

ADDRESSES AND COMPANY POLICIES

*COLLECTION
OF STANDARDS AND
GUIDELINES OF THE
COGENINFRA GROUP*



IDENTIFICATION

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RESPONSIBILITY

<i>Elaborated by</i>	Editors and departments of the Cogeninfra S.p.A. Group
<i>Verified by</i>	Editors and Department Heads
<i>Approved by</i>	Management Board
<i>On</i>	20/06/2024

INDEX

GLOSSARY, DEFINITIONS AND ACRONYM LIST	6
INTRODUCTION	10
1. THE GROUP	10
2. BUSINESS UNIT	10
3. VISION	10
4. MISSION	10
5. SUSTAINABILITY	10
6. ESG	10
7. FIGHT AGAINST CLIMATE CHANGE - DECARBONISATION	11
8. SKILLS DEVELOPMENT	11
9. POLICY DEFINITION	11
10. INTENT OF THE "COMPANY GUIDELINES AND POLICIES - COLLECTION OF RULES AND GUIDELINES OF THE COGENINFRA GROUP"	11
11. DESIGN AND METHOD	12
POLICY FOR THE PROTECTION AND PROTECTION OF HUMAN RIGHTS	13
1. REFERENCE FRAMEWORK	13
2. COMMITMENT	13
3. ACTION	13
4. EMPLOYEE RESPONSIBILITIES	14
DIVERSITY, EQUITY AND INCLUSION POLICY	15
1. PURPOSE	15
2. COMMITMENT	15
4. EMPLOYEE RESPONSIBILITIES	16
SUSTAINABLE SOURCING POLICY	17
1. ENVIRONMENT	17
2. BUSINESS ETHICS	17
3. WORK, HUMAN RIGHTS AND COMMUNITY DEVELOPMENT	17
STAFF TRAINING AND AWARENESS POLICY	19
1. TRAINING PLAN	19
2. ACTION	19
POLICY TO IDENTIFY STAKEHOLDERS	20
1. DEFINITION	20
2. PURPOSE	20
3. OBJECTIVES	20
4. IDENTIFICATION OF STAKEHOLDERS	20
POLICY FOR THE MANAGEMENT OF INITIATIVES AND COMMUNITY DEVELOPMENT	22
1. THE SELECTION OF INITIATIVES	22
2. COGENINFRA'S 2023	22
ANTI-CORRUPTION POLICY - CODE OF ETHICS	24
1. DEFINITION	24
2. PURPOSE	24
3. SCOPE OF APPLICATION	24
4. SENSITIVE AREAS	24

5. INITIATIVES	24
6. RECIPIENTS	25
7. OBLIGATIONS OF THE RECIPIENTS	25
8. CONFLICT OF INTEREST	25
9. RELATIONS WITH STAKEHOLDERS	26
10. IMPLEMENTATION AND MONITORING	26
WHISTLEBLOWING POLICY – REPORT MANAGEMENT	27
1. DEFINITION	27
2. REFERENCE LEGISLATION	27
3. OBJECTIVE	27
5. WHAT TO REPORT	27
6. WHAT WILL NOT BE REPORTED, DISCLOSED OR REPORTED	28
7. PROTECTION OF WHISTLEBLOWERS	28
ENVIRONMENTAL POLICY	29
1. PRINCIPLES	29
2. COMMITMENT	29
3. OBJECTIVES	30
4. EMPLOYEE RESPONSIBILITIES	30
OCCUPATIONAL HEALTH AND SAFETY POLICY	31
1. COMMITMENT	31
2. OBJECTIVES	31
QUALITY POLICY	32
1. OBJECTIVES	32
ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT	33
1. ETHICAL WORK ENVIRONMENT	33
2. CONFLICT OF INTEREST	33
3. CORRUPTION	33
4. COMPETITION	33
5. PROTECTION OF THE ASSETS OF THE COGENINFRA COMPANY	33
6. TRANSPARENCY AND DISCLOSURE OF INFORMATION	34
7. PRIVACY AND DATA PROTECTION	34
ANNEX II: CODE OF CONDUCT FOR SUPPLIERS	35
1. SOURCE OF PERSONAL DATA	35
2. DATA CONTROLLER	35
3. PURPOSE OF DATA PROCESSING	35
4. RECIPIENTS OF PERSONAL DATA - COMMUNICATION	35
5. DISSEMINATION OF PERSONAL DATA	35
6. CATEGORIES OF DATA PROCESSED	35
7. TRANSFER OF DATA TO A THIRD COUNTRY	36
8. DATA RETENTION PERIOD	36
9. LAWFULNESS, NATURE OF THE PROVISION AND CONSEQUENCES OF ANY REFUSAL	36
10. METHODS OF DATA PROCESSING	36
11 RIGHTS OF THE DATA SUBJECT	36
12 SYSTEMS AND ACCESS TO THE COGENINFRA NETWORK	36
ANNEX III: CODE OF CONDUCT FOR CUSTOMERS	38
1. PERSONAL DATA CONTROLLER	38

2. SOURCE FROM WHICH THE PERSONAL DATA ORIGINATES	38
3. CATEGORIES OF DATA PROCESSED	38
4. PURPOSES OF THE PROCESSING AND LEGAL BASIS	38
5. NATURE OF THE PROVISION AND CONSEQUENCES OF ANY REFUSAL	39
6. PROCESSING METHODS	39
7. DATA RETENTION PERIOD	39
8. CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED	40
9. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY	40
10. RIGHTS OF THE DATA SUBJECT	40
ANNEX IV: ESG	42
1. SCOPE AND FRAMEWORK	42
2. PURPOSE	42
3. COMMITMENT	43
4. EMPLOYEE RESPONSIBILITIES	43
ANNEX V: WASTE MANAGEMENT	44
1. DEFINITIONS AND LEGISLATION	44
2. LIABILITY	46
3. THE CLASSIFICATION OF WASTE	47
4. TEMPORARY STORAGE AND PACKAGING OF WASTE	47
5. WASTE TRANSPORT	47
6. THE CHOICE OF THE RECIPIENT	48
7. REDUCTION OF WASTE PRODUCTION	48
ANNEX VI: CLIMATE RISK ANALYSIS	50
DRAFTING OF THE DOCUMENT EXPECTED BY SEPTEMBER 2024	50
ANNEX VII: MODEL 231	51
DRAFTING OF THE DOCUMENT EXPECTED BY 2026	51
BIBLIOGRAPHY	52

GLOSSARY, DEFINITIONS AND ACRONYM LIST

2030 AGENDA	The 2030 Agenda [12] for Sustainable Development is an action program for people, the planet and prosperity signed in September 2015 by the governments of the 193 member countries of the UN. It incorporates 17 Sustainable Development Goals (SDGs) into a major action program for a total of 169 'targets' or targets. The official launch of the Sustainable Development Goals coincided with the beginning of 2016, guiding the world on the path to be taken over the next 15 years: countries, in fact, have committed to achieving them by 2030. It is a collection of common goals, which means that they concern all countries and all individuals: no one is excluded, nor should they be left behind along the path necessary to bring the world on the path of sustainability. (https://unric.org/it/agenda-2030/)
ANGA	The National Register of Environmental Managers was established by Legislative Decree 152/2006 [19] divided into a National Committee, Regional Sections and Provincial Sections based at the Chambers of Commerce of the regional capitals. The subjects obliged to register with the ANGA are those who carry out the following activities: collection and transport of waste, remediation of sites, remediation of goods containing asbestos and trade/brokerage of waste without possession of the same.
Cogeninfra	It derives from the fusion of <i>Cogeneration, a process that consists in the production of electricity and thermal energy from a single source of primary energy that guarantees a better energy yield, and infrastructure, a complex of capital goods that provide a series of services essential for the functioning of the economic system.</i>
Board of Management	In public limited companies that choose a two-tier system of administration and control, the management board performs the typical functions of the administrative body. In fact, he is in charge of the management of the company and to this end carries out all the operations necessary for the realization of the corporate purpose.
Editor	Person who has been entrusted with the care of the " <i>Company Guidelines and Policies - Collection of Standards and Guidelines of the Cogeninfra Group</i> " for the purpose of its publication.
ESG	Environmental, Social and Governance are the environmental, social and governance issues referred to in the Paris Agreement, the UN Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights and the UN-backed Principles for Responsible Investment. [2] The term ESG was coined in 2004 in the publication entitled "Who Care Wins - Connecting Financial Markets to a Changing World" [39].
GDPR	The General Data Protection Regulation is the European regulation on the processing of personal data and privacy [22] [23]. In particular, it regulates how companies and organisations process the personal data of all persons in the EU. As a data controller, every organization must track, monitor, and have a legal basis for personal data processing activities. This includes personal data processed not only within the organization, but also by data processors, i.e. third parties who process personal data for the data controller.
Information Personal	This refers to any information that could be used to identify someone, directly or indirectly, such as their name, IP address, employee ID, email address, or phone number.

ISO

The International Organization for Standardization is the world's largest and longest-running non-governmental organization for the definition of homogenized technical standards. Founded in 1947 in Geneva, it draws up and updates the "ISO standards" that cover all sectors: IT and related technologies, Health, Transport, Management and services, Environmental sustainability, Energy, Safety, security and risk, Food and agriculture, Engineering, Building and construction, Materials, Diversity and inclusion and Government.

ISO 14001

This European Standard specifies the requirements of an environmental management system (EMS) [20] that an organisation can use to develop its environmental performance. The standard is intended for an organization that wishes to manage its environmental responsibilities in a systematic way that contributes to the environmental pillar of sustainability. The standard helps an organization achieve the expected outcomes of its environmental management system, which provide added value for the environment, for the organization itself and for stakeholders. In line with the organization's environmental policy, the expected outcomes of an environmental management system include: - the achievement of environmental performance; - the fulfilment of compliance obligations; - the achievement of environmental objectives. The standard is applicable to any organization, regardless of size, type and nature and applies to the environmental aspects of its activities, products and services that the organization determines it can control or influence, considering a life cycle perspective. The standard does not establish any specific environmental performance criteria. The standard can be used, in whole or in part, to systematically improve environmental management. Declarations of compliance with this standard, however, are not acceptable unless all requirements of the standard are incorporated into an organization's environmental management system and met without exclusion.

ISO 45001

The standard specifies the requirements for an occupational safety and health (OSH) management system [21] and provides guidance for its use, in order to enable organisations to prepare safe and healthy workplaces, preventing work-related injuries and illnesses, as well as proactively improving their OSH performance. The standard is applicable to any organisation, regardless of size, type and activity, that wishes to establish, implement and maintain a management system to improve occupational health and safety, eliminate hazards and minimise OSH risks (including system deficiencies), seize OSH opportunities and address OSH management system non-conformities associated with its activities. The standard facilitates the organization in achieving the expected results of its OSH management system; i.e.: (a) continuous improvement of OSH performance; b) compliance with legal and other requirements; (c) achievement of OSH targets. The standard includes the NA national appendix which specifies the keys to interpreting the requirements of the standard in application of the national legislation in force. The standard is the European transposition of the international standard ISO 45001:2018, already adopted as a national standard on 12 March 2018, and is therefore identical, in technical content, to UNI ISO 45001:2018.

