

2023



NON-FINANCIAL
STATEMENT

Pursuant to Italian Legislative Decree 254 of 2016

For information or comments about this document, please send an e-mail to sustainability@dolomitienergia.it

On the cover and inside: One Group, many faces – Dolomiti Energia Group Archive

NON-FINANCIAL STATEMENT 2023

Pursuant to Italian Legislative Decree 254 of 2016

Sustainability is not 'feel good fluff': today it is one of the strongest levers for being competitive.

The power of sustainability in the hands of people is the only possible future.

Sustainability is our calling, our distinctive and natural sign.

It is a commitment that guides every action, every day.

Every single action is essential in moving towards a shared direction.

A challenge that requires everyone's involvement.

Because today sustainability is no longer an option, it is a priority.

We at the Dolomiti Energia Group have chosen to commit ourselves first, providing everyone with the tools to be the major players of a sustainable future, which is not a distant ambition, but a goal we can believe in.



Silvia Arlanch
Chairperson



LETTER TO STAKEHOLDERS

Dear Stakeholders,

CHANGE requires consensus, and consensus must first come from individuals, from society and then from companies who find themselves deciding whether sustainability is something they WANT or MUST pursue because the market - which reflects consumer choices (and the financial system) - imposes it on them.

The Dolomiti Energia Group WANTS to walk in the wake of sustainability and then some: with its **new Vision** it is declaring its desire to be an active part of this process.

The power of sustainability in the hands of people is the only possible future.

As a player on the market, the Dolomiti Energia Group wants to become an 'empowerer' for all stakeholders and people in the value chain.

Empowerment is a process of acquiring power, of increasing individuals' possibilities to have control of their own lives. When a person develops their empowerment, they move from a condition of weakness to one of strength, developing skills and abilities to manage difficulties. The concept of personal empowerment is based on stimulus, bolstering people so that they feel they have the strength and power to actively intervene.

And the Dolomiti Energia Group wants to have this role vis-a-vis its customers: it wants to be a facilitator, an enabler in developing first the attitude and then the skills in each of us, and finally providing the tools to be an actor in the energy transition.

In 2023 we also reviewed the values of the Group: values represent the base, the foundations of common action and only if shared can they represent the solid basis for promoting the right behaviour to achieve our goals.

Listening, Expertise, Synergy and Innovation.

Our Group is evolving, and this movement and dynamism are not only focused externally, but also internally. Training as a solid basis for facing everyday life with competence and confidence, but also with a new mindset that puts people at the centre, along with their growth as individuals and as a community.

The challenges that have emerged in recent years have accelerated the need to focus on innovation as a tool for the energy transition, leading the Dolomiti Energia Group to invest in digitalisation, artificial intelligence, to make business processes more efficient and effective and thus have a positive impact on costs and consequently on our customer.

The commitment to digitalisation is nothing new. However, it is important to emphasise the importance of digitalisation as an integral process in the transition towards a sustainable economy. Our commitment continues in the use of applications that go in this direction, such as digital twin for the monitoring and predictive maintenance of energy networks, gas distribution networks and the optimisation of water resources. One of the most interesting applications of the Internet of Things (IoT) is the Smart Grid, used to create smart electricity networks and use smart meters that allow the real-time measurement of consumption and efficient energy management.

The Group defined its strategic plan in 2023 with precise guidelines, which also include the definition of specific strategic initiatives necessary for achieving the Group's objectives.

These guidelines include 'Environmental and social sustainability' and 'People at the centre', two precise and strong orientations that we find throughout our narrative.

We do not want to confuse narrative with reality, we do not want to simply make proclamations: we produce energy only from renewable sources, at present water and in the future sun and wind, as defined in the new strategic plan approved for the next few years (2023-2027), and we only sell certified green energy on the free market, a choice we had already made in 2017, as very early precursors of a trend.

In particular, with respect to wind, the Group signed a purchase agreement in October 2023 for a company that owns two wind farms in Apulia and whose management was entrusted to the newly established subsidiary Dolomiti Energia Wind Power S.r.l.

The Dolomiti Energia Group was again included in the list of companies known as 'Sustainability Leaders 2023', prepared by Statista in cooperation with Il Sole24Ore. Numerous Italian companies were analysed within the study in relation to the three ESG dimensions: environmental, social and economic, as well as business governance.

With the desire to continue promoting a society suitable for everyone and building a fairer, more welcoming world for all, this year the Group has again confirmed the eco-solidarity offers Etika and Sinergika, the first specifically for the citizens of Trentino, the second for the remaining part of Italy. These gas and electricity offers allow Dolomiti Energia to donate €10 every year, at no additional cost, to support solidarity projects that improve the lives of the most vulnerable people and their families.

In order to address the climate crisis, it is necessary to commit to methods for preventing and managing climate risks, as well as the transition towards an economy with low greenhouse gas emissions. As is known, fossil fuels are the main cause of global warming, and reducing their use is essential to limit the increase in gases responsible for the greenhouse effect.

Dolomiti Ambiente made significant progress in 2023 in the transition towards electric mobility: the electrification of the waste collection fleet is an ambitious objective indicative of a tangible commitment towards environmental sustainability. The choice to use electric vehicles for planned short-distance itineraries is consistent with the characteristics of electric mobility, offering benefits for both the environment and for the operators themselves. The same objective has been achieved by confirming the experiment to install automatic bag dispensers for waste collection in the municipality of Rovereto. In fact, the experiment's objectives included reducing the production of CO₂ within the process of distributing the annual amounts of waste collection bags to users, and reducing the printed materials sent to citizens.

Lastly, the ESG Department was established in 2023, which reports to the Chairman, and we are already working on drafting the Sustainability Plan for the period 2024-2027.

Some Plan actions have already been introduced, with the aim of promoting our commitment to the current and future challenges related to operational business and the well-being of our employees. The Group has introduced a voluntary process aimed at achieving the Family Audit certification for all Group companies and the certification relating to Gender Equality, starting from Dolomiti Energia Holding and Dolomiti Energia S.p.A.

The society of the future is called upon to implement the decarbonisation path of economies, while at the same time guaranteeing energy security. Today, 'in a context of growing environmental and social challenges, the energy system's enabling role for human progress takes on unprecedented importance' and the Dolomiti Energia Group will staunchly continue to make its contribution in this direction.

Chairperson
Silvia Arlanch



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THE DOLOMITI ENERGIA GROUP



980,000 tonnes

of carbon dioxide avoided through
100% green energy supplies
(932,000 tonnes in 2022)



1544

people
(1,424 in 2022)



3,119.15 GWh

energy produced
(2,250.68 GWh in 2022)



82.3%

average separate waste
collection (Trento Rovereto)
(82,1% in 2022)



97%

energy fed into the grid from
renewable sources
(93% in 2022)



63.8%

public shareholders



2,341 million

total revenue and other income
(€3,354.3 million in 2022)



115.4 million

in investments
(97,6 million in 2022)

17 PARTNERSHIPS
FOR THE GOALS



8 DECENT WORK AND
ECONOMIC GROWTH





1.1

WHO WE ARE

GRI 2-1 | GRI 2-6 |

The Dolomiti Energia Group was created over 20 years ago with the name Trentino Servizi, from the merger of SIT and ASM, the historical public service companies of Trento and Rovereto; over the years it has welcomed new industrial entities and new shareholders, growing to become the union of entities that it is today.

The Group has considerably grown over the last 20 years, starting from Trentino (which is why the name pays homage to the Dolomites) and arriving, with the offshoots of some companies, to reach all of Italy. That is why it is important to tell all stakeholders what the Group means when it talks about Territory.

TERRITORY IS EXTENDED GEOGRAPHY.

Trentino is the Group's land of origin, but its gaze goes beyond the crystalline lakes and magnificent mountains to include a broader horizon. The geographical territory is only a starting point towards new landscapes, new connections.

TERRITORY IS AN EXTENDED COMMUNITY.

The Trentino people are the first community of the Dolomiti Energia Group, and being an integral part of their life and expression of their way of being is a source of great pride for the Group: tireless workers attentive to their surroundings, energetic, caring and reliable. Wherever someone who recognises themselves in this feeling may be, even outside Trentino, they are part of the Dolomiti Energia community.

TERRITORY IS A SHARED VISION.

The Group loves its Trentino origins, but it also loves the Earth. It is thus committed to preserving and protecting resources, adopting sustainable energy practices, and restoring well-being to people. It doesn't do it just for itself: it wants to inspire others to do the same, it seeks to give everyone the tools, so that everyone can contribute.

For this reason, when we talk about Territory we are not referring to a closed geography, or to a static community, or to an interest merely within the context of the Group. When we talk about Territory, we are talking about an ideal place in which to meet those who share the vision of a broader common good.

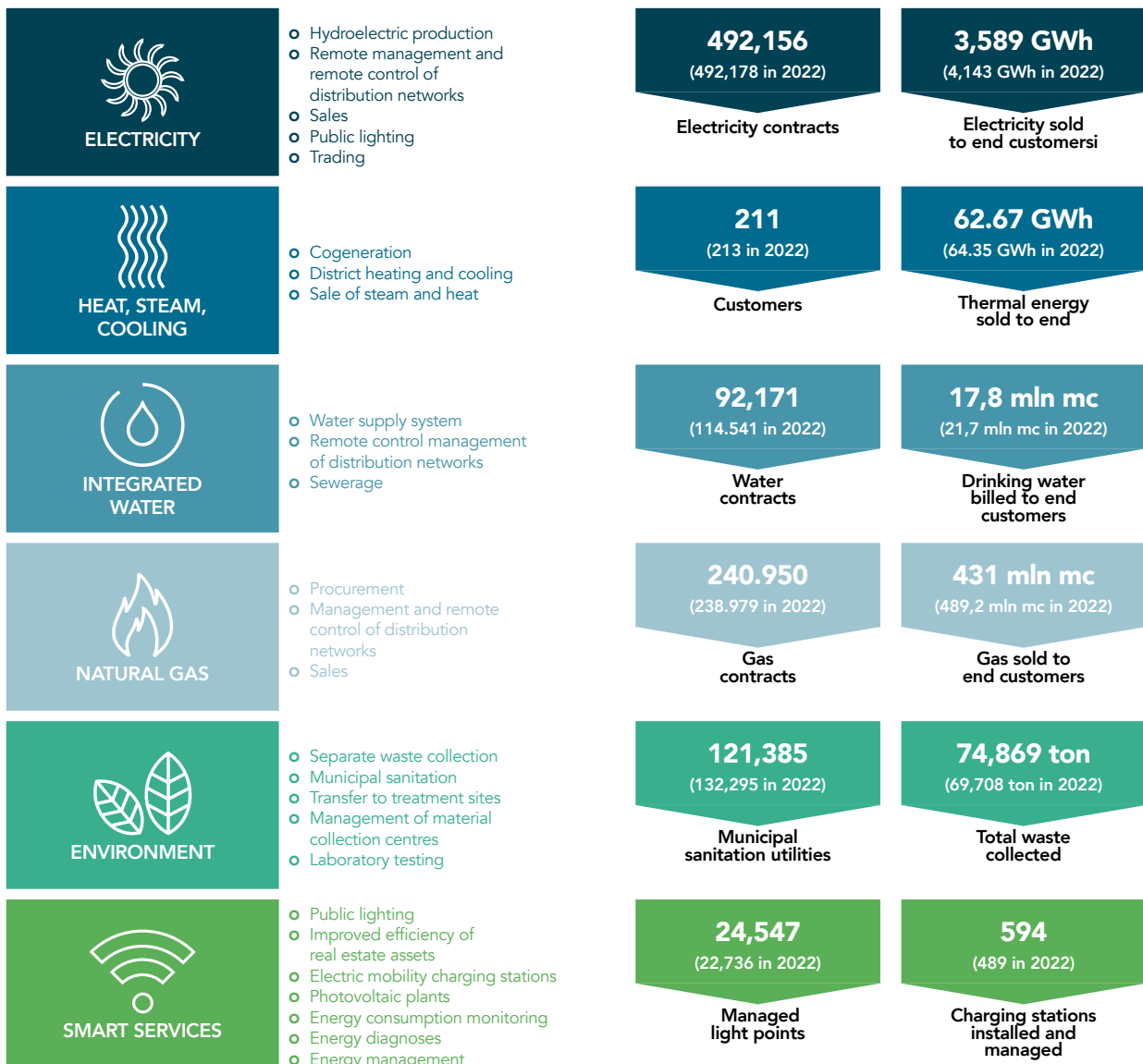
The Group's story thus not only takes place in the Dolomites: the Trentino roots are a starting point, but not one of arrival. The Group has customers throughout Italy, and is aware of the fact that its choices have impacts on the entire planet.

By providing families, companies and cities with the services needed to carry out everyday activities and improve the quality of life, the Group is a benchmark provider at provincial level and one of the main multi-utility companies in Italy; it is also confirmed as one of the main national players in terms of renewable hydroelectric generation in 2022, positioning itself in fifth place in the Arera 2022 Report (Arera: Annual Report 2023 - Volume 1: State of services).

1.2 WHAT WE DO

Going into more detail regarding the different businesses managed, the Group is active across the entire energy supply chain (production, distribution and sale of electricity, distribution and sale of gas, cogeneration and district heating), in the management of the integrated water service

(drinking water, sewerage and purification), the management of environmental services (collection, waste disposal, street sweeping, laboratory testing), in trading, in public lighting services and in the field of energy efficiency, photovoltaics and e-mobility.



For more information on the quantitative and economic data, please refer to the 2023 Re-

port on Operations published on the website www.dolomitienergia.it

BUSINESS AREAS

Environment (waste collection and sweeping)



The Group's main activities include environmental waste collection and treatment services and the urban cleaning service, carried out in the major municipalities of Trento and Rovereto, and in the Vallagarina area since September 2023.

Specifically, the Group collects municipal waste door to door and sends it for disposal or recovery, cleans public areas on behalf of local administrations, collects bulky waste upon request and, on a residual basis, collects and conveys special waste to treatment centres. These activities are managed in accordance with the law and carried out with the awareness that correctly separated waste can be sent for recovery, thanks to specialised platforms and sector supply chains, allowing its reuse and return to the economic and production cycle of the country.

The Group considers promoting the culture of recycling and supporting circular economy initiatives to be of great importance. For this reason, numerous projects have been implemented in order to continuously improve the environmental sustainability performance of its services. These certainly include the development and support of the Junker application which, by reading the barcodes and QR codes present on products, allows the waste to be easily and quickly identified and provides instructions for correct disposal in the municipality of residence.

THE GROUP COMPANY RESPONSIBLE FOR WASTE COLLECTION AND SWEEPING IS DOLOMITI AMBIENTE.

Network services

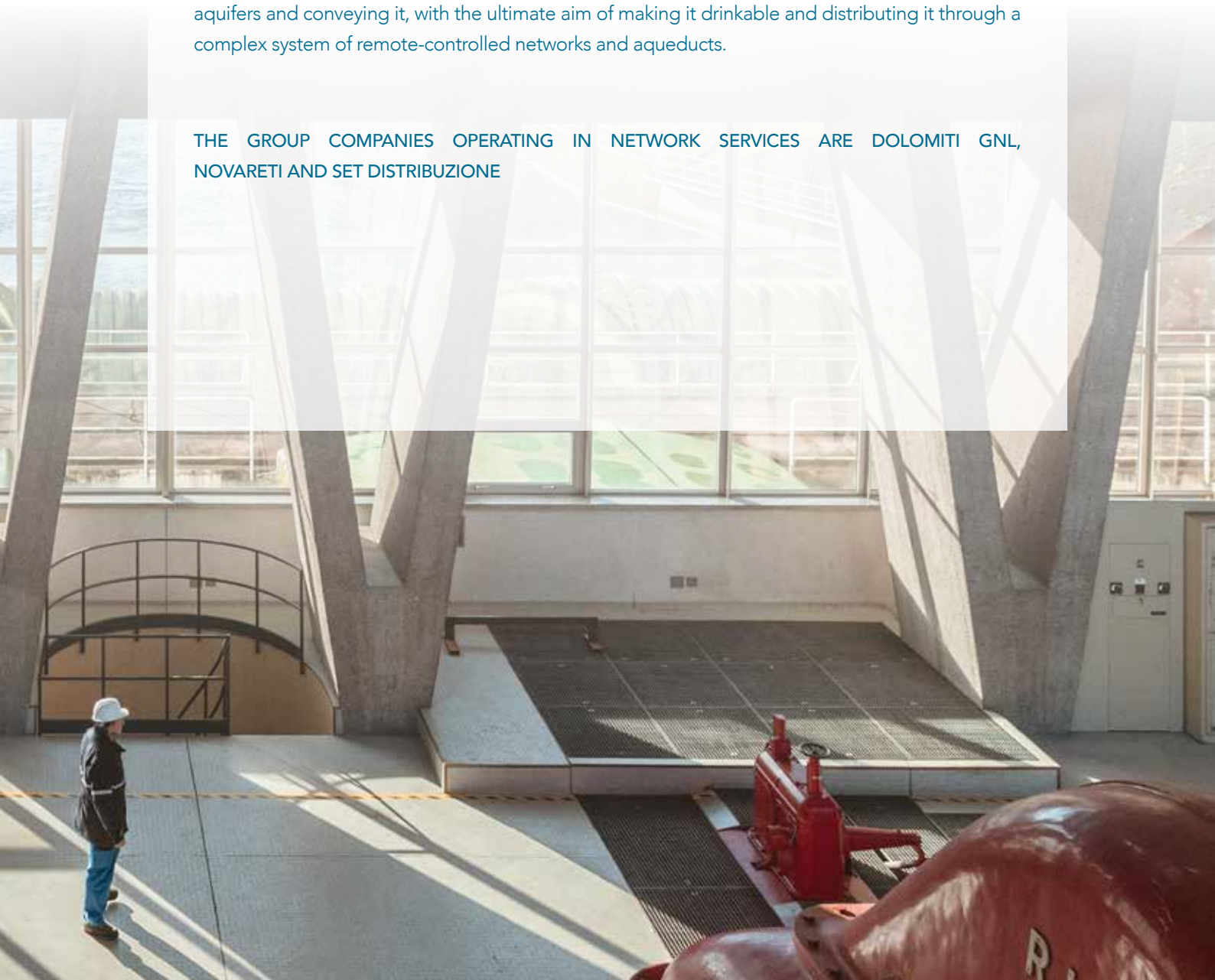


The Dolomiti Energia Group boasts a vast network of infrastructures that allow methane gas, liquefied natural gas (LNG), drinking water, electricity, heat and cooling to be brought to thousands of users daily, divided into homes, private companies and public structures, throughout the country.

In particular, electricity is dispatched into the national electricity system by Terna and distributed across the country through a network consisting of primary substations, overhead lines, underground lines and area substations. As for gas, once it is withdrawn from the methane pipelines of the largest national distributor, it is odourised by the Group to detect leaks and then transported to domestic and non-domestic users in the provinces of Trento, Verona and Bolzano.

As for water resources, the Group is present in every phase of the integrated water cycle, with the exception of purification. More specifically, it is responsible for withdrawing water from springs and aquifers and conveying it, with the ultimate aim of making it drinkable and distributing it through a complex system of remote-controlled networks and aqueducts.

THE GROUP COMPANIES OPERATING IN NETWORK SERVICES ARE DOLOMITI GNL, NOVARETI AND SET DISTRIBUZIONE



Energy production



The Dolomiti Energia Group specialises in the production of electricity from renewable sources at its hydroelectric power plants, photovoltaic plants and wind farms.

Historically, hydroelectricity is the Group's main generation method: water borrowed from rivers and streams is released from a dam or barrier and directed into turbines connected to generators that transform the kinetic energy created by the fall of the flow of water into electricity. Another important generation source comes from the Group's photovoltaic production, which is based exclusively on the absorption of sunlight by photovoltaic cells containing semiconductor materials, within which an electric current is generated which is then converted by an inverter into power.

Recently, the Group has strategically developed its position by also engaging in a third green production method: wind power. This exploits the kinetic energy of the wind, captured by wind turbines to activate a generator and produce mechanical energy, which can subsequently be transformed into clean electricity to be fed into the grid.

Complementary to the sources mentioned above, the Group generates part of its electricity through cogeneration which, through the simultaneous generation of heat and electricity, offers high advantages in terms of energy efficiency: starting from a single energy source, generally a fuel, it allows the recovery of the heat produced by the system during the transformation process and its subsequent use for other thermal purposes.

Lastly, the Group holds a minimum shareholding (5%) in a thermoelectric production plant in Ponti sul Mincio. The thermal energy generated inside the plant by the combustion of a mass of fuel is transformed into mechanical energy through a thermal cycle, after which it is converted into electrical energy through the alternator.

THE GROUP COMPANIES OPERATING IN PRODUCTION ARE DOLOMITI ENERGIA HOLDING, DOLOMITI ENERGIA HYDRO POWER, HYDRO DOLOMITI ENERGIA, DOLOMITI EDISON ENERGY, DOLOMITI ENERGIA WIND POWER AND NOVARETI - COGENERAZIONE.

Smart Services



The Dolomiti Energia Group offers services and products related to energy sustainability and efficiency with the ambitious aim of providing its customers with optimal and resource-friendly solutions.

In particular, the Group evaluates the energy efficiency potential for the industrial and residential sectors, proposing energy requalification interventions. These include the relamping of traditional public lighting systems (such as street lamps and tunnel lights) with latest-generation LEDs, and revamping of buildings and thermal power plants, through which existing energy systems are renewed in order to keep them fully efficient and, when possible, enhance and optimise their performance.

The smart services offered also include Power Quality activities on electrical parameters and energy quality, i.e., energy audits and consumption monitoring, as well as the construction of photovoltaic plants for companies and private individuals with a turnkey formula.

Lastly, through its participation in Neogy, the group is involved in the creation of a network of electric charging points for cars and electric bicycles.

THE GROUP COMPANIES OPERATING IN SMART SERVICES ARE DOLOMITI ENERGIA SOLUTIONS AND EPQ.

Market



Through its dedicated business areas, the Group supplies the free market with clean electricity, 100% of whose CO₂ emissions are offset, and with natural gas, a significant percentage of whose CO₂ emissions are offset.

Alongside this activity, the Group supports the purchase and exchange of electricity and environmental certificates on the main European stock exchanges and markets, as well as the management of commercial relationships with wholesalers for the exchange of energy efficiency certificates. Lastly, the Group provides emission certificates and is active within the Title Transfer Facility, a reference point for the virtual exchange of natural gas in continental Europe.

THE GROUP COMPANIES OPERATING IN THE MARKET ARE DOLOMITI ENERGIA TRADING AND DOLOMITI ENERGIA.

1.3

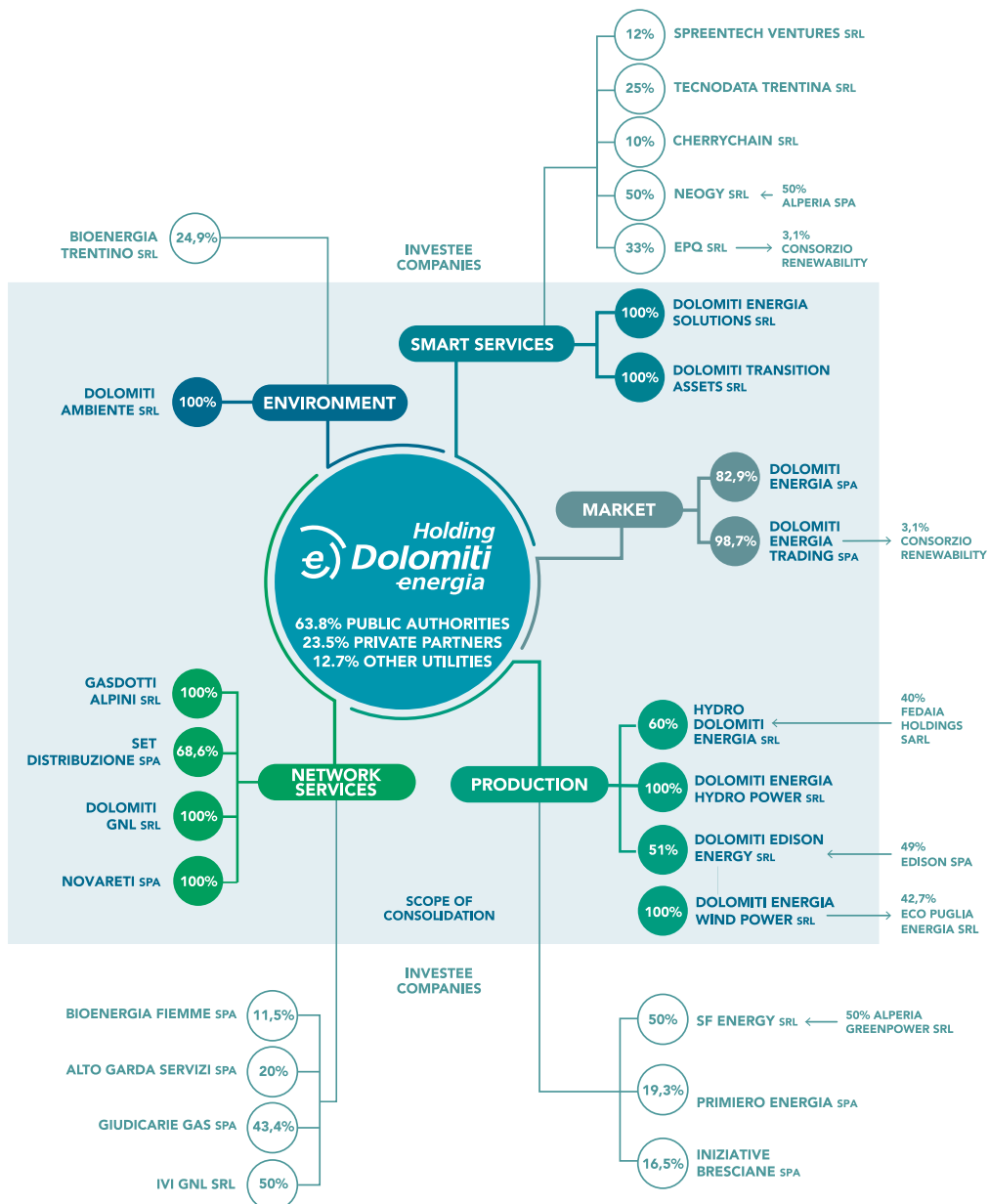
HOW WE ARE ORGANISED

TAll Group companies report to Dolomiti Energia Holding S.p.A., which has its registered office in Rovereto, in the province of Trento, and its operational headquarters in Trento.

The organisational structure of the Dolomiti Energia Group is flexible and oriented towards ef-

ficiency: the specialised companies within the Group are the arms through which it acts in the world. Each of them deals with specific activities, but they all rely on common principles.

The structure of the Dolomiti Energia Group is depicted below:



The Parent Company Dolomiti Energia Holding S.p.A. has a mixed shareholding. 63.8% of its shares belong to public shareholders: the main ones are the Autonomous Province of Trento, the Municipality of Trento and the Municipality of Rovereto.

The minority shareholders include private partners, local utilities and many other Trentino municipalities, including Mori, Ala, Volano, Calliano and Grigno.

The complete shareholder structure of the Parent Company is shown below:



The main organisational changes which took place during 2023 are outlined below:

- Acquisition by Dolomiti Energia S.p.A. of the branch of business related to marketing electricity in the Municipality of Cavalese, effective as of 01/04/2023;
- Acquisition by SET Distribuzione S.p.A. of the branch of business concerning the distribution of electricity in the Municipality of Cavalese and Palù del Fersina, effective as of 01/04/2023;
- Acquisition of the entire share of Dolomiti Transition Assets S.r.l.;
- Acquisition of the minority share of Eco Puglia Energia S.r.l., through the newly established Dolomiti Energia Wind Power S.r.l. (100% controlled by DE Holding) with a shareholding of 42.73%. The company Eco Puglia Energia S.r.l. operates in the renewable energy market as the owner of wind farms in Apulia, called 'Montecalvello' and 'Troia';
- Awarding by the subsidiary Dolomiti Ambiente S.r.l. of the tender relating to the urban hygiene PPP (Public Private Partnership) in Vallagarina at the beginning of June 2023. The company began managing the urban hygiene service on 1 September 2023;
- Presentation by the subsidiary Dolomiti Ambiente S.r.l., in RTI (temporary consortium) with Ecoopera, (70% Ecoopera, 30% Dolomiti Ambiente S.r.l.) of a proposal for managing the waste collection service for the Valsugana and Tesino communities, in a similar manner to what has been done for the Vallagarina community;
- Extension of the lease for the electricity distribution business branch between SET Distribuzione S.p.A. and the Municipality of Vermiglio and Ossana.
- Signing of a joint venture agreement with the Municipality of Panchià for the construction and management of a run-of-the-river hydroelectric power plant on the Rio Cavelonte un-



til 31 December 2040, after the award of the tender announced by the Municipality, in a temporary consortium with STE Costruzioni Generali S.r.l.

