable the implementation of appropriate actions to mitigate the risk of professional illnesses associated with their specific role.

Several actions are taken to reduce the risk of professional illnesses. These include:

- the use of CE-certified equipment;
- anti-glare work surfaces and monitors;
- adoption of ergonomic furniture.
- position of work stations away from direct sources of heat and direct and artificial light;
- staff training and information;
- procedures for the use of company vehicles and rigorous ordinary and extraordinary maintenance plans for vehicles and equipment;
- replacement of obsolete technology;
- staff training and information.

Occupational illnesses particularly affect workers employed in the gas distribution and environmental services sectors. The main occupational illnesses and their causes are listed below:

- hypoacusis due to noise, as employees involved in certain tasks are exposed to noise levels above 80 dB(A) on a daily or weekly basis;
- illnesses caused by mechanical vibrations to the hands and arms, as certain tasks involve the use of tools, equipment, machines and apparatus that transmit vibrations to the hands and arms;

- herniated discs in the lower back, caused by certain tasks that require the use of machinery that transmit vibrations to the entire body;
- illnesses caused by infrared radiation due to tasks involving burning objects;
- illnesses caused by UV radiation, including solar radiation;
- manual handling of loads.
- possible illnesses resulting from exposure to chemical agents.

All risks are determined according to the risk assessment procedure and analysed in the Risk Assessment Document, which is updated periodically. For example, in 2022, Murgia's Risk Assessment Document was revised to remove the risk of asbestos exposure following the removal of asbestos roofs on three M&R rooms.

In addition to those mentioned above, other actions taken to minimise the risk of contracting occupational illnesses are:

- replacement of the source of the danger with something less dangerous (e.g. work equipment);
- plant and equipment maintenance to maintain compliance;
- specific risk assessment with field measurements (e.g. noise, vibrations);
- employee health checks;

### 5.5.3 Freedom of Association

At the end of 2022, a total of 259 employees were members of trade unions, equating to 31.5% of the workforce. In absolute terms, there was a slight increase (+17 resources) compared to the previous year, but the percentage remained more or less the same. In 2022 no agency workers were members of a trade union. In terms of gender, during the three years the rate of trade union membership among men was significantly higher than among women (199 men to 60 women).

Number of workers who are trade union members, subdivided by gender	2020	2021	2022
Total	239	242	259
Men	177	176	199
Women	62	66	60

## 6. Customers and the Community

### 6.1 Targets and results

Targets for 2022	Results in 2022
Open new stores in Assisi for Prometeo and restructure the Estra Energie offices in Atessa and Pagliare del Tronto.	<i>Target achieved</i>
Estra Launch of Urban Jungle project at Estra's Prato office.	<i>Target partially achieved</i> In 2022 an agreement was signed with Consiag to carry out the project; due to the pandemic and the increase in cost of materials, the project is currently being analysed to define the optimal structure.
Estra CO <sub>2</sub> detectors installed in rooms	<i>Target achieved</i> The sensors were tested for three months in the Prato office. They were installed in meeting rooms and proved very useful in monitoring air quality (CO <sub>2</sub> detection). The alarm systems in place to activate air exchange were found to be ineffective because they could only be monitored remotely from the control centre and not locally. The test was concluded and detectors will not be installed in stores.
Centria Average time for gas supply activation < 3.5 days	<i>Target achieved</i>
Centria Average arrival time for emergency gas call-outs < 35 minutes	<i>Target not achieved</i> Average arrival time for emergency gas call-outs downstream of the POD: 36.86 minutes, upstream of the POD: 37.13 minutes.
Gergas Renewal of 6 gas regulation units.	<i>Target achieved</i>
Estracom Improve air quality: implement a digitalisation project in industrial areas to manage environmental conditions and vehicle traffic.	<i>Target not achieved</i> The project was not completed but in 2022 the Smart Neutral City programme was launched in collaboration with the Municipality of Prato, which will run over the 2023-2025 period.
Estracom Building energy efficiency: digitalisation of urban areas to improve the energy efficiency of buildings.	<i>Target partially achieved</i> In 2022, after Estra selected the building, preliminary activities began to plan the redevelopment of the building, intended to become the ESTRA headquarters in Ancona,

	through modelling activities using BIM technology. The redevelopment contract was awarded to the company DBA.
<p>Estra Group</p> <p>Design and implementation of stakeholder engagement initiatives to create opportunities for dialogue and debate about sustainability topics and raise awareness among stakeholders of the social and environmental impacts generated by the Group in its areas of operation. In 2021, offers of stakeholder engagement initiatives were requested from several specialist companies. In 2022 the Company that provided the most cost-effective offer will be selected and the engagement activity will be implemented.</p>	<p><i>Target not achieved</i></p> <p>The stakeholder engagement initiatives were postponed to 2023.</p>
<p>Estra</p> <p>Launch projects to support families in need, promoting a culture of solidarity and social responsibility to combat energy poverty, including through actions to promote the sustainable use of resources and energy production. In 2021, a demoscopic survey was conducted to study various aspects relating to energy poverty, including measures to combat it. In 2022 the various possible actions will be assessed in collaboration with sales Companies, with a view to implementing those deemed most effective and efficient.</p>	<p><i>Target not achieved</i></p> <p>The initiative to increase the number of instalments for deferred bill payments began in February 2023.</p>

### Targets for 2023

Centria

Average time for gas supply activation < 3.5 days

Average arrival time for emergency gas call-outs < 35 minutes

Edma Reti Gas

Average arrival time for emergency gas call-outs < 35 minutes.

Edma Reti Gas

Average time for gas supply activation < 3.5 days.

### Targets for 2023/2024

Estra Group

Launch of the cyber security management project to study the vulnerability of the ESTRA Group's IT system, leading to the subsequent definition of a set of security measures aimed at protecting against fraudulent attempts to commit data breaches through cyber attacks. The project also involves the research and implementation of remediation measures.

## 6.2 Relations with customers

Proximity and customer care are two central elements of Estra's sustainability vision, and are expressed through the trusting relationships that the Group aims to forge through transparency, fairness and reliability.

The communities in which Estra operates are the linchpin of the Group's commitment to a shared and widespread approach to sustainability able to pave the way to economic and social development, in line with SDGs 8, 9, 11 and 12.

Through Estra Energie and Prometeo, the Group addresses all areas of the market - residential, small and medium-sized enterprises, large industrial customers and public administrations - offering tailor-made services and solutions for the supply of electricity and gas as well as value-added services, also relying on the support of external partners to manage contracts, and adopting a multi-channel model centred on both physical and digital channels.

Moreover, the Estra Group offers its customers a complete range of services which, starting from its traditional activities, integrate new solutions and technologies such as fibre optic networks, energy efficient boilers, solutions to improve household energy efficiency and photovoltaic panels, to meet the demands of efficient energy management and well-being for citizens, businesses and public authorities.

These services are marketed to customers through a capillary sales network of stores and branches (82 in 2022), call centres, digital channels such as the app and customer area, and specialists devoted to large corporations, combining energy supply services with consultancy and support on tariffs and contractual matters. These tools and channels enable customers to easily and quickly manage their supply, providing assistance and information on products and services and helping them to make conscious and transparent energy decisions.

To ensure all customers receive maximum protection and in compliance with the competition laws, in 2019 Estra Energie and Prometeo launched a joint process in collaboration with Consumers' Associations which led to the approval of a voluntary self-governance protocol for unsolicited contracts and activations, in partnership with leading consumers' associations and the Control Authority.

In 2022, the Control Authority held two meetings under the Voluntary Self-Regulation Protocol on Unsolicited Contracts and Activations, one for Estra Energie and one for Prometeo, with the aim of analysing the trend of complaints and resolutions. The online events were attended by representatives from leading consumer associations.

In 2021, in order to further consolidate the dialogue with Consumers' Associations, the Charter of Responsibilities of the Estra Group was created, a digital tool available on the company's website which provides extensive, clear and detailed information on the methods and procedures that regulate the sale and distribution of gas and electricity by the Estra Group. In light of the liberalisation of the energy market, the Charter of Responsibilities has become an increasingly vital tool to enable consumers to make free, conscious decisions and access all of the useful information in a clearly presented way. An email channel was also created to enable the direct submission of reports by Consumers' Associations to ensure that complaints are rapidly handled and resolved.

In 2022, there are no reported cases of non-compliance with marketing communication regulations and self-regulatory codes and no new legal actions regarding anticompetitive behavior and antitrust and monopoly law violations against the Group. With the ruling published on 17/10/2022, the Lazio Regional Administrative Court rejected the appeal filed by Estra Energia and confirmed the actions issued by the AGCM (paid at the time by the company against Estra Energie and Estra Elettricità for anti-competitive behaviour).

### 6.2.1 Our customers in figures

The Group carries out its activities predominantly in Central and Southern Italy. The geographic distribution of gas and electricity customers is as follows:

- from 0 to 5,000 customers in Basilicata, Emilia Romagna, Friuli Venezia Giulia, Liguria, Piedmont, Sardinia, Trentino Alto Adige and Valle d'Aosta;
- from 5001 to 15,000 customers in Lazio, Lombardy, Apulia, Umbria and Veneto;
- from 15,001 to 50,000 customers in Abruzzo, Calabria, Campania, Molise and Sicily;
- from 50,001 to 400,000 customers in Marche and Tuscany.

Compared to 2021, the total number of customers fell across both the gas (-5.8%) and electricity (-0.2%) supply sectors. In relation to contract type, in the 2020-2022 period the general downwards trend in gas and electricity sales on the regulated market continued, a sign of the measures being adopted by all commercial energy companies to confront the end of the regulated market scheduled for January 2024 without too many consequences.

	2020	2021	2022
<b>Number of gas PODs</b>			
End market - Free	387,968	384,023	373,203
End market - Regulated	236,901	209,647	186,031
<b>Total</b>	<b>624,869</b>	<b>593,670</b>	<b>559,234</b>
<b>Number of electricity PODs</b>			
End market - Free	175,729	181,666	182,671
End market - Regulated	16,569	14,134	12,651
<b>Total</b>	<b>192,298</b>	<b>195,800</b>	<b>195,322</b>

In line with the trend seen among gas and electricity customers, the volume of gas and electricity sold in 2022 fell by 22.3% for gas and 12% for electricity. The decline in gas consumption in 2022, which in any case was higher than electricity consumption, was due to a mild winter and more conservative energy usage by customers concerned by the high cost of energy.

	2020	2021	2022
<b>Gas volumes sold (million m<sup>3</sup>)</b>			
End market - Free	1,192	1,319	1,033
End market - Regulated	203	183	134
<b>Total</b>	<b>1,395</b>	<b>1,502</b>	<b>1,167</b>
<b>Electricity volumes sold (GWh)</b>			
End market - Free	731	781	693
End market - Regulated	33	35	25
<b>Total</b>	<b>764</b>	<b>816</b>	<b>718</b>

The number of telecommunications customers, who are mainly located in Tuscany, particularly Prato and Florence, continues a trend of steady growth, and in 2022 rose by 4.7%. The number of customers served by the district heating network remained unchanged compared to 2021.

Number of customers	2020	2021	2022
<b>District heating</b>	1,328	1,446	1,446
<b>Telecommunications</b>	4,170	4,359	4,565

With a view to continued and gradual expansion, in 2022 Estracom, the Group company responsible for managing fibre optic cabling works across Italy in collaboration with Open Fiber, continued to extend its infrastructure, with a 10.4% increase in kilometres of network achieved in 2022.

The installation of fibre optic cables is aimed at digitalising urban areas in the municipalities located in the Group's closest regions, mainly the metropolitan areas of Florence, Prato and Pistoia, to provide users (businesses and local authorities) with high-speed connections to enable them to access the new value-

added digital services facilitated by the technology thanks to a super-fast, stable and high performance full-fibre broadband network.

For these projects, Estracom focuses on the installation of FTTB (Fiber to the Building) and FTTH (Fiber to the Home) infrastructure, guaranteeing connection speeds of at least 100 Mbps for every user.

The fibre optic network is one of the Group's areas of excellence and to this end, since its foundation the Estra Group has chosen to invest in its expansion through the company Estracom.

<b>Fibre optic infrastructure</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Fibre optic infrastructure (km of cable)	948	1,250	1,380

With regard to the Group's gas distribution service data for the 2020-2022 three-year period, it should be noted that in 2022, Edma Reti Gas joined the three other distribution companies Centria Reti Gas, Gergas and Murgia Reti Gas. These four companies manage the gas network and plants in the provinces of Arezzo, Ancona, Bari, Campobasso, Florence, Foggia, Grosseto, Isernia, L'Aquila, Lucca, Perugia, Pistoia, Prato, Rieti, Siena and Teramo.

A comparison of the 2021 and 2022 data shows a pronounced increase in the number of active PODs, in the length of the network, and in the amount of gas entered into the network as a result of the entry of the new company Edma Reti Gas into the Group.