Model 231

A set of protocols that regulate and define the company structure and the management of its sensitive processes. This is a series of regulated company procedures [15] aimed at ensuring the prevention of the commission of crimes in the performance of all the tasks envisaged during the performance of one's work activity.

Monopoly

Centralization of the market supply or demand for a given good or service in the hands of a single seller or buyer

Refusal	Any substance or object that the holder discards, intends or is required to discard [19].
Scope 1	Emissions generated directly from the organization's activities. The GHG Protocol [4] defines Scope 1 as the sum of emissions from stationary combustion, from mobile sources (vehicles...), process and fugitive (leaks and other irregular releases) directly produced to the organization.
Scope 2	Emissions generated indirectly by the organization's activities resulting from purchased or acquired energy.
Scope 3	Emissions generated indirectly by stakeholders related to the organization's activities. The US Environmental Protection Agency (EPA) describes Scope 3 as the sum of activities that generate emissions from assets not owned or controlled by the reporting organization, but which the organization indirectly impacts its value chain. (https://www.epa.gov/climateleadership/scope-3-inventory-guidance)
SDGs	<p>The Agency's 17 Sustainable Development Goals 2023 [12]:</p> <ol style="list-style-type: none"> 1. defeat poverty; 2. to defeat hunger; 3. health and well-being; 4. quality education; 5. gender equality; 6. clean water and sanitation; 7. clean and affordable energy; 8. decent work and economic growth; 9. businesses, innovation and infrastructure; 10. reducing inequalities; 11. sustainable cities and communities; 12. responsible consumption and production; 13. fight against climate change; 14. life underwater; 15. life on earth; 16. peace, justice and strong institutions; 17. partnerships for goals.
EEA	The European Economic Area brings together the 27 Member States of the European Union (EU) and three Member States of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway) into a single market subject to the same rules. These rules cover the four freedoms (free movement of goods, capital, services and persons), competition and state aid rules, as well as other areas related to the four freedoms. The rules also ensure equal rights and obligations within the Single Market for citizens and businesses across the EEA. The EEA was established by the Agreement on the European Economic Area, which entered into force on 1 January 1994.
System Management (SG)	The set of procedures and rules that an organization or company can apply in order to achieve defined objectives. There may be different management systems, depending on the industry to which they apply. With reference to some of these, it is possible to apply a particular international standard (ISO) and achieve, on a voluntary basis, a standardization certification with the aim of keeping the organization's processes and activities under control.

Stakeholders	All subjects, individuals or organizations, actively involved in an economic initiative (project, company), whose interest is negatively or positively influenced by the result of the execution, or the progress, of the initiative and whose action or reaction in turn influences the phases or completion of a project or the destiny of an organization.
District heating	Thermal energy transport system, mainly carried out on public land, aimed at allowing anyone interested, within the limits allowed by the extension of the network, to connect to it for the supply of thermal energy for heating or cooling spaces, for processing processes and to cover domestic hot water needs. [1]
Whistleblowing	A complaint, usually anonymous, filed by a company employee to public authorities, the media, public interest groups, unethical or illegal activities committed within the company itself.

INTRODUCTION

1. THE GROUP

The **Cogeninfra Group** was born from the shared vision of a team of experts, with over fifteen years of experience in the district heating and energy efficiency sectors, together with a prestigious international infrastructure investment fund. Together they have created a platform capable of aggregating several territorial realities to consolidate the fragmented Italian energy market and create a new and competitive player at national and international level. The Group is also active in the foreign market with a subsidiary based in Warsaw.

The goal is to develop new markets thanks to the strong know-how gained in recent years.

2. BUSINESS UNIT

The **Cogeninfra Heat** division designs, builds and manages district heating networks which, starting from the production plant, provide heat in the public, residential, commercial and industrial sectors.

The **Cogeninfra Save** division offers highly technological solutions aimed at respecting the environment, saving through the design, financing and management of energy assets and the redevelopment of energy plants.

All the companies specialize in energy efficiency services in the industrial and agricultural sectors and are responsible for saving money, reducing consumption and polluting emissions. Both divisions work on multiple sustainable development and technological transition projects of existing structures or the creation of new plants, in the public and private sectors.

3. VISION

Designing energy solutions for cities and innovative companies.

4. MISSION

To offer customers the best efficient and renewable energy solutions that promote a rational use of energy; guarantee economic savings and new perspectives of environmental sustainability.

5. SUSTAINABILITY

Sustainability is the **engine of** the Cogeninfra Group's business to enable the sustenance, improvement and evolution of the Group's companies in the long term. Cogeninfra is committed to integrating the principles of environmental, social and economic sustainability into its ordinary activities. In particular, all the companies of the Group share and apply the value of the responsible use of resources on a daily basis with an eye always oriented towards the future.

6. ESG

The principles of corporate sustainability are the basis of ESG issues and criteria [2]. Cogeninfra has established an internal ESG Committee [Annex IV: ESG] for the better monitoring of its business and all related activities, for the achievement of international market standards, for greater transparency and for better financial and non-financial communication. The committee meets monthly for periodic and constant updating and discussion. Finally, the Group aims to adopt the CSRD [3] within the timeframe set out in European Union (EU) legislation.

This initiative stems from the desire to produce a collection of transversal corporate policies with sustainability and ESG issues at the center.

7. FIGHT AGAINST CLIMATE CHANGE - DECARBONIZATION

In the fight against climate change and in the ecological and energy transition process of interest to every company together with countries and cities, Cogeninfra is committed to reducing its environmental impact through a decarbonisation strategy (improvement of its direct and indirect CO2 emissions - Scope 1, Scope 2 and Scope 3 [4]) and an investment strategy in renewable solutions.

The Group plans to prepare an in-depth analysis linking climate change risks and the development of its business [Annex VI: CLIMATE RISK ANALYSIS] by September 2024.

8. SKILLS DEVELOPMENT

The Cogeninfra Group is constantly growing thanks to its human capital, which is why it stimulates, trains and invests in people. The Group's governance is always transparent in corporate decisions and choices, protects its investors and provides stakeholders with an updated report on progress.

The awareness that Cogeninfra is made up of people keeps the Group's attention first in enhancing and supporting its internal resources and in the search for new talents.

9. POLICY DEFINITION

"Company Guidelines and Policies - Collection of Cogeninfra Group Standards and Guidelines" is the collection of all company policies and related annexes to policies. Policy means:

- the set of rules adopted by the Company to govern the conduct of its employees;
- the set of guidelines and guidelines of the organization;
- the guideline towards objectives and strategies agreed upon and accepted by the organization.

10. INTENT OF THE "COMPANY GUIDELINES AND POLICIES - COLLECTION OF STANDARDS AND GUIDELINES OF THE COGENINFRA GROUP"

The *project* stems from the need to:

- formalize Cogeninfra's ideas and projects;
- create trust between the Companies and among the Group's employees by providing accessible, understandable and easily updated policies;
- to involve and empower employees by creating a healthy and stimulating work environment;
- define policy scopes and avoid redundancy in the various documents;
- define and communicate the consequences for employees, collaborators, suppliers and customers in the event of non-compliance with policies;
- clarify how employees should act in the event of internal breaches.

11. PROJECT AND METHOD

The need to produce the collection of policies and guidelines of the Cogeninfra Group has led to the appointment of an Editor, in the person of Stefano Pedrini, who has the task of organizing, managing and keeping updated the *"Company addresses and policies - collection of rules and guidelines of the Cogeninfra Group"*.

The process, also supervised by the Management Board, that generated this document is as follows:

- The *state of affairs* , i.e. the collection of documents produced in recent years relating to the policies and initiatives of Cogeninfra and all the companies of the Group. Subsequently, the material that could be kept to start the project was skimmed and selected.
- The *first bibliographic research* on the subject collecting as much material as possible through the internet and discussion with the Group's offices. The aim was to identify all the issues to be dealt with in the "*Company guidelines and policies - collection of rules and guidelines of the Cogeninfra Group*".
- The topics *to be explored have* been defined:
 - the identification of stakeholders;
 - human rights, diversity, equity, inclusion, ethics and anti-corruption;
 - the behavior of customers, suppliers and employees;
 - the management, training and awareness of staff;
 - health and safety at work;
 - the quality of the service offered;
 - the environment, waste and sustainability;
 - initiatives and community development;
 - the in-depth study of the ESG issue.

At this point it was decided to have two levels of importance and in-depth analysis:

- policies: general and universal documents;
 - Annexes to policies: more specific and operational documents.
- The Editor has assigned the drafting of the documents planned in the previous process to the departments of interest. He has made himself available to support, plan, support and help in the drafting of policies and annexes to the policy. Thanks to a targeted and in-depth bibliographic search, the Group's offices were able to produce the first draft of the "*Company Guidelines and Policies - Collection of Standards and Guidelines of the Cogeninfra Group*".
 - The subsequent *continuous discussion* between departments/Editor and Editor/Management Board has made it possible to develop policies.
 - Finally, the Editor proceeded to write the *glossary*, definitions and list of acronyms, the *introduction* and the *bibliography*.
 - *Approval* by the Management Board.

"*Company guidelines and policies - collection of standards and guidelines of the Cogeninfra Group*" will be updated annually as necessary.

POLICY FOR THE PROTECTION AND PROTECTION OF HUMAN RIGHTS

Reference office: *HR, LEGAL & GENERAL AFFAIRS DEPT*

Contact person: *Ilaria Caruana*

1. REFERENCE FRAMEWORK

- The "Universal Declaration of Human Rights" [5].
- The "Convention for the Protection of Human Rights and Fundamental Freedoms" and subsequent protocols [6].
- The "International Covenant on Civil and Political Rights" [7].
- The "International Covenant on Economic, Social and Cultural Rights" [8].
- The "Convention on the Elimination of All Forms of Discrimination against Women" [9].
- The "Charter of Fundamental Rights of the European Union" [10].
- The "Declaration on the Fundamental Principles and Rights of Work and its Sequels" [11].
- The "2030 Agenda" [13] and its 17 Sustainable Development Goals (SDGs).
- The Ten Principles of the United Nations Global Compact [14].

2. COMMITMENT

The Cogeninfra Group recognizes, understands and respects human rights as fundamental for the well-being of the communities in which it operates and for the long-term success of its business in the energy sector. In particular, the Group undertakes to:

- respect all the natural and inalienable rights of man (civil, political and social) for which inalienable of man, that is, those rights which, if violated, would cause an offense to the very human essence;
- create a safe, adequate, fair, respectful and inclusive working environment for all employees, contractors and other stakeholders involved in the operations of all Group Companies;
- protecting the environment and natural resources, combating climate change and contributing to sustainable economic development;
- condemn all forms of discrimination and activities that may harm natural and human rights.

3. ACTION

The Cogeninfra Group recognizes the following as essential points:

- ***The right to work***
Ensuring equal employment opportunities, decent working conditions and a safe and healthy working environment for all employees. Cogeninfra opposes forced labour, child labour and all forms of labour exploitation.
- ***The right to freedom of expression and opinion***
Protect the freedom of expression and opinion of its employees, customers and all other interested parties [POLICY TO IDENTIFY STAKEHOLDERS], in compliance with applicable laws and regulations.
- ***The right to privacy and protection of personal data***
Protect the privacy and personal data of the individuals with whom you interact, in accordance with applicable laws and taking appropriate measures to ensure the security of your information. The protection and processing of personal data is a major challenge in the age of digitalisation and globalisation of markets. In particular, respect for private and family life, home and communications, the protection of personal data, freedom of thought, conscience and religion, freedom of expression and information.