- Finalisation of two ten-year PPAs (Power Purchase Agreements) with Aquardens
- Project for the construction of a renewable hydrogen production plant in the disused industrial area of the municipality of Rovereto, presented by Dolomiti Energia Holding and eligible for NRRP financing. The proposed intervention will enhance and redevelop the area through the creation of a 'Hydrogen Valley' on the one hand, and encourage the decarbonisation of the district heating plant located in the same territorial area on the other. Powered by renewable electricity deriving from photovoltaics, the plant will produce green hydrogen, which will be used to produce heat for use in the Rovereto district heating network.
- Exchange of assets between SET Distribuzione S.p.A. and Azienda Reti Elettriche (ARE). In particular, SET transferred its electricity distribution networks in Vanoi to ARE following the transfer by ARE of its distribution networks in the Municipality of Predazzo, which SET had already managed since 2017 under a company rental contract. This is a significant transaction from a strategic point of view, as it guarantees better investment planning integrated with the surrounding networks for SET, as well as coverage of the Fiemme and Fassa Valleys



1.4

WHAT WE BELIEVE IN

There are three fundamental assumptions underlying how the entire Dolomiti Energia Group acts and thinks. The first: activities closely concern the development of communities, with the aim of restoring value to all those who share the same vision, for a broader common good. The second: compliance with current regulations, fundamental in the Group's specific field of activity. The

third: being responsible for the management of natural resources and aware that the future is in everyone's hands.

Starting from these three assumptions, the Group defined its vision, mission and the four essential values that guide it towards achieving them.

1.4.1 OUR CHOSEN VALUES

LISTENING: putting people at the centre

Dedicating time to listening, to remaining receptive to the needs of customers and people and responding to challenges with a smile.

COMPETENCE: always renewing skills

Competence is never enough: challenging yourself by always raising the bar, to be as dynamic as the markets.

SYNERGY: creating long-term synergies

In order to achieve concrete results in the development of the Trentino area and the territories in which it operates, the Group fosters synergies between people, the environment and institutions.

INNOVATION: never stopping

Experimenting and never giving up, because we want to actively contribute to the energy transition through innovation.

1.4.2 OUR MISSION

The Dolomiti Energia Group brings 100% certified green gas, water and electricity into the homes of its customers, lights and cleans cities, helping to accompany them into the future with innovative services, invests in its territory, increasing its well-being in a virtuous circle of environ-

mental, economic and social sustainability.

In harmony with natural resources and people, the Dolomiti Energia Group serves the community every day thanks to solutions that satisfy essential needs.

1.4.3 OUR VISION

The Dolomiti Energia Group seeks to be an enabler of sustainability for individuals, companies and communities in the Trentino area and beyond with its expertise, its closeness and its

energy. The desire is to be the first to commit and provide everyone with the tools to pursue conscious and autonomous sustainability.

“

Sustainability in the hands
of people is the only
possible future.

”

1.5

OUR SUSTAINABILITY ROADMAP

- 2001** —○ Trentino Servizi was created from the merger of SIT and ASM, the historical public service companies of Trento and Rovereto.
- 2003** —○ The sales company Trenta was founded, to which the commercial activities of Trentino Servizi and the companies STET and AIR were assigned.
- 2005** —○ SET Distribuzione took over the electricity distribution activities in Trentino.
- 2008** —○ Two important joint ventures brought the control of hydroelectric production in Trentino under the leadership of the Group, now Hydro Dolomiti Energia and Dolomiti Edison Energy.
- 2009** —○ The Group consolidated its sales activities on the national free market with the acquisition of Multiutility, a company that brought in new customers throughout Italy and an extensive sales network.
- 2010** —○ Dolomiti Reti was established to deal with cogeneration, district heating, water cycle, and gas distribution.
- 2014** —○ Dolomiti Ambiente was established to take care of urban hygiene services in Trento and Rovereto.
- 2016** —○ All activities concerning sales to end customers were concentrated in Dolomiti Energia;
Dolomiti Reti took the name Novareti.
- 2017** —○ Dolomiti Energia chose to sell only 100% energy from renewable sources on the free market, reinforcing the Group's sustainable strategy.
- 2019** —○ Dolomiti Energia Solutions, a company dedicated to energy efficiency, and Neogy, which deals with e-mobility infrastructure, were established.
- 2020** —○ The Group's digital transformation process began, with new and renewed communication channels to improve customer services.
- 2021** —○ Dolomiti Energia chose to offset the environmental impact of the natural gas it sells by financing international social responsibility projects, certified by third-party entities.
- 2022** —○ The proposal of energy efficiency services continued;
The Group carried out a Climate Risk Assessment;
EPO and Dolomiti Energia Trading founded the Renewability Consortium
- 2023** —○ The Group began investing in wind power, through the newly formed Dolomiti Energia Wind Power
The Group ESG Department was established
The Parent Company signed a preliminary contract to purchase the entire capital of EPO, which will be finalised in January 2024



1.6

2023-2027 BUSINESS PLAN

The Business Plan is the first and main instrument with which the Group defines its objectives and outlines its commitments to business conduct focused on sustainability. This document is approved by the Board of Directors of the Parent Company, which assigns implementation responsibilities to the Boards of Directors of the subsidiaries and the managers reporting to them.

In the 2023-2027 Business Plan, the Dolomiti Energia Group has modulated its objectives and development strategies not only territorially, but

also extra-regionally and nationally, projecting itself towards the future with over €1 billion in total investments and important economic, industrial and sustainability objectives. It is a business strategy based on the diversification of renewable production sources, on integrated assets along the entire energy, water and waste value chain: a new model aimed at ensuring the Group's solidity and generating value for stakeholders and the territory



The Strategy is based on three fundamental pillars:

- **growth and strengthening** of the presence in the area, consolidating the assets and businesses already present and the link with the communities;
- **economic and operational resilience to enable** the Group to withstand social and environmental changes and market shocks;
- **active participation in the energy transition** by acting as an enabler of change. In this last aspect, the Group will be able to contribute with projects both as a manager and as a producer of remote energy communities for industrial and commercial consumers, with initiatives to support the development of smart and zero-impact cities, in the field of electric mobility, smart public lighting, and building efficiency.

<p>PRODUCTION</p>	<p>THE GROUP'S CONTRIBUTION TO DECARBONISATION CONTINUES</p> <p>Growth will be focused on the development of renewable plants (Photovoltaic, Wind, Floating Photovoltaic, Biogas) in the local and national territory, reaching an installed capacity of more than 300 megawatts from sources other than hydroelectric by the end of the plan.</p>
<p>NETWORKS</p>	<p>ENSURING THE RESILIENCE OF NETWORKS</p> <p>Important measures will be implemented for the territorial expansion of gas distribution and water service and the consolidation of electricity distribution. In addition to strengthening and further improving the quality and continuity of services, these investments are geared towards the technological innovation of infrastructures in order to deal with the changing energy scenarios envisaged by the ambitious climate package of the European Union (Fit for 55).</p>
<p>SALES AND TRADING</p>	<p>DIGITALISATION AND CUSTOMERS AT THE CENTRE</p> <p>The plan aims at strengthening commercial policies, growth in the national free market and the development of new customer-oriented services and products, which will make sustainability affordable for everyone and contribute to the mitigation of climate change and the achievement of carbon emission reduction targets.</p>
<p>ENVIRONMENT</p>	<p>PROMOTING THE CIRCULAR ECONOMY</p> <p>The plan envisages the territorial expansion of the service by broadening the areas served and the recovery activities of differentiated waste, thus contributing to the closure of the treatment cycle from a circular economy perspective.</p>

1.7

SUSTAINABILITY FOR THE DOLOMITI ENERGIA GROUP

GRI 2-29 |

GRI 3-1 | GRI 3-2 |

For years, the Group has been committed to renewing its approach to sustainability, which is already an integral part of its business, in order to meet stakeholders' expectations, play an increasingly important role in the country's energy transition and remain competitive in a dynamic economic context; all this with an evolution that is compatible and consistent with some of the shared development goals defined by the UN in the 2030 Agenda and the reference regulatory developments, such as the Corporate Sustainability Reporting Directive (CSRD) and the European Taxonomy.

A new Group ESG Department was established in 2023, reporting to the Chairman. It was given the role of managing and developing sustainability projects and programmes, intercepting sector dynamics, trends and best practices, in close collaboration with the other Group departments and with the managers of the various businesses, thereby ensuring constant alignment between the strategic vision and operational activities. Not

least, the new department has an important role to play in raising widespread awareness of ESG issues, contributing to the creation of a sustainable and responsible corporate culture.

With regard to reporting, also thanks to the support of the Non-Financial Controlling Department, in 2023 the Group updated and expanded the materiality analysis, started an activity to streamline and refine the data collection process at the companies (updating roles and responsibilities) and committed to progressively start to report on additional indicators.

Data managers at all Group operating areas collect and enter data, which is then shared centrally with Non-Financial Controlling, which coordinates the preparation of the Non-Financial Statement.

It is important to emphasise that the drafting of the document is an all-encompassing process involving numerous departments and collaborators at all levels.



SUSTAINABILITY RECOGNITION OF SOLE 24 ORE

For the second consecutive year, the Dolomiti Energia Group was recognised for its commitment to sustainability with a prestigious positioning in the 'Leader of Sustainability 2023' ranking of Sole 24 Ore. This recognition is the result of the Group's ongoing commitment to high standards of environmental, social and economic sustainability. In fact, the ranking evaluates companies on the basis of their concrete actions to integrate sustainability into corporate strategy, measuring the three ESG (Environmental, Social and Governance) parameters.

1.7.1 CONTINUOUS STAKEHOLDER ENGAGEMENT

The creation of value for the territory, which is the Group's primary objective, can only start from engaging and listening to its stakeholders. Investing in the construction of correct, transparent and continuous dialogue allows for the early detection of possible criticalities and for conscious and shared decision-making.

As a consequence of the very nature of the Dolo-

miti Energia Group, the roles of the various stakeholders often have blurred boundaries, so much so that employees, citizens and suppliers are often also customers, and in some cases institutions also have the dual function of shareholders.

The following shows the Group's main categories of stakeholders:



For each stakeholder category, various communication, listening, dialogue and partnership methods are in place, such as customer satisfaction surveys, press review monitoring, discussions with institutional clients, and meetings with the financial community. These are carried out at variable intervals and are aimed at identifying and understanding stakeholder expectations, which form the basis on which Group strategies are defined and business actions are consequently articulated, with the primary objective of improving the socio-environmental impact of Group activities on a day-to-day basis.

The following initiatives towards both internal and external stakeholders promoted in 2023 deserve mention:

- website updating (in particular Dolomiti Ambiente) for the purpose of more effective communication;
- continuous training of staff on environmental and health and safety;
- days dedicated to information ('Communication Days') and the engagement of employees in Hydro Dolomiti Energia S.r.l., in Dolomiti Edison Energy S.r.l., in Novareti and in SET Distribuzione;
- structural use of agile working and increase in the value of the meal voucher offered to employees on remote work days;
- monitoring of quality and performance indicators which highlight trends in terms of internal and customer service processes as compared with defined goals, and monitor the level of efficiency and effectiveness of these processes/services;
- supplier performance evaluation activities with the aim of sharing the results with suppliers in the future in order to define any improvement plans.



THE NEW INTERNAL COMMUNICATION DEPARTMENT

The corporate Internal Communications Department was established in 2023, confirming the importance that the Group reserves for its internal stakeholders.

It aims to build an internal network of communication initiatives to consolidate the corporate culture, strengthen the sense of belonging, support changes, engage employees and keep them informed, and improve internal synergies.

Availing itself of the cooperation of the different corporate departments involved:

it drafts and promotes communications addressed to employees, screening the requests received for consistency with the Group's values;

it agrees, with the requesting department, on paths and objectives and prepares a communication proposal, processing the information and/or materials received;

it plans and implements agreed communication activities via the designated internal channels: e-mail, intranet and electronic noticeboards;

it manages the updating, maintenance and development of the intranet and electronic noticeboards;

it ensures support in the drafting, distribution and processing of internal survey results;

it guarantees logistical support in the organisation of staff events and conventions;

it cooperates with the centralised Facility Management and External Communication and Brand Marketing Departments in the care of owned properties;

it monitors the progress of the initiatives implemented in terms of effectiveness of the action and impact (any responses, requests for clarification, new developments, etc.)

In line with the Non-Financial Statement for 2022, in which the Dolomiti Group declared its intention, with respect to the preparatory activities for the identification of its material topics, to engage all its stakeholders, not only internal but also external, already starting the following year, the Dolomiti Energia Group began activities to engage its stakeholders in the materiality analysis between October and December 2023. Some categories of stakeholders outside the Group

were involved, such as banks and financial institutions, suppliers and customers, members of the Parent Company's Board of Directors and Board of Statutory Auditors, as well as the renewed engagement of employees.

This engagement took place in 2023 through dedicated questionnaires shared via online forms, as detailed in the next section.

EXPECTATIONS AND INTERESTS



DIALOGUE CHANNELS



HUMAN RESOURCES
SHAREHOLDERS
COMMUNITY
INVESTORS
CUSTOMERS

- home-work mobility
- continuous training projects
- corporate plans on relevant topics
- occupational health and safety
- work-life balance
- job stability
- remuneration and benefits
- internal communication

- interviews and climate surveys
- internal company events
- meetings with employees
- meetings with trade union representatives
- channels for reporting
- HR department activities

- economic results
- honesty
- management of activities
- protection of reputation
- ordinary and extraordinary financial transactions

- one-to-one meetings
- phone calls
- financial statements
- institutional meetings
- shareholders' meeting
- publication on website and circulation to the media of communications on all economically significant company events (approval of financial statements, major operations)

- corporate activities
- value added created for the territory
- environmental protection
- support for local initiatives
- environmental fees
- hydroelectric fees
- responsible and sustainable management

- public meetings
- open doors and guided plant tours
- participation in conferences
- participation in research projects
- participation in and support for local social and cultural events
- communications
- direct contact
- website

- relationship continuity
- capital strength
- creditworthiness
- support for business growth

- one-to-one interviews
- technical round tables
- plant tours
- analysis of accounting data
- Finance department activities
- website
- financial statements

- quality of commercial service
- reports and complaints
- fine-tuning of Group products
- commercial transparency and honesty
- complaint management
- listening
- product sustainability
- safety of services
- compliance with regulations and legislation
- tariffs
- prices

- agents
- correspondence
- periodic meetings
- pre-sales consultancy
- after-sales services
- meetings and information activities
- direct contacts at events and in branches
- daily monitoring of the media
- direct mailing
- call centre
- Customer Care department activities and relations

- relationship continuity
- terms of payment
- qualification
- equal access
- treatment

SUPPLIERS

- periodic meetings
- online qualification
- e-procurement platform
- procurement department activities and relations

- observance of authorisation, environmental and safety aspects
- employment for the territory
- running of managed services
- hydroelectric fees
- environmental fees
- tax contribution
- linked industry
- investments

INSTITUTIONS

- technical round tables
- one-to-one meetings with authorities and institutional offices
- participation in research projects
- participation in trade association work and themed committees
- communication

- collaboration in solving common issues and promoting sector policies
- strengthening of relations also in terms of collaboration

COMPANIES OF THE SAME SECTOR/COMPETITORS

- participation in trade association work and themed committees
- one-to-one meetings

- transparency
- punctual and timely communications

MEDIA

- press conferences
- press releases
- phone calls
- press presentations
- direct contact
- interviews and participation
- programmes
- Communication department activities

- atmospheric emissions of production activities
- use of depletable fossil resources
- environmental protection
- environmental fees
- energy and water savings
- separate waste collection
- drinking water quality
- water network leaks

ENVIRONMENT

- awareness-raising and information-sharing activities on environmental issues, water and energy savings, tap water quality and separate waste collection
- participation in trade round tables
- EMAS certification of production plants
- communication of results and support for the industrialisation of research projects in the environmental field, to identify energy solutions to help safeguard the environment;
- activities to identify and prevent water network leaks

1.7.2 MATERIALITY ANALYSIS

As defined by the Global Reporting Initiative (GRI) guidelines, materiality analysis represents the fundamental tool for identifying relevant issues, around which the organisation then defines its sustainability strategy and builds its non-financial reporting.

In light of the regulatory changes that are affecting the sustainability landscape and, in particular, non-financial reporting, when updating the materiality analysis, the Group started a progressive approach towards what is outlined in the CSRD, Corporate Sustainability Reporting Directive (Directive (EU) 2022/2464) and in the related European Sustainability Reporting Standards (ESRS) drawn up by the European Financial Reporting Advisory Group (EFRAG).

In the national and international scenario, the concept of 'double relevance' introduced by the CSRD is particularly important, according to which in identifying its material topics, every organisation must consider:

- on the one hand, impact materiality, which provides information on the impact of an organisation's activities on the environment, economy, and people, with a focus on human rights issues;
- on the other hand, financial materiality, which aims to represent how environmental, social and governance issues can positively or negatively influence a company's development, performance, cash flows and positioning and thus ultimately create or erode its economic and financial value.

Already starting from October 2022, the Dolomiti Energia Group had carried out an initial adaptation exercise towards the provisions of the regulatory update on reporting with respect to the materiality analysis, known as Double relevance, supplementing its list of topics and impacts with risks and opportunities, in order to include the evaluation from the perspective of financial materiality in the materiality analysis. This process was reviewed and adapted in light of the available guidelines in 2023.

Thanks to this analysis, the Group was able to grasp and assess the significance of impacts also with respect to their ability to positively or negatively contribute to the creation and/or preservation of economic value in the short, medium or long term.

The Dolomiti Energia Group has structured its process for determining material topics according to the following phases¹:



¹ The process was defined in light of the draft EFRAG guidelines available when the methodological approach was defined.

The list of impacts, risks and opportunities (hereinafter also referred to as IRO) subject to assessment, divided into positive or negative, current or potential and direct or indirect, was updated starting from the impacts assessed during the analysis carried out last year and considering the reference sector and context, the Group's services, the area of operations, internal policies, stakeholder expectations and possible financial and human rights implications linked to the Group's activities. In particular, the impacts were initially traced back to the list of topics and sub-topics as proposed within the draft ESRS 1, made available in July 2023 by EFRAG, in order to be able to also identify risks and opportunities for each topic that was material last year and allow for the assessment of financial materiality.

The IROs thus identified were assessed through stakeholder engagement by means of dedicated online questionnaires.

The online form reached approximately 1,596 stakeholders, both internal and external, and, in particular, the perspectives to be evaluated were differentiated on the basis of affinity with the stakeholder category to which they belong. In fact:

- impact materiality was evaluated by: the Board of Directors and Board of Statutory Au-

ditors, employees, customers and suppliers;;

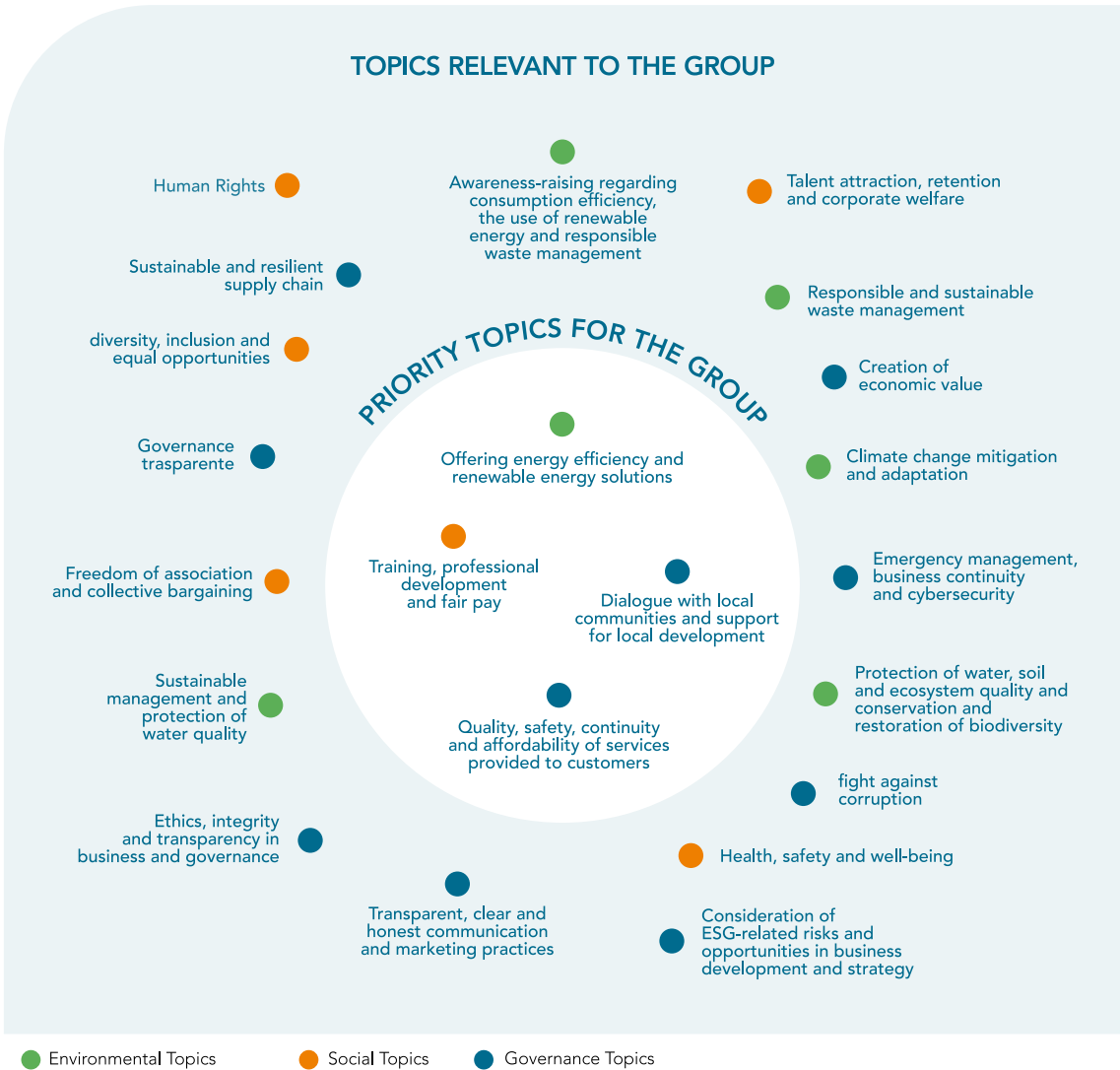
- financial materiality was analysed by the Board of Directors and Board of Statutory Auditors, Banks and Credit Institutions.

Each IRO was evaluated by considering its magnitude and likelihood of occurrence. In particular, with reference to magnitude, the stakeholders considered:

- Scope: understood as the magnitude of the negative impact-risk or the scope of the benefits from the positive impact-opportunity;
- Extent: in the sense of the breadth of the perimeter concerned (e.g., with respect to the number of subjects involved or the extension of the area concerned);
- Irremediability: for negative impact-risks only, the degree of difficulty in remedying any damage resulting from the impact was also considered.

There was an overall response rate of 24%.

The evaluations of all responding stakeholders were then processed in order to obtain the list of the Group's material topics: the IROs were then clustered and traced back to the material topics, and the four priority topics for the Group were finally identified from among the relevant ones, as shown in the chart below.



The following is a list of material topics, in alphabetical order, with a description of each and an indication of the stakeholders involved in managing the impacts, risks and opportunities assessed:

MATERIAL TOPIC	IRO MANAGEMENT
<p>SUSTAINABLE AND RESILIENT SUPPLY CHAIN</p>	<p>The Dolomiti Energia Group relies on suppliers to procure energy raw materials and perform services to support its business. Wanting to ensure, at every stage of its activities, the protection of the community and the environment, parameters of technical quality, sustainability and cost-effectiveness are considered during offer selection and evaluation. The Group is thus committed to promoting and disseminating ESG principles along its supply chain, generating a positive impact on the environment and people in the long term. In doing so, at the same time the Group seeks to minimise the risk of possible ESG violations by its commercial partners and the subsequent image repercussions.</p>
<p>CONSIDERATION OF ESG-RELATED RISKS AND OPPORTUNITIES IN BUSINESS DEVELOPMENT AND STRATEGY</p>	<p>By its very nature, the Group is avowedly sensitive and attentive to the promotion of initiatives linked to sustainability values, particularly environmental ones. This is reflected in the corporate culture and management's commitment to consider the risks and opportunities for business arising from ESG issues in the day-to-day conduct of business and for strategy purposes. The Group thereby seeks to mitigate any risk of inadequate commitment in the social and environmental sphere, protecting its image and promoting the positive impact of its business in the communities in which it operates.</p>
<p>CREATION OF ECONOMIC VALUE</p>	<p>The activities of the Dolomiti Energia Group generate economic value, which during the year is redistributed in various forms to employees, shareholders, suppliers, the local community and the public administration, making it possible to set up activities for the development of company operations, also with a view to even greater environmental protection and the improvement of stakeholder welfare.</p>
<p>DIALOGUE WITH LOCAL COMMUNITIES AND SUPPORT FOR LOCAL DEVELOPMENT</p>	<p>Given the nature of the services provided, the activities of the Dolomiti Energia Group directly and indirectly generate impacts on the local area, contributing to social and economic well-being. These include job creation, donations, forms of dialogue and engagement, voluntary work and sponsorship of cultural and sporting events aimed at involving and enhancing the local community. As a result, the Group recognises the value of dialogue with its reference community and the subsequent favourable opportunities for company operations resulting, for example, from better brand reputation or from a general improvement in the economic fabric.</p>

<p>HUMAN RIGHTS</p>	<p>The Dolomiti Group is committed to protecting human dignity and contributing to people's well-being, valuing diversity and guaranteeing equal opportunities in order to ensure a healthy working environment that is attentive to the needs of its internal employees and along the supply chain. It is also committed to combating all forms of discrimination, child labour, forced labour and to promoting freedom of association, health and safety at work, decent working conditions, protection of privacy and sustainable social development. The Group thereby wishes to contribute to generating a positive impact on the community in which it operates and to guarantee the legality of its operations.</p>
<p>DIVERSITY, INCLUSION, AND EQUAL OPPORTUNITY</p>	<p>The Dolomiti Energia Group recognises the importance of the contribution of each employee and the added value of having a workforce devoted to inclusiveness and respectful of diversity. Protecting the well-being and working conditions of each employee not only generates a positive impact on the workforce, but also allows the Group to benefit from increased productivity and higher quality services.</p>
<p>ETHICS, INTEGRITY AND TRANSPARENCY IN BUSINESS AND GOVERNANCE</p>	<p>Aware of the key relevance of ethical and responsible business conduct, the Group is committed, through instruments such as the Code of Conduct and the Organisation, Management and Control Model, to preventing the occurrence of incidents of non-compliance with laws and regulations, including in the ESG sphere. The aim is to protect the ultimate interest of all stakeholders and the continuity of the Group's activities.</p>
<p>TRAINING, PROFESSIONAL DEVELOPMENT AND FAIR PAY</p>	<p>The Dolomiti Energia Group considers staff training crucial, not only to ensure the presence of the skills necessary to offer high-quality services and products, but also to allow its people to benefit from greater professional and personal development. A comprehensive and up-to-date training offer is proposed to each employee. The Group is also committed to promoting a meritocratic remuneration policy aimed at motivating, attracting and retaining its talents.</p>
<p>EMERGENCY MANAGEMENT, BUSINESS CONTINUITY AND CYBERSECURITY</p>	<p>In recent years, the Group has strengthened the process of innovation and digitalisation of its operations through continuous investments. In this regard, given the nature of the services provided, special attention is paid to the protecting customer and employee data and to training employees on cybersecurity. The aim is to mitigate the negative impact on individuals resulting from any loss of data and to minimise the risk of inadequate or non-compliant IT security measures will generate costs related to the adaptation of measures, litigation or loss of trust of the Group's partners.</p>