*Methane gas distribution service users (thousands)*

	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>No. of active PODS</b>	516	517	634

*Gas input into the network (million m<sup>3</sup>)*

<b>2020</b>	<b>2021</b>	<b>2022</b>
652	601	790

*Natural gas network length (km)*

<b>2020</b>	<b>2021</b>	<b>2022</b>
7,015	7,038	8,383

Centria Reti Gas and Gergas also handle the distribution and sale of mains LPG, offering a valid alternative for households, businesses and communities in areas not connected to the methane gas grid via a safe and convenient service. The LPG network considers the environmental characteristics of the site and is installed in a way that respects the surrounding nature and environment. The location of the storage tank, for example, is located on the perimeter of the inhabited area and the depot is constructed underground to minimise the visual impact.

The data on the LPG distribution and sales service by Centria and Gergas show a decrease in the number of customers (-5.6%) and in the volume of LPG distributed (-10%), while the length of the managed network is unchanged.

*LPG distribution and sales customers*

	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>No. of active PODS</b>	5,293	5,511	5,205

*LPG volumes sold (million m<sup>3</sup>)*

2020	2021	2022
0.782	0.840	0.756

*LPG network length (km)*

2020	2021	2022
143	150	149

### 6.2.2 Privacy

In line with the activities and services they perform, Group companies must also process the personal data of employees, customers, suppliers, customers who have filed complaints, etc. As such, it is of paramount importance to protect such data in accordance with the provisions of the relevant laws in force (e.g. Privacy Regulation (EU) 679/2016 and Legislative Decree 196/2003, as amended).

To guarantee compliance with the relevant legislation, the proper processing of data, the security of customer, supplier and employee data, and the protection of company know-how, the Estra Group has set up a procedural system to regulate the main privacy issues: the Privacy Organisational Model.

The Privacy Organisational Model is an important tool that enables the Data Controller(s) of Group Companies to responsibly and independently manage compliance with data protection regulations. Furthermore, it allows users, at any time:

- to document and demonstrate compliance with GDPR processing regulations;
- to document and demonstrate the effectiveness of the adopted processing methods;
- to ensure continuity over time of any changes made, even in the event of changes to the company's organisational structure;
- to engage with the audit authorities to ensure a well-structured and defined privacy compliance procedure, which can also provide the authorities with reference points when conducting audits or investigations.

The adoption of the Privacy Organisational Model also allows the Group to meet its requirement to collaborate with the audit authorities in inspections and the performance of their duties, when required, as established in articles 30, section 4, and 31 of the GDPR. In fact, together with the “register of data processing activities”, the “record of data breaches” and the other safeguards provided for by the legislation (such as the external controllers register, privacy organisational chart, management of appointments, training, management of disclosures, etc.), the Model represents a fundamental tool for achieving GDPR compliance. In developing the Model, the voluntary ISO/IEC 27001:2013<sup>20</sup> (Information Security Management System) certification was also taken into account.

The scope of application includes all the possible methods by which processing can be carried out, i.e. digital and paper, and covers the entire life cycle of the data, i.e. from its initial collection to its storage or deletion. In order to guarantee the implementation of the Model within the Group, a dedicated structure was established, which in 2022 performed the following activities:

- The drafting, updating and maintenance of the Data Controller and/or Data Processor Register;
  - the “Privacy Organisational Structure” identifying the organisational and functional responsibilities;
  - “Designation and Authorisation for the processing of personal data for Company employees/administrators”, specifying the processing and data operations linked to the professional roles involved;

<sup>20</sup> For more information on the companies which have been awarded the certification, please refer to the “Certifications” paragraph in the chapter “The Group”.



- “Pre-assessment of privacy risks”, identifying the levels of risk associated with the activities carried out;
- “Preparation and Review of Information” according to the specifications and requirements of EU Regulation 2016/679;
- “Catalogue of Company Assets”, with relative assignment of Company resources;
- “Classification of suppliers” with drafting of a “Deed to appoint an external processor”;
- Managing and formulating responses to claims/complaints submitted by data subjects to protect and safeguard the position of the Data Controller and avoid the submission of reports and complaints directly to the Italian Privacy Authority, and preparing documentation and supporting the Data Protection Officer in the presentation of responses to the Italian Data Protection Authority;
- Planning, implementation and execution of Privacy by Design and Privacy by Default policies in company processes, pursuant to article 25 of the GDPR.
- Preparation, management, updating and adjustment of the Privacy Organisational Model, analysing the company's internal certification procedures;
- Planning, management and evaluation of internal and external audits to support the DPO, with pre-contractual GDPR checklists and the definition of alignment and improvement actions in the company's data protection systems;
- Planning and delivery of employee training on data protection;
- Supporting the Data Controller in the correct adoption of security measures compliant with the provisions of articles 32 *et seq.* of the GDPR and the evaluation of processing methods, where necessary conducting data protection impacts assessments (DPIA) pursuant to article 35 of the GDPR;
- Definition, updating and monitoring of contractual models, also in collaboration with other company functions, pre-contractual checks, contractual clauses in supplier and partner agreements where these involve data processing (e.g., customers, potential customers, suppliers, collaborators, etc.) to ensure regulatory compliance.

The Group's privacy policy can be viewed by customers and suppliers on the website (<https://www.estra.it/privacy-policy-e-copyright>), and can be accessed by Group employees on the company Intranet.

In 2022 there was one request for verification of a data protection breach, which regarded the submission of a report from a data subject (customer) who: *“in accessing the customer portal of Estra Energie S.r.l. with their own access credentials in order to download the bill for their supply contract, was instead presented with a bill summary belonging to a third party”*. The company promptly responded to the notification issued by the Data Protection Authority and provided the necessary clarifications. Subsequently, with the notification issued on 01/02/23, the Data Protection Authority declared the case closed with no further action required.

In 2022 a total of 130 requests were received by data subjects to exercise the rights provided for by Articles 15-21 of the GDPR and/or to request information and clarifications regarding the processing of data. There were no cases of theft or loss of customer data.

### 6.2.3 Social bonus and instalments

The social bonus is a subsidy established by ARERA (the Regulatory Authority for Energy, Networks and the Environment) which reduces the cost borne by domestic electricity and gas customers who have an ISEE indicator below a certain threshold.

As of 2021 customers no longer have to apply for the subsidies which are instead applied automatically on the presentation of the DSU for the ISEE for INPS, which provides the data directly to the relevant authorities.

The electricity bonus was designed to provide savings on annual electricity spending for two types of household: those in economic difficulty, and households that include someone with a serious health

condition whose life is supported by domestic electromedical equipment. The gas bonus, on the other hand, is determined based on weather zones. For both bonuses, a discount is applied to the utility bill.

The tables below show the data regarding the allocation of gas and electricity bonuses by Estra Energie and Prometeo in 2020-2022.

In 2022 there was a sharp increase in payments of both the gas and electricity bonus (both in terms of the number of bonuses disbursed and their value); this is because in 2022 the government announced additional specific measures to respond to the increase in energy costs that occurred in the middle of the year, widening the band of those eligible for the bonus and increasing its value.

*Gas bonuses allocated by the Group's main sales companies*

	2020	2021	2022
<b>No. of bonuses allocated</b>	20,510	36,186	58,019
<b>Value of bonuses allocated (€)</b>	1,902,494	4,174,612.89	36,593,259.77

*Electricity bonuses allocated by the Group's main sales companies*

	2020	2021	2022
<b>No. of bonuses allocated</b>	9,725	21,187	33,888
<b>Value of bonuses allocated (€)</b>	873,331	3,174,366.91	17,834,250.05

Due to rising energy costs, the number of requests for payment in instalments increased significantly in 2022. In fact, 65,684 gas and electricity bills were paid in instalments, compared to 32,118 in 2021 (+104.5%).

Other measures introduced by the government in 2022 to mitigate the extraordinary rise in energy tariffs caused by rising raw materials costs included:

- eliminating general system charges in the electricity and gas sector;
- reducing VAT and general charges on gas;
- establishing the option of monthly billing for domestic gas tariffs on the regulated market

#### 6.2.4 Online utility bills, customer area and app

In 2022 the number of gas, electricity and telecommunications customers who opt to receive their bill electronically via email increased.

This decision reflects both customers' increasing awareness of environmental issues and paper consumption, as well as their need to access their bills more quickly, easily and at any time or place.

*Methane gas customers*

	2020	2021	2022
<b>Online billing</b>	14.3%	16%	17.2%
<b>Total customers</b>	89,246	95,008	95,521

*Electricity customers*

	2020	2021	2022
<b>Online billing</b>	26.5%	28.5%	27.2%

<b>Total customers</b>	51,041	55,820	54,211
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#### *Telecommunications customers*

	2020	2021	2022
<b>Online billing</b>	7.8%	18.4%	14.58%
<b>Total customers</b>	323	326	334

In 2022 a survey was carried out to evaluate how clear the information on utility bills is. The survey was emailed to customers by the Marketing Automation service.

In May 2022, with the introduction of the new Customer Experience programme, a question on the readability of utility bills was added to the survey sent out by email as part of the “Understanding your utility bill” campaign, which is sent to customers after the payment of their first bill. As an undoubted result of the increases in raw material costs during the period, the percentage of negative responses received increased. The items most frequently judged to be less clear included “Cost of energy raw materials”, “Invoiced consumption” and “Invoiced amounts”.

To manage their gas and electricity supply, customers have access to two digital channels: the customer web area and the Estra App.

There was a 22.4% increase in the number of subscribers to the customer area, a 2.8% increase in accesses and a 100.3% increase in customers who downloaded the Estra App. The data on number of accesses to the customer web area only includes the figures up to October as the analytics service for the customer area was suspended in November.

<b>Customer web area</b>	2020	2021	2022	Variation 2021-2022
Number of registered customers	291,421	243,753	298,297	+22.4%
No. of accesses to the portal	2,105,894	1,899,107	1,952,578	+2.8%

<b>The Estra App</b>	2020	2021	2022
Customers who have downloaded the Estra App in the relative years (Android/iOS)	44,411	33,167	66,444

## 6.3 Quality, security and service continuity

### 6.3.1 Customers served in branch and by call centres

In 2022 the Estra Group opened 9 new stores (5 in Abruzzo, 2 in Tuscany, 1 in Calabria and 1 in Marche), increasing total store numbers from 73 in 2021 to 82 in 2022, mainly located in central and southern Italy.

Furthermore, the branches in Assisi (PG) and Spinetoli (AP) were completely redesigned and relocated into spaces more in line with the layout of the Group's stores.

<b>Number of stores</b>	2020	2021	2022
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	87	73	82
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The concept behind the Estra Stores is to provide large, well-equipped spaces where customers can sign up to commercial offers (gas, electricity, energy services, ADSL and telephone) and obtain advice on the complex scenario of the free energy market and all other services (activations, transfers, queries regarding bills, takeovers, information, etc.).

Many stores have a smart queuing system which simplifies and speeds up enquiries.

Estra TV is broadcast on a screen in store waiting rooms, offering a direct line to the company and displaying news, useful information, news and details of commercial offers.

2022 marked a significant return of customers requesting services in store. In fact, after the decline of in-store services in 2020 and 2021 due to the Covid-19 pandemic, in 2022 the number of customers served in store returned to pre-pandemic levels.

This significant increase (+45.6%) is also due to the many requests for information and clarifications from customers in response to high energy bills. In the second six months of 2022 there was a significant increase in gas and electricity costs due to the higher prices of the raw materials.

Number of customers served in branch <sup>21</sup>	2020	2021	2022
	159,874	168,259	245,013

Average waiting time in branch (minutes) <sup>21</sup>	2020	2021	2022
	12	8	17

Estra Energie and Prometeo, the two Group Companies that operate in the gas and electricity sales sector, have a call centre dedicated to customers and potential customers where callers can receive information about their supply, manage certain aspects of their account and file complaints. Calls are managed by specialist personnel from external companies that have their own registered offices and headquarters in Italy.

The table below shows that in 2022 there was a sharp increase in the number of calls received by call centres compared to previous years. This is mainly due to higher energy costs, particularly for gas, from June onwards but particularly in the last quarter of 2022, which resulted in large-scale demand for clarifications from customers, and as well as due to disruptions caused by necessary adjustments following the migration to the new management system. The waiting time to speak to an operator rose from 41 seconds in 2021 to 118 seconds in 2022, with a consequent reduction in service levels (from 95.89% in 2021 to 66.88% in 2022). The waiting time for customers calling the call centre is calculated including the time in which the customer listens to the pre-recorded menu before speaking to an operator.

*Number of calls (call centres of electricity and gas sales Companies) to operators, total and with positive outcomes*

2020		2021		2022	
Received	Answered	Received	Answered	Received	Answered
903,151	515,001	620,091	594,111	1,040,625	685,170

<sup>21</sup> The number of customers served in branch and the average waiting time in branch in 2022 refers to Estra Energie and Prometeo.

### 6.3.3 Complaints and queries

Compared to the trend in 2019-2021, when the number of written complaints fell steadily, in 2022 there was a significant increase, mainly involving written complaints received by the Group's electricity and gas sales companies (Estra Energie and Prometeo), which increased from 676 in 2021 to 2,322 in 2022.

As per the data shown in the paragraph below, this increase in calls to call centres and the number of customers served in store is due to the pronounced instability in the cost of raw materials and, consequently, the higher price of energy bills during the year, as well as disruption caused by the migration to the new management system.