- **The right to free association and collective bargaining**
While favoring and promoting direct dialogue with its employees to create an environment of mutual trust, Cogeninfra respects the right of employees to associate freely, to trade unions and to negotiate collectively, in accordance with applicable national and international legislation.
- **Diversity and inclusion [DIVERSITY, EQUITY AND INCLUSION POLICY]**
Ensure that all persons are treated with dignity and respect, without discrimination based on race, ethnicity, religion, gender, sexual orientation, gender identity, disability, age, or any other protected characteristic. Foster diversity, equity, and inclusion in hiring, development, and promotion practices, while respecting and valuing individual differences.
- **Environment**
Minimising the environmental impact of companies in the territory [ENVIRONMENTAL POLICY], promoting the sustainability of goods [SUSTAINABLE PROCUREMENT POLICY], products and services and preventing risks related to climate change [ANNEX VI: CLIMATE RISK ANALYSIS].
- **Health, safety and well-being [OCCUPATIONAL HEALTH AND SAFETY POLICY]**
People's health, safety and psychological, relational and physical well-being is the most precious asset to be protected at all times of life, at work as well as at home and in free time. Cogeninfra is committed to developing and disseminating a solid culture of health, safety and well-being throughout the company, in order to guarantee a work environment free of health and safety risks.
- **Stakeholders [POLICY FOR THE IDENTIFICATION OF STAKEHOLDERS and POLICY FOR THE MANAGEMENT OF INITIATIVES AND COMMUNITY DEVELOPMENT]**
Collaborate with all stakeholders, including governments, civil society organizations and other companies, to jointly address human rights challenges in the energy sector. Consult and actively engage local communities in the areas where you operate to understand and respond to their needs, concerns and expectations.
- **Transparency [ANTI-CORRUPTION POLICY - CODE OF ETHICS]**
Operate in a transparent and accountable manner, providing clear and accessible information on activities and their impacts on human rights.
- **Preventing and mitigating negative impacts**
Cogeninfra believes that human rights, occupational health and safety and the environment are three areas that share the common goal of sustainability. Through the continuous monitoring of environmental, corporate and human performance, the Group seeks to prevent and mitigate any negative effect that may harm companies, the territory and all stakeholders, with particular attention to its employees.

4. EMPLOYEE RESPONSIBILITIES

All employees are required to respect and promote this policy [ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT] AND TO REPORT ANY HUMAN RIGHTS VIOLATIONS OR CONCERNS TO A DIRECT SUPERIOR OR TO HUMAN RESOURCES (*personale@cogeninfra.it*).

DIVERSITY, EQUITY AND INCLUSION POLICY

Reference office: *HR, LEGAL & GENERAL AFFAIRS DEPT*

Contact person: *Alessandra Bonetti*

1. PURPOSE

Cogeninfra is committed to promoting, cultivating and preserving a culture of diversity, equity and inclusion applicable to all its employees. The Group believes that valuing diversity is a competitive differentiator that allows it to achieve its vision and create unparalleled value for its Stakeholders [[STAKEHOLDER IDENTIFICATION POLICYS](#)].

Cogeninfra is aware that its employees are the most precious asset. The collective sum of individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique skills and talent that employees invest in their work represents a significant part not only of their own culture, but also of the reputation and results of the companies.

The Group welcomes and encourages differences in age, color, disability, ethnicity, marital or family status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socioeconomic status and other characteristics that make its employees unique.

Cogeninfra's diversity initiatives are applicable to, but not limited to, its recruitment and selection practices and policies, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations and the continuous development of a work environment built on the premise of gender equity and diversity that encourages and enforces the following:

- respectful communication and cooperation between all employees;
- teamwork and employee participation, allowing representation **in each project of all groups by treasuring the different perspectives offered;**
- the recognition of each employee as an individual with unique backgrounds and lived experiences;
- work-life balance through working hours that take into account the different needs of employees;
- the contributions of lavoro employers and employees to the communities in which they operate to promote greater understanding and respect for diversity.

2. COMMITMENT

To provide informed and authentic leadership, in line with the Group's core values and sponsored by the highest levels of the organization, Cogeninfra is committed to:

- create a culture of the lavoro environment free of discrimination, harassment and gossip and that welcomes individual differences;
- attract, retain and develop a diverse range of talented, energetic and committed people;
- Consider diversity, equity and inclusion as elements linked to our mission and fundamental to ensuring the well-being of our people and the communities we serve;
- recognize and eliminate any inequality within our policies, systems, programs, and services, and continuously update and report on the organization's progress;
- explore the potential underlying and unquestioned assumptions that interfere with inclusivity;
- practice and encourage transparent communication in all interactions;
- encourage respect and tolerance.

3. ACTION

To help promote diversity and inclusion, Cogeninfra adheres to the following action points:

- Pursue cultural competence across the organization by creating substantive learning opportunities and formal, transparent policies;
- Train the staff recruitment team on equity issues to develop a greater awareness of bias during hiring, promotion, performance and compensation decisions.

4. EMPLOYEE RESPONSIBILITIES

All employees of the Cogeninfra Group have a responsibility to treat all their interlocutors with dignity and respect and are expected to share the concepts set out in this document even outside the work environment.

They are expected to maintain conduct that reflects inclusion during the Job, in Job functions on or off the Job site, and in all other events sponsored and attended by the Company.

Employees who are found to have engaged in inappropriate conduct or behavior toward others may be subject to disciplinary action that may include termination.

Employees may ask questions, raise concerns, or report potential non-compliance with this Policy by contacting their line manager or an HR representative.

SUSTAINABLE SOURCING POLICY

Reference office: *PROCUREMENT & LOGISTIC DEPT*

Contact person: *Simona Lomartire*

Cogeninfra is always guided by its values as a constant commitment to always do the right thing for its customers, suppliers, staff and the communities it serves. The Group is committed to social impact and strives for sustainability in every function, including supply and logistics.

Through this procurement policy, Cogeninfra intends to make operations more sustainable:

- comply with the laws and regulations of the respective countries in which it operates and with which it collaborates;
- upholding the highest standards of economic, social, ethical and environmental practices;
- consciously choose carriers and suppliers based on their focus on ESG policies [[ANNEX IV: ESG](#)];
- identify and moderate the risks and waste associated with their procurement process;
- communicate the policy with stakeholders (internal and external) and raise awareness among its suppliers by making them part of the initiatives.

In accordance with its commitment to the highest standards, Cogeninfra expects its employees to also aspire to the same goals in their business operations, including, but not limited to:

1. ENVIRONMENT

Take initiatives to promote greater environmental responsibility [[ENVIRONMENTAL POLICY](#)], such as:

- reduction of purchase-related waste, including unnecessary and unnecessary packaging;
- "zero plastic" policy in all our locations;
- choice aimed at suppliers who propose development projects using renewable energy;
- reduce the handling of goods by optimizing loads and transport with a consequent reduction in emissions by planning purchases and deliveries;
- where possible, choice of eco-sustainable products and promoting circularity;
- scheduling of periodic maintenance to ensure the constant efficiency of the systems to minimize accidents, breakdowns and breakdowns.

2. BUSINESS ETHICS

Taking into account the Anti-Corruption Policy [[ANTI-CORRUPTION POLICY - CODE OF ETHICS](#)], Cogeninfra is active to:

- prevention against money laundering, fraud, corruption, bribery, conflicts of interest and data security issues;
- transparency with the planned activation of the whistleblowing channel [[WHISTLEBLOWING POLICY – REPORT MANAGEMENT](#)],_for the reporting in complete anonymity, also by all suppliers, of illegal or fraudulent activities detected within the Group.

3. LABOUR, HUMAN RIGHTS AND COMMUNITY DEVELOPMENT

The Group promotes the following initiatives:

- create strong, long-lasting relationships based on respect and trust;

- provide employees with a living wage, as a minimum [**POLICY FOR THE PROTECTION AND PROTECTION OF HUMAN RIGHTS** and **ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT**];
- guarantee financial integrity, making the relationship also economically sustainable;
- collaborate with local communities to improve educational, cultural, economic and social well-being;
- involvement of local activities to improve the economy of the area;
- give priority to the choice of suppliers linked to the territory who employ local labour [**POLICY FOR THE MANAGEMENT OF COMMUNITY INITIATIVES AND DEVELOPMENT**].

Cogeninfra is aware that improving procurement performance is a continuous process and recognizes the contribution of its suppliers in the path to becoming more sustainable, which is why the Group tries to organize training meetings and events useful for deepening the aforementioned issues. And precisely in this direction, in the coming months, a screening system will be introduced for the selection and management of suppliers through a dedicated platform [**ANNEX II: CODE OF CONDUCT FOR SUPPLIERS**].

Cogeninfra also recognises the value of diversity and has adopted a programme in the procurement process to promote the inclusion of small businesses and diverse businesses.

For any complaint or suggestion on sustainable procurement practices, the email from the purchasing department (*ufficioacquisti@cogeninfra.it*) is available. The utmost confidentiality will be maintained.

STAFF TRAINING AND AWARENESS POLICY

Reference office: *HR, LEGAL & GENERAL AFFAIRS DEPT*

Contact person: *Alessandra Bonetti*

Cogeninfra recognizes the crucial importance of staff training and awareness for the long-term success and well-being of the organization. The policy is based on the idea that investing in the skills and awareness of its employees is key to ensuring a safe, inclusive and stimulating work environment.

1. TRAINING PLAN

The training plan includes:

- Skills development: offer targeted training programs to improve employees' technical and soft skills, allowing them to grow professionally and contribute significantly to the success of the company;
- promoting awareness: conducting awareness-raising and training activities to promote awareness on crucial issues [ANNEX IV: ESG] such as diversity and inclusion [DIVERSITY, EQUITY AND INCLUSION POLICY], OCCUPATIONAL HEALTH AND SAFETY [OCCUPATIONAL HEALTH AND SAFETY POLICY], ENVIRONMENTAL SUSTAINABILITY [ENVIRONMENTAL POLICY] AND CORPORATE SOCIAL RESPONSIBILITY;
- Individual and collective growth: fostering an environment that encourages individual and collective growth through knowledge sharing, experiential learning, and the development of soft skills such as effective communication and problem solving.

2. ACTION

The actions and strategies for the implementation of the training and awareness-raising plan include:

- Course planning: identify employee training needs through periodic assessments and plan specific courses to meet those needs, using both internal and external resources;
- continuous awareness-raising: organising regular training sessions on key topics to raise awareness among staff and foster understanding and adoption of conscious practices;
- Incentivizing participation: offering incentives and recognition for active participation in training and awareness programs, thus encouraging continued engagement on the part of employees;
- Evaluation of results: regularly monitor the effectiveness of training and awareness programs through employee feedback, performance evaluations and defined success indicators;
- continuous updates: updating and adapting programs according to emerging needs and changes in the business context, thus ensuring a training offer that is always relevant and at the forefront.