<p>RESPONSIBLE AND SUSTAINABLE WASTE MANAGEMENT</p>	<p>The Dolomiti Energia Group, through the company Dolomiti Ambiente, is constantly committed to guaranteeing a quality service, respecting reference standards and promoting initiatives to increase its internal circularity, and therefore the recycling and recovery rate, and reduce the production of waste and landfill.</p> <p>The Group's general commitment to ensuring the correct recovery and disposal of waste produced by its activities (and by the other players in the value chain) is intended, on the one hand, to mitigate the negative impact on the planet by avoiding the occurrence of damage to the environment and to people, and on the other hand, to reduce the risk that an episode of non-compliance with the regulations on end-of-life management of the waste generated causes an erosion of brand reputation.</p>
<p>SUSTAINABLE MANAGEMENT AND PROTECTION OF WATER QUALITY</p>	<p>Considering the importance of water resources, the Group pays particular attention to the supply of quality drinking water and to ensuring its continuity. Similar efforts are made to monitor compliance with national and international water management regulations in order to reduce the risk of possible sanctions or fines.</p>
<p>TRANSPARENT GOVERNANCE</p>	<p>The Dolomiti Energia Group recognises the importance of transparency in the management of company resources, which is why it is committed to guaranteeing clear and truthful communication to its stakeholders. The objective is certainly to protect internal and external stakeholders from episodes of inefficient and ambiguous management of the Group's financial flows and assets that may, in turn, facilitate the occurrence of unlawful conduct that could threaten financial relations with credit institutions and other financing bodies.</p>
<p>FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</p>	<p>The Group is committed to fostering free association and collective bargaining. All Group employees are guaranteed freedom of association and trade union membership. The intention is to recognise our employees' full rights.</p>
<p>FIGHT AGAINST CORRUPTION</p>	<p>Given the sensitive nature of the Group's business and its presence throughout the country, the possible occurrence of episodes of corruption would have a negative impact on meeting community needs and on the continuity of the business activity itself. For this reason, the Dolomiti Energia Group strives to fight corruption by developing and periodically reviewing organisational structures and procedures aimed at guaranteeing the correct behaviour of its employees.</p>

<p>CLIMATE CHANGE MITIGATION AND ADAPTATION</p>	<p>Aware of the impact of GHG emissions on the environment, the Group is involved in initiatives aimed at reducing them, including through the production and sale of energy from renewable sources. The importance of the services provided requires the Group pay particular attention to assessing the impacts of climate change on its facilities and networks in order to identify the best adaptation solutions and protect business continuity. To this end, the Group carries out implementation and maintenance work to prevent and manage any critical situations arising from accidents and/or natural disasters. The ultimate aim is to avoid further damage to the environment and ensure the continuity of service provision to the community and customers by protecting its infrastructure.</p>
<p>OFFERING ENERGY EFFICIENCY AND RENEWABLE ENERGY SOLUTIONS</p>	<p>The Dolomiti Energia Group is aware of its role in the context of the energy transition. By promoting energy from renewable sources and offering tailor-made energy solutions to cut inefficiencies and operating costs, the Group is ready to guide people, companies and public bodies towards the new frontiers of energy.</p> <p>On the one hand, the Group's comprehensive green offer brings significant benefits to the environment through the reduction of GHG emissions, and on the other hand, the consolidation of the Group's strategic positioning through greater alignment with current consumption trends and customer interests.</p>
<p>TRANSPARENT, CLEAR AND HONEST COMMUNICATION AND MARKETING PRACTICES</p>	<p>The Group is aware of the risks that may arise from non-transparent commercial communication and anti-competitive behaviour. These risks then extend to the brand reputation and regulatory compliance of its activities.</p> <p>For this reason, with respect to this issue, the Group distances itself from forms of greenwashing and misleading communication.</p>
<p>QUALITY, SAFETY, CONTINUITY AND AFFORDABILITY OF SERVICES PROVIDED TO CUSTOMERS</p>	<p>The Dolomiti Energia Group provides basic services to its customers and the local community. These include energy, gas and water distribution and urban hygiene services. Considering the importance of these services, the Group is committed to guaranteeing reliable and secure supplies at competitive costs and to offering concrete and immediate answers to its customers and the community also through physical and web-based channels (e.g., call centre available 24 hours a day).</p> <p>In doing so, the Group contributes to the well-being of the community and generates opportunities to increase brand reputation and attract new customers.</p>

<p>HEALTH, SAFETY AND WELL-BEING</p>	<p>Attention to the health and safety of employees and collaborators is central to all Group companies. In order to reduce and mitigate the risk of accidents, the Group encourages the development of a healthy and safe working environment by adopting the best organisational and procedural techniques to ensure the continuous improvement of the performance of the occupational health and safety management system. This awareness is also reflected in the provision of internal training courses aimed at maintaining a consistently low accident rate. No less important is the focus on protecting the mental and physical health of employees, which the Group demonstrates by promoting work-life balance.</p> <p>The Group is currently committed to educating its suppliers on the collection and communication of their data related to the injury rate of non-employee workers.</p> <p>The Group's ultimate goal is to generate a positive impact on the well-being of internal and external employees and to ensure the soundness of its workforce, as well as the compliance of the business with current regulations.</p>
<p>AWARENESS-RAISING REGARDING CONSUMPTION EFFICIENCY, THE USE OF RENEWABLE ENERGY AND RESPONSIBLE WASTE MANAGEMENT</p>	<p>The Dolomiti Energia Group recognises that it can play an important role in raising the awareness of customers, the community, and more generally its stakeholders with respect to the use of energy from renewable sources, the efficiency of consumption and the virtuous management of waste produced. Through its commitments in this regard, the Group can contribute to minimising the negative impacts on the environment and simultaneously respond to the community's increasingly urgent need to protect the planet.</p>
<p>TALENT ATTRACTION, RETENTION AND CORPORATE WELFARE</p>	<p>Through increased staff engagement, solid corporate welfare and continuous professional training, the Dolomiti Group wishes to contribute to individual well-being and satisfaction, thus generating a positive impact on its people. In addition to enhancing the internal growth of its resources, the Group recognises the importance of attracting professional figures in order to create internal value and maintain a competitive advantage for the quality of its services.</p>
<p>PROTECTION OF WATER, SOIL AND ECOSYSTEM QUALITY AND CONSERVATION AND RESTORATION OF BIODIVERSITY</p>	<p>Given its activities, such as the management of the water network, hydroelectric plants and urban hygiene services, the Group recognises its role in preserving the quality of water, soil, ecosystems and biodiversity. It is thus committed to mitigating any negative impacts that might arise from its activities on the surrounding environment, in particular through projects to renovate and improve the efficiency of networks and facilities, as well as to restore biodiversity.</p> <p>The Group thereby also protects its reputation and compliance with the relevant law.</p>

RESPONSIBLE GOVERNANCE





45%

women on the Board of Directors
(42% in 2022)



61.3%

percentage of expenditure on local suppliers for purchasing goods and services
(54.5% in 2022)



16%

women executives out of total executives
(17% in 2022)



100%

of supply contracts have contained clauses related to compliance with the Code of Conduct or Anti-Corruption Laws in the last three years



0

cases of corruption reported in the last three years



2.1

THE GOVERNANCE MODEL

GRI 3-3 Consideration of ESG-related risks and opportunities in business development and strategy |

GRI 2-9 | GRI 2-10 | GRI 2-11 | GRI 2-12 | GRI 2-13 | GRI 2-14 | GRI 2-16 | GRI 2-17 | GRI 405-1 |

The growing complexity characterising the scenario in which the companies of the Dolomiti Energia Group operate alongside the evolution of regulatory provisions in the sector have led the Management to define an organisational and governance structure characterised by flexibility and the search for efficiency, able to promote technological innovation and continuous improvement in order to enhance the expertise of our human resources, ensure customer satisfaction, respect for the environment and the reference regulations.

The corporate governance model involves a series of organisational and control processes which consist of the clear identification and sharing of corporate values, the determination of a multi-year strategic and business plan, the mapping and assessment of associated risks, the definition of adequate safeguards to prevent and manage risks and the resulting internal control system. In line with this approach, an annual internal audit plan is defined by the Group and subject to periodic reporting to the Board of Directors (also 'BoD') and Board of Statutory Auditors.

The organisation and governance system is therefore composed of bodies, committees, organisational positions and organisational measures and mechanisms which contribute to the decision-making processes of the Group and the individual companies: the Shareholders' Meeting; the BoD; the Board of Statutory Auditors and Internal Control Committee; the Executive Committee; the Chairman; the Chief Executive

Officer; the Independent Operator for the electricity and gas distribution networks; the Employers and delegated employers; the Environmental Officer; the Risk Committee; the Supervisory Bodies; the Credit Collection Committee; the Operational Business Managers.

The organisational model of the Dolomiti Energia Group is based on the following principles:

- The primary processes are assigned to specific corporate entities, which have full responsibility for them, while the support and management processes are centralised in the corporate and organisational structure of the Parent Company, which manages, coordinates and controls management and operational activities on one hand, and provides assistance and supplies services on the other;
- The Group performs its management, coordination and control activities on the basis of five-year strategic plans which are translated into annual budgets that, in turn, are used as a reference for the planning, checking and approval of the activities of the single subsidiaries. The annual budgets are monitored on a monthly basis and subject to quarterly reports presented to the Board of Directors;
- The composition of the Boards of Directors of the subsidiaries is defined with a view to optimising the coordination and management of the Group activities and ensuring consistency with the company's business, in observance of the relevant legislation in force;

- The company organisation, the structure of the hierarchical lines of reporting and the distribution of responsibilities, powers and tasks between the various organisational functions and within each function are designed to guarantee an effective system of overlapping and cross-checks for all processes and company activities, particularly for processes regarded as critical for the Group;
- The Group governance and organisation system is focused on the corporate separation of activities subject to accounting and functional unbundling regulations. Pursuant to Italian and European Community legislation, the Group constitutes a so-called vertically integrated company as it both produces electricity, distributes natural gas (Novareti S.p.A.) and electricity (SET Distribuzione S.p.A.) and sells it to end customers (Dolomiti Energia

S.p.A.). Consequently, the Group is subject to the Functional Separation obligations laid down by law, i.e. a series of measures aimed at ensuring the distribution companies enjoy a level of autonomy and independence of decision-making powers which simulate the corporate separation. In other terms, the functional separation fulfils the task of establishing a condition where parties (natural persons), who manage a given activity, are not involved in the management of other activities along the chain. The distribution system operator, should it be part of a vertically integrated company, must be independent in terms of its legal form, organisation and decision-making powers, from the other activities carried out by the Group and not connected with distribution.

2.1.1 CORPORATE BODIES

The Board of Directors of the parent company Dolomiti Energia Holding S.p.A. is composed of twelve members. Five of them - the Chair, Chief Executive Officer, Vice Chair and two members appointed by the Shareholders' Meeting - are also members of the Executive Committee.

The body - which remains in office for three consecutive financial years and expires on the date of the Shareholders' Meeting called to approve the Financial Statements for the last financial year of their office with the possibility of being re-elected - consists of at least one third of directors belonging to the least represented gender.

The process of appointing the members of the Board of Directors and the Board of Statutory Auditors of the Parent Company takes place through the filing of lists submitted by Shareholders who individually or jointly represent at least 5% of the share capital. Each list contains at least

seven names listed by a sequential number. At the time of appointment, the first seven directors are appointed from the list that obtains the majority of the votes cast, with the first name on the list being appointed Chair, and the remaining five directors being drawn from any other lists filed. The candidate elected from the list other than the one that obtained the majority of votes, placed first, is elected Vice Chair of the Board.

If more than two lists are presented, the appointment of the five directors shall be made by allocating quotients obtained by dividing the votes attributed to each candidate by one, two, three, four, five, maintaining the progressive number of the list, thus forming a ranking.

The lists submitted contain candidates of different genders so that the new Board of Directors is also composed of directors of the less represented gender, which may not be less than four members per list.

All nominees meet the requirements set forth in Article 2382 of the Italian Civil Code and all directors indicated by the shareholders have the necessary skills with reference to the characteristics

of the business carried out by the Parent Company and the Group.

The Chair of the Board of Directors, Silvia Arlanch, is not an executive of the company

Composition of the Board of Directors and Executive Committee of Dolomiti Energia Holding

Director	Office	List ²	Holding company executive committee
Silvia Arlanch	Chair	M	Chair
Marco Merler	Chief Executive Officer	M	○
Giorgio Franceschi	Vice Chair	m	○
Paolo Decarli	Director	M	○
Massimo Fedrizzi	Director	m	○
Chiara Tomasi	Director	M	
Daniela Salvetti	Director	M	
Manuela Seraglio Forti	Director	M	
Simone Canteri	Director	M	
Eleonora Stenico	Director	m	
Giorgio Rossi	Director	m	
Fabio D'Alonzo	Director	m	

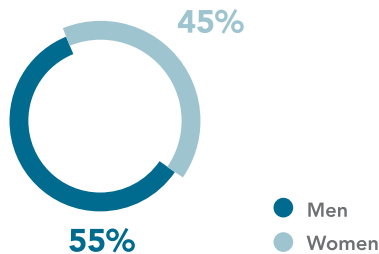
Composition of the Board of Statutory Auditors

Statutory auditors	Office
Michele Iori	Chair
William Bonomi	
Maura Dalbosco	
Alternate auditors	
Giovanni Paolo Rao	
Tiziana Depaolo	

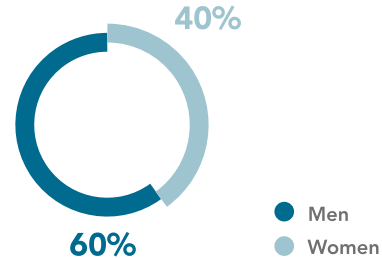
² M/m Majority/minority list

Aspects of Diversity in the Board of Directors

Directors by gender diversity

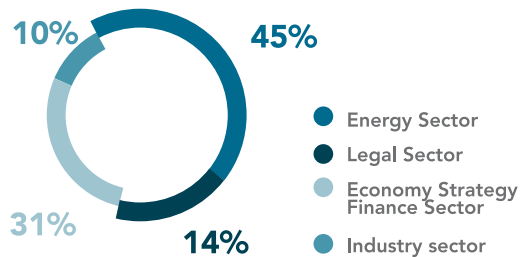


Composition Board of Statutory Auditors

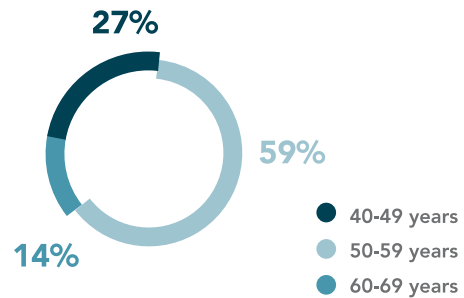


According to the provisions of the law and the company's Articles of Association, the Board of Statutory Auditors consists of three statutory auditors and two alternate auditors, appointed by the Shareholders' Meeting in compliance with the gender balance. The current Board of Statutory Auditors has a three-year term of office.

Directors by diversity of specialist backgrounds



Directors by age diversity



By virtue of its listing on the Irish Stock Exchange, Dolomiti Energia Holding is listed as an Entity of Public Interest (EPI). The Dolomiti Energia Group is therefore obliged to draw up - in compliance with the dictates of Italian Legislative Decree 254/2016 - its Non-Financial Statement. The parent company's Board of Directors is responsible for the preparation of the Non-Financial Statement, while the Board of Statutory Auditors is responsible for the control.

The Supervisory Body, within the framework of the performance of the functions assigned to it by law, monitors compliance with the provisions laid down in Italian Legislative Decree 254/2016 and report on it in the annual report to the Assembly.

The role of overseeing the sustainability issues connected with the company's operations and the interaction dynamics of the latter with all of its stakeholders was assigned to the Executive Committee which is tasked with assisting the Board of Directors with preliminary activities, both propositional and consultative in nature, regarding all sustainability evaluations and decisions, in accordance with the principles of the Code of Conduct and the other tools that guide the Group's actions. In the performance of their duties, they act in a professional and diligent manner.

In order to better fulfil its tasks and with the aim of further developing the collective knowledge, skills and experience of the highest governing

body with regard to the Group's strategy and sustainable development, the Board of Directors is routinely involved in discussions with experts and consultants with respect to ESG issues of interest to the core businesses and in the contextualisation of the positive sustainability impacts of the core investments of the various businesses.

A multi-year training plan with respect to ESG issues was defined in 2022, designed for members of the Board of Directors, managers and employees, and which provided the opportunity to participate in workshops, seminars or standard training courses. In this regard, two conferences regarding sustainability issues were organised in 2023 which involved managers, and further initiatives in this regard are planned for the next few years.

In the meetings concerning activity planning for the new financial year, the Board of Directors then identified a series of actions necessary to strengthen the corporate culture also from an ESG point of view, including, in particular:

- revision of the Code of Conduct: the changed context in which the Group operates requires a consistent renewal of values and rules of conduct in addition to the strengthening of provisions to facilitate economic, social and environmental sustainability performance;
- updating the Corporate Risk Governance Model: in this case as well, the new external and internal context requires an update of the Risk Assessment and Management methodology and process, with a specific focus on the ESG impacts of corporate operations, in order to achieve an increasingly integrated tool in decision-making;
- the definition of a new cross-Group ESG Department to define and govern the Sustainability Plan, in close cooperation with the corporate departments and businesses.

Internal Audit's activity of preparing the ESG Critical Processes Control Plan which began in 2023 will be completed in 2024 in light of the review of the Group's values and corporate conduct, also with a view to increasing the accountability of management and all the recipients of the Code.

2.2 RISK MANAGEMENT

GRI 2-12 | GRI 2-16 |

The Group's internal control and risk management system is composed of specific rules, safeguards, organisational responsibilities and procedures, as well as monitoring and control tools which allow business activities to be conducted ethically, transparently, responsibly and consistently with strategic intentions and aimed at preventing risks which might jeopardise the operational and strategic objectives of the Dolomiti Energia Group, in accordance with the laws and regulations in force.

The corporate risks management system involves various roles, within the framework of the different competences:

- the Board of Directors, which defines the nature and level of risk compatible with the company's strategic objectives, including all elements that may be relevant to the company's sustainable success within its assessments;
- the Board of Statutory Auditors, which monitors the adequacy of the organisational and administrative and accounting structure;
- the Internal Audit Department, which verifies, both on an ongoing basis and in relation to specific needs and in compliance with international standards, with a view to advisory and assurance, the adequacy and effectiveness of the governance, risk management and internal controls system through a risk-driven internal audit plan approved by the Board of Directors, based on a structured process of analysis and prioritisation of the main risks;
- the Risk Management Department which, with specific reference to liquidity and com-

modity energy risks, carries out risk monitoring activities without direct involvement in risk management activities, thus fulfilling the Segregation of Duties criteria;

- the Compliance Officers of each company and Business Unit who are responsible for defining and updating regulatory risk controls;
- the Planning and Development department, responsible for periodically monitoring the company's economic and financial performance;
- the direct Managers of the company departments who are entrusted with the identification, processing and management of the risks for which they are responsible;
- the Supervisory Body, the Corruption Prevention Manager and the Data Protection Officer, who monitor the adequacy and effectiveness of the risk prevention controls with respect to the committing of offences pursuant to Italian Legislative Decree 231/01 to the benefit of the entity, and the committing of corrupt practices to the detriment of the entity.

The aforementioned monitoring activities performed by the various company departments and the different risk control measures described make up the Governance, Risk Management and Internal Control System of the Group which is geared to ensuring, in line with a healthy and prudent management approach, the achievement of the strategic goals, the containment of the aforementioned risks, the effectiveness and efficiency of company processes and compliance with laws and with internal and external regulations.

The Internal Audit Department, within the context of its responsibility for verifying the completeness, adequacy, functionality and reliability of such a system, defines and implements an annual risk-driven Internal Audit plan which is subject to the approval of the Parent company's Board of Directors, to which it reports periodically, as anticipated in the previous chapter.

In terms of significant aspects relating to environmental and health and safety risks, control measures are planned and implemented by the Quality, Safety and Environment department which periodically reports to top management on these issues.

Similarly, other company departments plan and carry out second-level control activities on specific aspects such as protecting the privacy of Dolomiti Energia Group stakeholders, complying with human resources policies, implementing IT security measures, monitoring compliance with the regulations on company liability pursuant to Italian Legislative Decree 231/01 and anti-corruption, whistleblowing process management and

the implementation of the personal data protection model.

The Dolomiti Energia Group risk mapping is the subject of a systematic risk assessment process based on regulatory, economic, financial, operational, reputational, sanctioning, ethical, sustainability and probability of occurrence impacts, taking into account the safeguards developed by the Group to prevent, mitigate and manage such risks.

Relevant risk scenarios are included such as:

- the economic, social and environmental impact of business on the environment and the community,
- the volatility of energy prices,
- the opportunity risk linked to the renewal of concessions of historical businesses such as hydroelectric production, distribution, urban hygiene services,
- the energy mix;

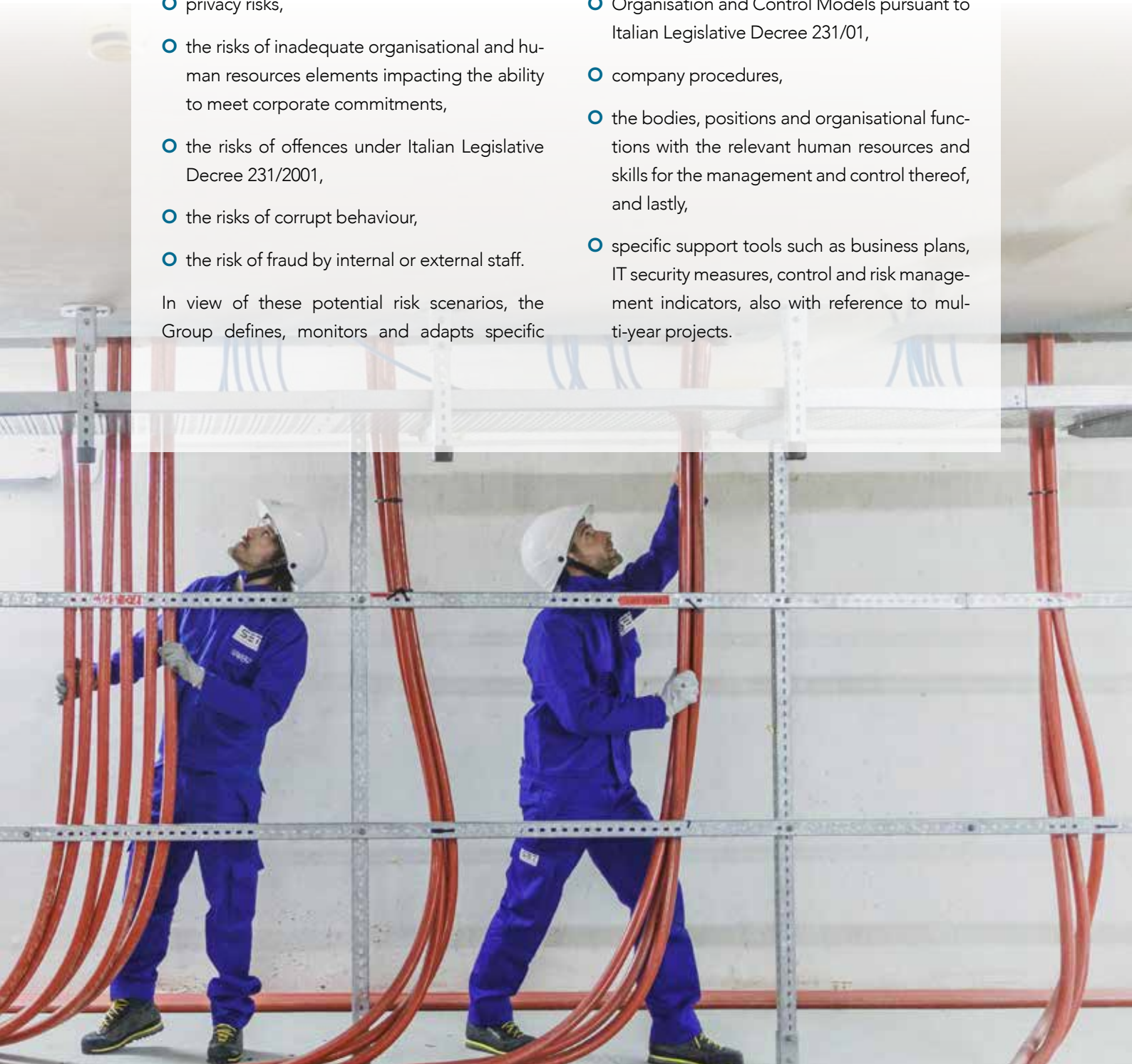


- inflation,
- access to sustainable finance,
- the competitiveness of the business strategy,
- the adequacy of the corporate and organisational structure,
- supply chain adequacy risks,
- the level of digitalisation and IT security of processes,
- privacy risks,
- the risks of inadequate organisational and human resources elements impacting the ability to meet corporate commitments,
- the risks of offences under Italian Legislative Decree 231/2001,
- the risks of corrupt behaviour,
- the risk of fraud by internal or external staff.

In view of these potential risk scenarios, the Group defines, monitors and adapts specific

safeguards, which will be discussed in greater detail in the following sections, such as:

- the Group Code of Conduct,
- anti-corruption policies and measures,
- environmental, diversity and human rights policies,
- the Corporate Governance, Risk Management and Internal Control Process System,
- Organisation and Control Models pursuant to Italian Legislative Decree 231/01,
- company procedures,
- the bodies, positions and organisational functions with the relevant human resources and skills for the management and control thereof, and lastly,
- specific support tools such as business plans, IT security measures, control and risk management indicators, also with reference to multi-year projects.



2.2.1 THE CORPORATE GOVERNANCE, RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM

The Group's Governance, Risk Management and Internal Control Model, with regard to the impacts that the various businesses can generate on the environment, people and the economy, can be defined as risk-based, as already mentioned. In this sense, the Board is concerned with:

- identifying and assessing external and internal risk/opportunity signals that influence the achievement of strategic objectives;
- defining, developing and monitoring risk/opportunity management controls as enablers of the management model in the pursuit of strategic objectives;
- constituting the reference framework within which to define and develop the following company initiatives:
 - Strategic planning
 - Programming and budgeting
 - Management and development of business and enabling factors
 - Internal Audit Plan

The Board of Directors meets periodically in the presence of the Board of Statutory Auditors, a collegial body responsible for supervising the adequacy of the Group's organisational and control structure, which has the powers, means and competences to report any critical issues to the Board of Directors and, if it deems it appropriate, to the Shareholders' Meeting.

In line with the Internal Audit Manual of the Dolomiti Energia Group and in conformity with the International Professional Practices Framework (IPPF) of the Institute of Internal Auditors (IIA), the Area Manager prepares the Internal Audit Plan on an annual basis, defined in a risk-based logic and approved by the Board of Directors. The document reports the risk assessment update, the progress, the outcome and any criticalities

encountered in audit activities, both planned and unplanned, in the advisory and assurance areas, as well as those planned for the following year.

In addition, at least every six months, the Board of Directors receives a report from the Internal Audit Department on the progress and outcome of the Plan. As part of the Internal Audit Plan, any critical data protection issues identified by the Group Data Protection Officer are also addressed to the Board.

Every six months, the Board of Directors is finally informed of the outcome of the supervisory activities carried out and of any critical issues through a written report by the Supervisory Body appointed with reference to the 231 Model, in coordination with the Corruption Prevention Manager with regard to the supplementary anti-corruption measures.

On the basis of the materiality analysis, the Strategic Plan and the corporate organisation, the Board of Directors identifies and appoints managers, each within their area of responsibility, with respect to impact management and the implementation of ESG guidelines.

The Group's organisation is based on a logic of efficiency, structure by processes, segregation of powers and consistency with the technical and managerial skills of the managers entrusted with the business areas. Each company manager, for their own area, examines and evaluates the specific risks of their processes, identifies the safeguards and ensures their monitoring in terms of adequacy and effectiveness.

The Board of Directors is the recipient of numerous periodic reports from the Chair, the CEO and the Group's executives according to their areas of responsibility, including the Non-Financial Statement itself relating to all ESG indicators defined, monitored and collected by company executives and summarised in this single, integrated, independently audited document.