Complaints received by the Group's gas distribution companies (Centria, Gergas, Murgia Reti Gas and Edma Reti Gas) also increased, from 49 in 2021 to 136 in 2022. This is due to the entry into the reporting boundary of the company Edma Reti Gas, which in 2022 received 73 complaints alone. The maximum response times to complaints in 2022 were met in just under 99% of cases for all of the Group's distribution companies.

Moreover, thanks to improvements to the data collection system, the total number of complaints received in 2022 also includes those received by Estra Clima (2 in 2022).

Overall, the Group's electricity and gas sales companies (Estra Energie and Prometeo) received over 94% of all complaints and the average response time to those complaints was 24 days, compared to 12 days in 2021.

	Written complaints	Cases pending a response as at 31/12	Responses processed within the maximum time period
2020	2,119	6	2,107
2021	725	33	690
2022	2,460	128	2,317

Complaints regarding unsolicited gas or electricity contracts or activations received by Estra Energie and Prometeo also reflected this upwards trend, from 57 in 2020 to 272 in 2022. Of these, only 5 were handled beyond the standard processing time of 30 days.

As regards written requests for information received by Estra Energie and Prometeo in 2022, there was a similar upwards trend with an increase of 15.6% compared to 2021.

Despite the upwards trend in information requests, the maximum response times continued to be met in more than in 99% of cases, but the average response time increased from 7.5 days in 2021 to 18 days in 2022.

	Written requests for information	Cases pending a response as at 31/12	Responses processed within the maximum time period
2020	3,150	43	3,100
2021	3,375	42	3,331
2022	3,901	38	3,871

The upwards trend in the use of the Group's digital contact channels (chat, website, Facebook) that the company makes available to its customers continued. In fact, the number of messages received via the chat function, the website and Facebook increased significantly compared to 2021.

*Other communications channels*

	Chat	Website	Facebook
<b>2021</b>	31,317	7,555	946
<b>2022</b>	47,467	21,770	4,317

<b>2022</b>	
Number of press releases published on the website	56
Number of new articles published on the website	66
Posts published on the LinkedIn page	51
Number of LinkedIn followers	5,300
Tweets published on Twitter	71
Number of Twitter followers	52
Number of Instagram posts	144
Number of Instagram followers	1,130

### 6.3.4 Settlements

The Alternative Dispute Resolution (ADR)<sup>22</sup> tool continues to be successfully used to resolve disputes without having to resort to the judicial system.

The procedure is straightforward for the customer, who can participate in the dispute resolution process personally or through an appointed representative via digital platforms, thus saving time.

The use of the Single Buyer Service of the ARERA Customer Help Desk continued to grow in 2022, increasing from 91 settlements handled in 2021 to 144 in 2022. This increase in the number of settlement requests is partly linked to complaints lodged by clients about their contract renewals (with regard to which the Estra Group's actions to renew the tariff automatically at the end of the 12-month supply contract are supported by both ARERA and the relevant case-law), and partly due to incorrect estimates made by the distribution company.

#### *Number of settlements through the Chamber of Commerce*

	2020	2021	2022
Closed positively	0	3	0
Closed negatively	0	0	0
Pending	0	1	0
Total	0	4	0

#### *Number of settlements through the Sportello del Consumatore Acquirente Unico*

	2020	2021	2022
Closed positively	48	60	71
Closed negatively	13	15	40
Pending	6	16	33
Total	67	91	144

### 6.3.5 Disputes with customers

Legal action<sup>23</sup> brought by customers against Companies of the Estra Group mainly regards disputes related to billing estimates and adjustments, supply fees, technical faults and delays in service activation.

At year-end 2022, there were 33 open legal proceedings, mainly against Estra Energie, and 4 out-of-court disputes filed by customers.

The table below shows the data for closed judicial and extra-judicial disputes brought by customers against Group companies (included in the reporting boundary).

	2020	2021	2022
Judicial cases brought by customers against Group companies that were open at year-end	13	68	33
Judicial cases brought by customers against Group companies that were concluded during the year	4	17	57

<sup>22</sup> Settlements refer to Estra Energie and Prometeo.

<sup>23</sup> There were no significant claims for compensation made by customers.

Extra-judicial cases brought by customers against Group companies that were open at year-end	3	1	4
Extra-judicial cases brought by customers against Group companies that were open at year-end	12	8	12

### 6.3.6 Quality of the gas distribution service

#### 6.3.6.1 Standards

In 2022 two of the Group's four gas distribution companies, Centria and Gergas, conducted customer satisfaction surveys.

Centria launched a survey conducted through 1,000 telephone interviews to study the level of customer satisfaction with the services provided, with a view to identifying strengths, weaknesses and potential improvements, focusing on the perceived quality of the relationship with the company, service delivery and overall satisfaction.

The survey revealed a good level of overall satisfaction with the quotation service (with a score of 8.1 on a scale of 1 to 10), an increase in overall customer satisfaction with the works execution service (8.9 out of 10), a positive and continually growing assessment of the fault hotline service, and good overall satisfaction with the gas distribution service (8.6 out of 10).

Possible areas for improvement highlighted by the respondents were quality and clarity of information, and reducing the times to complete works and resolve issues.

In order to constantly improve the services provided, in 2022 Gergas also held a customer satisfaction survey to assess the quality of its services and highlight potential areas for improvement. The survey was conducted through 70 telephone interviews.

According to the data, customer satisfaction exceeded expectations in all areas except for tariff transparency, where levels were slightly lower than expected but nonetheless evaluated as “very good”. With regard to “Customer Relationships” (ease of contact, courtesy, promptness) and “Technical Aspects” (waiting times, resolution of technical faults, recognition of personnel), the overall response was “very good”.

The results of the survey are given below, with an overall rating of the services provided by Gergas of 3.61 (on a scale of 1 to 4):

- satisfaction regarding waiting times for technical works was 3.71;
- satisfaction regarding staff courtesy was 3.64;
- satisfaction regarding case handling was 3.74;
- satisfaction regarding the resolution of technical issues was 3.70.

Considering the positive responses received, no critical issues were identified. The survey will be repeated in order to constantly monitor end customer satisfaction.

Centria, Gergas, Murgia Reti Gas and, as of, 2022 also Edma Reti Gas, represent the Group's four methane gas distribution companies. This activity incorporates two particularly crucial elements: the security and continuity of the service offered to customers.

To safeguard these two aspects, the gas distribution companies have a dedicated call centre to provide technical assistance by phone, information regarding service status, quotes or works, manage requests for services and appointment changes, and manage requests for specific services regarding smart meters (installation, maintenance and general information).

Furthermore, all users have access to an emergency call centre for 24/7 rapid intervention, to be called in the event of a gas leak. This service is of paramount importance to guarantee the safety of citizens and communities.



ARERA Resolution 569/2019 "Consolidated Text on the regulation of the quality and tariffs of the gas distribution and metering services for the 2020-2025 regulatory period" (TUDG) requires distribution companies to meet a minimum annual percentage service level (i.e. 60 minutes response time to site of the call) in 90% of cases. In this regard, in 2022 the four companies that operate in this field consistently performed above the standard set by ARERA, as shown in the table below. This positive trend is also reflected by the level of compliance with the maximum response time, which for all four companies was well over 98%.

*Rapid gas intervention: average response time to site of call (minutes) - ARERA target: 60 minutes*

Company	Type of project	Average time (in minutes)		
		2020	2021	2022
Centria	On the distribution plant	32.11	32.71	37.13
	Downstream of the POD	32.32	32.09	36.86
Gergas	On the distribution plant	20.06	28.28	29.03
	Downstream of the POD	20.30	27.51	24.30
Murgia Reti Gas	On the distribution plant	35.51	34.91	37.53
	Downstream of the POD	35.46	37.22	36.05
Edma Reti Gas	On the distribution plant	-	-	28.5
	Upstream of the POD	-	-	25.75

As regards calls made to the call centre to request rapid gas intervention, the maximum response time established by ARERA is 90% within 120 seconds.

In 2022 all four of the Group's gas distribution companies recorded levels of compliance well above the standard, from 99.88% at Edma Reti Gas to 100% at Gergas and Murgia Reti Gas. The average waiting time to talk to an operator continued to decline in the 2020-2022 three-year period, also thanks to the reduction in the number of calls received (-8.5% compared to 2021).

*Gas distribution call centre: number of calls and average waiting time before speaking to an operator*

Number of calls		
2020	2021	2022
21,151	23,771	21,740

Average waiting time before speaking to an operator (seconds)		
2020	2021	2022
64.27	56.79	37.67

In 2022 the Group continued its work to install electronic smart meters. These devices provide real-time data, enabling utility bills to reflect actual usage and accelerating certain activities (activation or deactivation of a supply, transfer, etc.). The overall increase in the number of smart meters installed by the Group is also a direct consequence of the acquisition of the new distribution company Edma Reti Gas.

*Electronic meters*<sup>24</sup>

	2020	2021	2022
Number of electronic meters installed in the year	57,338	22,880	33,502
Total number of electronic meters in operation	370,562	408,173	536,434

The number of cases where the gas distribution service failed to meet the required standard and where the right to automatic compensation applies increased significantly in 2022, mainly due to the addition of cases concerning Edma Reti Gas (255 cases). As in 2021, in 2022 there were no cases of failure to meet quality standards at Gergas.

Number of failures to meet the gas distribution commercial quality standard with right to automatic compensation		
2020	2021	2022
204	135	450

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<sup>24</sup> The data refer to the gas distribution companies only: Centria, Gergas, Murgia and Edma Reti Gas.

### 6.3.6.2 Inspections

In 2022, the Estra Group - operating through its gas distribution companies - continued to plan and carry out grid inspections, a fundamentally important activity to prevent gas leaks, ensure a high level of plant safety and avoid the risk of accidents. The inspections require specialised and modern equipment and the very specific expertise and skills of the human resources employed by the gas distribution companies.

For this activity, ARERA establishes minimum standards that must be observed. In this regard, the Group Companies that conduct the inspections not only comply with all regulatory provisions but also aim to achieve an even higher standard.

In fact, Centria, Gergas, Murgia Reti Gas and Edma Reti Gas conduct ongoing, scheduled inspections using specialist equipment. In particular, monitoring is carried out thanks to a remote control system of metering and regulating stations aimed at reducing the pressure of methane gas, and an alarm system that facilitates rapid intervention.

The table below shows the data for gas distribution grid inspections conducted by Centria, Gergas, Murgia Reti Gas and Edma Reti Gas.

In 2022 the total length of the high-pressure and low-pressure network and the number of metres inspected both increased due to the acquisition of the company Edma Reti Gas.

Gas distribution network inspections	2020	2021	2022
Total metres of high- and low-pressure network	3,081,430	3,119,216	3,823,712
Metres of high- and low-pressure network inspected	3,068,295	3,082,940	3,689,550
Total metres of low-pressure network	3,899,272	3,919,695	4,558,200
Metres of low-pressure network inspected	3,898,139	3,910,547	4,428,578
Number of repairs	33	39	100

In 2022, as shown in the table below, there was a sharp increase in inspections of gas metering devices by Centria and Gergas. This is due to the area chosen for the inspection, as the number of metering devices can vary by region. The inspection of metering devices is voluntary and aims to increase user safety by conducting a manual operator check on the device, rather than an automatic check.

Metering devices inspected					
Number of high- and medium-pressure POD			Number of low pressure POD		
2020	2021	2022	2020	2021	2022
202	66	1,159	6,147	4,943	10,497

Overhead connection inspections in 2022 also increased significantly, also as a result of a region selected for inspection which, given the varying characteristics of the different regions, inevitably results in variable data.

\* The overhead connection inspection data refer to Centria and Gergas (Murgia Reti Gas and Edma Reti Gas did not carry out overhead connection inspections).

Overhead connection inspections	2020	2021	2022
Metres of high- and low-pressure network inspected	245	503.53	777
Metres of low-pressure network inspected	8,677	2,851.45	11,658.1
Number of high- and medium-pressure connections	73	71	257
Number of low-pressure connections	2,223	822	3,427
Number of repairs	69	29	64

However, unlike in 2021, in 2022 the number of underground connection inspections fell as the Group decided to focus monitoring on the overhead network rather than on the underground network. The data refer to Centria, Gergas and Edma Reti Gas (Murgia Reti Gas did not carry out underground connection inspections).

Underground connection inspections	2020	2021	2022
Metres of high- and low-pressure network inspected	33,912	20,106.80	7,740
Metres of low-pressure network inspected	445,057	208,909.30	156,583
Number of high and medium connections inspected	3,912	2,538	1,252
Number of low-pressure connections inspected	51,615	23,816	19,559
Number of repairs	28	26	33

#### 6.4 Relations with institutions, the community and the region

Since its foundation the Estra Group has maintained deep roots in its native region, a link consolidated by the value generated by its operations, not only in terms of economic and employment benefits but social and cultural ones as well.

In particular, all of the Group's activities are planned and performed conscious of the responsibility towards the community and the region, with the goal of generating wealth, protecting the environment and meeting stakeholder expectations and needs, as well as creating value and implementing projects and actions able to develop the assets and management and technological capital of the Group, and provide economic and social well-being for employees and the community.