STAKEHOLDER IDENTIFICATION POLICY

Reference office: *Marketing & Communication*

Contact person: *Giorgia Baudone*

The Cogeninfra Group operates in a dynamic context by interacting with different stakeholders, called Stakeholders, who directly or indirectly can influence or be influenced by the achievement of corporate objectives; transparency and dialogue with stakeholders are essential for our sustainable growth and for creating value in the long term.

1. DEFINITION

An entity or individual who can reasonably be significantly influenced by the organization's activities, products, and services, or whose actions can reasonably be expected to affect the organization's ability to successfully implement its strategies and achieve its goals [14].

2. PURPOSE

The purpose of this Policy is to identify the Stakeholders for the other Policies and the Group's relations with them.

3. OBJECTIVES

Cogeninfra is actively engaged in managing relations with Stakeholders by trying to:

- create trusting, lasting and transparent relationships;
- promote sustainable development and share its ideals;
- consider the possible difficulties that may lead the Stakeholders not to participate in any request for exchange or comparison, for reasons related to financial resources, time, language skills or other problems that may arise;
- always be open to dialogue and listen to its stakeholders;
- foreseeing any critical issues trying to transform them into opportunities;
- maintain and increase the company's reputation at Group level.

4. IDENTIFICATION OF STAKEHOLDERS

The number of Stakeholders is very high, so they have been grouped into the following macro-categories:

- customers [ANNEX III: CODE OF CONDUCT FOR CLIENTS];
- shareholders and investors;
- the environment considered as a Stakeholder because it represents the framework within which the Group's activities find their purpose, limit and origin [ENVIRONMENTAL POLICY and ANNEX VI: CLIMATE RISK ANALYSIS];
- local institutions and authorities, authorities, government and regional authorities;
- suppliers [ANNEX II: CODE OF CONDUCT FOR SUPPLIERS];
- employees [STAFF TRAINING AND AWARENESS POLICY and ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT];
- local and territorial communities, citizens and future generations [POLICY FOR THE MANAGEMENT OF COMMUNITY INITIATIVES AND DEVELOPMENT];

- public administration;
- average;
- business partners e competitors;
- companies of the Cogeninfra Group.

POLICY FOR THE MANAGEMENT OF INITIATIVES AND COMMUNITY DEVELOPMENT

Reference office: *BUSINESS DEVELOPMENT DEPT*

Contact person: *Giorgia Baudone*

Cogeninfra is aware that companies cannot ignore interaction with the territory in which they are located. For this reason, the Group supports various organizations in the area, and beyond, and considers projects for their value.

Cogeninfra participates in the improvement of the environmental characteristics and daily life of the communities in which its plants are located both thanks to economic, energy and pollutant emission saving solutions and through initiatives, sponsorships and projects.

Finally, the Group actively participates in trade fairs and events throughout Italy, trying to share its sustainable business and ideals with as many people as possible.

1. THE SELECTION OF INITIATIVES

To give value to its Stakeholders [[POLICY TO IDENTIFY STAKEHOLDERS S](#)], Cogeninfra has designated the following areas of intervention in parallel with its ESG objectives [[ANNEX IV - ESG](#)]:

- the protection, care and safeguarding of the environment;
- sport and sports activities;
- territorial development;
- social and cultural growth;
- creating inclusive places.

The dedicated email is available to collect applications for sponsorships:
marketing@cogeninfra.it.

2. COGENINFRA'S 2023

- Sponsorship:
 - Local basketball team (Valtellina).
 - Nordic Walking Valtellina (race, world relay and non-competitive walk).
 - "HEALTHY" festival (Health, Harmony, Holistic Nature).
 - School diary for the "B. Pinchetti" Institute of Higher Education.
 - Santa Caterina Valfurva Ski Club.
 - Local padel sports center (Borgaro T.se).
- Teaching activities:
 - Guided tours of our centres dedicated to schools, institutes and universities.
 - Training project "Mountain 4.0 FUTUReALPS".
- Sharing:
 - Technical visits to our power plants and plants with the aim of showing visiting companies or groups successful experiences and possible examples of replication. Such as, for example, the visit to the biogas plant in Borgo Santa Maria (LT) by a Serbian-Uzbek delegation of the FAO and subsequently to members of the Moroccan Ministry of Agriculture officials and engineers of the Moroccan company MEDZ Morocco.

- Care of the territory:
 - Maintenance and cleaning of forests, mountain paths and firebreaks to prevent fires and natural disasters and represent an additional tourist offer.
 - Withdrawal of plant material produced by silvicultural and pruning interventions.

ANTI-CORRUPTION POLICY – CODE OF ETHICS

Reference office: *TOP MANAGEMENT*

Contact person: *Francesco Vallone - Ilaria Cannata*

1. DEFINITION

The anti-corruption policy defines the rules of conduct that Collaborators but also agents, suppliers, consultants or external parties, i.e. suppliers acting in the name and on behalf of the Company, employees and management are required to comply with to ensure compliance with Italian and European anti-corruption legislation.

2. PURPOSE

This Policy reaffirms the Company's zero tolerance of any form of corruption, defined as the practice by which a person, or a group of persons, offers or procures an advantage to induce another person to commit an act contrary to his or her duties of office or below his or her power of appreciation, by committing to act honestly, integrity and in full compliance with laws, regulations and regulations on the fight against corruption.

3. SCOPE OF APPLICATION

List of business processes covered by this Policy:

- the selection, choice and management of Collaborators;
- customer relationship management [[Annex III: CODE OF CONDUCT FOR CUSTOMERS](#)];
- the management of relations with the Public Administration;
- the selection, selection and management of suppliers [[Annex II: CODE OF CONDUCT FOR SUPPLIERS](#)];
- the selection, choice and management of partners and companies with which to establish any Temporary Business Associations;
- the management of relations with competitors;
- the management of relations with the media;
- the management of relations with institutions in general.

4. SENSITIVE AREAS

As far as Cogeninfra's business is concerned, the most sensitive areas are:

- relations with public bodies;
- maintenance or construction/demolition activities entrusted to external companies;
- the assignment of projects to external collaborators;
- the supply of gas and electricity, both active and passive, and the trading of energy efficiency certificates.

5. INITIATIVES

- In 2024, we have developed the whistleblowing reporting system, which is better explained in the [whistleblowing](#) policy.
- The division of tasks and responsibilities not only of Cogeninfra, but also at the level of the individual companies of the Group, and the double signatures on contracts of particular size;
- Constant communications throughout the year to involve employees in all company initiatives and allow them to be updated also with regard to the management of resources and responsibilities.
- The desire to adopt the Model relating to Legislative Decree 231/2001 [[Annex VII: MODEL 231](#)].

6. RECIPIENTS

The rules contained in the Code of Ethics apply to the Company and its subsidiaries, meaning directly and indirectly controlled companies pursuant to art. 2359 of the Civil Code, who will have to align their activity with the provisions.

In particular, the Code of Ethics binds:

- Directors, Managers, Statutory Auditors, Collaborators and all those who carry out management, management, administration and control functions within the company;
- external collaborators acting in the name and on behalf of the Group and the Group Companies.

7. OBLIGATIONS OF RECIPIENTS

All actions, operations, negotiations and, in general, the conduct implemented by the Recipients in the performance of their work activities must be based on the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect and be open to checks and controls in accordance with current regulations and internal procedures. All activities must be carried out with commitment and professional rigor. Each Recipient must provide adequate professional contributions to the responsibilities assigned and must act in such a way as to protect the prestige of the Group.

The Group's good reputation and/or image is an essential resource for which the Recipients are required to undertake to act in accordance with the principles dictated by this Code in relations between colleagues, customers and third parties in general. Under no circumstances does the claim to act in the interest of the Company and the Group justify the adoption of conduct contrary to those set out above and to laws and regulations.

Each Recipient is required to safeguard the company's assets, safeguarding the Group's movable and immovable assets, technological resources and IT supports, equipment, company products, information and/or know-how. Each Recipient is responsible for protecting the resources entrusted to him or her and has the duty to promptly inform his or her direct managers of potentially harmful events.

8. CONFLICT OF INTEREST

Any situation of conflict of interest between personal or family economic activities and the company duties held or the body to which one belongs must be avoided. It is necessary to carry out exactly the functions and responsibilities held and to avoid all situations and activities in which a conflict with the interests of the Group may arise or that may interfere with the ability to make decisions, in an impartial manner, in the best interest of the company and in full compliance with the principles and contents of the Code of Ethics [[Annex I: CODE OF ETHICS AND BUSINESS CONDUCT](#)];

The Company has not yet adopted internal regulatory instruments that ensure the transparency and correctness, substantive and procedural, of transactions with related parties, but it plans to adopt the Model relating to Legislative Decree 231/2001 [[Annex VII: MODEL 231](#)].

9. RELATIONS WITH STAKEHOLDERS

Relations with the Company's stakeholders, in the context of an anti-corruption policy and a code of ethics, play a crucial role in promoting an environment of integrity and transparency. A company committed to fighting

corruption must establish relationships based on strict ethical principles, clearly communicating its policies and expectations to all stakeholders, including employees, suppliers, customers and business partners. Implementing control and monitoring procedures, as well as promoting training and awareness on ethical issues, helps prevent illegal behavior and maintain the trust of the public and investors. The active involvement of stakeholders in the definition and adoption of ethical practices contributes to creating a solid and responsible corporate environment, promoting sustainable growth and the positive reputation of the Company.

For a company in the energy sector, engaged in district heating and energy efficiency, the relationship with stakeholders must be defined through a holistic and integrated approach, which recognizes the interdependence between corporate operations and the expectations of the community, investors, employees and regulatory authorities. It is essential to develop an engagement strategy that provides for a continuous and transparent dialogue, based on trust and the sharing of relevant information regarding environmental impact, sustainability and technological innovation. Clear communication of company policies on safety, the environment and social responsibility is essential to build and maintain solid relationships. In addition, collaboration with government bodies and non-governmental organizations can facilitate compliance with regulations and promote joint initiatives for sustainable development. Actively listening to stakeholders' concerns and expectations, responding proactively and responsibly, helps the Company identify and manage risks, improve reputation and gain a lasting competitive advantage.

10. IMPLEMENTATION AND MONITORING

It is essential to implement concrete measures put in place to ensure compliance with ethical standards and prevent illegal behavior. The Company must implement an internal control system that includes regular verification procedures, independent audits and continuous monitoring of activities at risk of corruption. It is essential to establish secure and confidential communication channels, such as ethics guidelines or anonymous reporting systems, through which employees and stakeholders can report suspicions of violations without fear of retaliation [WHISTLEBLOWING]. Continuous training of staff on ethical and anti-corruption issues is essential to raise awareness and empower all levels of the organization. In addition, the establishment of clear and proportionate sanctions for violations of the Code of Ethics helps to reinforce the importance of compliance. The adoption of a transparent and responsible approach in the control and review of Business practices ensures the integrity of the Company and protects its reputation.

The Cogeninfra Group is working in this direction to achieve as soon as possible all the necessary forms of control and implementation in accordance with the applicable legislation.