2.3 BUSINESS ETHICS AND INTEGRITY

GRI 3-3 Business ethics, integrity and transparency | GRI 3-3 Emergency management, business continuity and cybersecurity | GRI 3-3 Anti-corruption |

GRI 2-15 | GRI 2-23 | GRI 2-24 | GRI 2-25 | GRI 2-26 | GRI 205-2 | GRI 205-3 | GRI 401-1 | GRI 418-1 |

The Dolomiti Energia Group has always considered the importance of values and ethics in the management of corporate business, committing itself to operating in all areas according to the principles of integrity, honesty and transparency in compliance with current regulations. This is why it has taken steps to prevent the risk of corruption violations identified by the main instruments and national and international legislation to which the Group refers on this topic.

Observance of the laws and the committed fight against corruption are clearly established in the Group Code of Conduct, given tangible form in the working practices and methods defined and circulated through the company procedures, and supported, promoted and monitored through a system of communication, training and constant monitoring.

The Code of Conduct is aimed at defining and disseminating the Group's ethical principles and rules of conduct that must be observed by all those who - within the scope of their functions and responsibilities - work to achieve the Group's corporate objectives, in order to mitigate the Group's risks and foster the achievement of corporate objectives through a culture of fairness, integrity, transparency and competence that must be the hallmark of corporate activities. The Group Code of Conduct is approved by the BoD of the Parent Company and is adopted by the Boards of Directors of the single subsidiaries.

In line with the Code of Conduct, the Board of

Directors has approved a series of instruments implementing the values and rules of conduct defined therein, namely:

- the Organisation and Control Model pursuant to Italian Legislative Decree 231/01 drawn up on the basis of the Confindustria Guidelines and best practices on the subject;
- the Supplementary Measures on the Prevention of Passive Corruption, drawn up on the basis of the ANAC anti-corruption guidelines;
- the Anti-Corruption Policy.

In order to guarantee correctness and ethicality in the performance of its corporate activities, the Dolomiti Energia Group has adopted an Organisation and Control Model pursuant to Italian Legislative Decree 231/01 (also 'the 231 Model'), in Dolomiti Energia Holding and in each subsidiary, which is aimed at determining full awareness among shareholders, directors, employees, collaborators and external partners of the provisions of the aforementioned decree.

Thanks to the prevention protocols identified and the supervisory activity - carried out by the in-house and permanent specific Supervisory Body - the 231 Model makes it possible to prevent and/or promptly react to prevent offences from being committed, including but not limited to corporate offences, corruption offences, offences against the Public Administration and offences involving health and safety and the environment.

The 231 Model pursues governance of the company's activities in keeping with shared procedures and rules that distribute the responsibilities and balance the relationship between operational management and check and control activities. For instance, the guarantee of confidentiality of the identity of the whistleblower, the prohibition of retaliatory acts and discrimination against the whistleblower for reasons related to the report, and lastly the sanctions to be applied against those who violate the envisaged protection measures or raise unfounded claims are made explicit.

In 2023 the Group also guaranteed the constant updating and adaptation of the Organisation, Management and Control Model on the basis of organisational, regulatory (see Italian Legislative Decree 24/2023 implementing EU Directive 1937/2019) and operational changes in the Group, also monitoring the adequacy and efficacy of the relative company procedures periodically reported to the Supervisory Body and the Board of Directors.

The 231 Model is also the main corruption prevention tool used in the Dolomiti Energia Group, developed and adopted as an integral part of its operations.

At the same time the Group, aware of the importance of combating corruption and in light of the current social and political context, has decided to strengthen its prevention model with further specific measures to prevent corruption offences committed by company representatives to the detriment of the company³.

The specific corruption prevention measures are drawn up by the Group Corruption Prevention Manager, approved by the Board of Directors of the parent company and adopted by the Boards of Directors of the subsidiaries.

In particular, the main prevention protocols include:

- principles and rules of conduct,
- the budget tool as an instrument of guidance and control,
- the separation of powers and activities aimed at preventing a completely autonomous position from carrying out a process sensitive to corruption offences,
- traceability and reporting of sensitive operations,
- reference procedures and authorisation powers,
- specific standards and control mechanisms depending on the process,
- the whistleblowing process as a tool for bringing to light possible wrongdoing and violations in company activities.

The latter was the subject of important adaptation work in 2023 in order to implement the innovations introduced on the subject by Italian Legislative Decree 24/2023.

The Dolomiti Energia Group undertakes to disseminate the Code of Conduct, the 231 Organisation and Control Model and the anti-corruption measures to all personnel working for the organisation, or on its behalf, and to make them available to the public.

In this regard, in 2023 the Group continued to spread the principles, values and codes of conduct designed to prevent acts of corruption among its employees, suppliers and company partners, also through specific training courses. Anti-corruption training is administered to all employees during the recruitment phase, as well as on a massive scale when there are significant changes in the

³ For details on the measures, please refer to the documents published at www.gruppodolomitienergia.it.

relevant legislation. More specifically, new hires correspond to about 15% of the total Group population in 2023 and each of them received the aforementioned training during the year.

The anti-corruption procedures and policies have also been communicated to all staff, regardless of their job classification.

As far as business partners are concerned, as a category also including sales agents, all new hires

have been informed about anti-corruption policies and procedures. New agents in 2023 accounted for 8% of the total number of agents (16% in 2022). Anti-corruption training was also provided to members of the highest governing body in 2023; specifically, 57% of the members benefited from this.

There were no reports of corruption in 2023, as in previous years.

2.3.1 CONFLICTS OF INTEREST

All those who operate in and on behalf of the Group are obliged to act correctly in order to avoid situations of conflict of interest, meaning, in general, all situations in which in the performance of their activity or task, the person makes a decision and/or carries out an activity and has an interest that may actually, potentially or apparently invalidate the interest of Dolomiti Energia Group, which the person must pursue in making such a decision or in carrying out such an activity. Particular attention must be paid to relations with the Public Administration, since the existence of a conflict situation could lead to the entity being held liable for certain offences against the Public Administration.

In this respect, the Code of Conduct identifies precise operating procedures for managing conflicts of interest.

Any person operating within the Dolomiti Energia Group, whether internal or external, who finds themselves in a situation of conflict of interest is obliged to immediately communicate this in writing, also by email, respectively to their Manager or to their company contact person, as well as, in any case, to the legal representative of the company to which they belong and to the Supervisory Body, so that they may take all necessary measures to avoid the situation of conflict

of interest materialising.

The Manager and the company contact person, respectively, of the employee and the external recipient who find themselves in one of the situations of conflict of interest as described in the Code are obliged to take all appropriate measures to ensure their abstention from participating in the adoption of the decisions or activities in question. In particular, the Manager and the company contact person are obliged to take steps to avoid the materialisation of the situation of conflict of interest - real, potential and apparent - respectively, of the employee or external person, by assigning the activity in question to another company contact person and, if this is not possible, by taking over the management of the activity themselves.

In this case, when taking the measure or the assessment, the Manager and the company contact person shall justify in writing, with clarity and transparency, the choice made, indicating all the elements that led to the act, and shall notify the person concerned in writing, as well as the company's Supervisory Body, the Chair and Chief Executive Officer of both the company and the Parent Company. If the Manager or the company contact person assesses that the conflict of interest does not exist, after discussion with the

Supervisory Body and the legal representative, they notify the person concerned, the Supervisory Body and the Chair and Chief Executive Officer of both the company and the Holding Company in writing.

If the conflict of interest cannot be otherwise solved or involves a senior or one-man figure, the measure is taken by the Board of Directors or, in the case of a sole director, by the Shareholders' Meeting.

2.3.2 PROTECTION OF PRIVACY, INFORMATION AND BUSINESS CONTINUITY

Aware of the absolutely important role that corporate information and IT systems play in the achievement of strategic objectives, and considering the continuous growth and evolution of cyber threats, the Dolomiti Energia Group continues to implement activities and initiatives in the various technological, organisational and personnel spheres, with significant impacts on both personal data protection and business resilience.

With regard to the protection of privacy, the Dolomiti Energia Group ensures the respect of the rights of data subjects according to the GDPR (see General Data Protection Regulation) by providing a specific process for managing the rights that can be exercised by data subjects by means of an express request to the companies acting as data controllers. The process involves:

- receipt of the request through the methods indicated in the privacy policy by the input channels. Data subjects may also contact the Data Protection Officer (DPO) directly for all matters relating to the exercise of their rights;
- the input channel assesses the admissibility of the request in terms of the actual existence of the data subject and the data processed;
- the input channel provides an initial response within five days to indicate that the request has been taken charge of;
- the input channel makes sure to fulfil the implementation of the data subject's requests

(withdrawal of consent, rectification/deletion of data);

- the input channel provides a formal acknowledgement to the data subject (certified e-mail, e-mail or letter) within 30 days of the request, completing or informing the same, in the case of a particularly complex issue, that a reply will be provided within the next 60 days;
- the input channel archives the request and the answer provided, in an archive also available to the DPO.

With regard to the security of corporate information, this constantly evolving process includes the adoption of technologies for prevention and defence against cyber attacks, organisational adjustments, the definition and review of policies and procedures, and continuous awareness-raising activities so people know how to mitigate IT security risks.

The Dolomiti Energia Group's data protection operating model includes a specific procedure for managing any security breaches of personal data, known as the breach management process. It defines the actors, methods and tools for managing breaches and the consequent actions that the organisation must initiate and complete, in full compliance with the provisions of the European Data Protection Regulation (GDPR).

The Dolomiti Energia Group has adopted various measures to prevent the occurrence of unauthor-

ised access to the corporate information system, thus preventing hacker attacks and limiting their effects if they do occur. With reference to both Information Technology and Operation Technology systems, during 2023 the Internal Audit Department carried out an important review of the safeguards put in place by the Group to prevent, manage and mitigate IT security risks that jeopardise business continuity and the achievement of corporate objectives, providing important reinforcing indications to the corporate departments involved.

Specifically, in managing its applications, the Group adheres to ENISA (European Union Agency for Cybersecurity) best practices, dividing them into different intervention areas and applying them with varying intensity to the various company applications: backup, log collection, access control, encryption, authentication information management, physical and environmental security, operational activity security, media handling, malware protection, communication security and technical vulnerability management. The Security and IT Compliance department carries out annual vulnerability assessments of the company's systems, addressing the critical issues that emerge from time to time. It has adopted protection services such as firewall, IPS/IDS, DMZ and web filtering and segregated the production, development and testing environments.

In relation to cybersecurity and business continuity, the Group strengthened internal training for employees in order to constantly improve staff behaviour with IT tools; this action was also extended to customers through a training campaign on phishing prevention. The Group continues to use technological tools aimed at preventing cyber crime, in particular two-factor authentication (MFA) for access to corporate tools. It has also set up various safeguards to prevent unauthorised access to the company's information system, expanding the monitoring and response capabilities of the outsourced Security Operating Centre.

In relation to cybersecurity prevention training campaigns, the Group monitors employees' use of the training modules and activates continuous reminder campaigns to remind them of training deadlines. Monitoring shows participation in and passing of the training modules.

Stakeholder engagement has made it possible to identify the most suitable methods and frequencies for cybersecurity training, and also enabled messages to be conveyed more effectively.

The Group's register does not report any data breach events for 2023; the Dolomiti Energia Group recorded four cases of personal data breaches of minor importance in 2023, and in none of them was it necessary to notify the Guarantor or inform the data subjects.

Proven complaints regarding breaches of customer privacy and loss of customer data

	UoM	2023	2022
Complaints from external and confirmed parties	No.	-	-
Complaints from regulatory bodies	No.	-	-
Leaks, theft, loss of customer data	No.	-	2
TOTAL	No.	-	2



2.4 CREATION OF ECONOMIC VALUE

GRI 3-3 Consideration of ESG-related risks and opportunities in business development and strategy | GRI 3-3 Creation of economic value | GRI 3-3 Transparent governance | GRI 3-3 Climate change mitigation and adaptation |

GRI 201-1 | GRI 201-2 | 201-4 | GRI 207-4 |

Solid and cohesive, the Group is committed to returning value each year to its shareholders who, being mostly public entities, transform the Group's contributions into goods and services for local communities.

The commitment to generate shared value by investing in a sustainable development strategy was again confirmed for 2023. At its core is the creation of value for the environment, communities and the economic system.

The Group seeks to achieve this objective through decarbonisation, increasing production from renewable sources. In this direction, the essential role of the products and services offered by all Group companies that guarantee innovation is recognised, particularly in relation to energy efficiency, public lighting, electric mobility, smart cities, and to raising awareness towards the use of green energy and the principles of the circular economy

Main Economic and Financial Data⁴

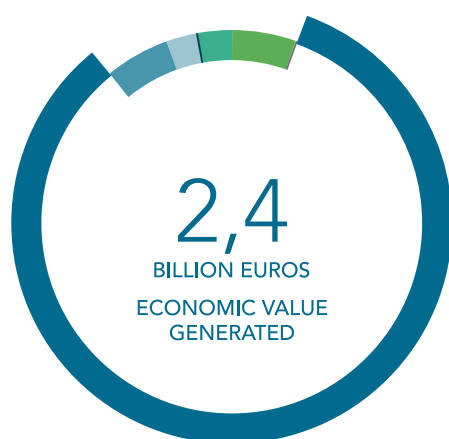
	u.m.	2023	2022	2021
Value added	€ million	578.9	389.5	375.8
Leverage (net financial position on shareholders' equity)	€ million	0.3	0,8	0.9
ROI (EBIT/net invested capital)	%	12.5	3.4	3.5
Gross operating margin/revenue and other income	%	16.8	5.9	9.5
ROS (EBIT/turnover)	%	13.9	3.5	6.6
TOTAL REVENUE AND OTHER INCOME	€ million	2,341.3	3,353.7	2,182
Gross operating margin	€ million	392.6	196.5	206.9
Investments	€ million	115.4	97.6	105.7

The creation of value for shareholders and all other stakeholders is one of the Group's main objectives. The economic value generated and distributed throughout the financial year is represented

here in a reclassification income statement of the Consolidated Financial Statements at 31 December 2023.

⁴ For more information on the economic performance of the Group and its assets and financial position see the 2023 Report on Operations published on the website www.gruppodolomitienergia.it.

	UoM	2023	2022	2021
ECONOMIC VALUE GENERATED BY THE GROUP	€ thousands	2,357,402	3,348,597	2,176,155
Revenue	€ thousands	2,341,292	3,353,712	2,176,715
Other income	€ thousands	6,902	1,382	551
Financial income	€ thousands	12,808	926	1,142
Value adjustments on financial assets	€ thousands	-	-	-
Write-downs	€ thousands	(3,600)	(7,423)	(2,253)
ECONOMIC VALUE DISTRIBUTED BY THE GROUP	€ thousands	(2,167,388)	(3,278,682)	(2,057,181)
Operating expenses	€ thousands	(1,769,286)	(2,965,593)	(1,801,253)
Remuneration of collaborators	€ thousands	(79,530)	(70,188)	(66,815)
Remuneration of lenders	€ thousands	(23,697)	(10,193)	(7,987)
Remuneration of investors	€ thousands	(105,680)	(25,020) ⁵	(69,865)
Remuneration of public administration	€ thousands	(186,861)	(205,575)	(108,980)
Sponsorships and donations	€ thousands	(2,334)	(2,113)	(2,281)
ECONOMIC VALUE HELD BY THE GROUP	€ thousands	190,014	69,915	118,974
of which Amortisation/depreciation and provisions	€ thousands	63,701	70,617	59,963
of which Other reserves	€ thousands	126,313	(702)	59,011



75,2%	Operating Costs
7,9%	Retained Value
3,4%	Collaborators
1,0%	Lenders
4,5%	Investors
7,9%	Public Administration
0,1%	Donations and Sponsorships

In 2023, the Group generated €357 million value added (€389 million in 2022). The Group distributed value to all its stakeholders, i.e., its employees, suppliers and Public Administration through

taxes, duties and fees, to shareholders with payment of dividends, to lenders and, lastly, to the community through donations and sponsorships.

⁵ This amount does not include the dividends of the parent company Dolomiti Energia Holding, as its Board of Directors resolved to postpone the decision on the amount of the dividend to be distributed to the Ordinary Shareholders' Meeting, to be held after the publication of this document.

2.4.1 THE GROUP'S FINANCIAL RELATIONS WITH THE COMMUNITY

The Dolomiti Energia Group recognises the importance of correct and precise administration of its financial flows and resources in order to protect the interests of its stakeholders, including especially shareholders, the Public Administration and the Community. In fact, these are the categories directly concerned with the transparency of the Group's financial relations as they are subject to their effects in the form of economic remuneration and contributions.

The Dolomiti Energia Group consists of companies with registered offices in Italy; therefore, in compliance with tax legislation, all the companies pay taxes to the national tax authorities.

The taxes recognised in the financial and economic statements can be divided into:

- current taxes, which are calculated based on the taxable income for the year, by applying tax rates in force at the reporting date;
- prepaid and deferred taxes, defined based on all the differences that arise between the tax value of an asset or liability and the related carrying amount. Prepaid taxes, including those related to prior tax losses, are recognised to the extent that it is probable that there will be future taxable income to which that tax loss can be applied. Prepaid and deferred taxes are determined by using the tax rate that it is estimated will be applicable in the years in which the differences will be realised or extinguished, based on the enacted or substantially enacted tax rate at the reporting date.

The Group's approach to taxation

	u.m	2023
Non-Group revenue	€ thousands	2,195,159
Intercompany revenue	€ thousands	1,399,935
Pre-tax profit/loss	€ thousands	314,409
Assets (net of cash and banks)	€ thousands	2,578,772
Taxes paid on company income (cash basis)	€ thousands	53,900
Taxes accrued on business income (accrual basis)	€ thousands	82,416

National financial assistance is a key monetary policy mechanism for economic development, used by national governments to promote and stimulate business growth and attract more and better investment opportunities. Given the value of these resources not only for the Group's business, but above all for the prosperity of the national economic and social fabric, the Dolomiti Energia Group is committed to ensuring their

transparent management.

In 2023, the Dolomiti Energia Group received tax credits relating to benefits provided for by law, amounting to about €1.8 million and specifically concerning: energy and gas credits to mitigate the increase in costs; tax credits for art bonuses established to encourage donations to entities dealing with the dissemination of artistic and historical culture; credits related to sports

sponsorships and to research and development; and credits for increased investments in capital

goods. No other amounts of financial assistance were received.

2.4.2 FINANCIAL IMPLICATIONS AND RISKS AND OPPORTUNITIES DUE TO CLIMATE CHANGE

Due to its social configuration, market positioning and the businesses its companies are involved in, the Group suffers the economic and financial impacts of physical climatic risks on its assets, such as networks, plants and infrastructure. This implies due analysis and mitigation of the latter.

Also for this reason, the Group has chosen to play an active and continued role in sustainable development, both in its own businesses and in the territories and communities in which and with

which it operates. This is achieved also thanks to the drive of the Shareholders, who are strongly interested in green and smart issues, demonstrated by the approval by the Autonomous Province of Trento of the Provincial Strategy for Sustainable Development.

Climate change does not only entail risks but can offer business opportunities to companies that are able to adapt their model and take advantage of this transition phase.

CLIMATE CHANGE - FLAGSHIP INITIATIVES

The Dolomiti Energia Group, which deals with central businesses in the context of the Green Deal, has launched and planned important initiatives in line with the 'Climate Change - Flagship Initiatives' promoted by the European Union that deserve to be enhanced and adequately communicated. These include:

- - Structural interventions to counteract the impact of rising temperatures on the operational activities of employees working outdoors, for example in waste collection and sweeping, including evaluations of work shifts and breaks, provision of appropriate clothing and water bottles, installation of air conditioning in vehicles, use of electric vehicles that reduce heat emissions on operators on platforms, as well as training waste collectors on the correct behaviour to adopt in the workplace in adverse weather conditions;
- Interventions aimed at managing the impacts of catastrophic weather events on the gas distribution network, in particular by carrying out network analyses to identify critical points, implementing system redundancy logic on certain network sections, and concluding agreements for the emergency interventions of cylinder trucks;
- Interventions aimed at managing impacts on building redevelopment projects through research and development initiatives on materials, aerodynamics and the design of photovoltaic panels as well as evaluations of early replacements of installations with high environmental impact;
- Interventions aimed at managing the impacts of catastrophic weather events on the electricity distribution grid through investments aimed at increasing grid resilience, intercepting grid criticalities, implementing innovative software and allocating adequate internal and external resources to deal with emergencies (also through long-term procurement contacts), as well as investing in large-scale projects underway to move the grid underground, replacing the oil in transformers potentially subject to breakage during intense events with vegetable oil, and engaging in projects to identify hydrogeological risk areas.

In the field of hydropower production, investments have been made in state-of-the-art software that enables forecasting inputs under normal conditions and in exceptional events, and in adequate infrastructure for managing floods, including through optimised intake management policies.

With reference to the integrated water service, studies have been carried out on plants to reduce water use, and actions have focused on intercepting and resolving leaks in the network, also with the use of specific software.

The European Union has classified many activities carried out by Group companies as relevant for Green Taxonomy purposes, with a significant positive impact from a reputational and evaluative point of view in anticipation of possible applications for investment funding.

Precisely in light of this context, the Group has carried out its risk assessment activities related to climate change in recent years in order to:

- Articulate climate risk impacts in the Group's different businesses;
- Identify and map climate change risks impacting the Group's activities and businesses;
- Identify the safeguards already implemented against those risks;
- Identify future actions to be implemented to further mitigate the impact of those risks;

- Pool climate risk mitigation initiatives within the Group, increasing awareness and sharing on climate change;
- Lay a solid foundation for a structured and inclusive project initiative, starting from the results of the analyses carried out.

As already described in the 2022 Non-Financial Statement, through a cross-functional team from the various businesses, last year the Group mapped climate change risks in terms of describing the risk scenario, classifying between physical and transitional risks, assessing impacts and identifying measures to manage, prevent and mitigate these risks. The activity carried out was

reviewed and furthered in the light of the indicators provided in two probabilistic climate change effect scenarios for Italy, namely RCP 4.5 and RCP 8.5. The results ultimately determined the main guidelines for the development of the Corporate Strategic Plan

Acknowledging the importance of what was completed during 2022, the risk assessment was revised in 2023 in light of the changing nature of the environment in which the Group operates and, based on the latest assessments of the team in charge, the correctness and completeness of the work performed the previous year was confirmed.



2.4.3 THE SUPPLY CHAIN

GRI 3-3 Catena di fornitura sostenibile e resiliente |

GRI 2-6 | GRI 204-1 | GRI 308-1 |

The Dolomiti Energia Group's main supplies concern energy raw materials and the execution of work, services and supplies to support the various businesses. The procurement - with the exception of energy raw materials - and logistics of materials are managed by a central department at the Parent Company for all the companies.

The organisation of the Group's procurement process is inspired by the general principles of:

- affordability
- effectiveness
- impartiality
- equal treatment
- transparency
- proportionality
- publicity
- protection of the environment
- energy efficiency

All the main stages of the relationship with suppliers are managed through an e-procurement platform to facilitate easy and equal access to the Group's procurement requirements by interested economic operators and to foster transparency, traceability and the lowest possible operating costs for the preparation of offers.

In addition, the supplier portal guarantees the application of the safeguards adopted in the Code of Ethics and 231 Model, including equal treatment, publicity as well as traceability, unambiguous identification of functions, persons responsible for process steps and their authorisation profiles.

With reference to the phase of selecting suppliers and evaluating offers, considering the significant use of external labour in the procurement of works, services and supplies for the maintenance activities of networks and plants that are critical for the continuity of the services provided, and considering the impact on safety and environmental protection issues, the Dolomiti Energia Group adopts strict rules not only upon supplier qualification, but also in the management of the contract execution phase. Particular attention is paid to the issue of safety at work, the requirements of which are excluded from downward economic competition for the award of contracts.

During qualification, suppliers are also required to prove that they hold and maintain documented procedures for the protection of workers. For companies belonging to sectors deemed most significant in terms of environment and health and safety, an in-depth study of management practices is also planned.

The economic operator is assessed for qualification purposes through a fully traced computer process, based on general, administrative and financial requirements, relating to quality, safety, environment, sustainability and technical issues, with reference to technical and organisational capacity, the development of the professional skills of its workforces and financial soundness.

Procurement, which concerns the awarding of critical activities for the business sectors of the Dolomiti Energia Group, and which mainly include the supply of materials and electrical equipment, works and services contracts in the sectors of gas and electricity distribution, hydro-electric power generation, energy efficiency and

information technology, are carried out in compliance with the regulations on public procurement, where applicable, and internal regulations, which are also inspired by the general principles mentioned above. These instruments envisage the evaluation of the offer according to the parameters of technical quality, sustainability and cost-effectiveness.

In the course of supply relationships and in the execution of related contracts, Group employees are required to:

- not preclude any economic operator meeting the requirements from competing by adopting objective and transparent evaluation criteria in the selection;
- observe the contractually agreed conditions and maintain clear and correct relations with public officials and private counterparties, avoiding any behaviour likely to impair the counterparty's freedom of judgement;
- carefully archive all the documentation of the entire selection and procurement procedure so that each operation can be reconstructed.

Businesses remain in the Register of Qualified Suppliers subject to checking that they maintain the minimum requirements and to the results of audits and Vendor Rating activities of the services they offer following the execution of contracts awarded.

In particular, in-depth studies and regular audits are planned in the following areas:

- periodic surveys aimed at gathering information with respect to accident data and occupational diseases related to events occurring in the performance of activities commissioned to suppliers by Dolomiti Energia Group companies;
- possession of the documentation required by current legislation on employment contracts;

- obligation for the employer of the economic operator to ensure that each worker receives sufficient and adequate training in health and safety, including with respect to language skills, as further specified in Art. 37 of Italian Legislative Decree 81/2008 as amended;
- verification of the effective and constant performance of adequate specific training for the operational areas for which the economic operator proposes its collaboration to the Dolomiti Energia Group. Differentiated certified specific training is required in relation to the professional figures identified, starting from the most generic roles and with a particular focus on specific areas of intervention considered particularly critical, such as operators involved in the assembly and maintenance of underground and overhead lines, plant trimmers, site managers, foremen and safety managers, operators in confined spaces, drivers of work vehicles, welders, operators on gas, electricity and water distribution lines and, in general, on operating plants;
- specific appointments according to the roles that will have to be filled by virtue of the tasks entrusted such as PEC, PAV or PES in accordance with CEI-EN 50110-1 (CEI 11-48) and CEI 11-27);
- appointment of the Prevention and Protection Service Manager (RSPP), the site safety officer, the emergency manager and his deputy, and the company doctor;
- requirement in contracts stipulated with contractors to provide immediate information on any accidents that may occur.

During 2023, the Procurement Department launched a model for the economic and financial monitoring of suppliers of critical products. This activity is accompanied by the preparation of a risk analysis policy which will pay particular attention to economic and financial sustainability and which, combined with social and environmental sustainability, will aim to promote the

generation of shared and lasting value along the supply chain.

For the coming year, also in order to expand sustainability reporting, the Group plans to initiate, together with the technical areas of the businesses involved, actions to consolidate the monitoring of supply chain sustainability. More specifically, an initial ESG rating campaign of critical suppliers will be carried out, the minimum qualification requirements will be revised, and critical Group products will be identified - for which specific sustainable procurement projects will be set up - at the project, proposal evaluation and contract execution stages.

The prevalence of Italian and local suppliers is determined by the specificity of the business, in particular by the need to very rapidly carry out

maintenance work to ensure maximum system safety with greater competitiveness in terms of transport costs for supplies that are very heavy and large, thus also contributing to reduce the corresponding environmental impacts.

The percentage of cost spent with local suppliers with headquarters in the province of Trento amounted to 61.34% (54.55% in 2022) of suppliers of raw materials and services for all the Group's companies, equal to an expenditure of over €2.2 billion (3.6 billion in 2022).

In 2023, 379 new suppliers were selected on the basis of environmental sustainability criteria (594 in 2022).