The Estra Group aims to act as an important partner for the community, not only by expanding its range of services but also through the projects, initiatives and communication campaigns it organises each year in the regions in which it operates, with the goal of improving and developing the local communities and the society in which we live.

To this end, the Estra Group engages in constant dialogue and discussion with the National Institutions, with Regions, Municipalities, Local Authorities and with all relevant stakeholders, in order to develop transparent communication, dialogue and collaboration, and to participate in round tables with Bodies and Institutions, local and national economic categories, and consumers' associations, in order to identify effective responses and solutions to stakeholder needs.

#### 6.4.1 Dialogue with local and national institutions

This focus on the relationship with stakeholders is a direct consequence of the fact that 139 Municipalities in the provinces of Ancona, Arezzo, Florence, Grosseto, Macerata, Pistoia, Prato and Siena are indirect shareholders of Estra, and thanks to this participatory relationship Estra has become a point of reference for these municipalities.

Estra has also cultivated a collaborative relationship with the higher education sector, particularly through agreements with universities such as the University of Florence and the University of Siena.

The Group and its companies are members of various regional bodies: Confindustria Toscana Nord, Confindustria Toscana Sud, Confservizi Cispel Toscana, Fondazione ITS Energia e Ambiente di Colle Val d'Elsa (SI), Alleanza Territoriale Carbon Neutrality Siena, Contratto di Rete AIREs (Estra, SEI Toscana, Acea Ambiente and fourteen other businesses and organisations have signed an agreement to promote research, innovation and development in the field of the circular economy and environmental sustainability.

Also nationally, the various Group Companies are associated with bodies such as Utilitalia, Associazione Italiana Internet Provider and APCE Associazione per la Protezione delle Corrosioni Elettrolitiche.

Furthermore, since 2019 Estra was awarded Supporting Member status by the Prato Textile Museum and there is now an Estra representative on the foundation's management committee.

All of these engagement activities pursued by Estra impact the quality of Estra's reputation, as evidenced by the presence of news articles about the Group in the local and national press. In 2022 3,815 articles were published in the local and national media and 8,961 articles about the Group were posted on local and national websites. 98% of the articles were positive or neutral in tone.

#### 6.4.2 Local community development initiatives

In 2022 Estra organised and contributed to several important social, cultural and environmental projects to raise community awareness on the sustainable use of natural resources, the importance of such behaviour for citizens and the region, and on correct waste management practices.

##### **Energicamente SY 2021/2022**

*"Energicamente – A scuola di sostenibilità"* is a digital edutainment-based project to students and teachers at primary and junior secondary schools across Italy, with the aim of raising awareness about energy innovation and environmentally sustainable consumption, in line with the Sustainable Development Goals and the UN Agenda 2030.

Participating schools can access a digital platform with an educational game with four levels aimed at students, a creative competition on how to improve the local region, along with a magazine with news, interesting facts and advice on sustainability designed to be read in class or at home.

Throughout the project, children are accompanied along their journeys by a team of five superheroes: Elio, Sofia, Ted, Regina and Aurora. With the support of the mascots, the students learn about the Sustainable Development Goals, starting with Goal 7 "Clean and accessible energy", which aim to build an equal and sustainable future by 2030. They will also learn about Goal 9 "Businesses, innovation and infrastructure", Goal 11 "Sustainable towns and cities", Goal 12 "Responsible consumption and production", Goal 13 "Climate action" and Goal 17 "Partnership for the Goals".

As shown in the table below, the project which ended in 2022 extended across some 20 regions with participation from over 700 schools.

*Edutainment programme 2021/2022*

Impact		Schools		Teachers		Teams of students	
Regions	20	Primary	459	Primary	499	Primary	369

Provinces	100	Secondary 1st Grade	254	Secondary 1st Grade	291	Secondary 1st Grade	345
		Total	713	Total	790	Total	714

Energicamente also offered schools the possibility to participate in *“Insieme per i Global Goals”*, an educational competition based on the 2030 Agenda. This year there were 56 projects submitted by 44 schools and 113 assignments. Classes could base their entries on reality, identifying a critical situation and proposing ideas and solutions to improve it, or take inspiration from the game, collecting the assignments completed during the online missions and adding the class presentation.

#### WINNERS

First Place - Scuola Primaria Carmela Ronchi - Vallada Agordina (BL) - Prize: a €1,000 voucher towards learning materials

Second Place - Scuola Primaria di Quadri - Quadri (CH) - Prize: a €800 voucher towards learning materials

Third Place - Scuola Primaria Edmondo De Amicis - Trino Vercellese (VC) - Prize: a €400 voucher towards learning materials

The project also includes an online competition with prizes, in which students must complete missions and activities to earn points and gain a place on the scoreboard. 121 schools and 228 classes took part in the competition.

#### WINNERS

First Place - Scuola Secondaria di I Grado Don Alessandro Sina di Esine (BS) - Prize: a €800 voucher towards learning materials

Second Place - Scuola Secondaria di I Grado Enrico Fermi di Lainate (MI) - Prize: a €500 voucher towards learning materials

Third Place - Scuola Primaria di Portella della Ginestra di Vittoria (RG) - Prize: a €300 voucher towards learning materials

### Masterclass SY 2021/2022

Estra also invited senior secondary schools from across Italy to take part in a series of four online Masterclasses on the energy transition. During the events held in March, experts and researchers explored a range of extremely current issues with students and teachers: renewable and/or sustainable energy, CO<sub>2</sub> offsetting and reforestation, circular economy and integrated waste management, hydrogen and the methane gas distribution network.

These topics are all elements of the broader issue of the energy transition and represent both a challenge and an enormous opportunity. In fact, the energy transition will need new thought leaders trained with specific skills and knowledge, and young people will be leading players in this major challenge to safeguard the future of our planet. This is why the Masterclass also invited students from the Energy and Environment Technical College to speak about why they chose to specialise in the energy, environmental and sustainability sector and to describe what this kind of post-diploma course has to offer.

#### Masterclass 2022

Schools	Teachers	Students
55	70	1,248

### Roarr! Save, recycle... roar! SY 2021/2022

The fifth edition of the *ROARR Risparmia, ricicla...ruggisci!* (Save, recycle, roar) project developed in collaboration with Straligut Teatro combined environmental responsibility with digital technology, using the language of theatre as an interactive vessel for communicating the content and values of environmental sustainability and helping to make educational activities more innovative and original. Over 5,000 primary school pupils in Marche, Tuscany and Umbria took part in the 2021/2022 project.

The project consists of an exciting environmental game based on a photographic treasure hunt, in which children, helped by their teachers and parents, search for environmentally friendly actions, photograph them and upload them to an album on the website [www.roarr.it](http://www.roarr.it), earning points to gain a position on the scoreboard.

The fifth edition of the project incorporated all of the digital innovations tried and tested in previous years: the online environmental education lessons, the famous ROARR! virtual pledge, virtual “twinnings” of “green” classes, the Estraclick social media competition, and the digital theatre prizes.

This year the ROARR! theatre prizes were also digital: the prizes for classes who took part in the game revolved around the multimedia and interactive work “OZz” by the KanterStrasse company and Straligut Teatro. Classes that won first place received the OZz Wizard Kit to create their own version of the creative and original story. Second and third place winners won online theatre workshops held by video-conference to promote interaction between educators and children and actively engage young defenders of the environment. Finally, there was the Estraclick competition to promote environmentally sustainable practices on social media. The competition was open to all and was held on Instagram. The most “green” photos published with the hashtag #estraclick that received the most likes received vouchers to purchase educational materials.

#### WINNERS

MARCHE - First and Third Grade of Scuola Anna Frank di Macerata and Class 2A of L. Mercantini di Ancona

TUSCANY- Class 3A of Pizzidimonte and Class 1B of Rodari, both in Prato, followed by Class 3A of S. D’Acquisto di Grosseto

UMBRIA - Classes 1C, 1B e 1D of Scuola di Bastia Umbra in the province of Perugia

#### *The 2021/2022 competition*

Schools	Classes	Teachers	Students
56	213	262	5,325

#### *Winning schools/classes that received a prize*

Schools	Classes
5	9

#### *Online activity ([www.roarr.it](http://www.roarr.it))*

Photos uploaded	Interactions	Views	Unique visitors
12,000	15,000	180,000	4,000

#### **Ecup competition**

Ecup is a digital competition launched by Estra in 2021 to support Sports Associations with non-professional or semi-professional youth activities in Italy and to promote sports culture. The digital initiative aims to engage local organisations who devote their commitment and willingness to support young people in their

personal development and teach them the positive and healthy principles associated with sport. In fact, these are the very same principles that Estra supports and embodies.

Associations from across Italy competed against each other for likes in 15 sports categories on the website [www.estra.it/ecup](http://www.estra.it/ecup).

The winners were announced in April and the 15 prizes, each worth € 3,000, were awarded to the top team in each category along with a fantastic “Winner's kit” containing sportswear and equipment: T-shirts, caps, bags, water bottles and a banner for the gymnasium.

The contest was exciting to the very last vote, as only by inviting fans to vote on the official contest page could contestants climb the leaderboard and hope to win the prize.

Furthermore, to promote social responsibility projects on “Inclusivity”, a special panel (composed of ACF Fiorentina and Lube Volley champions, as well as Estra representatives and a Fiorentina Esports Pro-player) also recognised Sports Associations that had distinguished themselves with outstanding projects and programmes.

#### *E-CUP competition 2021/2022*

Registrations	Number of votes	Regions	Sporting disciplines
67	700,278	20	14

The final ranking was as follows:

ASD/SSD Location Sports category

Arcieri del Marghine Birori, Nuoro Other

PGS PierGiorgio Frassati Pinerolo ASD Pinerolo, Torino Football

The ASD Lecce Basketball School

A.S.D. Primo Salto 012 Siena Volleyball

SSD Judo Yano Macomer Macomer, Nuoro Martial Arts

S.D. Ginnastica F. Petrarca 1877 Arezzo Gymnastics

ASD Filarete Roma Athletics

ASD Leonina 1978 Roma Tennis

GiSpi Rugby Prato Scarl Prato American Football / Rugby

Scuola di Ciclismo Arezzo Arezzo Cycling

ASD SciClub Amiata Abbadia San Salvatore, Siena Ski/Snowboard

ASD Speridan Macomer, Nuoro Dance

ASD Aquateam Nuoto Cuoio Castelfranco di Sotto, Pisa Swimming

ASD Club Scherma Colle Val d'Elsa asd Florence Fencing

Karting Club Tufo Tufo, Avellino Motorsports

Winners in the “Inclusivity” category:

1st place: Polisportiva Dil. Cerretese pallavolo Cerreto Guidi, Florence Volleyball

2nd place tie: Associazione sportivo dilettantistica Gam San Miniato, Pisa Athletics, ASD Culturale Ver Sacrum Ascoli Piceno Villa A Sesta Polo Club Castelnuovo Berardenga, Siena Other, and Sport Lab 75 Rome Football, Other

#### **Scuole Viaggianti SY 2022/2023**

*Scuole Viaggianti* is a new project launched by Estra for preschools, primary and secondary schools in Abruzzo, Marche, Molise, Tuscany and Umbria to work together to achieve the Sustainable Development



Goals of the UN 2030 Agenda. Using a digital platform, participating classes embark on a journey to explore four cities, each related to the SDGs, tackling different activities, sharing material, recording their experience in a Travel Journal and creating their own Smart City.

In the travel journals, classes record their journeys, describing their experiences during the *Scuole Viaggianti* project as well as their own school projects, school trips, classroom activities and topics tackled during the year on the SDGs of the UN 2030 Agenda.

The programme includes the following activities:

- the ESTRA TALK: a live streaming broadcast with guest speakers and video clips that schools can watch live and/or on demand with their families;
- reading exercises from the ESTRA SUSTAINABLE LIBRARY: using the PODCAST tool, an actress reads books for the youngest children related to the chosen topics, which can be watched in school or at home;
- book recommendations for children aged 3-6.

Furthermore, the project offers schools the possibility to meet each other virtually and share their experiences in a video-conference, just like when two travellers meet along the road and tell each other their stories. Video-calls are a simple tool that promote human and cultural relations between schools and pupils.

For all schools that participated in the project by uploading material and adopting the recommended practices, the programme concludes with a live-streamed presentation of digital works aimed at schools. The fifteen "*Scuole Narranti*", one for each school level per region, that complete the most original and interesting travel journals win tickets to a live theatre performance, ByBike Teatro, where the public award ceremonies will also be held. All of the smart cities created by the schools and uploaded onto the platform will be judged by special panels and will be entering into a competition, with 9 prizes awarded to the best entries: up for grabs are nine €500 vouchers awarded by families (Teamwork Award), ANCI (Active Citizenship Award), and Nanabianca (Innovation Award).

#### *Scuole Viaggianti 2022/2023*

Participating schools	Participating teachers	Participating students
833	1,700	40,000

#### **Transferable Skills and Orientation Programmes SY 2022/2023**

To confirm the Group's commitment to developing training projects aimed at the younger generations, in 2022 the Estra Group created a series of Transferable Skills and Orientation Programmes under the banner "*La transizione energetica che fa scuola*".