WHISTLEBLOWING POLICY – REPORT MANAGEMENT

Ufficio di riferimento: *HR, LEGAL & GENERAL AFFAIRS DEPT - BUSINESS DEVELOPMENT DEPT - PROCUREMENT & LOGISTICS DEPT*

Contact person: *Ilaria Caruana*

1. DEFINITION

Whistleblowing is the corporate compliance tool for reporting, in a confidential and protected manner, any wrongdoing found by the Whistleblower during his or her activity.

The Whistleblower is a Stakeholder of Cogeninfra [POLICY TO IDENTIFY STAKEHOLDERS] who decides to report an offence, fraud or danger that he has detected during his activity or in the course of his work experience.

As a result, whistleblowing is the practice of reporting violations of laws or regulations, offenses and cases of corruption or fraud, as well as situations of danger to public health and safety.

Anonymous reports are equivalent to ordinary reports.

2. REFERENCE LEGISLATION

- Directive (EU) 2019/1937 [17] and Legislative Decree 24/2023 [18];
- Legislative Decree 231/2001 [15];
- Legislative Decree 24/2023 [38].

3. OBJECTIVE

In addition to the intrinsic value of preventing wrongdoing, the added value of whistleblowing is to involve and raise awareness among employees in the fight against illegality, empowering them and requiring their active participation to improve the Group.

The goal is to strengthen the company control system starting from the first subjects able to promptly detect any anomalies.

4. HOW TO REPORT WRONGDOING

The Whistleblower will be able to report the offence in the dedicated Portal by logging in with their credentials. At the moment we are working to allow this activity in compliance with the regulations. Alternatively, the e-mail box visible only to the reporting manager identified as Dr. Vogliotti (*whistleblowing@cogeninfra.it* read by Dr. Vogliotti) will be available.

The whistleblower must indicate to which Company and/or department of the Cogeninfra Group the report relates and must provide all the elements (the time and place where the fact that is the subject of the report occurred, the description of the fact, the details of the persons concerned and the evidence through exhaustive documentation) useful to allow the reporting manager to proceed with the due and appropriate checks and verifications to verify the validity of the facts signaling.

5. WHAT TO REPORT

- Civil torts;
- Criminal offences;
- relevant unlawful conduct pursuant to Legislative Decree 231/2001 [15];
- irregularity;

- violations of European law with regard to European financial interests, supranational fraud, etc.

6. WHAT WILL NOT BE REPORTED, DISCLOSED OR REPORTED

- Disputes, claims or requests related to a personal interest that relate exclusively to one's individual employment relationships;
- reports of violations where already mandatorily regulated by the acts of the European Union indicated in Part II of the Annex to Directive (EU) 2019/1937 [17];
- reports that are not relevant to the Group and its Companies such as violations of national security, as well as procurement relating to defence or national security aspects;
- the news clearly unfounded;
- information that is already fully in the public domain;
- information acquired only on the basis of rumors or rumors that are scarcely reliable.

7. PROTECTION OF WHISTLEBLOWERS

The reasons that led the person to report, denounce or publicly disclose are irrelevant for the purposes of dealing with the report and protecting against retaliatory measures.

To guarantee the right to manifest freedom of expression and information, to have an effective tool for preventing and combating corruption by promoting the emergence of offences committed and to comply with the relevant legislation, the Whistleblower and the subjects mentioned by him will be protected and protected by ensuring the separation of the identity of the whistleblower from the content of the report.

ENVIRONMENTAL POLICY

Reference office: *TECHNICAL DEPT*

Contact person: *Stefano Pedrini*

1. PRINCIPLES

In line with the corporate philosophy focused on sustainability and the desire to continuously improve the company's ESG performance [ANNEX IV: ESG], the Group is guided by the following fundamental principles:

- environmental protection;
- the continuous improvement of environmental performance;
- pollution prevention and mitigation;
- the mitigation and adaptation of the potential negative effect of environmental conditions on the organization [ANNEX VI: CLIMATE RISK ANALYSIS];
- consultation and participation of workers;
- compliance with legislative compliance obligations and other requirements relating to activities carried out in environmental matters;
- cooperation with public authorities and control bodies.

2. COMMITMENT

- Complying, maintaining and updating the environmental authorizations of the sites;
- keep all plants, all district heating plants and related distribution networks in excellent working order;
- Constantly monitor the working parameters of district heating plants and plants, emissions into the atmosphere, consumption, waste produced [ANNEX V: WASTE MANAGEMENT] and other ESG parameters [ANNEX IV: ESG] to pursue the continuous improvement of environmental performance;
- optimize the use of resources by minimizing waste;
- manage waste deriving from production processes correctly and in accordance with the law, favoring recovery and not disposal as the final destination [ANNEX V: WASTE MANAGEMENT];
- optimize logistics and travel [SUSTAINABLE PROCUREMENT POLICY] and encourage smart working to reduce pollution;
- Increase the trust of the Stakeholders [POLICY FOR IDENTIFYING STAKEHOLDERS] on the company's activities and integrate the companies in the territory by pursuing an open dialogue on environmental issues [POLICY FOR THE MANAGEMENT OF INITIATIVES AND COMMUNITY DEVELOPMENT];
- make themselves available for discussion and cooperation with public authorities and control bodies;
- assess in advance any environmental effects of new activities or processes, adopting the operational measures with the lowest environmental impact;
- engage in raising awareness and spreading a culture based on respect for the environment of employees, suppliers and customers;
- promote the purchase of energy-efficient and sustainable products and services aimed at improving environmental performance;
- to make available the technological, organizational, financial and human resources necessary to achieve the commitments listed above.

3. OBJECTIVES

- Assess for which Group Companies an Environmental Management System is effective and schedule the achievement of ISO 14001 certification for them [20]. To this end, a resource was included at the beginning of 2024 in Cogeninfra Heat Valtellina;
- progressively reduce emissions from Scope 1 and 2;
- increase the group's revenues from renewable sources and efficient district heating;
- implement separate collection in all offices by 2026 [ANNEX V: WASTE MANAGEMENT];
- engage in awareness, education and training of personnel on environmental issues. As part of the first newsletter of 2024 focused on ESG [ANNEX IV: ESG], Cogeninfra wanted to share its vision with environmental issues at the center with its employees;
- encourage the purchase of materials and substances deriving from recycling and recovery processes.

4. EMPLOYEE RESPONSIBILITIES

The objectives can only be achieved through the commitment of all staff aimed at:

- consider environmental protection and rationalization of raw material and energy consumption as integral parts of their work activities;
- observe and understand the procedures and instructions received using the appropriate equipment;
- immediately report any dangerous condition, non-compliance and opportunities to improve environmental, energy and consumption performance;
- participate in awareness, education and training programs organized by the company.

Each worker, according to his or her level in the organization, must assume his or her responsibilities for those environmental aspects over which he or she has control.

OCCUPATIONAL HEALTH AND SAFETY POLICY

Reference office: *TECHNICAL DEPT*

Contact person: *Stefano Pedrini*

The companies of the Cogeninfra Group, in carrying out their activities, consider human health and safety at work an indispensable duty.

1. COMMITMENT

Cogeninfra is committed to:

- make and maintain safe and healthy workplaces by considering safety at work as an integral part of company management;
- protect the health of its workers;
- comply with applicable safety legislation and agreements;
- continuously improve company performance to prevent accidents, injuries or near misses;
- provide the necessary human and instrumental resources;
- inform, train and raise awareness among workers [[POLICY FOR THE TRAINING AND AWARENESS OF PERSONNEL](#)] ON Occupational Health and Safety issues;
- involve and consult workers.

2. OBJECTIVES

In parallel with the project relating to ISO 14001 certification [20] with a start date of 2024 [[ENVIRONMENTAL POLICY](#)], Cogeninfra aims to assess for which Group Companies an Occupational Health and Safety (OSH) Management System (SG) is effective and to schedule ISO 45001 certification [21] for them. By 2026, it is expected to acquire an Integrated Environment and Safety Management System for most district heating plants and plants.

QUALITY POLICY

Reference office: *TECHNICAL DEPT*

Contact person: *Stefano Pedrini*

This document is intended as a tool for the pursuit of business improvement aimed at the satisfaction of customers, its operators and suppliers.

The Group is committed to the search for the effectiveness and efficiency of resources and all those activities that have a direct influence on the quality of the services provided to customers.

1. OBJECTIVES

- optimize production and management processes, through the modernization and updating of plants and services performed, to improve productivity efficiency, minimize costs and provide increasingly high-quality services;
- to meet the expectations of its customers;
- continuously monitor production processes and administration activities through checks, inspections and discussions with employees;
- involve and train staff in order to maintain and increase the knowledge and skills necessary to carry out the activities [[STAFF TRAINING AND AWARENESS RAISING POLICY](#)];
- manage relations with Stakeholders [[POLICY TO IDENTIFY STAKEHOLDERS](#)]: develop a system of relations with suppliers [[SUSTAINABLE PROCUREMENT POLICY](#)] and collaborate with them to improve their performance.

ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT

Reference office: *HR, LEGAL & GENERAL AFFAIRS DEPT*

Contact person: Editor

This Code of Business Conduct stems from the desire to share and respect the principles that reflect the highest standards of ethics and integrity in terms of business conduct and is based on the Human Rights Protection Policy [HUMAN RIGHTS PROTECTION AND PROTECTION POLICY].

1. ETHICAL WORK ENVIRONMENT

- as an employer, Cogeninfra values the contribution of its employees and ensures that everyone has equal opportunities to succeed in a diverse, inclusive and respectful work environment [DIVERSITY, EQUITY AND INCLUSION POLICY];
- Cogeninfra employees are required to interact with customers, business partners and colleagues in a respectful and ethical manner at all times;
- Cogeninfra is also committed to ensuring a work environment free of discrimination and harassment of any kind.

2. CONFLICT OF INTEREST

- Cogeninfra employees are required to avoid all situations of conflict of interest, defined as situations in which the objective and impartial judgment of the employee is hindered by personal, economic, political considerations, etc.;
- Cogeninfra employees are also required to report to the Management any potential conflict of interest also found through whistleblowing [WHISTLEBLOWING POLICY – REPORT MANAGEMENT].

3. CORRUPTION

- Cogeninfra will act in accordance with all relevant anti-corruption laws and regulations [ANTI-CORRUPTION POLICY – CODE OF ETHICS];
- Cogeninfra employees are required to refuse and report all bribes and/or gifts (with the exception of "small gifts") from customers, suppliers, public officials and business partners. Cogeninfra employees are also required to refrain from offering bribes and/or gifts (with the exception of "small gifts") to customers, suppliers, public officials and business partners.

4. COMPETITION

- Cogeninfra operates in a liberalized market and does not hold any legal monopoly;
- in this context, Cogeninfra will comply with applicable competition laws and regulations;
- Cogeninfra employees are therefore required to refrain from engaging in anti-competitive behaviour.

5. PROTECTION OF THE ASSETS OF THE COMPANY COGENINFRA

- Cogeninfra employees are required to act to protect, to the best of their ability, the company's assets, including physical, intellectual and electronic or digital property;
- employees are also required to comply with the Company's confidentiality requirements.

6. TRANSPARENCY AND DISCLOSURE OF INFORMATION

- Cogeninfra will strive to achieve the highest possible level of transparency. This could involve the public disclosure of information (e.g., policies, guidelines, etc.) and consultation with key external stakeholders. [STAKEHOLDER IDENTIFICATION POLICY].