SUSTAINABLE ACTIVITIES AND SERVICES



3,119.15 GWh

of produced energy fed into the grid (2,250.7 GWh in 2022), of which 97% from renewable sources (93% in 2022)



74,866 tonnes

of waste collected in the municipalities of Trento, Rovereto and Vallagarina (69,708 tonnes in 2022)



271.3 million m³

of gas distributed (291.4 million m³ in 2022)



349,931

electricity customers (337,803 in 2022)



92,171

water cycle customers (114,541 in 2022)



3.1

THE GROUP'S BUSINESSES

GRI 3-3 Climate change mitigation and adaptation | GRI 3-3 Awareness-raising for consumption efficiency, use of renewable energy and responsible waste management | GRI 3-3 Protection of water quality, soil quality, ecosystems and conservation and restoration of biodiversity |

GRI 2-6 | GRI 302-5 | GRI 303-1 | GRI 306-2 | GRI 306-3 | GRI 306-4 | GRI 306-5 | G4 - EU - 1 | G4 - EU - 2 | G4 - EU - 3 | G4 - EU - 4 | G4 - EU - 8 | G4 - EU - 12 | G4 - EU - 26 | G4 - EU - 27 | G4 - EU - 28 | G4 - EU - 29 |

The Dolomiti Energia Group is active in the entire electricity supply chain, gas distribution, urban hygiene management and public lighting service, water service, district heating, electric mobility, energy sustainability and efficiency.

The Group's main customers are citizens (domestic customers) and companies (business customers) in the Province of Trento and throughout Italy: knowing their expectations, offering them timely and innovative services at favourable conditions, enhancing communication and facilitat-

ing accessibility to products and services are the social responsibility objectives that the Group is committed to achieving with concrete initiatives.

To be able to always guarantee the utmost safety for citizens, workers and the environment, the production plants, networks and infrastructure are monitored round the clock. This constant oversight allows us to guarantee prompt and efficient services, but also to detect critical situations and emergencies and to find prompt solutions to them.

3.1.1 ELECTRICITY PRODUCTION



The Dolomiti Energia Group handles electricity management in the most comprehensive manner: Hydro Dolomiti Energia, Dolomiti Edison Energy, Dolomiti Hydro Power, SF Energy and now Dolomiti Wind Power take care of production, favouring the use of renewable sources, Dolomiti Energia Trading dispatches it on the energy markets, Dolomiti Energia sells it throughout Italy to meet people's needs, and SET Distribuzione brings it to the homes of citizens and to the premises of companies.

In 2023, the Dolomiti Energia Group produced 3,119.15 GWh (2,250.7 GWh in 2022) of electricity (net of self-consumption) in its hydroelectric, cogeneration and photovoltaic plants, its wind

farms and at the turbogas plant in Ponti sul Mincio. Production from hydroelectric sources amounted to 97% (93% in 2022) of the total, an increase compared to last year thanks to the return of rainfall to a level aligned with the ten-year historical average, after a long period of marked drought which lasted over a year.

HYDROELECTRICITY



The production of energy from environmentally friendly sources such as water plays an important role in protecting the environment, as it reduces greenhouse gas emissions and means there is less need to resort to other forms of production with a higher impact on the environment. The Group's production capacity in the field of hydroelectric power includes directly operated power stations located in Trentino-Alto Adige and Veneto. This energy is generated by the companies Hydro Dolomiti Energia, Dolomiti Energia Holding, Dolomiti Edison Energy, Dolomiti Energia Hydro Power and the subsidiary SF Energy.

In 2023, an important milestone was reached following the award of a public tender for the

construction of a hydroelectric power plant on the Rio Cavelonte by the temporary consortium formed by Dolomiti Energia Holding and STE Costruzioni Generali. The power station being built by the Group will be owned by the Municipality of Panchià, and Dolomiti Energia Holding will support the Municipality in management thanks to its consolidated experience in the sector. The partnership will last until 2040, and until then the temporary consortium will benefit from 64.99% of the profits deriving from the operation of the hydroelectric power station, of which 80% will go to Dolomiti Energia Holding and the remaining 20% to STE General Construction. Dolomiti Energia Holding and STE will manage the plant until 2040 which, according to project estimates, will produce 4.2 GWh/year. Work on the construction of the power plant began on 31 May 2023 and will be completed in 2024

Installed capacity⁶

	2023	2022	2021
MWh	1,497.8	1,497.8	1,497.8

Energy generated⁶

	2023	2022	2021
GWh	3,018.5	2,092.7	3,429.9

The objectives and initiatives implemented by the Group in the field of hydroelectric production

and their state of progress are described in the following table:

⁶ The data have been updated from those published in previous non-financial statements, in light of a refinement of the data collection process and calculation methodology, in particular by not considering SF Energy, a company 50% owned by the Group.

Goals and initiatives	Goal year	State of progress	Description
Experimentation with new production methods with low environmental impact	2024	●●○	The testing of a new production method with low environmental impact continued during 2023 through the experimentation of hydrokinetic turbines on the Biffis canal (Hydro Dolomiti Energia). The activities are partially completed, with possible further implementation and development during 2024.
Adoption of water supply forecasting software	2024	●●○	Starting in 2022, the Group has been using specialised software for customising physical models on the relevant catchment areas, with the dual aim of optimising production (and improving use of the resource) and managing flood events, through liaison with the civil protection authorities and consequent increase in resilience. The resources dedicated to this project include investments in the development of predictive methods and software with the involvement of a resource exclusively dedicated to the project, and the involvement of research institutes. As of 2023, about 50% of the plants have been implemented. Further development and completion is planned for 2024.
European HORIZON project named SUNRISE 'Strategies and Technologies for United and Resilient Critical Infrastructures and Vital Services in Pandemic-Stricken Europe'	2025	●●○	Hydro Dolomiti Energia continues to participate in the SUNRISE project (started in 2022), which envisages the involvement of 41 partners at European level, including 18 European regulatory authorities and critical infrastructure operators. The project focuses on increasing active cooperation and developing joint response strategies within the European Critical Infrastructures (CI). The ultimate goal is to increase the preparation and equipment of CIs to adequately assess, address and manage the risks created by future pandemics.
Automation of intake works	2027	●○○	The project envisages the automation and remote control of regulating organs of the water catchment works in the riverbed in order to increase efficiency in the use of natural resources, reduce operating costs, and increase safety for staff and the works, thanks to the possibility of remote early action during adverse weather events. In order to achieve these objectives, investments were made in the development of parts of the plant with the involvement of internal staff and external specialised companies in the design and implementation phase. The activity has been implemented for three intake works, nearing completion for one and underway for two others. Further developments are planned over the next four years.

The production of hydrogen from hydroelectric power is part of the Dolomiti Energia Group's broader supply chain project focused on testing actual possible and sustainable use of the vector and verifying other potential advantages in the production field (e.g., the modulation of hydroelectric production by means of hydrogen storage). To this end, investments are planned for the development of new plants with the involvement of in-house staff, specialised suppliers and research institutes, pending regulatory developments that define the modalities.

PHOTOVOLTAIC ENERGY



The Dolomiti Energia Group also produces energy through photovoltaic plants operating at the sites in Rovereto, Preore, Torbole and Trento, and the construction of further plants is being evaluated. In addition, through the company Dolomiti Energia Solutions, the Group deals with turnkey high energy efficiency plants and photovoltaic plants throughout Italy for energy requalification and savings.

Dolomiti Energia Solutions is also committed to the development and sustainability of energy

communities mainly in its own provincial area. In 2023, Dolomiti Energia Solutions, together with the Autonomous Province of Trento, continued the My Green Home initiative (started in 2022) for the promotion of photovoltaic systems in the residential sector. In this context, supported by Dolomiti Energia Holding, the company introduced the possibility of benefiting from a bill discount as an alternative to the 50% tax deduction divided into ten annual instalments.

Also for 2023, the significant increase in energy prices led to a significant growth in demand for photovoltaic systems. The Consortia BIM (Consorti del Bacino Imbrifero Montano) further stimulated the development of photovoltaic systems

in the region, which granted non-repayable subsidies for the construction of photovoltaic systems in residential areas. Other incentives that prompted customers to install this type of system were undoubtedly various public contributions (e.g., Energy Community regulations, provincial contributions, national deductions, etc.) and the significant reduction in the cost of the system modules themselves.

For the coming years, the Group has set itself the goal of building photovoltaic plants with a total capacity of 4.5 MWp, developing the photovoltaic sector in both the industrial and residential fields.



ITALY'S FIRST FLOATING PHOTOVOLTAIC SYSTEM ON A HYDROELECTRIC RESERVOIR

Contributing to the achievement of green energy production goals, following a feasibility study started in 2022, the Dolomiti Energia Group activated the first proprietary floating photovoltaic plant in Italy in 2023, in the Dampone hydroelectric basin in Val di Non.

This is an innovative project that not only confirmed the compatibility of the two clean energy methods, but also highlighted some of the advantages of the new technology.

A floating system like the one in Dampone allows the panels to be cooled thanks to their proximity to the water and to optimise the ability of water to reflect light, helping to increase energy efficiency compared to a system installed on the ground, which is affected by the high temperatures reached by the soil in summer. Furthermore, the particular positioning on a hydroelectric basin uses a surface without taking up further space on the mainland, protecting the vegetation of the land that has not been disturbed. Added to these advantages are water savings, as evaporation is very low in the areas covered by the panels. With the Dampone experimental plant, the Dolomiti Energia Group makes a further contribution to the national and provincial decarbonisation goals, while simultaneously adding a further important piece to the strategic diversification of the Group's clean energy sources.

Installed capacity

Uom	2023	2022	2021
MWh	781.6	781.6	781,6

Energy generated

Uom	2023	2022	2021
GWh	0.4	0.3	0.3

WIND ENERGY



In October 2023, through the newly-formed Dolomiti Energia Wind Power S.r.l. (DEWP), the Group acquired 42.73% of the shares of Eco Puglia Energia S.r.l. (EPE), owner and operator of two wind farms located in Apulia.

The first park, called 'Troia', consists of seven wind turbines with a total rated power of 15.75 MW and is located in Pozzo Orsogono, in the municipality of Troia; the second, called 'Monte Calvello', consists of five wind turbines with a total rated power of 11.75 MW and is located in Ponte Albanito, in the municipality of Foggia. The parks were commissioned in 2020; the overall estimated annual production for the wind farms is approximately 70 GWh.

The acquisition of the described equity investment and related assets is an important step for the Group towards increasing production from renewable sources, and above all, the first significant stride towards diversifying these sources, in line with the objectives and guidelines set forth in the Business Plan approved in 2023.

Like hydroelectric production, energy production from wind power plays an important role in environmental protection, as it reduces greenhouse gas emissions and the use of other forms of production with a higher impact on the environment.

COGENERATION



Another important activity carried out by the Group is the production and transport of heat for heating, cooling and hot water, which is distributed by Novareti in Trento and Rovereto through 29 km of networks to citizens and industries. Sustainability and circular innovation meet in terms of district heating and cooling to improve people's quality of life.

Novareti owns the cogeneration plants with internal combustion engines in Rovereto and the trigeneration plant in Trento, 'Le Albere'. They are fired by natural gas and produce electricity in a combined cycle with residual heat that is partly used for the district heating of city buildings. Only the Trento power plant also delivers cold water for cooling buildings.

The cogeneration plants ensure energy efficiency thanks to recovery of the heat from exhaust fumes and the coolants. Moreover, cogeneration and trigeneration - associated with district heating and district cooling - reduce air pollution in the city, allowing for the elimination of many and at times poorly maintained sources of harmful emissions such as the boilers used to heat apartment blocks and individual homes.

Installed capacity

	Uom	2023	2022	2021
Electric power	MW	8.8	8.8	8.8
Thermal power	MWt	71.8	71.5	71.5
Cold	MWt	7.4	7.4	7.3

Energy generated

	Uom	2023	2022	2021
Steam produced	GWh	-	-	3.6
Heat and cooling provided	GWh	74.0	75.8	86.6
Electricity production	GWh	14.4	35.8	24.8
TOTAL	GWh	88.4	111.6	115

THERMOELECTRICITY



Dolomiti Energia Holding operates in the field of thermoelectric production through a 5% share in the ownership of a combined-cycle turbogas power plant located in Ponti sul Mincio, a few kilometres south of Lake Garda, precisely on the right bank of the Mincio River.

The construction of the plant began in the 1960s and can be divided into three phases:

- in 1966, the first 80 MWh conventional thermoelectric power unit was built;
- in 1983, the second 160 MWh conventional

thermoelectric unit was built;

- and finally, the installation of a 250 MWh gas turbine in the repowering phase of the second group.

This latest plant modernisation made it possible to obtain a total of 380 MWh of electricity.

To date, the first unit has been decommissioned and dismantled, and with it the Dense Fuel Oil tanks.

Production in 2023 was 11.83 GWh (corresponding to the 5% share), compared to 46.1 GWh in 2022.

Installed capacity⁷

UoM	2023	2022	2021
MWh	19 out of a total 380	19 out of a total 380	19 out of a total 380

Energia generata⁸

UoM	2023	2022	2021
GWh	11.8	46.1	49



3.1.2 ELECTRICITY DISTRIBUTION

SET Distribuzione is a subsidiary of the Dolomiti Energia Group operating in medium and low-voltage electricity distribution. All the grid plants, which include substations, overhead lines, underground lines and area stations, are mapped in the company's systems, complete with detailed cartographic mapping.

The network management and electricity distribution activity is carried out in around 156 municipalities in Trentino through more than 12,809 km of grid.

In this respect, the Group aims to research and develop state-of-the-art methods and materials while keeping pace with technological inno-

vation. Different types of resources are used to achieve this goal and affect all company departments. Annual investments are always aimed at continuous improvement and constant maintenance of the plants, as well as research into state-of-the-art methods and materials. People are at the centre of all company processes and are promoters of qualitative, professional, labour, social and technological improvement actions that characterise the nature of SET Distribuzione. In order to speed up development, SET Distribuzione continuously seeks collaborations with other distributors or people with specific expertise in the sector, joining Italian and European associations.

⁷ The Group holds 5% of the share capital.

⁸ In March 2021, the last contract for steam supply ended.

Total distributed electricity

	UoM	2023	2022	2021
Total energy fed into the grid	MWh	2,531,092.0	2,534,202.1	2,557,575.9

Length of electricity distribution network⁹

	UoM	2023	2022	2021
Medium voltage	Km	3,611	3,562	3,524
<i>of which</i>				
Not underground	Km	1,097	1,133	1,166
Underground	Km	2,514	2,429	2,358
Low voltage	Km	9,198	9,058	8,859
<i>of which</i>				
Not underground	Km	794	808	824
Underground	Km	8,404	8,250	8,035
TOTAL	km	12,809	12,620	12,383

As required by industry standards, SET Distribuzione carries out the necessary steps every

year to connect new users and producers who request it to its grid.

Low and medium voltage electricity distribution network meters

UoM	2023	2022	2021
No.	343,931	337,803	334,627

The electricity distribution network had a leakage rate of 1.96% in 2023 (2.22% in 2022). Over the past three years, the average percentage of

energy transmission losses out of the total energy fed into the grid has been around 9.33%.

Losses in energy transmission and distribution

	UoM	2023	2022	2021
Technical losses	kWh	49,536.15	56,142.2	60,896.3
Non-technical (commercial) losses	kWh	-	-	-

⁹ The Group is not involved in the transmission of electricity

The objective of SET Distribuzione is to maintain and improve the quality of the electricity distribution service, mainly designed to reduce supply interruptions and reduce response times to users' commercial requests. The objectives also include a commitment to reducing environmental impact, occupational health and safety, research and development of state-of-the-art methods and materials, and constant technological innovation. In addition to the above, on an annual basis, SET Distribuzione undertakes to reduce the number of pole-mounted transformer posts and

kilometres of overhead lines in forested sections as well. It also monitors any environmental incidents, such as oil spills, and ensures that they are properly handled and efficiently resolved.

The commitment to continuous service quality improvement is confirmed by the data provided annually to the Authority, including, for example, the following tables on the frequency and average duration indices of service interruptions, which confirm SET's role as a national leader in the sector.

Service interruption frequency index¹⁰

	UoM	2023		2022		2021	
		Annual value	Goal ARERA	Annual value	Goal ARERA	Annual value	Goal ARERA
low concentration area	minutes	1.4	4.3	1.4	4.3	1.3	4.3
medium concentration area	minutes	0.8	2.2	0.8	2.2	0.6	2.2
high concentration area	minutes	0.4	1.2	0.7	1.2	0.3	1.2

Average service interruption duration index¹¹

	UoM	2023		2022		2021	
		Annual value	Goal ARERA	Annual value	Goal ARERA	Annual value	Goal ARERA
low concentration area	minutes	24.0	68.0	24.6	68.0	28.9	68.0
medium concentration area	minutes	14.2	45.0	14.9	45.0	19.9	45.0
high concentration area	minutes	12.4	28.0	14.9	28.0	5.7	28.0

¹⁰ Average annual number of interruptions for low-voltage customers due to long interruptions without warning. The result indicated actually refers to the previous year, since ARERA publishes the results and awards the premiums in the year following the reference year.

¹¹ Average annual minutes of interruptions for low-voltage customers due to long interruptions without warning.

Number of service disconnections for non-payment

	UoM	2023	2022
< 48 hours	No.	290	278
48 hours - 1 week	No.	125	120
1 week - 1 month	No.	161	162
1 month - 1 year	No.	36	24
> 1 year	No.	0	0



3.1.3 GAS DISTRIBUTION

Through its subsidiary Novareti, the Dolomiti Energia Group distributes gas with a network of more than 2,728 km which reaches over 168,684 private users and companies in 90 municipalities of the Province of Trento (over 168,000 users also in 2022). Gas is distributed through High, Medium and Low pressure networks which, starting from the National Transport network (managed by SNAM), convey the gas through the Adige Valley, Valsugana and Tesino, Non Valley, Valle dei Laghi, on the Paganella, Cembra, Fiemme and Fassa plateaus and on the Folgaria, Lavarone and

Luserna plateaus. In addition to the distribution networks in the Province of Trento, gas distribution networks are also managed in the municipalities of Salorno and Brentino Belluno and in the territory of the Provinces of Bolzano and Verona.

In order to guarantee greater safety of its distribution systems and respect the arrival time at the location of the toll-free number for fault reports, there are several Operations Centres located throughout the Province of Trento.

Volumes of gas distributed

UoM	2023	2022	2021
m ³	271.347.000	291.000.000	341.838.817

Gas distribution network length

UoM	2023	2022	2021
km	2,798	2,695	2,652

The entire population in the electricity distribution area covered by the Group is served: a figure that is reconfirmed year after year.

Meters for the gas distribution network

UoM	2023	2022	2021
No.	168,684	168,470	168,766

The Group systematically searches for leaks and maintenance along the gas distribution network well beyond compliance with the standards and directives of the national authority ARERA. Although the ARERA directive provides for systematic verification with multi-year frequency, Novareti has instead decided to carry out verifications on an annual basis to further increase the safety level of its infrastructure. Together with the remote control system, a technologically advanced distribution network and its boosted quick intervention capability, this activity ensures that the network that the Group manages has

very few leaks on the whole, and fewer than the national average.

For the gas distribution service, the commercial quality level is measured using a general company index which represents the percentage of services executed, within the standard times envisaged by ARERA, especially for services subject to specific quality levels to be guaranteed to the applicant and to which an automatic indemnity policy applies. The general company index of services performed within standard timeframes achieved during the year was 99.6% (99% in 2022).

3.1.4 LIQUEFIED NATURAL GAS



Through the subsidiary Dolomiti GNL, the Dolomiti Energia Group is also active in the construction and management of LNG (Liquefied Natural Gas) plants consisting of a tank, a gasification system and a local distribution network, as well as cryogenic storage and supply.

As the most environmentally friendly and cleanest of fossil fuels, both medium and large industrial plants as well as hamlets and households not yet served by the gas network can be served with this type of gas, offering numerous advantages in terms of both energy savings and environmental benefits. Compared to traditional plant feeding technologies, producing the

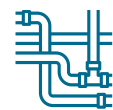
same amount of energy with an LNG-fuelled plant allows reducing emissions of carbon dioxide, sulphur dioxide and nitrogen oxide pollution.

There are also economic advantages: despite the ongoing high volatility of methane gas prices due to the current geopolitical situation, the price of LNG remains competitive compared to other fossil fuels, which are also subject to speculation.

THE GROUP'S FOCUS ON THE USE OF LNG

LNG is transported from the coastal terminals to our facilities using tankers mainly fuelled with bio-fuels.

The Group is urging its hauliers to convert their truck fleets to LNG-powered vehicles in order to significantly reduce pollutant emissions. It is also asking them to use sustainable fuels, namely Bio-GNL, i.e., liquefied natural gas produced by bio-methane plants.



3.1.5 HEAT, STEAM AND COOLING DISTRIBUTION

With its approximately 28 km of district heating networks (approx. 26.5 km of district heating network and approx. 1.4 km of district cooling network), Novareti meets the energy needs of many public and private users in the Rovereto area and in the innovative 'Le Albere' district in Trento. In the city of Rovereto, the superheated water dis-

trict heating network extends from the south to the north, starting from the industrial area and reaching the district S. Ilario, near the city centre. It supplies thermal energy to a hot water district heating network that has been serving a number of consumers located along Corso Rosmini and neighbouring streets since 1985.

DISTRICT HEATING AND COOLING DISTRIBUTION NETWORK METERS

	2023	2022	2021
No. of meters	211	213	211

3.1.6 INTEGRATED WATER CYCLE



The Dolomiti Energia Group is also present in every phase of the integrated water cycle, with the exception of purification: as water manager, Novareti draws water from springs and aquifers (abstraction), makes it drinkable and distributes it to more than 77,679 thousand users in 10 Trentino municipalities, mainly located in the Adige Valley, through a complex system of networks

and remote-controlled aqueducts. It also deals with sewage collection.

During the year, the integrated water system distributed 26.6 million cubic metres of water (27.4 in 2022) along the 1,468 km of fully geo-localised network.

Length of water supply system network

	UoM	2023	2022	2021
Trento	km	845.70	846.60	681.38
Rovereto	km	279.10	279.10	174.47
Other municipalities	km	342.90	342.00	257.67
TOTAL	km	1,467.70	1,467.70¹²	1,111.52

Water cycle meters

	UoM	2023	2022	2021
domestic uses	No.	65,308	64,169	64,169
non-domestic uses	No.	12,371	12,103	12,103
TOTALE	No.	77,679	76,272	76,272

The managed water supply systems are supplied both by collecting from surface sources and from groundwater by way of wells or by draining off. Considering all the municipalities managed, collection of water from sources makes up about 70% and groundwater approximately 30%. The collection and distribution of water is remote controlled by a 24-hour system that monitors the functioning of the networks and plants.

The water service can be affected by interruptions caused by force majeure events, malfunctions, programmed maintenance and maintenance needed to ensure the correct operation of the systems and to ensure the quality and safety of the service. In this case, the client is promptly and suitably informed in advance to limit their inconvenience to a minimum. If shortages or service interruptions take place that last longer than 24 hours, an emergency replacement service can be activated. An emergency service is available 24 hours, 7 days a week every day of the year and can be accessed on the toll free number 800 969898. The technical operational staff is activated immediately and

in a maximum of 2 hours will be on site to assess how to solve failures, water shortages or any other situation that could involve a risk to the health of citizens. For the sewerage service, the maximum time that can pass between the fault being reported and the start of remedial work is 8 hours.

In order to ensure the continuity of the water service (water supply system and sewerage), programmed leak search activities are carried out along the water supply system network along with checks to ensure that the water supply system is operating properly and to check the static conditions of the sewerage network. The drinking water supply is constantly monitored to verify the network's main operational parameters. Further, in compliance with reference legislation, laboratory testing is performed periodically to guarantee the drinking quality of the water supplied to the final customer, by carrying out sample checks along the entire water supply system. The results of these regular water analyses are published on the website www.novareti.eu.

¹² As of 2022, all connections have been included in the accounting. Only those in Trento were considered until 2021.

Novareti also has some teams permanently employed in monitoring and searching for hidden network leaks. Their work is guided by the minimum night-time consumption analysis models active in the various hydraulic districts of the network: these models are constantly being improved and new automatic tools are being tested

to carry out increasingly advanced multi-criteria analyses.

As of 2023 the losses, calculated as the difference between the quantity injected into the network and the quantity billed, were around 33%. Actual losses were around 15% in the core operations.

Losses in water transmission and distribution

	UoM	2023	2022	2021
Technical losses	m ³	5,793,553	4,834,592	7,170,117
Non-technical (commercial) losses	m ³	2,918,955	3,105,118	4,033,423
TOTAL	m ³	8,712,508	7,939,710	11,203,540

The objectives and initiatives implemented by the Group in the field of integrated water cycle

management and their state of progress are described in the following table:

Goals and initiatives	Deadline	State of progress	Description
Survey of the sewerage network in the Municipality of Trento	ongoing activity	●●○	The survey of the sewerage network in the municipality of Trento continued during 2023, with a focus on the hillside hamlets. The activity was conducted with the help of two technicians and supporting operational teams. The Group plans to purchase a new GPS survey instrument in the coming years.
Implementation of automatic district management via FAST supervisor software	2023	●●○	This new measurement management and consumption supervision software constantly analyses all the parameters that characterise hidden leaks and directs the leak detection teams. The implementation work involves the creation of new districts, which follows the replacement of the backbones.
Trento Water Supply System backbone replacement plan	2028/2029	●●○	The 10-year plan (started in 2018/2019) to replace the backbones, with the simultaneous creation of the pressure districts (construction of two regulation and measurement wells) continued in 2023. The project is entrusted to a technician who supervises the work of the external company, assisted by another technician and operational teams for coordination. At the end of 2023, completion was at 55%.
Configuration of new smart meters	2030	●○○	The installation phase of the new smart meters continues. The project will last until 2030 to cover all the municipalities managed and to bring the various connections up to standard. These activities are entrusted to a technician and field teams. Remote reading of measurements in drive-by mode is being implemented.

MONITORING AND MANAGEMENT OF WATER LOSSES: IMPLEMENTATION OF ACQUAWORKS SOFTWARE

The Trento aqueduct is a highly complex system, given its extension spanning from the city network of the provincial capital to the 1,500 m altitude of the hillside hamlets on Monte Bondone.

Most of the users are served from a header reservoir, which determines the piezometric starting point of the header pipeline that runs through the entire city, along which there are also outlets in the direction of the hillside hamlets to the left of Adige.

In the recent past, Novareti has completed two important projects related to the preparation of a digital hydraulic model of the entire aqueduct network (the basis for strategic interventions) and the creation of several physical districts and some virtual ones, which have led to a significant reduction in the average pressure in the network, with a significant reduction in water losses. These aspects also remain strongly linked to a system for the widespread remote control of the fundamental quantities for the management of the aqueduct located both at locations such as reservoirs, springs and relaunches (incoming and outgoing flow rates, pressures, levels in reservoirs, turbidity, etc.) and in the network (mainly flow and pressure measurements).

On this basis, in order not only to further reduce the wastage of drinking water, but also to continue on the path of optimising the management of the resources themselves and their costs, Novareti has introduced tools to support the analysis of the status of the districts, which can serve as a basis for operational and management decisions. In particular, the introduction of FAST's Acquaworks software has allowed detailed analyses to be carried out on the individual districts created (whether physical or virtual), making it possible to verify the trend of real consumption compared to the forecast and so identify the potential presence of leaks within the districts. This tool allows multi-year comparisons to be made on consumption trends, thus also highlighting the evolution trends of the districts themselves, which can be used as a starting point for strategic interventions on the network. This software also makes it possible to calculate Arera's M1 indicator both at district level and at the level of the overall aqueduct network, and to assess in the medium term the performance of the aqueduct managed by Novareti through a performance index required by Arera.

The information obtained through this tool will then allow daily/weekly targeting of the network leakage search, identifying the most critical areas in which to concentrate search efforts and therefore optimising resource management and problem solving.

In addition to the traditional instruments, a number of fixed loggers were also purchased and placed along the network, which can provide further feedback on the Acquaworks software analyses, and which can be used at sites that are difficult to reach or where there is a need for long-term monitoring.

This project will be implemented and updated as the replacement of the city backbones progresses, with the consequent creation of new hydraulic districts.

3.1.7 THE SALE OF ENERGY, GAS AND WATER



Dolomiti Energia Trading is the company that carries out the optimisation of the electricity and natural gas portfolio on the wholesale markets for the Group.

Dolomiti Energia is instead the Group's commercial company, which deals with selling energy, gas and water to customers. It operates under the Trenta brand on the enhanced protection service market.

For years, the Group has been offering energy

produced only from renewable sources under the '100% clean energy' label, and for customers who are more aware of environmental issues, it offers '100% offset CO2' gas.

The company Dolomiti Energia also offers energy efficiency services and products to free market customers throughout Italy.

The activities carried out by Dolomiti Energia and the services it offers are discussed in detail in chapter 3.2 of this document.