The project is organised in collaboration with Wonder What - Orientarsi nel futuro and ITS Energia e Ambiente in Colle Val d'Elsa, and is aimed at all third-year senior high school students in Italy.

The energy transition is the evolution towards a new approach to producing and using energy. As part of the project, this fundamental shift, necessary to support Italy's sustainable development, is approached considering the educational and professional opportunities available for young people who are deciding on their next steps after leaving school.

The programme is divided into 5 theoretical modules that explore the topic, focusing on the concept of sustainable development and the UN 2030 Agenda, the energy sources and vectors representing the current energy scenario in Italy and across the world, CO<sub>2</sub> and best practices for decarbonisation, and the circular economy.

The project is available online as a 40-hour certified course, with the option to certify additional hours through project work. The syllabus includes interactive exercises to encourage students to play an active role

in the learning experience, to explore professional careers, to immerse themselves into the world of work, and to acquire the skills required to enter it.

The online programme aims to develop the skills indicated in the “Recommendation on Key Competences for Lifelong Learning” approved by the European Parliament on 22 May 2018. In particular, the project focuses on transferable and technical/professional skills that can be applied in the world of research and work, as well as personal skills, the ability to learn and citizenship skills.

### **Journalism Award “Estra for Sport. “Reporting good news” and Call to Action**

For several years the Group has promoted sport through the “Estra for Sport: reporting good news” journalism award, now in its fifth year, and the 2nd “Reporting good sports news” Call to Action.

The “Estra for Sport: Reporting good news” Journalism Award aims to identify the best sport journalism articles and/or features that highlight the value of sport as a social asset and educational platform by confirming its best attributes.

In January 2022 the new call to action for call for the journalism call was launched, with applications open until 30 September.

The panel then met to select the winners, who were announced and awarded at the Awards Ceremony held at the CONI Centre in Rome in January 2023.

### **THE WINNERS**

- Printed Press Category: Eleonora Cozzari (Corriere della Sera) with the article “Bovolenta jr e l’esordio in serie A: ‘Pensavo a papà ed ero felice’.”;
- Web and Blog Category: Giulia De Stefanis (repubblica.it) with the feature “Vite da sincronetti, gli uomini del nuoto sincronizzato esclusi dalle Olimpiadi: il nostro sport contro gli stereotipi”;
- Television and Radio Category: joint winners Ida Barone (TGCom24) with the feature on Yeman Crippa and Andrea Caruso (Rai TGR Campania) for the feature on Domenico D’Ambrosio.

### **SPECIAL AWARDS**

- “Woman of Sport” Special Award: Elisabetta Caporale;
- “Lifetime Achievement” Special Award: Oscar Eleni;
- “Daniele Redaelli” Special Award: Greta Dircetti (Avvenire) with the article “L’ex campionessa che aiuta (in bicicletta) le ragazze in fuga”;
- “Estra per il territorio” Special Award: Nicola Catenaro (Corriere della Sera) with the article “Insulti razzisti al compagno, la squadra lascia il campo”;
- A Special Award was also presented to Luca Valdiserri who is promoting a campaign to raise awareness among young people about the risks of drink-driving in memory of his son Francesco.

### **SPECIAL COMMENDATION**

- Flavia Amabile (La Stampa) with the article “Il campo dei miracoli”;
- Antonio Ruzzo (Il Giornale) with the article “L’ironman di Cristina per battere la sclerosi”;
- Marco Cosenza (Rai 3) with the feature on the power of sport to overcome hardship;
- Gloria Giavaldi (cremaonline.com) with the article “Corro al buio e mi sento libera”;
- Sergio Arcobelli (Il Messaggero) with the article “L’iraniana Ahmadi scia contro i pregiudizi”;
- Lorenza Cerbini (Corriere della Sera) with the article “Ristrutturare le biciclette e reinventare la raccolta rifiuti: la resilienza dei detenuti”.

Once again, Estra used the journalism award as a platform to promote another initiative in collaboration with USSI and ODG: two webinars aimed at journalists, worth three training credits each.

The first event, entitled PER UNA NUOVA PRIMAVERA DELLO SPORT, was held on Tuesday 22 March at 10am, while the second, COME COMUNICARE LO SPORT, was held on Tuesday 29 March.

The Call To Action offers a financial award (a donation of €4,000 in support of sporting activities) aimed at Associations that work to promote the value function of sport through their daily activities, and is sponsored by the Italian National Olympic Committee and the Italian Paralympic Committee. The initiative is aimed at Abruzzo, Marche, Molise, Tuscany and Umbria, regions in which Estra has always had strong links with the community, with the aim of rewarding and supporting associations whose work emphasises the role of sport as a tool of social responsibility and inclusion, which can be used to implement concrete actions to support the region and the lives of the local community.

A total of 131 companies (31 from Abruzzo, 31 from Marche, 13 from Molise, 44 from Tuscany and 12 from Umbria) took part in the initiative and the award ceremonies were held in December and January in the five host regions.

## THE WINNERS

- Abruzzo: DYNAMICA ASD (Tagliacozzo AQ) and PESCARA'S PROMOTION ASD (Pescara);
- Marche: TANGOTECA SAN BENEDETTO DEL TRONTO ASD (San Benedetto del Tronto (AP) and TAEKWONDO OLYMPIC ANCONA ASD (Ancona);
- Molise: FLY SPORT MOLISE ASD (Termoli, CB);
- Tuscany: GS HANDICAPPATI TOSCANA APS (Camaione, LU) and ISOLOTTO UPD (Firenze);
- Umbria: VIVA ASD (Perugia).

## SPECIAL COMMENDATIONS

- Abruzzo: MUEVETE AMIGO ASD (Spoltore PE);
- Marche: IL TEMPIO DI BELLONA ASD (Fermo), COMPAGNIA ARCIERI CIVITANOVA ASD (Civitanova Marche MC) and LEGA NAVALE ITALIANA SEZ. SAN BENEDETTO DEL TRONTO (San Benedetto del Tronto AP);
- Molise: CS PATTINAGGIO CAMPOBASSO ASD (Campobasso);
- Tuscany: COSTONE SIENA FIDES 1904 ASD (Siena), PAPERINO SAN GIORGIO ASD (Paperino San Giorgio PO), SHOEMAKERS BASKET ASD (Monsummano T.me PT), VOLLEY REVOLUTION ASD (Sansepolcro AR), CERRETESE PALLAVOLO ASD (Cerreto Guidi - FI);
- Umbria: IACACT SPORT4NONPROFIT PERUGIA ASD (Perugia) and UNICHESS SSDRL UNIVERSITA' DEGLI SCACCHI (Perugia).

## Art Bonus and sponsorships

The Estra Group also expresses its proximity and support for local regions and communities to support regional socio-economic development through its sponsorship of cultural, social and sporting initiatives. Particular attention is devoted to events and projects with distinctive characteristics or that are rooted in the traditions of the local regions, as well as to initiatives that reflect the company's values and represent an opportunity to convey messages that align with the Group's principles and have a positive impact on society. In 2022, the Group dedicated around €1.5 million to these types of projects and initiatives.

### *Sponsorships*

2020	2021	2022
€ 1,209,400	€ 1,370,216	€ 1,450,418

In addition to the sponsorships, donations represent another opportunity to support proposals that are able to promote the principles of solidarity and social inclusion, spread the culture of participation, and promote social cohesion. In 2022 donations and charitable giving totalled € 313,000. Some of these grants were donated through the National Art Bonus scheme.

## 7. Suppliers

### 7.1. Targets and results

Targets for 2022	Results in 2022
Estra spa Maintain the voluntary certification as “Tender Specialist” for two resources, issued by En.i.c. (the Italian Certification Body).	<i>Target achieved</i> Certification maintained in 2022.
Estra Group Definition of a guideline that defines the criteria for the appointment, composition and operation of tender committees and commissions for contracts pertaining to special works, services and supplies, with a view to ensuring the correct performance and impartiality of the tender process in line with existing legislation.	<i>Target partially achieved</i> The regulation is currently being defined and will enter into force in July 2023, in view of the entry into force of the new Procurement Code.
Estra Group Definition of a procedure for the identification and management of contracts not covered by the Procurement Code.	<i>Target partially achieved</i> The regulation is currently being defined and will enter into force in July 2023, also in view of the entry into force of the new Procurement Code.
Estra Group Update the Supplier Register due to expire in January 2023.	<i>Target partially achieved</i> The expiry was postponed to June 2023, when the new regulation will come into force.

#### Targets for 2023

Estra SpA

Maintain the “Tender Specialist” voluntary certification for two resources.

Estra Group

Definition of a guideline that defines the criteria for the appointment, composition and operation of tender committees and commissions for contracts pertaining to special works, services and supplies, with a view to ensuring the correct performance and impartiality of the tender process in line with existing legislation.

Estra Group

Definition of a procedure for the identification and management of contracts not covered by the Procurement Code.

Estra Group

Entry into force of the new Group Supplier Register.

Estra Group

Submission of a request for quotation for the purchase of paper for the Prato, Siena, Arezzo and Ancona sites based on CAM (Ecolabel or equivalent).

## 7.2 Sustainable supply chain management

The Estra Group considers its suppliers as strategic partners and aims to forge relationships based on the spirit of reciprocal fairness and collaboration. Given the changes to the macro-economic and social context that characterise the current period, supplier relationships represent an essential element of the Group's commitment to create sustainable value. The Group purchases products and services from its suppliers which are used to deliver services to its customers, and also relies on external suppliers to highly-specialised activities. Suppliers who collaborate with the Group's gas distribution companies are mainly involved in maintenance work on methane gas networks, the supply and installation of gas meters and the maintenance of quality certifications. The majority of suppliers that serve the sales companies (Estra Energie and Prometeo) offer customer care and store/branch management services. Suppliers have a major impact on the quality and continuity of the services offered, and consequently monitoring and interacting with its supply chain in a proactive and consistent way is a key priority for the Estra Group.

This chapter contains supply data for the 2020-2022 three-year period. The figures do not include fees paid to Municipalities for the management of the gas distribution grid and the photovoltaic systems, the concession fees paid to Municipalities and third parties, purchases of raw materials (gas and electricity), inter-group purchases, suppliers of energy efficiency certifications and the relative fees, or the remuneration for participation on the Board of Directors of the various Group Companies.

In 2019 the Group adopted the "Single Central Commission" tool for companies operating in the gas distribution sector. Estra S.p.A. acts as Contracting Authority, and operates in the name and on behalf of all investee companies in this sector. This enables the Group to benefit from a centralised procurement system that optimises the procurement process by making it more standardised and efficient.

In 2022 the supply chain did not undergo any structure changes of note, and consequently the procurement and supplier monitoring procedures remain unchanged. In May 2022 the Group acquired Bisenzio Ambiente S.r.l., a hazardous and non-hazardous special waste company. Edma Reti Gas S.r.l., which manages the natural gas infrastructure in the Marche region, also entered the reporting boundary. The acquisition of these two companies did not result in any changes to the supply chain, as the Estra Group already had active supply contracts in the waste management and gas distribution sectors.

In 2022 the critical issues that could have a negative impact on customers and suppliers which were notified to the Board of Directors of Estra S.p.A. mainly concerned energy prices and the migration to the new management system (from SAP to NETA) and involved three Group companies: Centria, Prometeo and Estra Energie.

### 7.2.1. Supplier assessment and monitoring

All Group Companies, with the exception of Ecos, adopt supplier assessment systems that consider a range of criteria in order to evaluate the performance and reliability of each supplier. The assessment considers every single service provided by the supplier, who is then awarded an overall score. The assessment varies depending on type of contract, with different criteria for supplies, services and works. The criteria taken into consideration for each category are as follows: for supplies, compliance with delivery times, quality, consistency between the quantity ordered and the quantity delivered; for services, compliance with contractual conditions, competence and speed of intervention; and for works, compliance with delivery schedules, quality and environmental aspects. Unlike other Group Companies, in 2022 Centria, Prometeo and Estra Energie adopted a new management software that will eventually be rolled out to the rest of the Group. The new system allows other evaluation criteria to be incorporated if required by the service in question: for services, this includes environmental and occupational safety aspects, the latter of which may also be taken into consideration for works contracts. In the case of Estracom, the assessment establishes specific criteria for construction site operators. Murgia assesses suppliers at the time the order or service request is processed. The parameters monitored are similar to those indicated above for the other Group

companies. Based on the score given for each of the various categories, each supplier receives an overall score from 1 to 10. Gergas has adopted its own list of certified suppliers and conducts annual checks to ensure that certain requirements are met. The evaluation considers any cases of non-compliance and devotes particular attention to the maintenance and consolidation of certifications.

The commercial partners considered obtained an average score of 92.5 out of 100<sup>25</sup>, in line with the previous year.

EstraClima, the Estra Group company responsible for energy services, has adopted the JSB portal to manage the safety documents of its suppliers. Suppliers are required to access the portal and to upload their safety documents, such as the interference risk assessment report (DUVRI), professional training certificates, etc. The system automatically flags expired documents, in which case the suppliers are asked to update them.