7. PRIVACY AND DATA PROTECTION

- Cogeninfra will comply with local data privacy regulations in the countries in which it operates. Undertakes to manage and protect confidential information and to use it appropriately;
- in addition, Cogeninfra will implement all the necessary procedures to manage personal information (of employees, customers or business partners) in order to comply with the GDPR [22][23].

ANNEX II: CODE OF CONDUCT FOR SUPPLIERS

Reference office: *PROCUREMENT & LOGISTIC DEPT*

Contact person: *Simona Lomartire*

1. SOURCE OF PERSONAL DATA

The personal data processed by the Cogeninfra Group are collected directly from the data subject or from the offices of Cogeninfra S.p.A.

2. DATA CONTROLLER

The Data Controller is Cogeninfra S.p.A., with registered office in Via Tetti dell'Oleo, 17/25 - 10071 Borgaro Torinese (TO).

3. PURPOSE OF DATA PROCESSING

Personal data are processed as part of the normal activity of issuing and managing payments and collections (in addition to related and instrumental activities) and for the following purposes:

- purposes strictly connected and instrumental to the management of relations with the data subject (e.g. the acquisition of information prior to the conclusion of contracts, the execution of operations on the basis of the obligations deriving from the contract concluded with the data subject);
- purposes related to the obligations deriving from laws, regulations and EU legislation, as well as from provisions issued by authorities legitimated to do so by law and by supervisory and control bodies.

4. RECIPIENTS OF PERSONAL DATA - COMMUNICATION

To carry out part of its activities, Cogeninfra also turns to external parties. To this end, the personal data of the data subject may be communicated to the categories of subjects indicated below:

- subjects who intervene in the performance of the work necessary for the execution of existing relationships with the interested party;
- subjects who intervene for the control and optimization of Cogeninfra's activities (e.g. the auditing firm and consultants), for the control of financial risk and fraud, or for the recovery of credits.

The subjects who carry out the types of activities mentioned above, to whom the data may be communicated, will use the data themselves as "data processors", pursuant to Article 28 of the GDPR [22] [23]. Of course, the procedures aimed at guaranteeing the confidentiality of personal data remain unchanged. A list of these subjects is available at the headquarters of Cogeninfra S.p.A.

5. DISSEMINATION OF PERSONAL DATA

Personal data are not subject to dissemination.

6. CATEGORIES OF DATA PROCESSED

The data processed by Cogeninfra S.p.A. are personal (e.g., personal, fiscal, banking, communication and on-call data).

7. DATA TRANSFER TO A THIRD COUNTRY

Your personal data will be processed within the European Economic Area (EEA). Should the transfer of personal data outside the EEA exceptionally be necessary, such transfer will take place on the basis of an adequacy decision of the European Commission, if applicable, or in the presence of the appropriate safeguards required by the GDPR [22][23].

8. DATA RETENTION PERIOD

The processed data will be stored for the minimum period necessary to achieve the purposes indicated above. In particular, data with tax relevance will be stored for the time provided for by current national legislation [24][25] (to date, 10 years). At the end of this period, the data will be anonymized or deleted where technically possible.

9. LAWFULNESS, NATURE OF THE PROVISION AND CONSEQUENCES OF ANY REFUSAL

The provision of data is a contractual obligation and indispensable to pursue the purposes of the processing indicated above in paragraph 3. Failure to provide the data of the data subject would in fact make it impossible to fulfil the obligations deriving from the contract, as well as from legislative provisions. The processing, pursuant to art. 6 of the GDPR [22][23], is aimed at the execution of a contract to which the data subject is a party or at the execution of pre-contractual measures adopted at the request of the data subject; to comply with a legal obligation to which the Data Controller is subject.

10. METHODS OF DATA PROCESSING

In relation to the purposes indicated, the processing of personal data, in compliance with the law and confidentiality obligations, is carried out through manual processing, IT and telematic tools, with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data themselves (even in the case of the use of remote communication techniques).

11. RIGHTS OF THE DATA SUBJECT

The data subject has the right to ask the Data Controller for access to their personal data (art. 15 GDPR), their rectification (art. 16 GDPR), their deletion (art. 17 GDPR), the limitation of their processing (art. 18 GDPR), to receive notification in the event of rectification or deletion (art. 19 GDPR); you also have the right to object to their processing (art. 21 GDPR) and to request their portability (art. 20 GDPR) by contacting: Cogeninfra S.p.A., Via Tetti dell'Oleo, 17/25 - 10071 Borgaro Torinese (To). The data subject has the right to lodge a complaint with the Guarantor for the protection of personal data. The use of automated decision-making processes, including profiling pursuant to art. 22 GDPR.

12. SYSTEMS AND ACCESS TO THE COGENINFRA NETWORK

Access to Cogeninfra's systems and data is limited only to systems and data approved by Cogeninfra and necessary for the performance of the agreed services. Any representative of the supplier authorised to access Cogeninfra's systems shall comply with this Cogeninfra acceptable use policy which will be provided and available to such interlocutor. Any attempt to access data without authorization to the supplier constitutes a violation of Cogeninfra's security policy. If Cogeninfra becomes aware of a representative of the supplier attempting to access systems for which it is not authorized, Cogeninfra will take immediate action, which may include:

- a) the removal of the supplier's representative from Cogeninfra's premises;

- b) termination of access by the supplier's representative;
- c) the termination of the supplier's service contract with Cogeninfra.

Access codes and passwords cannot be shared or communicated to anyone other than those to whom they have been assigned access. Sharing these credentials may result in termination of the access of the supplier's representative(s) and the supplier's service contract with Cogeninfra. All extranet connections (i.e., those connections that are not physically located on or within a Cogeninfra site) must have a Cogeninfra approved security plan on file before the connection can be established and used. All hardware owned by Cogeninfra and/or hardware provided by the supplier used by the supplier to access Cogeninfra's systems (including via remote access) will be subject to a systems hardening review and vulnerability testing conducted by Cogeninfra's IT security teams and, if necessary, Cogeninfra may require the addition of measures or changes in configurations to ensure that the devices meet the security requirements of Cogeninfra. Cogeninfra.

The above requirements should not be considered as a limitation, in any way, of any representations, warranties or covenants regarding IT, data security and confidentiality included in any agreement between the supplier and Cogeninfra.

ANNEX III: CODE OF CONDUCT FOR CUSTOMERS

Reference office: *BUSINESS DEVELOPMENT DEPT – FINANCE DEPT*

Contact person: **Giorgia Baudone**

1. PERSONAL DATA CONTROLLER

Cogeninfra S.p.A., with registered office in Via Tetti dell'Oleo, 17/25 – 10071 Borgaro Torinese (TO), in its capacity as Data Controller, will process your personal data in accordance with the provisions of the applicable legislation on the protection of personal data and this policy.

Contact details: 011 4501466 – privacy@cogeninfra.it

2. SOURCE FROM WHICH THE PERSONAL DATA ORIGINATES

The personal data processed by the Data Controller, necessary for the execution of the contract, are directly provided or legitimately collected and failure to provide them prevents the contractual relationship from being carried out.

3. CATEGORIES OF DATA PROCESSED

The following categories of data are processed:

- identification and personal data (e.g. name, surname, tax code, address, date and place of birth);
- contact data (e.g. telephone numbers, landline and/or mobile, e-mail address);
- bank details (e.g. IBAN);
- information on solvency (e.g. reminders, unpaid payments, interest calculation, repayment plans);
- financial data relating to payments, their periodic trend, debt exposure, including residual debt, and the accounting status of the relationship;
- data relating to credit recovery activities or disputes;
- other data attributable to the categories indicated above (e.g. cadastral data).

4. PURPOSE OF THE PROCESSING AND LEGAL BASIS

Pursuant to EU Regulation 2016/679 [22], the processing of personal information is based on the principles of correctness, lawfulness, transparency and protection of confidentiality. Personal data are processed for the following purposes:

- a) purposes strictly connected and instrumental to the management of contractual and pre-contractual relations with the Data Subject (e.g.: acquisition of preliminary information at the conclusion of contracts, execution of operations on the basis of the obligations arising from the contract concluded with the Data Subject, for invoicing and delivery of invoices also through delivery agencies, for the collection of arrears, for the sending of IT supports to banks and for the investigations necessary for the evaluate the degree of customer satisfaction, for administrative needs);
- b) for the purpose of controlling the risks arising from the management and execution of contracts with the data subject;
- c) marketing purposes, i.e. sending advertising material, direct sales, market research or commercial communication of products and/or services offered by Cogeninfra S.p.A. This activity may be carried out by sending advertising, promotional or commercial material and/or invitations to participate in initiatives, loyalty programs, competitions and/or prize operations carried out using "traditional" methods (for example,

paper mail and/or calls with an operator), or through "automated" contact methods (e.g. e-mail, SMS, instant messaging services);

- d) for the purpose of analysing consumer habits and choices (profiling for marketing purposes), with the aim of offering personalised products and services;
- e) purposes related to the obligations imposed by laws, regulations and EU legislation and for civil, accounting and tax purposes;
- f) defend a right in court and prevent and/or detect any fraudulent activities;
- g) carry out maintenance and implementation of IT systems;
- h) send commercial communications aimed at the promotion and/or direct sale of products or services similar to those purchased or used by the Data Subject, using the e-mail coordinates indicated on such occasions and the paper mail addresses provided by the Data Subject, without prejudice to the right of the Data Subject to object at any time in the manner indicated at the bottom of the communication or at the contact details indicated in the following paragraph "Rights of the Data Subject". Data Subjects" for the exercise of the rights referred to in art. 15 et seq. of EU Regulation 2016/679 [22] (so-called "soft spam").

The legal basis justifying the processing is:

- for the purposes referred to in letters a) and g) by the performance of a contract to which the data subject is a party or by the execution of pre-contractual measures adopted at the request of the same (Article 6, paragraph 1, letter b) of EU Regulation 2016/679 [22]);
- for the purpose referred to in letter e) by the fulfilment of a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c), EU Regulation 2016/679 [22]);
- for the purposes referred to in letters b), f) and h), by the pursuit of the legitimate interest of the Data Controller (Article 6, paragraph 1, letter f), EU Regulation 2016/679 [22]);
- for the purposes referred to in letters c) and d) by the freely expressed consent of the data subject (art. 6, par. 1, letter a), EU Regulation 2016/679 [22]).

5. NATURE OF THE PROVISION AND CONSEQUENCES OF ANY REFUSAL

The provision of personal data is mandatory and indispensable to pursue the purposes of the processing indicated in paragraph 4, letters a), b), e), f) and g) above. Failure to provide and process the Data Subject's data would in fact make it impossible to fulfil the obligations arising from the contract.

The provision of personal data for marketing and profiling purposes only is optional. Failure to provide data does not prevent the contractual relationship from being carried out, but precludes the Data Controller from sending communications of a commercial nature.

6. PROCESSING METHODS

The processing is carried out by authorized personnel in the performance of their activities, with or without the aid of electronic tools, according to principles of lawfulness and fairness in order to protect the confidentiality and rights of the interested party at all times.