3.1.8 URBAN HYGIENE: FROM COLLECTION TO SWEEPING



Dolomiti Ambiente is the Group company that deals with municipal waste collection, street sweeping and the management of material collection centres in the municipalities of Trento, Rovereto and, from 2023, in the 19 municipalities of Vallagarina. For cities to be truly clean, the active cooperation of people is crucial. This is why Dolomiti Ambiente concretely supports citizens, so that together we can achieve the common goal of cleaner, circular cities.

Dolomiti Ambiente is committed to implementing innovative and sustainable solutions for waste collection, treatment and recycling, reducing environmental impact and promoting greater awareness among citizens of the importance of proper waste collection management.

Since 1 September, Dolomiti Ambiente, which was awarded the public tender called by the Vallagarina Community through a public-private partnership project, has started the integrated service for the collection, transport, delivery and disposal of municipal waste in Vallagarina and Al-

tipiani Cimbri. This is the start of a collaboration with the Vallagarina and Altipiani Cimbri communities and the 19 municipalities involved, which aims to improve and expand the urban hygiene service and responsible waste management in these areas, promoting greater environmental protection, the circular economy and the well-being of citizens. This long-term partnership, which will last 17 years, is an important step forwards in sustainable waste management.

For years, municipal waste collection and the cleaning of paved public areas (excluding parks and green areas) have been managed by Dolomiti Ambiente in the municipalities above in the name and on behalf of the respective Administrations, serving a total of 121,385 domestic and non-domestic users (132,295 in 2022).

The municipal waste management system includes the following services throughout the area served:

<p>DOOR-TO-DOOR COLLECTION OF MUNICIPAL WASTE FOR DOMESTIC AND NON-DOMESTIC USERS</p>	<p>Dolomiti Ambiente is responsible for the door-to-door collection of municipal waste for domestic and non-domestic users in the municipalities of Trento and Rovereto: specifically, collection is weekly for paper, light packaging and residual waste; twice weekly for organic waste; every fortnight for glass. By summer 2024, the door-to-door waste collection method will also be extended to all areas of Vallagarina.</p>
<p>COLLECTION CENTRES WHERE ALL THE MUNICIPAL WASTE SUPPLY CHAINS, HAZARDOUS INCLUDED, CAN DELIVER</p>	<p>The collection centres, where all types of municipal waste, including hazardous waste, are manned by employees who direct the user to the correct disposal of the waste. Below is the list of Dolomiti Ambiente's Material Collection Centres (CRM):</p> <ul style="list-style-type: none"> - Via Castel di Pietrapiana, 8 Trento - Via Martino Aichner, 15 Trento - Via Bellaria, 44/B Trento - Via Pradiscola, 22 Martignano Trento - Strada di Campedél, 10 Trento - Via della Gotarda Trento - Località Mira di Marco Rovereto - Località di Pradaglia di Isera Via dell'Artigianato, Ala - Viale Alcide Degasperi, Avio - Via Posta Vecchia, Loc. Rio Secco, Besenello - Loc. Monte Giovo di Castione, Brentonico - Loc. Elbele Carbonare, Folgaria - Loc. Carpeneda, Folgaria - Via Castel Pradaglia, Isera - Loc. Echebis Lavarone - Via Pineta, 30 Lavini - Loc. Lerch Luserna - Loc. Bazoera Mori - Via Antonio Pesenti, Villa Lagarina - Via ai Lopi, 44 Volano
<p>CUSTOMISED COLLECTION OF PARTICULAR TYPES OF HAZARDOUS WASTE (SUCH AS BATTERIES AND MEDICINES) FROM SPECIFIC BUSINESSES</p>	<p>Dolomiti Ambiente also deals with the customised collection of particular types of hazardous waste from specific businesses, such as the collection of expired medicines for pharmacies or spent batteries for contracted businesses.</p>
<p>HOME COLLECTION OF LAWN WASTE UPON REQUEST</p>	<p>Upon request, the company carries out home collection of lawn waste: for the collection of such waste, a fee-based service is available for 12 pick-ups per year on a voluntary basis. This service is carried out door to door.</p>
<p>HOME COLLECTION OF BULKY WASTE BY PHONE CALL</p>	<p>On call, the company carries out the home collection of bulky waste: a service can be booked on the dedicated toll-free number for the collection of such waste. When booking by telephone, the operator only needs a Customer Code (written on bills). The cost of the bulky waste collection service is charged according to the rates approved each year by the municipalities.</p>

The company implements initiatives to monitor and control the quality of the delivered waste; when possible, it returns feedback to the interested customers in order to stimulate higher levels of accuracy in separate waste collection. The special waste collection, transport and treatment services are instead mainly addressed to hand-craft and trade activities.

The separate waste is sent for recovery through the specialised platforms and the supply chains of the sector, also based on agreements in place with the members of the national packaging consortium Conai (Consorzio Nazionale Imballaggi), or to private operators if the materials are not handled by the consortia.

In order to foster connections with businesses within the Trentino territory, Dolomiti Ambiente mainly uses suppliers and transporters from the Autonomous Province of Trento. This reduces long-distance journeys and the associated emissions into the atmosphere. Instead as regards the management of WEEE, the relevant external consortium takes care of the collection via booking on the portal.

The concept of circular economy is central to the development of business processes. Specifically, Dolomiti Ambiente carries out initiatives to promote home composting by providing those who request it with a composter.



JUNKER APP

The new Junker APP allows direct interaction with Dolomiti Ambiente customers, encouraging the improvement of service quality and the differentiation of the waste delivered. The renewal of the application environments used by the company allows for better synergy between operational structures in the field and the back office, making the operational and organisational intervention of the service more accurate and encouraging Dolomiti Ambiente staff to have a smarter and more sustainable approach to work.

Dolomiti Ambiente is committed to fostering the growth of a green market in a circular economy perspective also within the procurement process through Green Public Procurement. The aim is to develop a purchasing system for environmentally preferable products and services, i.e., 'those products and services that have a lesser, or reduced, effect on human health and the environment than other products and services used for the same purpose'. Specifically, Dolomiti Ambiente undertakes to purchase containers and tubs, used for door-to-door collection, made of

recycled material. This process also allows less CO₂ to be emitted already during the production of the device.

Always within the concept of circular economy, Dolomiti Ambiente distributes paper bags made with 100% recycled material for the collection of organic waste. In doing so, the waste collected through separate waste collection can be used to produce bags for organic waste without having to waste virgin material, always with a view to sustainability.



PARTICIPATION IN ECOMONDO

In 2023, the Dolomiti Energia Group had the honour of participating in Ecomondo with Dolomiti Ambiente's innovative electric vehicles.

Ecomondo is the benchmark event in Europe and the Mediterranean basin for the ecological transition, and more specifically for technologies, services and industrial solutions in the green economy and circular economy sectors.

Even in the maintenance of machinery, products that are as biodegradable as possible are used, specifically all the sweepers operating in the municipalities of Trento and Rovereto are supplied with biodegradable hydraulic oil certified according to the EU Ecolabel. The transition to the use of biodegradable oil, at the expense of mineral oil, is also underway for closed circuit machines.

Furthermore, the gravel collected during street sweeping activities also contributes to the circular economy. In fact, it undergoes a treatment process that produces 'inert aggregates' suitable for use in construction, civil engineering works, road works and sandblasting roadways in winter.

Dolomiti Ambiente Dolomiti Energia Holding also holds 25% of the shares of Bioenergia Trentino S.r.l. Thanks to its anaerobic digestion plant, the latter has focused on treating the organic waste of the Trentino region in recent years, reaching 75% of its annual production. The organic waste produced by the population in their homes is returned, after being ennobled, to agriculture to give life to a new food chain, simultane-

ously contributing to the production of electricity and renewable biomethane for automotive use.

At Dolomiti Ambiente, environmental sustainability is not an abstract concept, but a goal to be achieved through daily work and the development of concrete projects for tomorrow. For example, the company consolidated the 'neighbourhood sweeper' pilot project - involving manual sweeping using a recognisable and innovative vehicle - accompanied by a dedicated communication project ('Our neighbourhood, clean like we deserve it').

The main objective of Dolomiti Ambiente, in agreement with the strategy of the entire Group, is to achieve the carbon neutrality of the services offered, in a scenario that envisages short, medium and long-term targets, anticipating International Agreements, in particular those of Paris.

The objectives and initiatives implemented by the Group in the field of urban hygiene and their state of progress are described in the following table:

Goals and initiatives	Deadline	State of progress	Description
Digitalisation of services	2024-2026	●●●○	Dolomiti Ambiente began implementing a project aimed at facilitating the separate waste collection system, setting up an automatic distributor of waste bags. The previous modus operandi involved sending a letter to users and a fixed period in which to collect the bags. With the automatic machines currently being tested in Rovereto, it will not only be possible to reduce the environmental impact, but also to increase the usability of the service for citizens.
Electric mobility	2030	●●●○	In 2023, Dolomiti Ambiente continued its experiments in electric mobility in neighbourhoods with small vehicles and electric sweepers. The Group plans to electrify 85% of its waste collection fleet. In fact, this service is well suited to e-mobility, as it includes planned routes of only a few kilometres. This choice is appreciated not only by citizens but also by workers, who gain a clear improvement in terms of the quality of their work: the benefits include reduced fuel consumption, reduced noise pollution and noise stress (decibels are halved), and the elimination of exhaust gases that would be inhaled by operators. The electricity used will come from renewable sources such as solar energy produced by photovoltaic panels that will be installed on the roofs of Dolomiti Ambiente buildings or from 100% green energy produced by the Dolomiti Energia Group.



AUTOMATIC WASTE BAG DISTRIBUTORS

The circular economy in the urban hygiene sector must not only be understood as minimising waste production but must start, as in other sectors, from the production and management phase of its flows.

It is precisely for this reason that the Dolomiti Energia Group, through Dolomiti Ambiente, decided to test a project to install automatic waste bag distributors in the municipality of Rovereto in 2022. In fact, the experiment's objectives included reducing the production of CO₂ within the process of distributing the annual amounts to users, necessary for collection, and reducing the printed materials sent to citizens.

To date, Dolomiti Ambiente has made use of travelling vans, which during the first month of the year are stationed within the municipality to distribute the annual supply to users. This makes it possible to reach the entire municipal area in a widespread manner, as the vehicles move according to pre-established times and places. The distribution calendar and the voucher indicating the material each citizen has the right to collect are sent to users via paper and/or e-mail a few weeks before the start of distribution.

However, distribution using vans has revealed many problems over the years, not only on the user side, including the endless queues for citizens in the cold during winter periods or the need to turn up at fixed locations and times to collect their provisions, but also in terms of sustainable and green flow management.

In fact, this system significantly increases the production of polluting CO₂ emissions caused by the vans forced to move around the area every day.

Another issue that emerged was the huge production of paper used to communicate the distribution methods, vouchers and calendars to users. In addition, widespread delivery by paper also generates CO₂ emissions into the atmosphere, given the need to reach the citizen's home address with postal systems.

In view of the problems mentioned above and given the strong push towards an increasingly green and environmentally friendly economy, it was decided to test a new, smarter bag distribution system within the municipality of Rovereto.

Specifically, two distributors were installed in front of the Dolomiti Energia Group's counters to distribute the paper bags for the collection of organic waste, bags for light packaging and bags for residual waste.

The digitisation of the service together with the installation of distributors will also make it easier for users to collect the bags they are entitled to or need, reducing paper production and polluting emissions.

The user will be identified at the machine using a QR-CODE displayed from the Dolomiti Ambiente App; in addition, each invoice will have its own identification code. Thus even senior citizens will be able to provide identification at the distributor without the app, but also without the expense of additional paperwork, as the tariff communication will instead be used for this purpose.

The system involves the import and storage of the inhabitants' records, of the utilities linked to them, of the types of utilities and of the standard number and type of bags supplied annually. The machine transmits to the server information on the number of bags delivered compared to those supplied, the bag stock of each machine, being able to set the minimum levels of available bags. Once they are depleted, the system sends the manager an email requesting the refilling of the machine. Similarly, any faults or operating errors (e.g., bag stuck, printer or card reader failure) are communicated in real time so as to allow rapid intervention by the maintenance team.

It should be noted that the location of dispensers throughout the territory will allow citizens to pick up the bags they need, even spread out over time, without necessarily having to go to the points and times specified in the distribution calendar. It also favours the reduction of pollutant emissions created by the vans located throughout the territory, since users can collect the bags on their way home from work or after activating the utility at the counters, regardless of the time.

The undoubted advantages promoted by this pilot project have a strong environmental value, including:

- The reduction in CO2 emissions due to both the elimination of travelling vans throughout the territory and the reduction of vehicles physically distributing vouchers to citizens in the weeks before distribution
- Less paper production in communications

In addition to these, the benefits for citizens must also be mentioned, including:

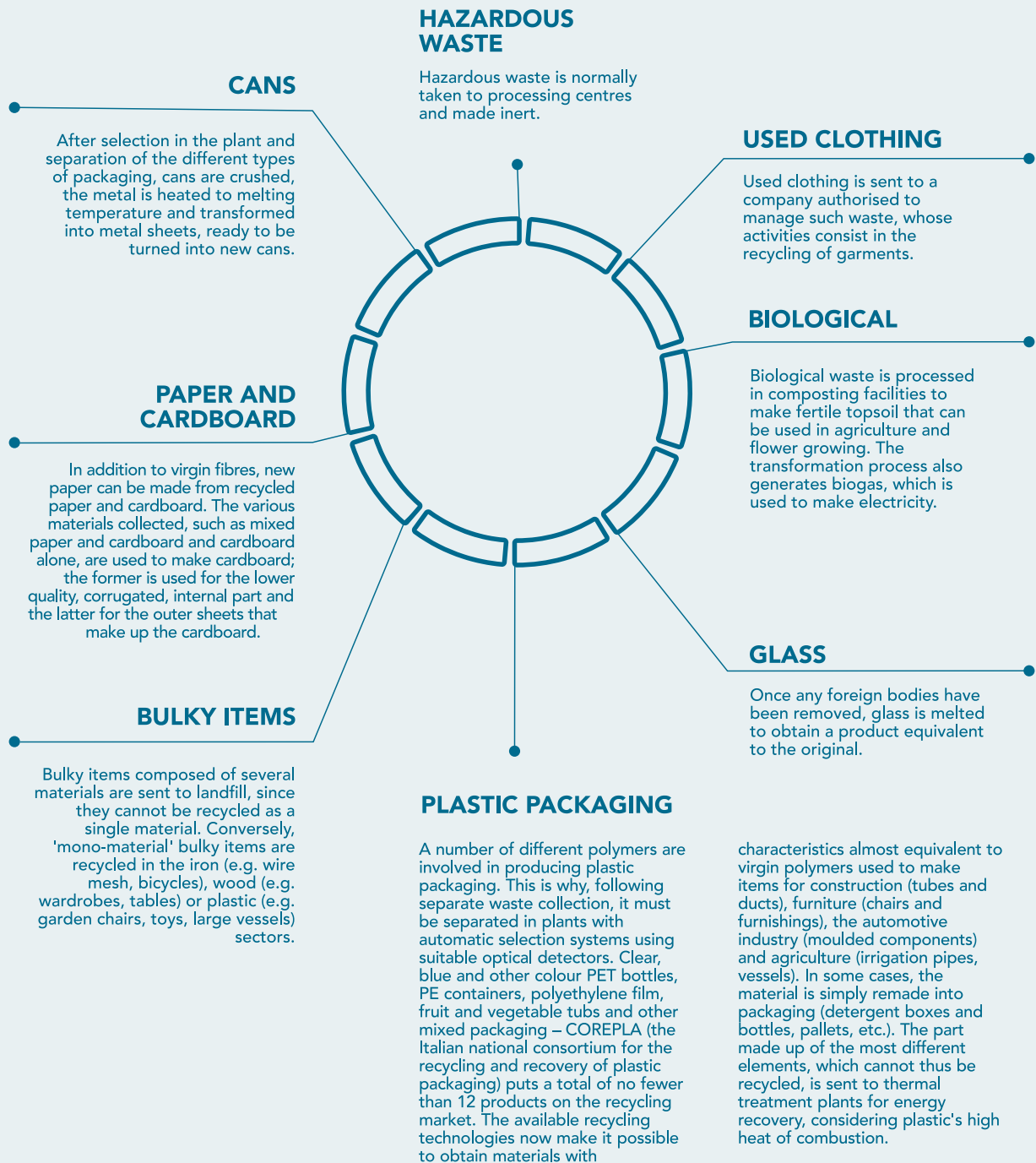
- the widespread positioning throughout the territory makes it easier for citizens to make use of the service, as they can use it 24 hours a day
- diluted distribution of bags throughout the year, avoiding queues and gatherings
- citizens can collect bags when needed and avoid having to store those not needed immediately

Given the success of the pilot project and the drive towards ever greener flows, the company's intention is to locate further distributors throughout the territory in order to cover the entire municipal demand and thus eliminate the distribution by vans at the beginning of the year.

This is intended merely as a first step in the direction of increasingly green projects, with a view to environmental sustainability not only towards citizens but also within our own business flows and processes.

We have also planned to install a pair of distributors in the Vallagarina area, specifically in the municipality of Folgaria.

WHAT BECOMES OF SEPARATED WASTE?



In 2023, 74,869 tonnes of municipal waste were collected, down from the volumes collected in 2022, which amounted to 69,708 tonnes.

The percentage of separate collection is 87.95% (82.1% 2022), calculated net of the share of waste from sweeping and bulky waste sent to recycling.

Waste collected in Trento, Rovereto and Vallagarina municipalities

Waste by composition	UoM	2023								
		Collected in Rovereto			Collected in Trento			Collected in Vallagarina		
		WASTE GENERATED	WASTE DIVERTED FROM DISPOSAL	WASTE DIRECTED TO DISPOSAL	WASTE GENERATED	WASTE DIVERTED FROM DISPOSAL	WASTE DIRECTED TO DISPOSAL	RIFIUTI PRODOTTI	RIFIUTI NON DESTINATI A SMALTIMENTO	RIFIUTI DESTINATI ALLO SMALTIMENTO
HAZARDOUS WASTE	t	111.95	111.31	0.64	318.45	316.53	1.92	45.68	45.41	0.27
WEEE	t	67.26	67.26	-	183.84	183.84	-	22.27	22.27	-
Other (Batteries, medicines, etc.)	t	44.69	44.05	0.64	134.61	132.69	1.92	23.41	23.14	0.27
NON-HAZARDOUS WASTE	t	16,113.74	16,113.74	-	50,052.32	50,052.32	-	8,226.61	8,226.61	-
Paper and cardboard	t	2,597.84	2,597.84	-	8,447.70	8,447.70	-	1,117.00	1,117.00	-
Glass	t	1,429.32	1,429.32	-	5,033.02	5,033.02	-	818.12	818.12	-
Lawn cuttings	t	1,047.75	1,047.75	-	2,775.68	2,775.68	-	480.18	480.18	-
Organic waste	t	3,952.98	3,952.98	-	13,404.16	13,404.16	-	1,454.62	1,454.62	-
Metal packaging	t	0.22	0.22	-	7.35	7.35	-	-	-	-
Multi-material	t	1,462.20	1,462.20	-	4,746.5	4,746.50	-	868.60	868.60	-
Bulky objects	t	326.12	326.12	-	915.82	915.82	-	177.67	177.67	-
Wood	t	793.67	793.67	-	2,167.66	2,167.66	-	449.09	449.09	-
Inert	t	548.64	548.64	-	1,402.36	1,402.36	-	431.65	431.65	-
WEEE	t	191.59	191.59	-	558.01	558.01	-	66.15	66.15	-
Metal	t	250.60	250.60	-	649.03	649.03	-	154.74	154.74	-
Other (Batteries, medicines, etc.)	t	62.72	62.72	-	247.45	247.45	-	47.89	47.89	-
Used clothing	t	189.31	189.31	-	518.35	518.35	-	34.04	34.04	-
Residual	t	2,863.02	2,863.02	-	8,288.54	8,288.54	-	2,126.86	2,126.86	-
Sweeping	t	397.75	397.75	-	890.69	890.69	-	-	-	-
TOTAL WASTE	t	16,225.68	16,225.04	0.64	50,370.77	50,368.85	1.92	8,272.29	8,272.02	0.27

Waste directed to recovery

2023										
Waste by composition	Collected in Rovereto				Collected in Trento			Collected in Vallagarina		
	UoM	IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL
HAZARDOUS WASTE	t	-	111.31	111.31	62.10	254.43	316.53	-	45.41	45.41
Other recovery operations ¹³	t	-	111.31	111.31	62.10	254.43	316.53	-	45.41	45.41
-WEEE	t	-	67.26	67.26	31.03	152.81	183.84	-	22.27	22.27
-Other (Batteries, medicines, etc.)	t	-	44.05	44.05	31.07	101.62	132.69	-	23.14	23.14
NON-HAZARDOUS WASTE	t	-	16,113.74	16,113.74	37,117.27	12,935.05	50,052.32	-	8,226.61	8,226.61
Recovery/Preparation for reuse	t	-	-	-	3,061.64	-	3,061.64	-	-	-
-Residual	t	-	-	-	-	-	-	-	-	-
Recycling	t	-	-	-	3,061.64	-	3,061.64	-	-	-
-Organic waste	t	-	-	-	-	-	-	-	-	-
Other recovery operations ¹³	t	-	16,113.74	16,113.74	34,055.63	12,935.05	46,990.68	-	8,226.61	8,226.61
-Paper and cardboard	t	-	2,597.84	2,597.84	4,784.29	3,663.41	8,447.70	-	1,117.00	1,117.00
-Glass	t	-	1,429.32	1,429.32	5,033.02	-	5,033.02	-	818.12	818.12
-Lawn cuttings	t	-	1,047.75	1,047.75	835.85	1,939.83	2,775.68	-	480.18	480.18
-Organic waste	t	-	3,952.98	3,952.98	10,342.52	-	10,342.52	-	1,454.62	1,454.62
-Metal packaging	t	-	0.22	0.22	6.15	1.20	7.35	-	-	-
-Multi-material	t	-	1,462.20	1,462.20	3,580.77	1,165.74	4,746.50	-	868.6	868.6
-Bulky objects	t	-	326.12	326.12	258.67	657.15	915.82	-	177.67	177.67
-Wood	t	-	793.67	793.67	401.25	1,766.41	2,167.66	-	449.09	449.09
-Inert	t	-	548.64	548.64	193.44	1,208.92	1,402.36	-	431.65	431.65
-WEEE	t	-	191.59	191.59	86.24	471.765	558.01	-	66.15	66.15
-Metal	t	-	250.60	250.60	96.24	552.79	649.03	-	154.74	154.74
-Other (Batteries, medicines, etc.)	t	-	62.72	62.72	87.03	160.42	247.45	-	47.89	47.89
-Used clothing	t	-	189.31	189.31	115.93	402.42	518.35	-	34.04	34.04
-Residual	t	-	2,863.02	2,863.02	7,343.54	945	8,288.54	-	2,126.86	2,126.86
-Sweeping	t	-	397.75	397.75	890.69	-	890.69	-	-	-
TOTAL WASTE	t	-	16,225.04	16,225.04	37,179.37	13,189.48	50,368.85	-	8,272.02	8,272.02

13 Includes, for example, waste delivered to suppliers that have agreements with the recycling chain.

Waste directed to disposal by disposal method

Waste by composition	UoM	2023								
		Collected in Rovereto			Collected in Trento			Collected in Vallagarina		
		IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL
HAZARDOUS WASTE	t	-	0.64	0.64	0.42	1.50	1.92	-	0.27	0.27
Other disposal operations ¹⁴	t	-	0.64	0.64	0.42	1.50	1.92	-	0.27	0.27
-Other (Batteries, medicines, etc.)	t	-	-	-	-	-	-	-	0.27	0.27
NON-HAZARDOUS WASTE	t	-	-	-	-	-	-	-	-	-
Disposal at landfills	t	-	-	-	-	-	-	-	-	-
-Residual	t	-	-	-	-	-	-	-	-	-
Other disposal operation ¹⁴	t	-	-	-	-	-	-	-	-	-
-Bulky objects	t	-	-	-	-	-	-	-	-	-
-Residual	t	-	-	-	-	-	-	-	-	-
TOTAL WASTE	t	-	0.64	0.64	0.42	1.50	1.92	-	0.27	0.27

¹⁴ This includes, for example, delivery to mechanical biological treatment plants.

Distribution of waste collected in Trento, Rovereto and Vallagarina municipalities

WASTE BY COMPOSITION	2023					
	Collected in Rovereto		Collected in Trento		Collected in Vallagarina	
	kg per capita	t	kg per capita	t	kg per capita	t
Paper and cardboard	63.72	2,597.84	69.33	8,447.70	18.90	1,117.00
Glass	35.06	1,429.32	41.31	5,033.02	13.84	818.12
Lawn cuttings	25.70	1,047.75	22.78	2,775.68	8.12	480.18
Organic waste	96.96	3,952.98	110.01	13,404.16	24.61	1,454.62
Metal packaging	0.01	0.22	0.06	7.35	-	-
Multi-material	35.86	1,462.20	38.95	4,746.50	14.70	868.60
Bulky objects	8.00	326.12	7.52	915.82	3.00	177.67
Wood	19.47	793.67	17.79	2,167.66	7.60	449.09
Inert	13.46	548.64	11.51	1,402.36	7.30	431.65
WEEE	6.35	258.85	6.09	741.85	1.50	88.42
Metal	6.15	250.60	5.33	649.03	2.62	154.74
Other (Batteries, medicines, etc.)	2.63	107.40	3.14	382.06	0.58	71.30
Used clothing	4.64	189.31	4.25	518.35	1.20	34.04
Residual	70.22	2,863.02	68.02	8,288.54	36.00	2,126.86
Sweeping	9.76	397.75	7.31	890.69	-	-
TOTAL	397.97	16,225.68	413.39	50,370.77	139.97	8,272.29



Kg pro capite di rifiuti raccolti a Trento, Rovereto e comuni della Vallagarina

Waste by composition	UoM	2023								
		Collected in Rovereto			Collected in Trento			Collected in Vallagarina		
		WASTE GENERATED	WASTE DIVERTED FROM DISPOSAL	WASTE DIRECTED TO DISPOSAL	WASTE GENERATED	WASTE DIVERTED FROM DISPOSAL	WASTE DIRECTED TO DISPOSAL	WASTE GENERATED	WASTE DIVERTED FROM DISPOSAL	WASTE DIRECTED TO DISPOSAL
HAZARDOUS WASTE	Kg per capita	2.75	2.73	0.02	2.61	2.60	0.01	0.78	0.77	0.01
WEEE	Kg per capita	1.65	1.65	-	1.51	1.51	-	0.38	0.38	-
Other (Batteries, medicines, etc.)	Kg per capita	1.10	1.08	0.02	1.10	1.09	0.01	0.40	0.39	0.01
NON-HAZARDOUS WASTE	Kg per capita	395.23	395.23	-	410.78	410.78	-	139.19	139.19	-
Paper and cardboard	Kg per capita	63.72	63.72	-	69.33	69.33	-	18.90	18.90	-
Glass	Kg per capita	35.06	35.06	-	41.31	41.31	-	13.84	13.84	-
Lawn cuttings	Kg per capita	25.70	25.70	-	22.78	22.78	-	8.12	8.12	-
Organic waste	Kg per capita	96.96	96.96	-	110.01	110.01	-	24.61	24.61	-
Metal packaging	Kg per capita	0.01	0.01	-	0.06	0.06	-	-	-	-
Multi-material	Kg per capita	35.86	35.86	-	38.95	38.95	-	14.70	14.70	-
Bulky objects	Kg per capita	8.00	8.00	-	7.52	7.52	-	3.00	3.00	-
Wood	Kg per capita	19.47	19.47	-	17.79	17.79	-	7.60	7.60	-
Inert	Kg per capita	13.46	13.46	-	11.51	11.51	-	7.30	7.30	-
WEEE	Kg per capita	4.70	4.70	-	4.58	4.58	-	1.12	1.12	-
Metal	Kg per capita	6.15	6.15	-	5.33	5.33	-	2.62	2.62	-
Other (Batteries, medicines, etc.)	Kg per capita	1.54	1.54	-	2.03	2.03	-	0.58	0.58	-
Used clothing	Kg per capita	4.64	4.64	-	4.25	4.25	-	0.80	0.80	-
Residual	Kg per capita	70.22	70.22	-	68.02	68.02	-	36.00	36.00	-
Sweeping	Kg per capita	9.76	9.76	-	7.31	7.31	-	-	-	-
TOTAL WASTE	Kg per capita	397.97	397.96	0.02	413.39	413.38	0.01	139.97	139.96	0.01

As of 2020, an accounting system for separate waste collection has been in place, whereby street sweeping sent for recovery in special plants is included in the quantities of waste sorted.