In order to monitor the safety procedures implemented by suppliers, the gas distribution companies and Estracom carry out inspections to roadwork sites. In 2022 a total of 234 inspections were carried out, down slightly on the 269 conducted in the previous year. The inspections were split between contractors and subcontractors. Out of all Group Companies, Centria has the most active construction sites and represented 83.3% of the inspections carried out by the Group. Gergas and Estracom inspected 100% of their active sites, while Centria inspected 36% and Murgia inspected 9%. None of the inspections detected any compliance issues and consequently no corrective action was taken. The sites operated by Estra Clima and Edma Reti Gas were not inspected, while the activities conducted by Estra and the gas and electricity sales companies do not involve any roadworks.

Centria is the main Estra Group company that operates in the methane distribution sector and since 2015 has been certified according to SA 8000, an international standard designed to certify certain requirements to be met by organisations committed to ensuring quality working conditions as part of their commitment to social responsibility. In particular, the certification considers the following corporate management aspects relating to corporate social responsibility: human rights, employment rights, the prevention of child labour, and occupational health and safety safeguards. It is a voluntary standard that is verified by third-party audits.

Centria's management body has long adopted an integrated company policy aimed at expressing its firm commitment to a corporate management approach that aims to make continuous improvements on aspects such as quality, occupational health and safety, the environment, energy, social responsibility and information security. In line with the law, Centria also monitors the corporate risk of its suppliers. Specifically, the Company has adopted an assessment system to evaluate the corporate risk of its suppliers, classifying the levels of potential risk based on the type and value of the supply. Each level identified corresponds to a specific monitoring procedure that becomes progressively more stringent as the risk increases. Centria decided to adopt this assessment procedure as its methane gas distribution activities, particularly the execution of works, may represent a greater corporate risk in the supplier selection process compared to other activities performed by the Estra Group.

According to the current risk assessment, suppliers with a risk level of 0 are sent information informing them of Centria's SA8000 certification and the main objectives of its CSR policy. Suppliers with a risk level of 1 are sent the information described above and are required to declare in writing that they will comply with, implement and pursue the principles of corporate social responsibility envisaged standard SA8000. Suppliers with a risk level of 2 are required to declare in writing that they will comply with, implement and pursue the principles of corporate social responsibility envisaged by standard SA8000, and are prepared to complete the self-assessment process through questionnaires to verify compliance with the above requirements. Suppliers with a risk level of 3 must comply with the criteria for level 2 and will be audited by Centria.

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<sup>25</sup> This score is the weighted average of the percentages of the supplier assessment, considering quality, environment and safety. As noted above, the data refer to the suppliers of all Group Companies except Ecos.

The table below shows the results of the assessment of social risk of Centria's suppliers in 2022, divided by product category and risk level.

PRODUCT CATEGORY	Level of Social Risk				
	3	2	1	0	Total
Other				31	31
Works contracts	5	6	5		16
Consultancy services		1	9	14	24
Supplies		11	22	26	59
Professionals		1	7	10	18
Restoration			1	28	29
Services	1	5	5	40	51
Sundry				16	16
<b>Total</b>	<b>6</b>	<b>24</b>	<b>49</b>	<b>165</b>	<b>244</b>

The table shows the results of the analysis of 244 suppliers, as follows:

- 165 suppliers (67.6%) have a risk level of 0;
- 49 suppliers (20.1%) have a risk level of 1;
- 24 suppliers (9.8%) have a risk level of 2.
- 6 suppliers (2.5%) have a risk level of 3.

Compared to 2021, a lower number of suppliers was assessed (-107). This is due to the fact that, unlike in previous years, the assessment only considered suppliers that were effectively active during the year. Moreover, the distribution of the first two risk levels differs to previous results: the percentage concentration of companies in the lowest risk level fell (67.6% in 2022 versus 82.6% in 2021), while the percentage concentration in risk levels 1 and 2 has doubled (20.1% in 2022 versus 10.0% in 2021 for risk level 1 and 9.8% in 2022 versus 4.3% in 2021 for risk level 2). The percentage of suppliers with the highest risk level was more or less the same, at just under 3% in 2022.

Finally, suppliers whose activities are characterised by significant environmental impacts are also required to hold adequate environmental certifications such as ISO 14001, which certifies the environmental management systems adopted by businesses.

### 7.2.2 Supplier Register

The Supplier Register is officially adopted by the Parent Company, Estra S.p.A., but is available to all other Group Companies thanks to an internal regulation that extends its use to the entire Estra Group. In 2022, more than 1000 economic operators were listed on the Supplier Register (1,058), an increase of 80% compared to 2020 and 53% compared to 2021, when the number of suppliers was 588 and 693 respectively. In particular:

- 894 suppliers are accredited;
- 5 are pending audit by the competent service;
- 159 have begun the registration process and but have not yet completed the application ("pre-registered suppliers").

The increase in the number of suppliers enrolled on the Supplier Register is mainly due to the new use of the Register as of 01 February 2020. The Supplier Register has been updated and the product categories have been reorganised, with some new categories added to align to changing company needs. The current list of economic operators will remain valid until June 2023. Accredited suppliers whose certifications have expired receive periodic alerts until they submit the updated documentation.

	2020	2021	2022
<b>Operators registered on the Estra Group Supplier Register</b>	588	693	1058
<i>of which certified</i>	465	584	894
<i>pending audit by the competent service</i>	3	12	5
<i>whose registration is incomplete</i>	87	76	159

The Supplier Register also records the number and type of certifications held by the operators. The breakdown of suppliers by certification is as follows:

- ISO 9001: 478 suppliers;
- ISO 14001: 265 suppliers;
- EMAS: 10 suppliers;
- SA8000: 87 suppliers;
- UNI ISO 45001: 68 suppliers;
- UNI ISO 45001:2018: 174 suppliers.

Furthermore, the Supplier Register also provides information on potential conflicts of interest. Suppliers are asked to declare the existence of any past or present relationships of kinship, marriage, cohabitation or affinity with employees (including managers), owners, directors or shareholders of Estra Spa or other Group Companies, or collaborative and/or corporate relations with the same, as well as whether they have held offices in local authorities and if they are politically exposed. In total, 20 suppliers (1.9%) listed on the Register are subject to potential conflicts of interest. Furthermore, 81 suppliers declared to have held offices and/or consultancy roles in the previous three-year period in Companies whose activities are in direct competition with the Estra Group.

Suppliers enrolled on the Supplier Register must declare, at their own responsibility, to not be subject to spent legal convictions, criminal convictions which have become irrevocable or plea-bargains pursuant to Article 444 of the Italian Code of Criminal Procedure, the non-existence of situations preventing negotiation with local authorities, as well as to undertake to comply with the provisions on the traceability of its financial flows. This is to guarantee the corporate and professional integrity of the suppliers that collaborate with the Estra Group.

Following Law 120/2020, Estra Group companies increased the use of the Supplier Register, which could now be used for supplies of values between € 500,000 and € 1,000,000.

Furthermore, on 1 October 2021, the provision adopted by Estra S.p.A. to standardise the appointment process of mandates to consultants and professionals came into force. The new operating methods were subsequently adopted by the other Group Companies. The procedure states that mandates may only be appointed to professionals and consultants who are registered on the Supplier Register. Furthermore, for mandates of over € 40,000.00, market research must be carried out and at least three quotes must be obtained. If it is not possible to obtain the minimum number of quotes required, the Area Manager involved must provide a written explanation. The Function Manager is responsible for reporting any conflicts of interest to their superior to ensure that the proper investigations are made.

### **Disputes with suppliers**

The table below shows a further reduction in the number of legal and out-of-court proceedings brought by suppliers against Group Companies. In fact, the extent of these disputes is negligible and is the result of the Group's willingness and policies to avoid disputes with suppliers. Only two legal disputes were ongoing at the end of 2022, while there were no active out-of-court disputes. One legal proceeding was concluded during the year.

The disputes regarded the failed payment of invoices for services rendered and transfers, and disputes over the amounts of reimbursements made in the gas distribution sector. There were no significant requests for compensation by suppliers.



Number of disputes with suppliers by type	2020	2021	2022
Judicial cases brought by suppliers against Group companies that were open at year-end (regardless of start date)	3	2	2
Judicial cases brought by suppliers against Group companies that were concluded during the year (regardless of start date)	0	1	1
Extra-judicial cases brought by supplier against Group companies that were open at year-end (regardless of start date)	1	0	0
Extra-judicial cases brought by suppliers against Group companies that were concluded during the year (regardless of start date)	4	2	0

### 7.2.3 Tender procedures

In 2022 the Estra Group held 14 tender procedures for supplies totalling over €46 million. In particular, there were 5 public tender procedures (of which 3 were launched in 2021), in line with the previous year, and 9 negotiated procedures for the award of works, supply and service contracts.

To be eligible to participate in both types of tender procedure, suppliers were required to hold specific certifications, with the dual purpose of ensuring that the technical competency requirements necessary to complete the supply were met, and to assess and evaluate environmental and social criteria. As shown in the table below, social, environmental and quality certifications were requested. In particular:

- In terms of social criteria, suppliers were required to hold certification 45001 and to comply with the standards of SA 8000.
- SA8000, which was the most commonly requested certification, certifies corporate management aspects relating to matters of corporate social responsibility, with a particular focus on topics such as human rights, respect for workers' rights, prevention of child labour and guarantees of occupational health and safety. The ISO 45001 certification concerns occupational health and safety and requires compliance with criteria aimed at reducing occupational risks and improving workers' health and well-being.
- As regards quality, ISO 9001, which evaluates quality management systems, was required.
- In terms of environmental performance, suppliers were required to hold ISO 14001, which certifies the environmental management system of an organisation.

For works contracts, in addition to SOA statements suppliers were required to hold specific certifications (e.g., welding standards) to guarantee appropriate safety and quality levels for certain processes, as opposed to product safety certifications (for gas meters, for example). This is a testament to the fact that the Group does not merely verify compliance with the standards required by public procurement regulations, but strives to identify highly specialised service and supply providers and operators.

In these tenders, Estra does not ask for specific certifications but rather requires that the performance standards defined by them are met. Not only does this guarantee the selection of high-quality, reliable suppliers, it also extends the Group's pool of partners by allowing smaller companies to compete for contracts. As such, in some of the negotiated procedures held in 2022, suppliers were not required to issue SOA statements, but rather to comply with the requirements set forth in paragraph 1, article 90 of Presidential Decree 207/2010, namely:

- value of works carried out directly in the five years prior to the date of publication of the call for tenders not less than the value of the contract to be signed;
- total staff costs not less than 15% of the value of works carried out in the five years prior to the date of publication of the call for tenders; in the event that the ratio between staff costs and value of

works is less than the required 15%, the value of works is proportionally reduced in order to re-establish the required percentage;

- the possession of appropriate technical equipment to conduct the works subject to the tender.

There was a very significant increase in the total value of public tender procedures, which rose from €7.8 million to €42.2 million. This increase is mainly due to tenders for gas network maintenance works that were contracted in 2022, thanks to the implementation of restricted procedures for framework agreements. These agreements have a duration of 4 years, as recommended by the regulations in force, and a specific amount of work is estimated for each tender, which will be allocated through specific implementation contracts.

Another important framework agreement, both economically and procedurally, regarded the supply of smart meters. In this case, the operators who are awarded the contract entered into the framework agreement and, when the supply is needed, a competitive analysis is conducted on the suppliers listed in the framework agreement. The framework agreement only involved 3 operators due to the highly specific nature of the supply. The operator who presents the best offer is awarded the supply contract, which is formalised through the signing of an implementation contract. Framework agreements represent 95.7% of the total value of public tender procedures held in 2022. The public tender procedures mainly concerned the supply of electronic gas meters with remote reading and remote management capabilities, ordinary and extraordinary maintenance of gas distribution networks, and support for emergency call-outs and related activities in the Arezzo, Prato and Siena areas.

The total value of negotiated procedures fell by 23.2% compared to the previous year, decreasing from €4.9 million to €3.8 million. This decline can mainly be attributed to the lower demand for this type of procedure as a result of the Group's activities during the year. Negotiated procedures only involve operators listed on the Supplier Register. Two of the procedures held in 2022 were based on framework agreements that are normally signed with a single supplier, which has consequently benefited from a long-term collaboration with the Estra Group (as opposed to the traditional award of contracts for specific annual amounts), and which often performs several activities on behalf of the Group.

The negotiated procedures mainly concerned the supply and installation of gas odourisation tanks in M&R rooms in the Arezzo, Siena and Prato operating areas, the redevelopment of existing plants, the award of contracts for ordinary and extraordinary maintenance work on the methane gas network, support for call-outs, any other associated activities in areas with smaller populations, as well as the design of Group's new internal communication Intranet.