Marketing activities can be carried out through traditional contact methods, such as paper mail and telephone calls with an operator, or with automated contact methods, such as e-mail, SMS, instant messaging services.

7. DATA RETENTION PERIOD

Your data will be stored for the time necessary to achieve the purposes for which they are processed and in particular:

- the data necessary for the management of the contract will be deleted after 10 years from the termination of the contractual relationship or service provided;
- the data processed for exclusive marketing purposes (not strictly necessary for the management of the contract) will be kept for 24 months from the collection/updating of the data and, in any case, from the last service performed in favour of the Customer;
- The data processed for exclusive profiling purposes, subject to specific consent, will be stored for 24 months from the collection of the same.

8. CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED

Personal data relating to the processing may be communicated for the above purposes to:

- a) subjects, including external ones, who intervene in the performance of services strictly necessary for the execution of existing contractual relationships with the data subject (by way of example: parent companies, subsidiaries and associates, banks, banking institutions, financial intermediaries, insurance companies, law firms, accounting firms, reading agencies, press and enveloping agencies, delivery agencies, service contractors, etc.);
- b) subjects (by way of example: Agencies), appointed as data processors, to whom Cogeninfra S.p.A. has entrusted the tasks of promotion and related assistance to customers to facilitate the conclusion of contractual relationships with the Data Controller;
- c) subjects who intervene for the control and optimization of the activities of Cogeninfra S.p.A. (by way of example: financial statement certification companies, quality system control, supervisory bodies, consultants, etc.), for the control of financial risk and fraud, for the recovery, sale and protection of credits, to pursue a legitimate interest of the Data Controller;
- d) public bodies for communications and compliance with laws, regulations, EU legislation (for example: Chambers of Commerce, Region, Municipalities, sector authorities, etc.).

These subjects will act as Data Controllers or Data Processors, as the case may be. The data, in any case, will not be disseminated (made available to unspecified subjects).

9. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY

Your personal data will be processed within the European Economic Area (EEA). Should the transfer of personal data outside the EEA exceptionally be necessary, such transfer will take place on the basis of an adequacy decision of the European Commission, if applicable, or in the presence of the appropriate safeguards required by the GDPR [22][23].

10. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15 – 22 of the GDPR [22], in relation to the personal data processed, the data subjects have the right to ask the Data Controller:

- confirmation as to whether or not personal data is being processed and, if so, to obtain access to it (right of access); rectification of inaccurate personal data or completion of incomplete personal data (right to rectification);
- the deletion of the data if one of the reasons provided for by the Privacy Regulation exists (right to be forgotten);

- the limitation of processing when one of the hypotheses provided for by the Privacy Regulation occurs (right to limitation);
- to receive the personal data provided to the Data Controller in a structured, commonly used and machine-readable format and to transmit such data to another Data Controller (right to portability);
- to object at any time to the processing carried out for the pursuit of a legitimate interest of the Data Controller and for marketing and profiling purposes (right to object);
- to revoke any consent to the processing of data, at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

The consent given for carrying out marketing activities with automated contact methods (e.g. e-mail, SMS, instant messaging services) also extends to traditional contact methods (paper mail or telephone call with an operator). Similarly, the objection to the performance of marketing activities with automated contact methods also extends to traditional contact methods.

To exercise the above rights, the data subject may contact the Data Controller at the e-mail address referred to in point 1.

The data subject has the right to lodge a complaint with the data protection supervisory authority, in particular in the EU state where he or she resides. In Italy, the supervisory authority is the Italian Data Protection Authority with headquarters in Piazza Venezia, n. 11, Rome (00187), www.gpdp.it – www.garanteprivacy.it, telephone 06-696771, E-mail: protocollo@gpdp.it or protocollo@pec.gpdp.it.

ANNEX IV: ESG

Reference office: *TECHNICAL DEPT*

Contact person: *Laura Folcolini*

1. SCOPE AND FRAMEWORK

The acronym **ESG** refers to the three fundamental themes, i.e. literally Environmental, Social and Governance. ESG is a way of systematizing quantitative and qualitative information related to sustainability issues by referring to a specific system of criteria.

The 17 ambitious goals (SDGs) of the 2030 Agenda [12] that cover and summarize the entire sustainable development by providing a shared, rich and operational definition, are included in the 3 dimensions of ESG:

- **Environmental**

It encompasses all that is the environmental impact of the company; therefore, it includes efforts aimed at reducing greenhouse gas emissions and pollution, with attention to climate change and its mitigation [ANNEX V: CLIMATE RISK ANALYSIS to be drawn up by September 2024]. In addition, attention is paid to the correct management of waste, water resources and methods of optimizing energy efficiency intended to reduce consumption [ENVIRONMENTAL POLICY]. In relation to the Group's business, this first dimension of sustainability represents the core of the business and Cogeninfra is convinced of its indispensability.

- **Social**

It represents the way in which the Company develops and weaves its relationships with its internal and external Stakeholders [POLICY FOR IDENTIFYING STAKEHOLDERSS] and is committed to the constant improvement of the quality of the latter. The Company is therefore required to raise awareness of compliance with issues concerning health and safety at work, respect for human rights [POLICY FOR THE PROTECTION AND PROTECTION OF HUMAN RIGHTS] AND THE IMPACTS ON LOCAL COMMUNITIES [POLICY FOR THE MANAGEMENT OF INITIATIVES AND COMMUNITY DEVELOPMENT].

- **Governance**

It is the driving dimension of the two listed above. The achievement of a good governance structure allows the Group companies to create value in the short, medium and long term through the complex of structures, rules, strategies and choices that govern the leadership of Cogeninfra.

ESG criteria intersect all the policies of the Cogeninfra Group.

2. PURPOSE

Cogeninfra has made the choice to align all its corporate practices and actions with environmental, social and governance (ESG) criteria to:

- make a positive impact on the world by engaging in environmental sustainability, social well-being and good governance;
- the improvement of the reputation, public image and credibility of the Group and its Companies;
- encourage dialogue with investors and stakeholders;
- more easily identify risks and opportunities for innovation and continuous improvement in order to create new value, not only for the Group but also for the Stakeholders;
- to promote and increase the competitiveness of the Group Companies;
- attract the right talent to the company (talent attraction);
- achieve the highest standards in terms of health and safety at work and the quality of the service provided.

3. COMMITMENT

Cogeninfra is committed to:

- promulgate and disseminate to employees and stakeholders the ESG criteria to which it adheres and in which it believes;
- make decisions and make internal changes in line with these criteria;
- achieve the highest international management standards (achieve UNI ISO certifications suitable for your business).

Specifically, the ESG policy, representing sustainability, conditions all the Group's choices and policies, divided as follows:

- Environmental
- [ENVIRONMENTAL POLICY], [ANNEX VI: CLIMATE RISK ANALYSIS to be written by September 2024] and the monitoring of Scopes 1, 2 and 3 [4];
- Social
- [HUMAN RIGHTS PROTECTION AND PROTECTION POLICY], [DIVERSITY, EQUITY AND INCLUSION POLICY], [STAFF TRAINING AND OUTREACH POLICY], [COMMUNITY INITIATIVE AND DEVELOPMENT MANAGEMENT POLICY], [STAKEHOLDER IDENTIFICATIONPOLICY] and [ANNEX I: CODE OF ETHICS AND BUSINESS CONDUCT];
- Governance
- [SUSTAINABLE PROCUREMENT POLICY], [ANTI-CORRUPTION POLICY - CODE OF ETHICS], [WHISTLEBLOWING POLICY - WHISTLEBLOWING MANAGEMENT - WHISTLEBLOWING MANAGEMENT], [OCCUPATIONAL HEALTH AND SAFETY POLICY], [QUALITY POLICY], [ANNEX II: CODE OF CONDUCT FOR SUPPLIERS], [ANNEX III: CODE OF CONDUCT FOR CUSTOMERS], [ANNEX VII: MODEL 231 to be written by 2026] and transparency in the commitment to the communication of ESG objectives.

4. EMPLOYEE RESPONSIBILITIES

Cogeninfra is responsible for providing all the tools in order to involve all employees in the evolution brought about by ESG criteria. The Group is aware that, in order to achieve all the objectives set, it is essential for all its employees to adhere to this project.

"Company addresses and policies - collection of rules and guidelines of the Cogeninfra Group" will be available in each Group Company and on the website. For any clarification, the Editor or the person or office pertaining to each policy is available.

ANNEX V: WASTE MANAGEMENT

Reference office: *TECHNICAL DEPT*

Contact person: *Stefano Pedrini*

1. DEFINITIONS AND LEGISLATION

As defined in Article 183 of Part IV of Legislative Decree 152/2006 [19], waste is defined as any substance or object that the holder discards (objective action), has decided (subjective action) or is obliged to discard (by law). The term discarding indicates, in any case, sending it to a final destination that is recovery or disposal. Not all substances are waste and the exclusions are specified in Article 185 of Part IV of Legislative Decree 152/2006 as amended. [19] such as emissions from gaseous effluents emitted into the atmosphere (point a) and waste water (point g).

Also according to Article 183, the *holder* means the producer of the waste, the person whose activity has produced waste, i.e. the initial producer (the person to whom such production can be legally referred) and the person who has carried out pre-treatment, mixing/mixing or other operations that have changed the nature or composition of said waste (new producer), or the person who holds them.

The *European List of Waste* is a harmonised and non-exhaustive list of all types of waste contained in Annex D of Part IV of Legislative Decree 152/2006 [19], updated by Legislative Decree 77/2021 [27] and converted with amendments by Law 108/2021 [28]. It consists of the numerical sequences of **EER** codes (formerly called CER – European Waste Catalogue [30]) consisting of six digits joined in pairs (XX XX XX). The first two digits are the division of the list into 20 chapters. Chapters 01 to 12 and 17 to 20 are called "vertical" or "process" and chapters 13, 14, 15 and 16 are called "horizontal" or "commodity". Below are the chapters most used by the Group Companies:

- 08** waste from the production, formulation, supply and use of coatings (paints, varnishes and glazed enamels), adhesives, sealants and printing inks;
- 13** spent oils and residues of liquid fuels (except fuel oils and oils referred to in Chapters 05, 12 and 19);
- 14** organic solvents, refrigerants and waste propellants (except 07 and 08);
- 15** packaging waste, sanitary napkins, rags, filter materials and protective clothing (not otherwise specified);
- 16** waste not otherwise specified in the list;
- 17** waste from construction and demolition operations (including soil from contaminated sites);
- 20** municipal waste (household and similar waste produced by commercial and industrial activities as well as by institutions) including waste from separate collection.

Waste can be divided into *hazardous* and *non-hazardous waste* on the basis of Annex I to Part Four of Legislative Decree 152/2006 [19] replaced by Article 39, paragraph 5 of Legislative Decree 205/2010 [30] with reference to Directive 2008/98/EC [31].