The sorting of bulky waste for recovery remained active at the Rovereto provincial landfill in 2023, which further contributed to the increase in the percentage of separate waste collection.

3.1.9 LABORATORY



The Dolomiti Energia Holding laboratory deals with chemical and microbiological analyses, quality control of water intended for human consumption, and analysis of soil and waste. It serves both Group companies and numerous municipalities in Trentino, offering the necessary support to perform internal controls and monitor water for human consumption, and thus guarantee the distribution of healthy, clean water. It is also a reference point for the environmental controls of many entities, professionals and companies that today make up a significant portion of its clientèle.

ACCREDIA certifies its competence, independence and impartiality according to the interna-

tional standard UNI CEI EN ISO/IEC 17025:2018, which requires compliance with specific and stringent quality and organisational standards. The activities are thus also guaranteed by an external control body and monitoring covers the quality system in place, procedures, quality of analytical data, sampling and customer focus.

Thanks to advanced scientific instruments and the expertise of its staff, the laboratory is able to promptly and professionally respond to every customer request.

Overall, during the year 13,500 samples were examined (11,829 in 2022), of which 53% (55% in 2022) for third parties.

3.1.10 PUBLIC LIGHTING



The Group also manages the public lighting service in some municipalities. In particular, 2,616 light points were managed by SET Distribuzione and 21,931 by Dolomiti Energia Solution in 2023 in various municipalities, including Buscate (MI) and Chiampo (VI). In this context, new relamp-

ing measures were carried out in 2023 and will be tested during 2024, the year in which the reduction in consumption brought about by these measures will be quantifiable (270,509.72 kWh in 2022, or 973.8 GJ).

3.2



CLOSE TO CUSTOMERS WITH AFFORDABLE, EFFICIENT AND RELIABLE SERVICES

GRI 3-3 Offering energy efficiency and renewable energy solutions | GRI 3-3 Transparent, clear and fair communication and marketing practices | GRI 3-3 | Quality, safety, continuity and affordability of services provided to customers |

GRI 2-6 | GRI 203-2 | GRI 305-5 | GRI 413-1 | GRI 417-2 |

Through their services, the Dolomiti Group's trading companies strive to provide customers with the tools to embark on a path of sustainability,

because they believe that every single contribution is essential and that the power of sustainability in people's hands is the only possible future.



ALTROCONSUMO 'RECOMMENDED PROVIDER' SEAL

In 2023, the Dolomiti Energia Group once again confirmed its position at the top of the Italian ranking of the best suppliers of energy products with services throughout the country, bearing the Altroconsumo 'Recommended Provider' seal.

In drawing up the ranking, Altroconsumo collected the experience of around 30,000 customers based on three macro-themes: contract fairness, overall customer satisfaction, with particular focus on satisfaction in accessing the call centre and digital channels, and bill transparency.

3.2.1 SUSTAINABLE OFFERS

The Group's sales company Dolomiti Energia offers diversified tariff plans to suit the many needs of households and companies. To optimise and rationalise consumption, the offers provide advantages in terms of saving options, but also in terms of additional services such as the online support desk, bonuses of various kinds, call centre services, e-mail invoices, monthly invoicing on the basis of real consumption estimates, but above all the possibility of contributing directly to solidarity projects focusing on social or environmental innovation.

The Group has always been close to its customers; in order to improve its services and continue to make them accessible also to households in particularly economically disadvantaged situations, it applies the social bonus and in general all the facilities provided by ARERA and/or other institutional bodies.

The total number of customers served by the Group in 2023 was 946,873, as detailed in the table below:

Contracts stipulated for service

	UoM	2023	2022	2021
ELECTRICITY	No.	492,156	492,178	489,086
GAS	No.	240,950	238,902	162,322
WATER	No.	92,171	114,541	113,638
Novareti	No.	78,134	77,427	76,760
Other distributors	No.	14,037	20,389	20,266
WASTE	No.	121,385	293,608	248,121
households	No.	109,216	88,363	77,637
non-domestic users	No.	12,169	43,932	9,183
COGE/DISTRICT HEATING	No.	211	213	211

All electricity supplies offered by the Group are from renewable sources with the '100% clean energy' label, certified through a Guarantee of Origin. For customers that are more concerned about environmental issues, the Group also offers gas supplies that are '100% CO₂ offset,' charging stations for electric mobility and offers that are linked to the sale of products and services for energy efficiency.

Some electricity offers provide tariffs based on time slots which are convenient for customers who mainly consume energy during evening hours and at weekends and contributes to making the national electricity grid more efficient. To promote more informed consumption behaviour and more efficient energy use, and more simply to explain how to properly read the information contained in bills, the Group participates with its experts in meetings and public events.

During 2023, the Group consolidated sales of energy efficiency services offered throughout Italy,

consolidating its presence in the sector. In fact, Dolomiti Energia and Dolomiti Energia Solutions have started a virtuous path with a growing number of customer companies and consumers that is aimed at limiting energy consumption as well as a more informed and efficient use of energy resources.

For business client supplies and major consumers, the commercial companies offer personalised advice along with made-to-measure conditions and tariffs. For Trade Associations and Organisations (retirement homes, craft workshops, hoteliers, etc.) the retailers stipulate framework agreements to offer competitive tariffs and simplified negotiation procedures.

By providing the market with green products and services, the Dolomiti Energia Group has enabled its customers to avoid the emission of 1,196,188 tonnes of CO₂ into the atmosphere in 2023 (1,120,487 in 2022).

	2023				2022				2021			
	UoM	products/ services provided	UoM	CO ₂ avoided/ cancelled	UoM	products/ services provided	UoM	CO ₂ avoided/ cancelled	UoM	products/ services provided	UoM	CO ₂ avoided/ cancelled
Green Energy - GO cancelled ¹⁵	No.	3,174,150	tonnes	980,495	n°	3,655,266	tonnes	932,092	n°	3,375,209	tonnes	949,784
CO ₂ Offset gas	m ³	105,060,000	tonnes	215,666	m ³	94,945,038	tonnes	188,106	m ³	52,593,693	tonnes	104,198
Puro Led ¹⁵	MWh	7.30	tonnes	2.25	MWh	975	tonnes	249	MWh	382	tonnes	108
Ecostab	MWh	81.50	tonnes	25.18	MWh	158	tonnes	40	MWh	226	tonnes	64
TOTAL				1,196,188				1,120,487				1,054,154

Now we will take a detailed look at the main green services offered by the Group during the year.

SUSTAINABLE OFFERS FOR COMPANIES

The 'Puro LED' package is dedicated to relamping projects for replacing client companies' neon systems with the latest generation of LEDs made in Italy, halving lighting costs by more than 50% while improving the visual comfort of the working environment.

Ecostab is the Group's power quality solution that generates energy saving by improving the quality of the energy, simultaneously acting on all the electrical parameters that produce that power and optimising the voltage by reducing the active and reactive power that is absorbed by the electricity grid. Besides generating savings, these systems reduce losses along power lines, improve the quality of the power, stabilise the current voltage, extend the average life of electrical appliances and monitor the supervision and operation of the client's system.

The energy monitoring service offered by the Dolomiti Energia Group provides accurate measurements of all electricity quantities, guaranteeing a correct evaluation of energy performance. In the light of this data, the Group supports its customers in finding concrete solutions to improve their company's energy efficiency.

SUSTAINABLE OFFERS FOR PRIVATE INDIVIDUALS

The 'Naturally Sustainable' package includes a variety of services and benefits for the customer:

- an annual report in digital format on the amount of CO₂ saved and on the environmental impacts generated;
- the monthly contribution in terms of CO₂ reduction is shown on the invoice;
- the purchase of LED bulbs at favourable prices with the possibility of payment in instalments over 36 months directly in the bill and at no extra cost;
- tickets for the Hydrotour Dolomiti at favourable prices to visit the hydroelectric power stations of Riva del Garda and Santa Massenza;
- '100% Dolomiti Energia clean energy' and 'Gas 100% CO₂ offset Dolomiti Energia' brand of the offer;
- 'Virtuous House' service with the definition of a tailor-made preliminary project for the energy requalification of one's own home;

Etika is the economic, ecological and solidarity-based electricity and gas offer stemming from the collaboration with the Trentino cooperative world (Federazione Trentina della cooperazione, Con.Solida, La Rete, SAIT, Cassa Centrale Banca),

¹⁵ The value of avoided emissions was calculated using the ISPRA 2022 factor according to the Location Based method

to act on savings, environment and social inclusion. The offer envisages the implementation of inclusive social projects for people with disabilities and protects the environment through the use of energy entirely from renewable sources and the offsetting of CO2 emitted from domestic gas consumption, while also guaranteeing savings for the customer. Thanks to the contracts activated, funding continued in 2023 for existing projects, 19 to be precise, supporting around 74 people in fragile conditions. Cumulative fundraising, connected with the subscriptions to Etika contracts (for which Dolomiti Energia disburses €10 for every active contract each year to the Etika Solidarity Fund), amounts to over €3 million (€3 million in 2022). The funds have made it possible to support other inclusive living projects involving dozens of people with disabilities and also initiatives to mitigate the social difficulties caused by the pandemic.

Sinergika is the 100% sustainable and fair trade electricity and gas offer that does good:

- to people and the community by supporting innovative social projects;
- to the planet, with certified 100% clean energy from renewable sources and carbon-neutral gas;
- to customers, offering a discount on the marketing cost and an entry bonus.

Dolomiti Energia disburses ten euros per active contract each year to support one of the partner associations that are members. When subscribing to the offer, the customer chooses the solidarity project of their choice, to which the contribution of ten euros per year will be donated (for a total of 20 euros if both energy and gas supply is subscribed). To date, there are active partnerships with 15 associations to which Dolomiti Energia donates funds to help develop as many projects. Unlike Etika, this offer is aimed at customers outside the Trentino region.



DOLOMITI ENERGY AGAINST VIOLENCE AGAINST WOMEN: D.I.Re

The Group has always been committed to supporting numerous social projects through Sinergika. One of these was created in collaboration with D.i.Re – Donne in Rete contro la violenza [Women Online Against Violence], a national organisation made up of 84 entities operating in Italy and part of the European network against gender violence, WAVE. More specifically, the project was called 'School at play: the power of being' and focused on raising awareness in boys and girls aged 4 to 7 and challenging gender stereotypes through activities in nursery and primary schools.

D.i.Re seeks to contribute to counteracting social models that objectify women, starting from the very young in order to effectively support a radical and lasting cultural change.

In 2023, the Group continued in the context of the 'Ecobonus 110% Dolomiti Energia' interventions, aimed at the energy efficiency of buildings on a turnkey basis. The initiative for households and apartment blocks is aimed at upgrading more than 200 housing units from an energy and earthquake-proof point of view, ensuring a jump of two energy classes.

The efficiency gains were realised through the following interventions:

- thermal insulation of vertical, horizontal or inclined opaque surfaces affecting the building envelope by more than 25%
- replacement of winter heating systems with condensing boilers
- installation of solar panels/solar collectors
- installation of grid-connected photovoltaic systems on buildings
- simultaneous or subsequent installation of integrated storage systems in subsidised pho-

tovoltaic systems

The objectives of the interventions were focused on reducing consumption, increasing the asset value of the properties and accessing the tax benefits provided by the State Superbonus.

SUSTAINABLE OFFERS FOR EVERYONE

The Group offers its customers recharging stations for electric cars to be installed in homes, public and private spaces, decisively contributing to promoting and supporting electric mobility. During 2023, the number of devices increased by 105 units compared to 2022: from 489 stations installed to 594 throughout the region. All the energy provided is generated by certified renewable sources.

Thanks to this service, the consumption of 340.1 tonnes of oil equivalent (629,08 in 2022) and the emission of 2,472.95 tonnes of CO₂ was avoided in 2023 (1,851.31 in 2022).

3.2.2 OFFER SUSTAINABILITY AND ACCESSIBILITY

The Group is genuinely committed to the management and provision of increasingly efficient services, both in terms of sustainability and accessibility.

In the area of service quality, safety and continuity to customers, the Group works daily to optimise their effectiveness and make them increasingly punctual, avoiding delays and inefficiencies.

To ensure maximum coverage in terms of both territory and time, the Group provides its customers with various channels, such as:

- *Counters: the Group has tennine customer branches open to customers throughout*

the provincial districts (Trento, Rovereto, Mezzolombardo, Pergine Valsugana, Borgo Valsugana, Panchià, Tione di Trento, Cles, Riva del Garda, Cavalese) with opening hours designed to enable customers to access services outside working hour constraints. During 2023, some points were moved to new spaces and shops facing the street, with easy access and visibility. In this regard, on some days of the week the offices in Rovereto and Trento are open to the public during extended afternoon hours. Again with the aim of facilitating access to services, also in 2023 Dolomiti Energia continued to provide the reservation service for access to the points, in order to reduce inconvenience and waiting times. Res-

ervations can be managed both online and by calling the company's toll-free numbers. During 2023, in order to meet the numerous requests for information about the end of the protected energy and natural gas market, the company also extemporaneously extended the access hours to its counters, also welcoming customers on some weekends.

- Dolomiti Energy Points: there are 46 Dolomiti Energia branded physical shops in different areas of the country, where customers and interested parties can meet Dolomiti Energia energy consultants. These are experienced people who, with competence and care, support them for all their energy needs, whether domestic or not, such as analysing supply costs, evaluating offers for the supply of energy and gas and energy efficiency projects (e.g., LED lighting systems, charging stations for electric vehicles, energy consumption monitoring), bill reading, managing takeovers, transcriptions and all other contractual paperwork.
- Separate telephone channel for retail and business customers, with personal assistants dedicated to large customers;
- Website: the commitment to continually improve Dolomiti Energia's sales website continued in 2023, by paying particular attention to the user experience, allowing users to easily identify the commercial offers best suited to their needs, and also improving the possibility for customers to make requests fully digitally. Furthermore, in 2023, the Dolomiti Energia sales site was updated in accordance with accessibility requirements. This allows easier and more inclusive access for all users, providing a better and more accessible experience for people with different needs and abilities.
- Online reserved area myDOLOMITI, available to search for information on contracts, accounting and consumption, send self-readings and request bill instalments.
- WhatsApp channel and online chat: available to customers and accessible directly from the

digital area at www.dolomitienergia.it.

- Toll-free number, operational 82 hours a week and late into the evening from Monday to Friday as well as Saturday. The toll-free numbers in particular are constantly improved in terms of the quality of service offered and the capacity to provide answers that are increasingly attentive to satisfying commercial or information requirements, enabling access directly from home to the same services provided at the local branches.
- Toll-free number for business customers on Dolomiti Energia's free market, with specialised and constantly trained operators to offer an even more complete and specialised service.

È inoltre attivo il servizio di notifica e avvisi via SMS. Il servizio, completamente gratuito, consente ai clienti di essere sempre aggiornati sullo stato delle proprie fatture e forniture di energia, gas e acqua, nonché ricevere in automatico degli avvisi relativi alle scadenze o al mancato pagamento di una fattura.

There is also an SMS notification and alert service. The service is completely free of charge and allows customers to be kept up-to-date on the status of their energy, gas and water bills and supplies, as well as to receive automatic alerts about due dates or the non-payment of a bill.

During the year, the incentive campaign to use the bollett@mail service continued, allowing paper bills to be eliminated thanks to a convenient digital archive that is always accessible, with obvious benefits both from an environmental point of view and in terms of simplified accessibility, even with respect to past bills.

These channels make it possible to optimise services, reduce travel and increase the level of digitalisation, while also reducing paper consumption.

Activities also continued in connection with the

'Butterfly Project' - which started in May 2022 and will be completed next year - aimed at revising and modernising the management systems used by the Group, with a view to improving them to meet emerging business needs.

The usual updating and training activities for operators and the sales network continued in 2023, with a focus on evolving scenarios and trends in energy and gas commodity prices.

In this regard, the Group has concretely contributed to actions to curb 'high utility bills' as defined by general and sector regulations, including the Budget Law 2023 approved by Parliament (Italian Law No. 197 of 29/12/2022), which affected the first quarter of 2023 with these concessions:

- elimination of general system charges in the electricity sector;
- application of the reduced VAT rate of 5% in gas supplier invoices issued for estimated or actual consumption in January, February and March 2023;

- reduction of gas system charges;
- recognition of the social bonus for electricity and gas with benefits for the year 2023 to households with a valid ISEE in the same year of up to €15,000 (until 31/12/2022 the limit was set at €12,000);

and Italian Decree-Law 131/2023, which introduced energy measures and measures to support purchasing power for the fourth quarter, including:

- updating the electricity and gas bonus for each type of disadvantaged customer;
- elimination of the rates of the tariff components relating to general system charges for the gas sector;
- extension of the reduced rate of 5% for the supply of methane gas for civil and industrial uses;
- reform of the subsidy scheme for so-called energy-intensive companies.

3.2.3 TRANSPARENT AND CORRECT COMMUNICATION

The Group is committed to basing its relations with final customers on trust, helpfulness and flexibility, clarity and transparency in order to provide simple and comprehensible answers, to be prepared to listen, and to protect the company's reputation through conduct based on competence and accountability, while fulfilling all its obligations. It undertakes to respect regulations, and both technical and legal standards, to keep customer data confidential, and to strive for continuous improvement of the performance of the Integrated Quality, Environment, Health, and Safety Management System, in compliance with the standards UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015.

These principles are translated into specific and measurable improvement objectives. These objectives include constant performance growth to achieve customer satisfaction, the pursuit of the best available technologies to protect the environment and the health and safety of our workforce, the reduction of accidents, the improvement of customer loyalty and the acquisition of new customers, thanks to commercial offers that are convenient and competitive and also clear and transparent to ensure customers' complete awareness of all aspects when they sign.

These guidelines also call for continuous monitoring of the market, to capture its needs and

expectations, the comparison with the main competitors in the sector and the promotion of energy from renewable sources and systems for efficiency, electric mobility and energy saving.

The Group recognises the importance of transparent commercial communication and clear and correct marketing practices that allow customers to fully understand the costs and characteristics of the product, also offered in order to avoid the risk of reputational damage and economic harm.

Specifically, marketing communication is achieved through:

1. contractual and technical-economic documentation;
2. website and social network pages;
3. online and offline advertising materials;
4. direct marketing communications.

As far as the production of content relating to contractual and technical-economic documentation is concerned, the Group has adopted a specific procedure in which the Communication and Brand Marketing and Compliance Departments interact to ensure strict compliance in both legal and transparency terms with current regulations (Civil Code, consumer code, ARERA code of commercial conduct, AGCM). Before their publication, the web pages presenting offers online are subject to evaluation by the Compliance Department in order to verify that all the information required is included and that the information presented is complete and user-friendly. The documents produced as a result of this evaluation are

subject to approval by the Compliance Department and the Market Department, respectively.

Furthermore an online tool has been included that allows web users to simulate the average total monthly cost of the offer described on the page. The tool is periodically updated to ensure that the various cost parameters that contribute to the construction of the average monthly budgeted cost are up to date. There are ad hoc buttons on the page that allow customers to make an appointment with an operator who can help them to understand the contents of the offer and guide them through the subscription process.

In addition, informative and explanatory pages and content have been created that seek to translate technical aspects of the target market into extremely clear terms.

In the creation of online and offline advertising content, after defining the graphic concepts, claim, pricing and possible promotion of a product, the material is again submitted to the Group's Compliance Department to be sure that what is produced complies with the regulatory perimeter; direct marketing communications are constructed in familiar, non-technical language and are sent only after having verified that the customer has given consent.

3.2.4 LISTENING AND CUSTOMER SATISFACTION

With the aim of offering an increasingly higher level of customer care and service, in 2023 the Dolomiti Energia Group continued to optimise activities aimed at understanding and satisfying the needs of each type of customer, paying particular attention to identifying potential improvement actions.

The commercial quality of Dolomiti Energia, SET and Novareti services is monitored through indicators expressed at national level by ARERA. These indicators, combined with requirements and procedures established internally, measure the efficiency and effectiveness of the company's performance in relation to its customers. The service level is measured by indicators and data acquired by management systems and constantly monitored in order to be able to identify critical areas and take prompt action to implement the best possible improvements.

For the Dolomiti Energia call centre, systematic monitoring of the quality of responses given to client requests by the company's contact centres and the customers' level of satisfaction is always in operation.

During 2023, a customer satisfaction survey was carried out within the service provided by the Holding's chemical laboratory. For all other Dolomiti Energia Group companies, for which a direct survey was not conducted, indirect measurement methods were used, which are based on the monitoring of indicators such as service delivery times, complaints and response times.

By means of ad hoc procedures, Group companies provide customers and external users specific processes for the collection (e.g., guided online forms on the website and e-mail) and management of complaints, both generic and detailed, relating to any inefficiencies detected in order to intercept and promptly resolve shortcomings.

The complaint processes ensure the tracking and verifiability of the activities performed.

In the event of a complaint, the involved and competent staff are responsible for analysing how best to solve the reported problem, and in parallel, analysing the problem across the board to identify its causes. Each complaint is logged and a record is also kept of the response provided to the reporter. On the other hand, there are no processes for collecting final feedback from users at the moment.

Periodically during management reviews, the opportunity to redefine or improve the complaints handling process (e.g., by reducing the response time) is checked, taking into account both the feedback received from stakeholders (consumer associations, workers, etc.) and the trend in the number of complaints, which must be decreasing and must show the absence of repeated/reiterated complaints.

During the year 2023, 76 79 non-conformities were recorded relating to the various Group companies in terms of quality, safety and the environment as a result of internal and external audits, feedback from stakeholders and/or supervisory bodies. The recorded findings of the various Group companies were also taken into account, as well as non-conformities relating to suppliers, as they were considered to be the responsibility (albeit indirectly) of the companies.

With a certified management system, management reviews are carried out regularly, at least once a year, during which data on non-conformities and customer reports are analysed.

PEOPLE

 **232**

new hires in 2023
(105 in 2022)

 **45,26** anni


average employee age
(45.29 in 2022)

 **22%**

female employees
(22% in 2022)

 **95,3%**

of employees with permanent contracts
(96.8% in 2022)

 **35,4%**

of employees are under 40
(34.7% in 2022)

3 GOOD HEALTH AND WELL-BEING



5 GENDER EQUALITY



8 DECENT WORK AND ECONOMIC GROWTH





4.1

COMMITMENT TOWARDS EMPLOYEES

GRI 3-3 Human rights | GRI 3-3 Diversity, inclusion and equal opportunities | GRI 3-3 Training, professional development and fair remuneration | GRI 3-3 Freedom of association and collective bargaining | GRI 3-3 Talent attraction, retention and corporate welfare |

GRI 2-7 | GRI 2-8 | GRI 2-19 | GRI 2-20 | GRI 2-21 | GRI 2-25 | GRI 2-30 | GRI 401-1 | GRI 401-2 | GRI 404-1 | GRI 404-2 | GRI 405-1 | GRI 405-2 | GRI 406-1 | GRI 407-1 |

The Dolomiti Energia Group is aware that the operation of the organisation and the achievement of its objectives depend on the vital contribution of all its personnel. It believes that the collective sum of the uniqueness of each single person significantly contributes to its own reputation, and assigns value to the human capital in that it is fun-

damental for its existence. The Group therefore pays great attention to its human resources by creating and promoting a management climate capable of motivating, acknowledging and gratifying the contribution at both team and individual level.

4.1.1 PEOPLE AT THE CENTRE

The Dolomiti Energia Group acknowledges the need to protect individual freedoms in all their forms and rejects all displays of violence, especially if designed to limit personal freedoms, as well as any form of violation of the dignity of the individual. The Group is committed to promoting the sharing of these same principles both within its own activities and primarily among its employees, collaborators, suppliers and partners.

Communication was also the focus of several events during 2023, as occasions to share achievements, good practices, objectives, strategies and future challenges. The meetings provided an opportunity to meet with business contacts, share knowledge and experiences, and socialise among colleagues, helping to strengthen the sense of belonging to the Group.

The 'Listening Desk' to support the Group's employees remained active in 2023 and, under the

management of external medical specialists, offered concrete help to those who found themselves in distress or difficulty, both at work and in their private lives.

The Group's trading company confirmed its commitment to work-life balance by renewing the 'Family Audit Executive' certification. Moreover, the Group has decided to extend certification to all its companies as a sign of attention to the needs of its employees, the promotion of equal opportunities and the growth of both corporate and territorial well-being. This choice is an important step for the Group, which confirms its desire to create an increasingly inclusive and sustainable working environment.

NEW INTRANET AND ELECTRONIC NOTICE BOARDS

In order to promote an inclusive corporate culture, to strengthen the sense of belonging, support change, involve employees and keep them informed, a new corporate intranet was designed and implemented as an internal communication tool. It provides a single access point to all company information and resources, facilitating and improving collaboration and efficiency. The launch of the new intranet and electronic notice boards has enabled more frequent communication with employees without the use of paper; it has also optimised internal organisation, as it has become the reference point for employees to access not only communications but also applications and training of interest to them, thus saving time and energy compared to before, minimising communication and maximising efficiency and clarity.

4.1.2 DOLOMITI ENERGIA GROUP STAFF

As at 31 December 2023, the Group's total personnel amounted to 1,544 people. 53% of personnel are white-collar workers, 42% are blue-collar workers, 4% are middle managers and 1% are executives. 10% of staff are 30 years of age or

under, 25% are between 31 and 40 years of age, 27% are between 41 and 50 years of age and 38% are over 50 years of age.

The number of employees increased slightly, up by 120 compared to the previous year.