Public tender procedures	2020	2021	2022
Total amount (€ thousands)	5,675	7,772	42,216
Number of procedures	1	5 (of which 1 launched in 2020)	5 (of which 3 launched in 2021)

Certifications required	ISO 9001 ISO 14001 OHSAS 18001 SA 8000 (1 request for compliance) SOA Statement Other certifications (Completion certifications for similar works)	ISO 9001 (3 procedures) ISO 14001 (2 procedures) OHSAS 18001 (1 procedure) SA 8000 (1 procedure) SOA Statements (1 procedure) Other certifications (Certification 39001 Road Traffic Safety Management; Training of welding personnel pursuant to standards UNI 9737:2016; UNI EN 13067:2013; UNI EN ISO 9606-1)	ISO 9001 (5 procedures) ISO 14001 (3 procedures) ISO 45001 (3 procedures) SA 8000 (5 procedures - request for compliance) SOA Statements (3 procedures) Other certifications (specific certifications of conformity to international directives and UNI standards for the products supplied) Certifications for specific workers (UNI 9737:2016, UNI 13067:2013, UNI 9606-1, UNI 11632)
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Negotiated procedures	2020	2021	2022
Total amount (€ thousands)	3,132	4,951	3,804
Number of procedures	12	14 (of which 4 were launched in 2020)	9
Certifications required	SA 8000 (10 requests for compliance)  SOA Statements (3 procedures)	SA 8000 (9 procedures) ISO 9001 (3 procedures) ISO 14001 - Compliance with the procedures of the 14001 environmental management system (2 procedures) OHSAS 18001 (2 procedures) SOA Statements - Required for works of under 150,000.00 (2 procedures) Certifications for specific works - Training	SA 8000 (7 procedures - request for compliance) ISO 9001 (2 procedures) ISO 14001 (2 procedures) ISO 45001 (2 procedures) SOA Statements - Required for works of under 150,000.00 (3 procedures) Certifications for specific workers - - UNI 9737:2016, UNI 13067:2013, UNI 9606-1; UNI 9737:2016, UNI 13067:2013, UNI 9606-1, UNI 11632; UNI 9737:2016, UNI 13067:2013, UNI 9606-1,

		of welding personnel pursuant to standards UNI 9737:2016; UNI EN 13067:2013; UNI EN ISO 9606-1 (2 procedures) Other certifications (EU Compliance with ATEX, MID and EMC Directives; Product compliance with standards: UNI/TS 11629:2020, UNI ISO 12405:2010, UNI 9167:2020 - 2 procedures; Products certified to comply with the Minimum Environmental Criteria established by the Ministerial Decree of 11 January 2017, amended by Italian Ministerial Decree of 3 July 2019 - 1 procedure).	UNI 11632 (3 procedures)  Other certifications (specific certifications of conformity to international directives and UNI standards for the products supplied - 4 procedures)
	Certifications for specific works (6 procedures)		

The significant increase in the number of negotiated procedures recorded in the last two years can be attributed to the entry into force of Law 108/21, converting Decree Law 77/21, which simplified tender procedures by accelerating the selection mechanisms. In fact, the new legislation raised the maximum amount permissible for negotiated procedures and lowered the number of operators that can be contacted. The new Law states that contracting authorities may directly award contracts for works of amounts of less than € 150,000, and for services and supplies of amounts of under € 139,000 without the need to consult with multiple economic operators, without prejudice to the principles of Art. 30 of the Public Procurement Code of Italian Legislative Decree no. 50 of 18 April 2016. Estra nonetheless requests one or three quotes and conducts this process like a negotiated procedure in order to ensure transparency and quality, as well as to optimise the selection process.

The Decree provides for the use of a negotiated procedure, with no call for tender, upon consultation of at least five economic operators, where present, for the award of contracts for services and supplies of values equal to or above € 139,000 and up to a limit set at EU level, and between € 150,000 and € 1 million for works, while in the case of works of values in excess of € 1 million, at least ten operators must be consulted.

## 7.3 Value of supplies

### 7.3.1 Our suppliers in figures

In the 2020-2022 three-year period the number of suppliers grew steadily, increasing by 14.4% from 2,302 to 2,634. This increase is mainly due to the expansion and consolidation of various areas of the Group's business, partly as a result of new company acquisitions.

*Number of suppliers*

2020	2021	2022
2,302	2,549	2,634

In terms of business type, the data for 2022 are exactly the same as in 2021: 97.2% of commercial partners (2,561 out of 2,634) are partnerships, share capital companies, associations, freelance professionals and affiliated practices. The remaining 2.8% are represented by cooperatives and consortia. In line with the data of the previous years, 97.6% of suppliers are Italian companies, while the rest are registered abroad, mainly in Europe.

With regard to the type of services provided, the Group's trade partners are essentially characterised by services to the distribution service and the sales service. As regards gas distribution, suppliers are mainly companies that specialise in gas network maintenance, the supply and installation of gas meters, and quality certification updates. With regard to the sales sector, suppliers mainly offer customer care and customer acquisition services, including store and branch management services. The services offered by trade partners of Estracom, the Group's telecommunications company, include connections, customer care (both for end users and municipal authorities), and the supply and maintenance of hardware and software. Estra Clima, which operates in the energy services sector, deals with construction firms (such as works at the apartment blocks managed by the Group) and suppliers of materials required to operate the biomass plant in Calenzano. The services that concern the parent company Estra relate to software maintenance and supply, vehicle leasing, consultancy, sponsorships, marketing and CSR projects. Ecolat mainly deals with suppliers of transport services, electromechanical plant maintenance, and hardware supplies. Ecos' main suppliers are businesses operating in the management and recovery of industrial waste, service providers and transportation firms. Finally, Bisenzio Ambiente collaborates with suppliers specialising in the treatment of hazardous and non-hazardous special waste and plant maintenance.

As regards the geographical distribution of the Group's Italian suppliers, the data is fairly consistent, with around 2 out of 3 suppliers located in central Italy.

	2020	2021	2022
<b>North</b>	28.2%	27.3%	28.4%
<b>Central</b>	65.4%	66.4%	65.6%
<b>South</b>	4.9%	5.1%	5.0%
<b>Islands</b>	1.5%	1.2%	1.0%

Once again Tuscany firmly remains the region where most of the Group's trade partners are located, with 1,123 out of 2,570 Italian businesses based in Tuscany. Considering Italian companies only, 43.7% of suppliers are in Tuscany, followed by Lombardy (15.5%) and Marche (10.5%).

The Estra Group devotes considerable attention to its relations with its local suppliers based in the regions of central Italy. The overall number of suppliers located in central Italy is constantly growing and has increased by 13.5% over the three years, with around 200 new suppliers joining the register. The distribution of suppliers in percentage terms among the regions of central Italy shows no significant change from the previous year. The number of trade partners in the Marche region increased while there was a slight reduction in those from Tuscany and Umbria.

	2020	2021	2022
<b>Abruzzo</b>	5.1%	4.3%	4.4%

Lazio	8.2%	7.9%	8.0%
Marche	14.8%	13.5%	16.0%
Molise	3.5%	2.6%	2.3%
Tuscany	65.7%	68.5%	66.6%
Umbria	2.7%	3.1%	2.7%
Total suppliers in Central Italy	1,485	1,661	1,686

In 2022, the total value of suppliers of the Estra Group exceeded €300 million, and came to €323,107 thousand. The value of supplies grew constantly over the three years: in particular, from 2021 and 2022 there was a 19.3% increase as a result of the new acquisitions, high costs for transporting raw materials, and above all the necessary purchase of new software and services. These include services and software for the management and optimisation of activities in the energy sector that were purchased from foreign companies. Consequently, the percentage value of foreign supplies increased significantly from 0.2% in 2021 to 17.2% in 2022.

Total value of supplies (€ thousands)	2020	2021	2022
	258,513	270,815	323,107

It is worth emphasising that 49.9% of the total value of supplies, including those from abroad, is concentrated in central Italy. Italian supplies amounted to €267,544 thousand, in line with the €270,334 thousand recorded in 2021; of this, 96.3% is generated by partnerships and share capital companies, associations, freelance professionals and affiliated practices. With regard to the value of supplies for individual Group Companies, Estra Energie, the Group's main sales company, represents 60.3% of the total, followed by Estra (8.9%), Estra Clima (8.2%) and Centria (7.3%).

60.3% of the value of the Group's Italian supplies is concentrated in central Italy (€161,297 thousand). While the figures for the south of Italy and the islands remained generally unchanged, there was a decline in the north which benefited central Italy.

Geographical distribution of Italian supply value in percentage terms	2020	2021	2022
North	36.7%	41.7%	36.5%
Central	59.9%	55.8%	60.3%
South	2.3%	2.0%	2.6%
Islands	1.1%	0.5%	0.6%

At the regional level, Tuscany remained the region with the highest supply value at €95,658 thousand, or 35.8% of Italian supply value, recording a decrease of 8 percentage points compared to 2021. While the proportion represented by companies in Marche - an important region for the Estra Group - remained unchanged, the value of supplies in Lazio increased from 4.5% to 14%. The other regions remained generally stable, including Lombardy which represented around 20% of the total value.

Distribution of Italian supplies by region (%)	2020	2021	2022
Abruzzo	1.3%	1.3%	2.0%
Basilicata	0.1%	0.0%	0.1%
Calabria	0.6%	0.5%	0.2%
Campania	0.6%	0.6%	1.1%

Emilia Romagna	4.7%	4.7%	4.2%
Friuli Venezia Giulia	0.1%	0.1%	1.7%
Lazio	4.3%	4.5%	14.0%
Liguria	1.9%	0.5%	0.6%
Lombardy	13.9%	21.0%	20.6%
Marche	8.3%	5.1%	6.3%
Molise	0.3%	0.4%	0.4%
Piedmont	13.8%	13.0%	6.8%
Apulia	1.1%	0.8%	1.1%
Sardinia	0.8%	0.1%	0.0%
Sicily	0.3%	0.4%	0.6%
Tuscany	44.7%	43.8%	35.8%
Trentino-South Tyrol	0.2%	0.2%	0.3%
Umbria	0.9%	0.8%	1.8%
Aosta Valley	0.0%	0.0%	0.0%
Veneto	2.1%	2.2%	2.4%
<b>Total value of Italian supplies (€ thousands)</b>	<b>258,149</b>	<b>270,334</b>	<b>267,544</b>

The analysis of the value of supplies in central Italy, amounting to €161,297 thousand, shows a decline of almost 20 percentage points in Tuscany, which nonetheless remains the region with the most supplies in central Italy. There was a major increase in the value of supplies in Lazio, which rose from 8% in 2021 to 23.2% in 2022.

<b>Supply value in Central Italy</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Abruzzo	2.2%	2.2%	3.4%
Lazio	7.1%	8.0%	23.2%
Marche	14%	9.1%	10.5%
Molise	0.5%	0.8%	0.7%
Tuscany	74.6%	78.5%	59.3%
Umbria	1.6%	1.4%	2.9%

### 7.3.2 Contracts and procurements

The Estra Group uses two main methods to procure goods and services:

- orders under contract, resulting from a tender procedure or direct instruction;
- authorised procurements, for which a quote is requested, and authorised rapid procurements for supplies required by a specific service for emergency situations (for which a quote is therefore not requested).

As shown in the table below, purchases resulting from orders under contract, authorised procurements and rapid authorised procurements in 2022 amounted to €306,899 thousand. As such, these represented around 95% of total supply value, in line with the data for 2021.

Authorised procurements and rapid authorised procurements only represent a small portion of total supply value. This is the result of a specific company transparency policy that has led Estra Energie and other Group companies such as Centria, Prometeo, Gergas and Murgia to cease the use of rapid authorised procurements. Finally, the new management system adopted by Centria, Prometeo and Estra Energia on 01 June 2022 includes the facility to process pre-invoices which allow work orders to be reported monthly,

reducing the time required for reporting and closing work orders. In 2022 pre-invoices amounted to €2,753 thousand.

*Orders under contract (thousands, €)\**

2020	2021	2022
184,368	247,673	290,031

*Authorised procurements and rapid authorised procurements (€ thousands)\**

2020	2021	2022
11,590	11,156	16,867

\* The data do not include Piceno Gas Vendita, Gas Marca, Ecos and Bisenzio Ambiente as it was not possible to subdivide orders under contract, authorised procurements and rapid authorised procurements.



## Note on methodology

The reporting period for this Non-Financial Statement, published on an annual basis, is from 01/01/2022 to 31/12/2022. The reporting boundary includes all companies consolidated on a line-by-line basis referred to in the Consolidated Financial Statements of the Group, excluding Ecocentro Toscana, a small company acquired three months before the end of 2022.

This document has been prepared “in accordance” with the GRI Standards. Quantitative indicators that do not refer to any general or topic-specific disclosure of the GRI Standards, which are reported on the pages indicated in the Content Index, are not subject to limited review by EY S.p.A.

## The reporting standards

The table below shows the correlation between the material topics of the Estra Group and the corresponding GRI aspects selected.

The GRI Standards used refer to the 2021 edition for GRI 1, GRI 2 and GRI 3, while the others refer to the 2016 edition except the following standards: “GRI 403: *Occupational Health and Safety*” and “GRI 306: *Waste*” of 2020. For each topic reported in this document, the materiality according to the materiality analysis conducted by the Estra Group, the associated risks and the relative management methods, Group policies, results achieved and the associated quantitative indicators have been indicated.