In particular, the characteristics that lead a waste to be classified as hazardous are the following (Regulation (EU) No. 1357 of 18/12/2014 [32] which replaces Annex III of Directive 2008/98/EC [31] as of 1 June 2015):

- HP1** Explosive: waste that can, by chemical reaction, develop gases at a temperature, pressure and speed such as to cause damage in the surrounding area (including pyrotechnic waste, explosive organic peroxide waste and explosive self-reactive waste);
- HP2** Oxidizer: waste capable, in general by oxygen supply, of causing or favoring the combustion of other materials;
- HP3** Inflammable:

- liquid waste with a flash point of less than 60 °C or waste of diesel oil, diesel fuels and light heating oils with a flash point of more than 55 °C and less than or equal to 75 °C;
- solid waste and pyrophoric liquid which, even in small quantities, can ignite in less than 5 minutes when it comes into contact with air;
- solid waste that is easily flammable or that can cause or promote a fire by rubbing;
- gaseous waste that ignites in contact with air at 20 °C and at a normal pressure of 101,300 Pa;
- suitable waste that develops flammable gases in hazardous quantities in contact with water;
- flammable aerosols, flammable self-heating waste, flammable organic peroxides and flammable self-reactive waste.

HP4 Irritant – skin irritation and eye lesions: waste whose application may result in skin irritation or eye damage;

HP5 Specific Target Organ Toxicity (STOT) / Respiration Toxicity: Waste that may cause specific target organ toxicity with single or repeated exposure, or cause acute toxic effects following aspiration;

HP6 Acute toxicity: waste that may cause acute toxic effects following oral or dermal administration, or following exposure by inhalation;

HP7 Carcinogenic: waste that causes cancer or increases its incidence;

HP8 Corrosive: waste whose application can cause skin corrosion;

HP9 Infectious: waste containing viable microorganisms or their toxins that are known causes, or rightly believed to be such, of diseases in humans or other living organisms;

HP10 Toxic to reproduction: waste that has harmful effects on the sexual function and fertility of adult men and women, as well as on the development of offspring;

HP11 Mutagenic: waste that can cause a mutation, i.e. a permanent change in the quality or structure of a cell's genetic material;

HP12 Release of acute toxicity gases: waste that releases acute toxicity gases (Acute Toxicity 1, 2 or 3) in contact with water or an acid;

HP13 Waste sensitizer that contains one or more substances known to cause sensitisation effects on the skin or respiratory organs;

HP14 Ecotoxic: waste that presents or may present immediate or deferred risks for one or more environmental compartments;

HP15 Waste which does not directly possess one of the hazard characteristics already mentioned but may manifest it subsequently: waste which contains one or more substances marked with one of the hazard statements or with one of the additional hazard information listed in Table 9, unless it is in such a form that it cannot, under any circumstances, be manifest explosive or potentially explosive characteristics.

Municipal waste, as per Article 183, paragraph 1, letter b-ter and Article 184, paragraphs 1 and 2 of Legislative Decree 152/2006 [19] for the purpose of implementing Part Four of the Decree, is of interest to Cogeninfra:

1. unsorted household waste and separately collected waste (paper and cardboard, glass, metals, plastics, organic waste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators and bulky waste, including mattresses and furniture);
2. mixed waste and separately collected waste from other sources that are similar in nature and composition to the household waste listed in Annex L-quarter produced by the activities listed in Annex L-d;

It is *special waste*, as per Article 184, paragraph 3 of Legislative Decree 152/2006 and subsequent amendments. [19], of interest to Cogeninfra:

- b.** waste deriving from construction, demolition and excavation activities (for the latter, without prejudice to the provisions of Article 184-bis);
- c.** waste produced in the context of industrial processing, if different from that referred to in paragraph 2;
- e.** waste produced in the context of commercial activities, if different from that referred to in paragraph 2;
- f.** waste produced as part of service activities, if different from that referred to in paragraph 2;
- g.** waste deriving from waste recovery and disposal activities, sludge produced by drinking water and other water treatments and wastewater purification, as well as waste from fume abatement, septic tanks and sewerage networks;
- i.** end-of-life vehicles.

2. RESPONSIBILITY

Article 188 of Legislative Decree 152/2006 [19] identifies the holder as the person responsible for the treatment and management of waste. In the case of the presence of intermediaries, traders or bodies or companies that carry out the collection and transport (registered in the National Register of Environmental Managers – ANGA) they are jointly responsible for the waste itself. Liability is excluded only in the following two cases (paragraph 4):

- a.** delivery of waste to the public collection service;
- b.** delivery of waste to persons authorised to carry out recovery or disposal activities, provided that the holder has received the form referred to in Article 193, countersigned and dated on arrival by the consignee, within three months of the date on which the waste was delivered to the transporter, or that, on expiry of that period, the producer or holder has notified the competent authorities of the non-receipt of the form. For transboundary shipments of waste, with reference to the documents provided for by Regulation (EC) 1013/2006 [33], this deadline is increased to six months and the communication is made to the Region or Autonomous Province.

The Group Companies, as producers of hazardous and non-hazardous waste and therefore responsible for their management, ensure compliance with current legislation and use the SNPA guidelines from the production and characterisation of the waste to the final delivery to an authorised plant and undertake to collaborate only with bodies and companies with valid authorisations.

For the correct management of the waste produced, all workers are trained and are responsible, based on their level in the organization, for those environmental aspects over which they have control.

3. THE CLASSIFICATION OF WASTE

For the assignment of the EER code, the following are carried out by levels of investigation:

- 1.** the first level, consisting of the first two digits, refers to the activity that produced the waste, i.e. the industrial category and/or generator of the waste;
- 2.** the second level, consisting of the third and fourth digits, refers to the industrial sub-category relating to the single production process or to the single sub-activity generating the waste;
- 3.** the third level, consisting of the fifth and sixth digits, identifies the specific characteristics and types of waste.

To be better guided in the classification of waste, the SNPA Guidelines (Resolution no. 105/2021 [34]) come in handy, which divide the EER codes into:

- absolute hazards (P);
- absolute non-hazardous (NP);

- dangerous mirror (SP);
- non-hazardous mirror (SNP).

For maintenance activities, the material "removed from work" that is transported for subsequent technical evaluation does not constitute waste.

4. TEMPORARY STORAGE AND PACKAGING OF WASTE

Waste must be deposited in one or more dedicated areas within the company perimeter or at the place of production^{*(1)} of the waste itself. This area is called temporary storage (DT) while waiting for waste to be sent for recovery or disposal according to the following criteria:

- at least quarterly, regardless of the quantities in storage;
- when the total quantity of waste in storage reaches 30 m³, of which a maximum of 10 m³ of hazardous waste;
- in any case, the temporary storage cannot have a duration of more than one year.

The other conditions of the DT are:

- waste containing persistent organic pollutants referred to in Regulation (EC) No 850/2004 [35], as amended, must be deposited in accordance with the technical standards governing the storage and packaging of waste containing hazardous substances and managed in accordance with that Regulation;
- temporary storage must be carried out for homogeneous categories^{*(2)} of waste (with a ban on mixing) and in compliance with the relevant technical standards, as well as, for hazardous waste, in compliance with the rules governing the storage of hazardous substances contained therein;
- the rules governing the packaging and labelling of hazardous substances must be complied with;
- the obligation to keep the Loading and Unloading Register (R C/S).

5. WASTE TRANSPORT

The Group Companies interface only with transporters regularly registered in the National Register of Environmental Managers (ANGA) for the category in relation to the specific type of activity. A copy of the transporters' authorisations is kept in the company.

6. THE CHOICE OF THE RECIPIENT

Cogeninfra collaborates only with recipients authorised to recover or dispose of the activities and any intermediaries regularly registered with the ANGA in category 8.

The Group's goal is to prioritise as much as possible the choice of allocating the waste produced to recovery activities and to optimise the number of transports to minimise fuel consumption.

7. REDUCTION OF WASTE PRODUCTION

Cogeninfra aligns itself with the waste treatment hierarchy established by art. 179 c. 1 of Legislative Decree 152/2006 [19] according to which prevention must be implemented by promoting the reduction of waste production and hazardousness and facilitating reuse, recycling and other recovery operations. Finally, there is disposal considered the residual operation and to be chosen only if there are no other opportunities.

The five Rs of the circular economy:

- **Reduction** consists in using fewer resources trying to minimize waste and implementing small measures that add up to have a considerable weight on a large scale:

- optimize transport and avoid empty runs;
 - minimize the use of packaging and if necessary reuse it for other shipments;
 - avoid choosing disposable equipment;
 - carry out routine maintenance at a fixed interval to avoid breakdowns, breakages or accidents as much as possible and therefore a greater production of waste;
 - optimize and monitor the use of resources to research possible solutions to reduce waste;
 - Collaborate with suppliers and business partners who embrace the circular economy.
- *Reuse* applicable above all in maintenance both in favoring the restoration of the functions of the object or machinery rather than replacement and in the careful evaluation of objects, equipment, components, parts or machinery to be replaced;
 - favour a destination plant that carries out **Recycling** (any operation through which waste is treated to obtain products, materials or substances to be used for their original function or for other purposes);
 - *separate waste collection* to be carried out in the offices, but also in the Group's plants;
 - *Energy recovery* with regard to those materials that cannot be reused or recyclable.

*⁽¹⁾ Pursuant to Article 183 of Legislative Decree 152/06 [19], the place of production means not only the place where the waste is produced, but also the place that is at the disposal of the manufacturing company and in which it is deposited, provided that it is functionally connected to the place of production.

*⁽²⁾ According to the Judgment of the Cass. Pen. 11492/2015 [36] "for the purposes of verifying the requirement of homogeneity of the categories of waste, required by art. 183, paragraph 1, letter bb), no. 3, Legislative Decree no. 152/2006 for the integration of the case of temporary storage, it should be noted that these categories are not identifiable sic et simpliciter with the classification referred to in art. 184, Legislative Decree no. 152/2006 (urban and special, hazardous and non-hazardous waste), but constitute specification and precise technical identification (connoted by a specific CER code), so that the homogeneity of the same must also be verified in the same terms". In the absence of an explicit and unambiguous position on the part of legislation and jurisprudence, it can reasonably be argued that homogeneous categories can be identified starting from the EER codes assigned to waste, or a single criterion can be chosen for all hazardous and one for non-hazardous. It is essential that the producer classifies the waste before carrying out the temporary storage. The case law limits itself to specifying that the abandonment of waste "in bulk" does not constitute a deposit for homogeneous categories, with the consequent exclusion of the configurability of the relevant case and integration, on the other hand, of the crime of illegal landfill management (Cass. Pen. 6985/2014 [37]).

ANNEX VI: CLIMATE RISK ANALYSIS

Reference office: *TECHNICAL DEPT*

Contact person: *Laura Folcolini*

DRAFTING OF THE DOCUMENT EXPECTED BY SEPTEMBER 2024

ANNEX VII: MODEL 231

Reference office: *TOP MANAGEMENT - HR, LEGAL & GENERAL AFFAIRS DEPT*

Contact person: *Ilaria Cannata - Francesco Vallone*

DRAFTING OF THE DOCUMENT EXPECTED BY 2026

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[2]

REGULATION (EU) 2019/1238 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 June 2019 on the pan-European Personal Pension Product (PEPP), Chapter 1, Article 2.

[3]

DIRECTIVE (EU) 2022/2464 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting.

[4]

GreenHouse Gas (GHG) Protocol taking as a reference the website: <https://ghgprotocol.org/>.

[5]

"Universal Declaration of Human Rights" (UDHR) 10 December 1948, United Nations (UN) General Assembly.

[6]

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