Topics	GRI indicator	Internal impact	External impact
Infrastructure, networks and business continuity	203 – Indirect economic impacts 2016	X	
Data protection and cyber security	418 – Customer privacy 2016	X	
Employment, development and enhancement of human capital	202 – Market presence 401 – Employment 404 – Training and education	X	
Region, community, and creation of sustainable economic and financial value	201 – Economic performance 204 – Procurement practices 413 – Local communities	X	
Quality, competitive prices and customer-oriented approach	416 – Customer health and safety	X	

Protection of the rights, health and safety of employees	403 – Occupational Health and Safety	X	Suppliers*
Responsible supply chain management	308 – Supplier Environmental Assessment 414 – Supplier Social Assessment	X	Suppliers*
Promotion of diversity and inclusion	405 – Diversity and Equal Opportunity 406 – Non-discrimination	X	Suppliers*
Energy transition and climate action	302 – Energy 305 – Emissions	X	
Ethics, integrity and anti-corruption	205 – Anti-corruption	X	Suppliers*
Transparent, clear and truthful communication and marketing strategies	417 – Marketing and Labeling	X	
Digital transformation, innovation and smart cities	There are no GRI indicators associated with this topic	X	
Circular economy, waste reduction and recovery	306 – Waste	X	

\* Aspects with significant impacts outside the Group were not included within the reporting boundary. The Group aims to incorporate these aspects in the future.

### The calculation methodology

The main calculation methods and the parameters used in this document are described below:

- The work-related accidents rate is the ratio between the number of recorded occupational accidents, not including accidents during travel, and the total number of hours worked, multiplied by 1,000,000.
- The rate of work-related accidents with serious consequences (not including fatalities) is the ratio between the number of recorded occupational accidents with serious consequences (not including fatalities) and the total number of hours worked, multiplied by 1,000,000.

- The fatality rate is the ratio between the number of work-related fatalities and the total number of hours worked, multiplied by 1,000,000.
- The severity rate is calculated as the ratio between number of calendar days lost due to accidents (not counting the day on which the accident occurred) and the number of possible working hours in the reference period multiplied by 1,000.
- To calculate the hours of absence for workers for whom data for 2021 was not available, estimates were made using the following method. For each worker, the number of working days in one year was divided by 5 in order to calculate the number of working weeks. The number of working weeks was multiplied by the number of hours provided for in the contract to obtain the number of workable hours. Hours of absence were calculated by multiplying the number of workable hours by the absenteeism rate of the Estra Group, represented by the ratio of hours of absence to workable hours (using employee data, where available). Hours worked were then calculated as the difference between workable hours and hours of absence.

The emission factors used to calculate the CO<sub>2</sub> reported are as follows:

- Direct emissions (Scope 1): for natural gas consumption the emission and conversion factors are taken from the table of national standard parameters published in 2023 by the Italian Ministry for the Environment and the Protection of Land and Sea in relation to the latest update. Methane emissions are calculated with a methane GWP of 28, as indicated by the scientific paper of the Intergovernmental Panel on Climate Change (IPCC) "Fifth Assessment Report IPCC". Furthermore, the quantity of methane is based on an estimate of gas leaks relating to incidents recorded by Centria and Edma Reti Gas, while Gergas and Murgia Reti Gas did not record any incidents. Finally, to calculate emissions resulting from physical gas leaks along the distribution network the Group used ARERA Resolution 39/2020/R/GAS, which refers to the documents published by the Technical Association of the European Gas Industry (Marcogaz), specifically "Assessment of methane emissions for Gas Transmission & Distribution System Operators" and "Survey Methane Emissions for Gas Distribution in Europe."
- Indirect energy emissions (Scope 2):
  1. *Location based*: these emissions are calculated by multiplying the electricity acquired by the national electricity network by the emission factor taken from Terna's International Comparison of Enerdata figures (2019 data).
  2. *Market based*: these emissions are calculated by multiplying the quantity of electricity withdrawn by the national electricity grid (net of energy consumed by the "Scelta Pura Luce" tariff) by the residual mix emissions factor for Italy according to the European Residual Mixes, AIB (2021 data).

Emissions of NO<sub>x</sub> and PM<sub>10</sub> were calculated according to the most recent emission factors published by Ispra Ambiente in 2021.

Due to the impossibility of accurately determining the consumption of certain users due to the various contract types, certain data has been estimated.

The estimation method adopted does not follow the average consumption indicators per capita published on the AEGESI website as these do not apply to the types of property, given said assets are not constant but rather intermittent.

Based on these considerations, estimates have been made according to the following steps:

- First, the average consumption of the energy carrier is identified based on available data, identifying the consumption in square metres (total consumption of the energy carrier relative to the property

for which data is available, divided by the area in square metres of said property).

- This value is then multiplied by the surface area of the property for which no consumption data is available in order to estimate average consumption per square metre.
- Finally, the figure is multiplied by a consumption index based on the property's weekly opening hours.

As regards the data for emissions avoided: the Group applied an internal methodology to calculate emissions avoided through the production of electricity, thermal energy and cooling energy from renewable sources. To calculate emissions avoided due to renewable electricity, the quantity of electricity was multiplied by the emission factor taken from Terna's International Comparison of Enerdata figures (2019 data).

As regards heating and hot water production:

- the calculation considered the thermal energy transferred to users of the biomass-powered district heating network, which was subsequently converted into primary energy considering the average seasonal performance of a condenser boiler (average seasonal performance of 94%). This primary energy was converted into consumption of methane equivalent using the calorific value indicated by SNAM Rete Gas for the supply of the Calenzano area. The calorific value of SNAM Rete Gas for the Calenzano area refers to the output of the natural gas distribution plant "34675600 - PoD PRATO". The conventional calorific output for 2020 is published at the link [https://www.snam.it/it/trasporto/adempimenti-reporting-autorita/PCS\\_Convenzionale/](https://www.snam.it/it/trasporto/adempimenti-reporting-autorita/PCS_Convenzionale/) and is: 0.0396324 GJ/m<sup>3</sup>. The value of methane equivalent is then used to calculate the CO<sub>2</sub> emissions and, therefore, emissions avoided.

As regards air conditioning systems:

- the calculation considered the cooling energy transferred to users of the biomass-powered district heating network, which was subsequently converted into primary energy, considering the seasonal energy efficiency ratio (SEER) of the cooling unit (9.54). This primary energy was then converted into consumption of electricity equivalent. The value of electricity equivalent was then used to calculate the CO<sub>2</sub> emissions and, therefore, emissions avoided.

Finally, not all thermal energy produced by the biomass plant and transferred to the grid originates from the biomass plant; some of it derives from the methane boiler used as a backup in the case of plant downtime due to maintenance or fault. Therefore only the part relative to energy effectively derived from renewable sources is considered in the calculation of emissions avoided, not including the thermal energy produced from the woodchip boiler.

## GRI Content Index

Statement of use	Estra S.p.A. has reported in accordance with the GRI Standards for the period 01/01/2022 to 31/12/2022.
GRI 1 used	GRI 1: Foundation 2021
Relevant GRI Sector Standards	There are no relevant GRI Sector Standards

GRI Standard	Disclosure	Page	Omission
General Disclosures			
GRI 2: General Disclosures – 2021	The organization and its reporting practices		
	2-1 Organizational details	pages 1, 6	
	2-2 Entities included in the organization's sustainability reporting	pages 7, 14	
	2-3 Reporting period, frequency and contact point	Page 155	
	2-4 Restatements of information		
	2-5 External assurance		
	Activities and workers		
	2-6 Activities, value chain and other business relationships	pages 6, 142-146, 151-153	
	2-7 Employees	Pages 89-90, 92-94, 101, 103-104	
	2-8 Workers who are not employees	Pages 89-90, 91	
	Governance		
	2-9 Governance structure and composition	Pages 10-12, 46-47	
	2-10 Nomination and selection of the highest governance body	Pages 47-48	
	2-11 Chair of the highest governance body	Page 48	
	2-12 Role of the highest governance body in overseeing the management of impacts	Page 48	

	2-13 Delegation of responsibility for managing impacts	Page 48	
	2-14 Role of the highest governance body in sustainability reporting	Page 50	
	2-15 Conflicts of interest	Pag. 48, 54, 146	
	2-16 Communication of critical concerns	Page 64	
	2-17 Collective knowledge of the highest governance body	Pag. 47, 49-50	
	2-18 Evaluation of the performance of the highest governance body	Pages 48-50	
	2-19 Remuneration policies	Pages 48-49	
	2-20 Process to determine remuneration	Pages 48-50	
	2-21 Annual total compensation ratio	Pages 94-95	
	Strategy, policies and practices		
	2-22 Statement on sustainable development strategy	Page 5	
	2-23 Policy commitments	Pag. 52, 54-59, 69-70, 100, 114	
	2-24 Embedding policy commitments	Pag. 52, 54-59, 69-70, 100, 114	
	2-25 Processes to remediate negative impacts	Pag. 16, 18-22	
	2-26 Mechanisms for seeking advice and raising concerns	Pages 14-16	
	2-27 Compliance with laws and regulations	Pag. 70, 120	
	2-28 Membership associations	Page 135	
	Stakeholder Engagement		
	2-29 Approach to stakeholder engagement	Pages 14-16	
	2-30 Collective bargaining agreements	Page 89	

Material Topics			
GRI 3: Material Topics – 2021	Disclosures on material topics		
	3-1 Process to determine material topics	Pages 16-24	
	3-2 List of material topics	Pages 18-24	
Economic performance			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 27-28, 60-62, 105	
201- Economic performance	201-1 Direct economic value generated and distributed	Pagg.27-28	
	201-2 Financial implications and other risks and opportunities due to climate change	Pages 60-62	
	201-3 Defined benefit plan obligations and other retirement plans	Page 105	
Market presence			
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 91	
202- Market presence	202-2 Proportion of senior management hired from the local community	Page 91	
Indirect economic impacts			
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 28	
203- Indirect economic impacts	203-1 Infrastructure, investments and services supported	Page 28	
Procurement practices			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 152-153	
204- Procurement practices	204-1 Proportion of spending on local suppliers	Pages 152-153	
Anti-corruption			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 55-58	
205-Anti-corruption	205-2 Communication and training about anti-corruption policies and procedures	Pages 55-58	
	205-3 Confirmed incidents of corruption and actions taken	Pag. 55, 58	
Energy			

GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 69-70, 70-76	
302-Energy	302-1 Energy consumption within the organization	Pages 70-76	
	302-3 Energy intensity	Page 70	
Emission			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pag. 76, 84-86	
305-Emissions	305-1 Direct (Scope 1) GHG emissions	Pag. 76, 84-85	
	305-2 Energy indirect (Scope 2) GHG emissions	Pages 84-85	
Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 69-70, 76-77	
306-Waste	306-1 Waste generation and significant waste-related impacts	Pages 76-77	
	306-2 Management of significant waste-related impacts	Pages 69-70, 76-77	
	306-3 Waste by type and disposal method	Pages 76-77	
Supplier environmental assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 143-145	
308- Supplier environmental assessment	308-1 New suppliers that were screened using environmental criteria	Pages 143-145	
Employment			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 96-99	
401-Employment	401-1 New employee hires and employee turnover	Pages 96-99	
Labor/management relations			
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 112	
402 - Labor/management relations	402-1 Minimum notice periods regarding operational changes	Page 112	
Occupational health and safety			

GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 108, 110-117	
403- Occupational health and safety	403-1 Occupational health and safety management	Pages 110-112	



	system		
	403-2 Hazard identification, risk assessment, and incident investigation	Pages 111-112, 116-117	
	403-3 Occupational health services	Pages 113-114	
	403-4 Worker participation, consultation, and communication on occupational health and safety	Pages 112-113	
	403-5 Worker training on occupational health and safety	Page 108	
	403-6 Promotion of worker health	Pages 113-114	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Pages 111-112, 114-116	
	403-8 Workers covered by an occupational health and safety management system	Page 112	
	403-9 Work-related injuries	Pages 114-116	
	403-10 Work-related ill health	Pages 116-117	
Training and education			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 49-50, 95-96, 106-110	
404-Training and education	404-1 Average hours of training per year per employee	Pages 107-108	
	404-2 Programs for upgrading employee skills and transition assistance programs	Pages 106-110	
	404-3 Percentage of employees receiving regular performance and career development reviews	Pages 49-50, 95-96	
Diversity and equal opportunity			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 47-48, 95,100-102	
405- Diversity and equal opportunity	405-1 Diversity of governance bodies and employees	Pages 47-48, 100-102	

	405-2 Ratio of basic salary and remuneration of women to men	Page 95	
Non-discrimination			
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 101	
406- Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	Page 101	
Local communities			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 14-16, 136-141	
413-Local communities	413-2 Operations with significant actual and potential negative impacts on local communities	Pages 14-16, 136-141	
Supplier social assessment			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 143-145	
414- Supplier social assessment	414-1 New suppliers that were screened using social criteria	Pages 143-145	
Customer health and safety			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 133-134	
416- Customer health and safety	416-1 Assessment of the health and safety impacts of product and service categories	Pages 133-134	
Marketing and labeling			
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 120	
417-Marketing and labeling	417-3 Incidents of non-compliance concerning marketing communications	Page 120	
Customer privacy			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 123-124	
418- Customer privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pages 123-124	

Digital transformation, innovation and smart cities			
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 9, 28-31, 79	
This is a non-GRI disclosure	Digital transformation, innovation and smart cities	Pages 9, 28-31, 79	