Employees by age group and gender

	2023			2022			2021		
	No.	MEN	WOMEN	No.	MEN	WOMEN	No.	MEN	WOMEN
<=30 years	156	of which 80%	20%	149	of which 83%	17%	151	of which 83%	18%
31-40 years	390	of which 71%	29%	345	of which 71%	29%	344	of which 70%	30%
41-50 years	418	of which 73%	27%	367	of which 72%	28%	358	of which 72%	28%
> 50 years	580	of which 84%	16%	563	of which 86%	14%	565	of which 86%	14%
TOTAL	1,544	of which 78%	22%	1,424	of which 78%	22%	1,418	of which 79%	21%

Employees by age group and gender

	2023				2022				2021			
	No.		MEN	WOMEN	No.		MEN	WOMEN	No.		MEN	WOMEN
Executives	19	of which	84%	16%	18	of which	83%	17%	19	of which	79%	21%
Middle Managers	65	of which	82%	18%	62	of which	82%	18%	58	of which	81%	19%
White-collar workers	819	of which	61%	39%	777	of which	63%	37%	768	of which	63%	37%
Blue-collar workers	641	of which	98%	2%	567	of which	98%	2%	573	of which	99%	1%
TOTAL	1,544	of which	78%	22%	1,424	of which	78%	22%	1,418	of which	79%	21%

Employees by contractual category and gender

	UoM	2023		2022		2021	
		MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
Executives	No,	16	3	15	3	15	4
Middle Managers	No,	53	12	51	11	47	11
White-collar workers	No,	501	318	491	286	485	283
Blue-collar workers	No,	628	13	558	9	567	6
TOTAL	No.	1,198	346	1,115	309	1,114	304

Employees by classification, full-time or part-time status and gender

	UoM	TEMPO PIENO			TEMPO PARZIALE		
		2023	2022	2021	2023	2022	2021
TOTAL	No.	1,402	1,281	1,272	142	143	146
OF WHICH MEN TOTAL	No.	1,169	1,083	1,082	29	32	32
Executives	No.	16	15	15	-	-	-
Middle Managers	No.	53	51	47	-	-	-
White-collar workers	No.	495	484	475	6	7	10
Blue-collar workers	No.	605	533	545	23	25	22
OF WHICH WOMEN TOTAL	No.	233	198	190	113	111	114
Executives	No.	3	3	4	-	-	-
Middle Managers	No.	11	10	10	-	1	1
White-collar workers	No.	206	176	170	112	110	113
Blue-collar workers	No.	13	9	6	1	-	-

Employees by classification and gender on permanent contracts

	UoM	2023	2022	2021
TOTAL	No.	1,471	1,379	1,368
OF WHICH MEN TOTAL	No.	1,146	1,083	1,080
Executives	No.	16	15	14
Middle Managers	No.	53	51	47
White-collar workers	No.	485	481	471
Blue-collar workers	No.	592	536	548
OF WHICH WOMEN TOTAL	No.	325	296	288
Executives	No.	3	3	4
Middle Managers	No.	12	11	11
White-collar workers	No.	301	276	267
Blue-collar workers	No.	9	6	6

Number of employees, by contractual category and age

	2023					2022					2021				
	< 30	31-40	41-50	> 50	TOTAL	< 30	31-40	41-50	> 50	TOTAL	< 30	31-40	41-50	> 50	TOTAL
Executives	-	-	6	13	19	-	1	6	11	18	-	1	7	11	19
Middle Managers	-	7	25	33	65	-	5	25	32	62	-	6	24	28	58
White-collar workers	85	236	221	277	819	84	210	207	276	777	83	221	191	273	768
Blue-collar workers	71	147	166	257	641	65	129	129	244	567	68	116	136	253	573
TOTAL	156	390	418	580	1,544	149	345	367	563	1,424	151	344	358	565	1,418

Fixed-term employment contracts active as at 31 December

	2023			2022			2021		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
No.	52	21	73	32	13	45	34	16	50

Workers by geographical area

2023	MEN			WOMEN			
	UoM	PLANT SITES ROVERETO / TRENTO	TERRITORIAL SITES	VERONA AND VIMERCATE	PLANT SITES ROVERETO / TRENTO	TERRITORIAL SITES	VERONA AND VIMERCATE
Executives	No.	13	3	-	3	-	-
Middle Managers	No.	36	14	3	11	1	-
White-collar workers	No.	279	202	20	253	52	13
Blue-collar workers	No.	131	492	5	-	13	-
TOTAL	No.	459	711	28	267	66	13

Hires by gender and age

	2023			2022			2021			
	UoM	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
<=30 years	No.	46	20	66	38	6	44	41	10	51
31-40 years	No.	43	14	57	19	12	31	35	9	44
41-50 years	No.	51	14	65	18	7	25	19	8	27
> 50 years	No.	36	8	44	5	-	5	5	-	5
TOTAL	No.	176	56	232	80	25	105	100	27	127

Terminations by gender and age

	2023			2022			2021			
	UoM	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
<=30 years	No.	16	4	20	12	1	13	8	4	12
31-40 years	No.	13	4	17	11	8	19	9	4	13
41-50 years	No.	18	3	21	7	5	14	4	4	8
> 50 years	No.	46	8	54	49	4	53	39	5	44
TOTAL	No.	93	19	112	79	20	99	60	17	77

Hiring rate by gender and age¹⁶

	UoM	2023		2022		2021	
		MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
<=30 years	%	36.8	64.5	30.6	24.0	32.8	38.5
31-40 years	%	15.5	12.5	7.8	11.9	14.5	8.8
41-50 years	%	16.8	12.4	6.8	6.9	7.3	8.1
> 50 years	%	7.4	7.1	1.0	-	1.0	-
TOTAL	%	14.7	16.2	7.2	8.1	8.9	8.9

Termination rate by gender and age¹⁶

	UoM	2023		2022		2021	
		MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
<=30 years	%	12.8	12.9	9.7	4.0	6.4	15.4
31-40 years	%	4.7	3.6	4.5	7.9	3.7	3.9
41-50 years	%	5.9	2.7	2.6	6.9	1.5	4.0
> 50 years	%	9.4	8.9	10.2	7.4	8.0	6.5
TOTAL	%	7.8	5.5	7.1	6.5	5.4	5.6

Non-employed workers¹⁷

UoM	2023			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
No.	9	18	27	10	16	26

In 2023, 27 internships and apprenticeships were set up (21 in 2022) which involved students from vocational institutes, secondary schools and uni-

versities. The average duration of the internships was 136 days (90 days in 2022).

¹⁶ Percentage of total employees by age group and gender as at 31 December.

¹⁷ These are exclusively workers with fixed-term staff leasing contracts as at 31 December 2023 (an average of 32: 21 women, 11 men) and are guaranteed the same treatment as employees hired on a fixed-term basis.

4.1.3 PROTECTION OF HUMAN RIGHTS

The Dolomiti Energia Group protects human dignity in all tasks and is committed to contributing to people's well-being. This is why it has adopted a Policy dedicated to the issue of Human Rights, which integrates and broadens what has been already included in the Code of Conduct, the Anti-Corruption measures, the Organisation, Management and Control Model, the Integrated Quality, Environment, Health and Safety Management System and the Privacy Management System for the Protection of Personal Data.

To this end, the Group's commitment focuses on opposing the employment of minors, forced labour, harassment, discrimination and promotes the freedom of association, health and safety at the workplace, dignified working conditions, the protection of personal privacy and sustainable social development.

These documents are inspired by the United Nations International Charter of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organisation's Declarations on Fundamental Principles and Rights at Work and the relevant Conventions, the UN Global Compact, the UN Convention on the Rights of the Child, and the European Convention on Human Rights.

The Group is also committed to fostering free association and collective bargaining. Numerous meetings were held during the reporting period with both trade unions, which led to the signing of second-level agreements on pay, organisational and work-life balance issues, and with the representatives of the workers who run the company's recreational clubs. The most significant trade union agreement signed in 2023 concerns the conversion of the Gas/Water NCLA into the Electricity NCLA of the companies Dolomiti Energia Holding S.p.A., Dolomiti Energia S.p.A.

and Dolomiti Energia Trading S.p.A., which guarantees workers having the same the same function and job duties, as from 1 January 2024, the harmonisation and standardisation of the salary compensation and contract terms envisaged by the collective bargaining. This was an important joint effort between the Group and the trade union representatives, which resulted in improved working conditions for some 270 employees.

PROCESSES ARE IN PLACE TO REMEDY AND MITIGATE POSSIBLE NEGATIVE IMPACTS

The protection of human rights in the performance of business is central to the Dolomiti Energia Group, and the risks connected to this area are not only monitored by the Human Rights Policy and the Group Code of Conduct, but also through monitoring initiatives such as periodic meetings of the Human Resources Department with internal and external workers' representatives.

The Human Resources Department is committed to ensuring compliance with human resources management procedures and processes, adopting transparent and collaborative behaviour in order to resolve any irregularities and limit their negative impacts. To this end, a virtual desk was set up within Zucchetti's HR Portal, through which all employees can activate reports or requests, including addressing specific users in our organisation and receiving feedback. This is in addition to the e-mail address risorseumane@dolomitienergia.it, which is monitored on a daily basis.

Aware of the importance of this process as a tool for monitoring and constantly improving the organisation's ethics and compliance, the Board of Directors of Dolomiti Energia Holding is committed to guaranteeing the highest standards of

transparency, integrity and reliability.

In line with this commitment, the Board of Directors of Dolomiti Energia Holding and, consistently, the Board of Directors of each subsidiary company of the Group, encourage employees, associates, any third parties working with the Group and the individual subsidiaries to report situations of unethical behaviour, irregularities, offences, violations of company regulations, that they have detected in their work activities or in their relations with Dolomiti Energia Group, so that the Group may use these reports to intercept any non compliant behaviour in good time and remedy and correct it.

In fact, the aim of the tool is to prevent any irregularity within the organisation, but also to involve all stakeholders in activities to combat offences and irregularities through active and responsible participation.

Reports of violations and offences can originate from internal individuals such as employees, subordinate and self-employed workers, associates, freelancers and consultants, volunteers and trainees, shareholders and persons with duties of administration, management, control, supervision or representation of Dolomiti Energia Holding S.p.A. or of its subsidiaries, but also from other external parties operating in the working context of the company.

In order to manage any reports, Dolomiti Energia Holding S.p.A. and its subsidiaries have set up a collegial body specifically established for the collection and management of reports, called the Reporting Committee. It consists of three members: the Chair of the Parent Company Dolomiti Energia Holding, the Internal Audit and Data Protection Manager, and an independent external lawyer with a permanent appointment. This Committee is responsible for the process of managing and directing the investigative activities to be carried out in response to any reports. If the subject of the report is relevant for the purposes of the Organisation and Control Model pursuant to Italian Legislative Decree 231/01, the preparation of the investigation and the subsequent stages are carried out in agreement with the Supervisory Body, also in relation to the areas of their respective expertise. Where, on the other hand, the subject of the report is related to anti-corruption measures, the preparation of the investigation and the subsequent stages are also carried out in agreement with the Head of the Prevention of Corruption in relation to their respective areas of expertise.

Dolomiti Energia Holding S.p.A. and its subsidiaries provide adequate channels for the collection of reports both in written and oral form, which guarantee traceability and confidentiality in compliance with Italian Legislative Decree 24/2023.

4.1.4 THE CONCEPT OF 'TAKE CARE' FOR THE DOLOMITI ENERGIA GROUP

SMART OFFICE PROJECT

In the course of 2023, the Group set up an ambitious, state-of-the-art project called 'Smart Office'. The main objective of this project is to analyse and redesign organisational functioning and be a useful tool to accompany the change and growth of people through a new model of culture. In fact, the project consists of a detailed analysis of activities and processes, interdependencies between roles as well as informal relationships through questionnaires, interviews and workshops.

It is driven by two key aspects: the implementation of remote work (explored in more detail in the next section) and the need to review the organisation of space, finding the right balance between different organisational needs. Creating places in which people work better, are stimulated to innovate, to be together. An organisation of the workspace no longer built on hierarchical organisation, but on processes.

AGILE WORKING

In 2023, it was stipulated that agile working (i.e., remote working) will be made structural in the coming year. At the same time, a decision was made to raise the value of the meal voucher granted to employees during agile working days from the current €3 to €5, a value that will then be reviewed annually through discussions with the trade union representatives.

In 2023, approximately 28% of the total workforce had access to work remotely for a total of 8.72% of the hours out of the total hours worked.

2021 WELL-BEING PLATFORM PROJECT

For the Dolomiti Energia Group, placing people at the centre of the organisation means contributing to the overall well-being of its employees, therefore not only from an economic perspective, but also from a physical and mental one. To meet the growing needs of employees and their families, a number of programmes aimed at improving work-life balance have been launched, which are available on the platform provided to employees in collaboration with the company Edenred.

More specifically, the initiatives concern:

- Empowerment: information and training snippets on typical care-giving topics (childhood, adolescence, elderly);
- Student Help: support for primary and secondary school students in after-school activities;
- Aptitude Guidance: support for high school students in deciding which study path or profession to pursue;
- Women's Support: awareness-raising process on issues relating to gender relations, violence against women and family abuse;
- Dietary Well-being: nutritional counselling programme.

JOB DESCRIPTION PROJECT

In a historical moment when understanding the 'meaning' of one's job is becoming increasingly important, the Dolomiti Energia Group wished to

revise the previous job description model for its employees, while recognising the strategic importance of job descriptions: a fundamental tool to support the processes of recruiting, training, development and defining remuneration.

The review process, which started in the Dolomiti Energia and Dolomiti Energia Trading companies, began with the Skill Mapping of current positions in order to compare the profile expected by the business strategy, in terms of responsibilities and skills, with the current profile. A new job description template was therefore structured in order to share a clear and in-depth list with each employee of the areas of responsibility, related

activities and both the transversal and technical skills required by their position. Through this gap analysis, Managers have immediate visibility of the areas of intervention to which training interventions should be directed to fill the gap. This discussion will take place annually and is a valuable opportunity for each employee to improve and increase their individual skills and awareness and to participate in their own development.

The activity will involve the entire Group and will represent the starting point for the work of building company and intra-company development and growth plans.

4.1.5 DIVERSITY AND INCLUSION

the Group is committed to valuing diversity within the company, to facilitating the reconciliation of work and life needs, and more generally, to improving the quality of the working environment. The aim is to team up, to add value to the result of individual work and increase the sense of belonging, thereby creating professional, social, cultural and intellectual common ground.

Thus the Group's commitment recognises the value of being able to offer non-discriminatory conditions, equal opportunity, the inclusion of people and tools so that they may reconcile work and private life in the best possible way, including flexible working hours which enable most employees to carry out their work within a time frame that guarantees a certain daily flexibility on entrance and exit and for other types of contract a multi-period or part-time flexibility, a tool which employees can rely on in order to find precious and useful time to reconcile work and private life. The introduction of remote working has been an

additional element of flexibility in balancing professional and family needs.

The Group does not tolerate any form of discrimination with reference to age, race, nationality, citizenship, political opinion, religion, marital status, gender, sexual orientation, sexual identity, disability, personal characteristics and experiences or aspects that distinguish an individual throughout their life, such as personal and corporate culture, type of employment contract, professional role and hierarchical position within the organisation. That is why the Group has adopted a Policy on diversity since 2017, which supplements and broadens the provisions on the matter in our Code of Conduct and the 231 Models.

As at 31 December 2023 the number of workers in protected categories was 88 (58 men and 30 women), while it was 93 in 2022 (62 men and 31 women) and 95 in 2021 (67 men and 28 women).

Percentage of employees belonging to protected categories, by gender and age group

	UoM	2023		2022	
		MEN	WOMEN	MEN	WOMEN
<=30 years	%	100	-	100	-
31-40 years	%	71	29	67	33
41-50 years	%	48	52	48	52
> 50 years	%	73	27	74	26
TOTAL	%	66	34	67	33

Number of employees belonging to protected categories, by gender and age group

	UoM	2023			2022		
		TOTAL	MEN %	WOMEN %	TOTAL	MEN %	WOMEN %
Executives <= 30 years	No.	-	-	-	-	-	-
Executives 31-40 years	No.	-	-	-	-	-	-
Executives 41-50 years	No.	-	-	-	-	-	-
Executives > 50 years	No.	-	-	-	-	-	-
TOTAL EXECUTIVES	No.	-	-	-	-	-	-
Middle Managers <= 30 years	No.	-	-	-	-	-	-
Middle Managers 31 - 40 years	No.	-	-	-	-	-	-
Middle Managers 41 - 50 years	No.	-	-	-	-	-	-
Middle Managers > 50 years	No.	1	100	-	1	100	-
TOTAL MIDDLE MANAGERS	No.	1	100	-	1	100	-
White-collar workers <= 30 years	No.	-	-	-	3	100	-
White-collar workers 31 - 40 years	No.	14	71	29	14	64	36
White-collar workers 41 - 50 years	No.	25	44	56	25	44	56
White-collar workers > 50 years	No.	26	58	42	25	60	40
TOTAL WHITE-COLLAR WORKERS	No.	65	55	45	67	57	43
Blue-collar workers <= 30 years	No.	3	100	-	2	100	-
Blue-collar workers 31 - 40 years	No.	3	67	33	4	75	25
Blue-collar workers 41 - 50 years	No.	2	100	-	2	100	-
Blue-collar workers > 50 years	No.	14	100	-	17	94	6
TOTAL BLUE-COLLAR WORKERS	No.	22	95	5	25	92	8
TOTALS	No.	88	66	34	93	67	33

The Group guarantees the absence of discrimination in the recruitment, hiring, training, management and remuneration of personnel, as set

out in the company's Code of Ethics, aiming to develop an inclusive work environment respectful of all forms of diversity and inspired by the

principles of fairness and dignity in professional relations, and free of discriminatory behaviour.

Over the past few years, the Group has participated in working groups to pursue, together with other Italian multi-utility companies, its commitment to promote the inclusion of diversity in terms of gender, age, culture and ability within company policies as formalised in 'PATTO UTILITARIA - la diversità fa la differenza'.

The Group hires and manages its personnel according to standard employment contracts, not allowing any form of employment that is not compliant or is elusive of current legislation and is committed to ensure that this requirement is also complied with by its suppliers and commercial partners.

Reforms in labour regulations and pension systems, which prolong people's stay in the company, have had a significant effect: for the first time

there are at least four generations working side by side, bringing with them a different perception of work, roles and relationships. The diversity and coexistence of different generations offer opportunities for enrichment and openness to change, to cope with technological revolutions and to drive innovation, exploiting the breadth of experience and knowledge.

To facilitate cooperation and integration between senior and junior figures, it is necessary to understand the strengths, limitations and values of each generation towards their work and to create a corporate culture that demonstrates readiness for the changing world of work.

In addition, the Group guarantees disabled staff the conditions for the best possible job placement, operating in compliance with the relevant regulations.

DOLOMITI ENERGIA'S GENDER EQUALITY CERTIFICATION

UNI/PDR 125:2022 Gender Equality certification is a voluntary certification focused on certified companies' implementation of a structured process to promote gender equality within the organisation. It calls for structuring and adopting a set of KPIs concerning gender equality policies in order to close the gaps between women's and men's work.

In 2023, the Dolomiti Energia Group implemented a work plan in cooperation with a team of external experts in order to achieve certification by 2024. In this first phase of preparation for the certification, the Group carried out an assessment of the KPIs required by the standard, after which an action plan will be drawn up to improve current practices and align with the requirements. This last step will then be accompanied by a training course to 'approach' the internal working group's standards. The latter consists of a Steering Committee, which encompasses the highest functions of Dolomiti Energia Holding's strategic orientation, and an Operational Working Group made up of representatives of the following corporate departments: external and internal communication, recruiting & onboarding, training & development, administration, safety and internal audit.

4.1.6 TALENT ATTRACTION AND RETENTION

The Dolomiti Energia Group's goal is to become 'The Place To Be', i.e. the workplace where everyone can express their potential and aspirations to the fullest, contributing to the success and sustainability of the business.

The Dolomiti Energia Group considers human capital to be a key element in creating value and maintaining a competitive advantage, even more so at a time of great transformation in the energy sector such as the present. Therefore, the Group's objectives include maintaining high levels of employability, enhancing the internal growth of resources, taking care of plurality and inclusion, and promoting well-being at work through robust corporate welfare.

Priority is given to organic growth and to enhancing the skills available in the company; in fact, many vacant positions are first sought internally through job postings shared on the intranet and company notice boards.

When, on the other hand, the Group turns to the outside world in its search for talent, it does so using different channels:

- 'Work with us' section on the website for active searches and voluntary applications.
- Universities in the area for extra-curricular vocational internships. It also provides students with the opportunity to undertake curricular internships aimed at the completion of their academic career, possibly also giving them the opportunity to use the training experience for their thesis project.
- Participation in events such as Career Day to get in touch with undergraduates and recent graduates and participation in on-campus and employer recruitment activities.
- Events created by the Employment Agency to promote the successful integration of people with disabilities and those belonging to Protected Categories.

- Collaboration with Istituto Enaip Alta Formazione in Trento where a two-year recruiting pathway was created in 2022, which includes evaluations (interviews and assessment) and training internships in the company, all aimed at a concrete possibility of employment.
- Professional social networks (e.g.: LinkedIn, Indeed, Monster): through smart monitoring of social and digital communication channels and a targeted use of more traditional channels in order to recruit the most suitable, targeted and talented professionals for the role sought.

In view of the ever-increasing importance given to a sense of belonging by job seekers, the Group aims to attract professionals and recent secondary school or university graduates who share its values (listening, expertise, synergy and innovation) and vision from the outset: taking part in a new initiative, exploring an idea or embarking on a path, is only done if alignment with the above-mentioned Group values has already been ascertained.

The mission, objectives and values of the Dolomiti Energia Group are heavily influenced by the nature of the Group's activities as a public utility, its compliance with current legislation and its sustainable use of natural and local resources.

The Recruiting & Onboarding Department tries to convey the corporate values from the outset, communicating the importance of the sense of belonging also at this stage by using various tools and methodologies, aimed at understanding whether the candidate possesses the necessary skills to fill the required job position.

The new Group Recruiting & Onboarding procedure was published in 2022. In compliance with the principles of transparency and impartiality, it establishes the essential requirements, criteria

and general procedures for selecting and hiring staff in the Group. All stages of the process are tracked.

The procedure also applies to the selection of subjects for traineeship projects (internships) and in the case of the use of staff leasing contracts. The recruiting process allows candidates to demonstrate their talent through a structured, innovative and increasingly digital route.

The most widely used tool is undoubtedly Assessment: this method also offers candidates the opportunity to gain an introspective look (useful in any case for their own future) into the world of their own cross-cutting skills. The latter, which are naturally more difficult to identify in a normal interview, are evaluated in the assessment phase and are also called life skills; these include, for example, listening and empathy, problem solving, strategic thinking, team working, flexibility and change management. Thanks to its standardised and objective nature, the assessment is considered one of the most reliable tools as a staff selection test. The behaviour to be observed and the skills possessed by the candidates are stimulated by simulating the business and operating reality; this is why the tests vary according to the

role to be filled. In other words, assessments must be targeted and designed according to what is being sought.

The Group is working on Employer Branding initiatives to increase the company's appeal as a desirable workplace for candidates.

Talent management and retention are also of key importance and are considered a strategic factor for employee development. More specifically, with regard to employee retention, meaning the company's ability to implement strategies and policies to attract and retain talented employees, keeping them in the workforce for a long time, we can affirm that in all Group companies the average turnover rate is just under 5%, close to the physiological turnover: in this case, rotation offers the company wide margins of flexibility and staff the possibility of seeking opportunities in line with their needs, preserving organisational stability and the company's productive continuity.

No less important is the attention given to feedback from candidates and employees: knowing how to effectively communicate externally is the next step in building a solid brand reputation and really making a difference.

4.1.7 SKILLS DEVELOPMENT AND TRAINING

People are a key asset for the Group in every interaction with its internal and/or external customers, in every small detail, day in, day out. This is why, with the support of the Human Resources & Business Partner Department, the Dolomiti Energia Group is committed to building fair processes aimed at attracting and retaining the best resources, developing their potential and guaranteeing vertical and/or horizontal professional and salary growth paths.

The focus on the personal and professional devel-

opment of people has gained increasing interest for both employers and department managers, with Human Resources constantly more involved. Attention to people's aptitudes is enhanced by the Assessment processes introduced in the Group, as is the acquisition of in-house expertise in the management of these variables.

Training projects involve the entire company population through annual, long-term training and development plans.

A Training Needs Analysis was introduced in 2023 in order to provide managers with the necessary tools to reason together about areas of improvement, strengths and upcoming strategic goals, and consequently to analyse what impact to expect on people's skills.

2023 also saw the start of a series of 'structural' interventions in the area of training and development. Firstly, the Group equipped itself with a flexible, agile and adaptable LMS platform (Docebo) for all employees. A course library contains the entire usable e-learning training content, with over 400 hours of training in the various fields. Lastly, the Training & Development Management Procedure was published which, in steady evolution, details the processes and methods in place to stakeholders.

Whether in-person, synchronously online or in e-learning, training focuses on the four clusters identified when defining the training catalogue:

- Health, Security & Environment;
- Technical skills;
- Digital skills
- Life skills.

Training and the development of skills in the field of Health, Safety & Environment are of vital importance for compliance with regulations, and bear witness to the Dolomiti Energia Group's commitment to all its stakeholders. As in previous years, the Group's commitment to ensure high standards in the performance of its work and to comply with regulatory obligations has led to setting up a large number of training hours on

Health, Safety and the Environment and on the development and maintenance of technical skills in the sector. Respect for the individual as such and for their health and safety in the working environment are equally fundamental. Attention to environmental protection and the working environment has recently been gaining increasing importance.

The development and maintenance of technical area skills is a prerequisite for the Group's people in order to perform their work more and more excellently and to improve processes. Failure to develop role skills results in a missed opportunity for both the Group and the individual. The same applies to digital skills, which are increasingly important in today's labour market.

Equally important is the focus on personal and professional development, which is nurtured through training courses with a focus on soft skills. Attention to these skills makes it possible to raise managerial standards for the present and the future, accompanying the culture of care in people and enabling the development of those skills necessary to maintain business continuity in an increasingly volatile and uncertain environment.

Projects for the acquisition and growth of both technical and managerial skills are constructed in order to develop careers and potential. These paths aim to accompany resources in the growth of their roles and responsibilities. The professional development of the role also includes consistent growth in salary and contractual position.

CONSTRUCTION OF
STOREY
RELATED TRAININGS
TO REAL NEEDS
OF TODAY'S BUSINESS E
OF TOMORROW

VALORIZATION OF
PEOPLE, CONSTRUCTION
OF AD TRAINING PLANS
HOC, ATTENTION TO THE TOPICS
OF HEALTH, SAFETY AND
ENVIRONMENT

DEFINITION OF
GROWTH PATHS
PROFESSIONAL
PROFESSIONALS AND PLANS
BUSINESS DEVELOPMENT

During the year, several training projects were launched; the following deserve mention:

- **Leadership Academy:** in 2023, the Group went through a profound transformation that resulted in new values and a new vision. The Academy will be the place for learning and putting these into practice so that the objectives of the Group and its people can take shape. First of all, the leadership skills that the Group defines as strategic in facing its present and building its future were identified; the profile of the Group's ideal leader was drawn up, and the behaviours to be implemented to make the ideal leader's skills concrete were identified and trained. Inclusive, participative leadership focused on goal-oriented work, trust, delegation and empowerment of employees and managers, listening and taking care;
- **"La Leadership si_cura"** project: an innovative behavioural safety project for all Novareti people managers. The project combines the topics of safety and role responsibility with those of leadership, listening, feedback and sharing. All these aspects represent the essence of the project: caring for people;
- **Skills and potential assessment** projects introduced in internal and external selection processes, but also in ad hoc projects on specific groups;
- **Effective Communication:** a four-hour training session dedicated to effective communication was included in onboarding, focusing on the importance of communication, conflict management and relating to others. This training intervention is also extended to the Group's existing colleagues;
- **Rites of passage:** as part of the Vallagarina integration project, Dolomiti Ambiente was involved in a cultural mediation project with the aim of preparing for reception and raising awareness about accepting what is 'different', with reference to both 'organisational culture' and 'identity culture';
- **Gender harassment in the workplace:** on the occasion of International Day for the Elimination of Violence against Women, the Group implemented concrete actions, and from 22 to 25 November a 'Seat Taken' was reserved at all Group counters, i.e., an empty chair to commemorate the absence of a woman victim of femicide. The Group considers it essential to keep attention high at all times, starting with knowledge and awareness. For this reason, and in order to acquire the tools to prevent, recognise and manage what can also occur in the workplace, all employees were involved in a special e-Learning training initiative in Docebo;
- **Graduates Academy and a structured talent management process:** failure to manage potential profiles could lead to the exit of such talent from the group, with a consequent increase in terms of loss of professional expertise and costs in turnover management. The Group is implementing a structured talent management process to mitigate this, including through the creation of an ad hoc Academy;
- **ESG issues:** a path on these topics was started in 2023, which saw the front lines especially involved in two conferences organised by Federmanager and Ambrosetti, and further initiatives are in the pipeline for next year.

Hours of training per employee, by gender and category

	UoM	2023		2022	
		MEN	WOMEN	MEN	WOMEN
Executives	No.	1,203	203	458	122
Middle Managers	No.	2,560	467	2,116	439
White-collar workers	No.	17,656	6,868	13,744	7,006
Blue-collar workers	No.	21,782	541	13,827	118
TOTAL	No.	43,201	8,079	30,145	7,685

Average annual hours of training per employee, by gender and category

	UoM	2023		2022	
		MEN	WOMEN	MEN	WOMEN
Executives	No.	75	68	31	41
Middle Managers	No.	48	39	42	40
White-collar workers	No.	35	22	28	24
Blue-collar workers	No.	35	42	25	13
TOTAL	No.	36	23	27	25

In 2023, the number of training hours provided increased by 36%, from 37,830 in 2021 to 51,280. In 2023, the percentage of employees who attended at least one training course was 99%. (99% in 2022).

The percentage of training initiatives delivered

that covered health and safety was 54% (57% in 2022), while technical specialised training amounted to 34% (30% in 2022).

844 hours of training were provided on human rights policies or procedures, involving 36% of employees.

4.1.8 REMUNERATION POLICIES

In defining the type of contract and remuneration, the Group scrupulously complies with Italian legislation, which rules out gender distinction in the remuneration relationship.

The remuneration policy classifies all employees according to the national collective labour agreements. The national collective labour agreements applied to the Group's employees are the UTILITALIA NCLA for environmental services, the UTILITALIA NCLA for the gas-water sector and the UTILITALIA NCLA for workers in the electricity sector.

For all employees remuneration is structured around fixed and variable monetary components and includes a series of benefits to support income or easements (health and retirement insurance, exclusive offers exclusively reserved for employees on services managed by the Group and a series of benefits of various kinds). Managerial staff are covered by the NCLA for Industry Managers, applying all the provisions of this contract.

The main tools used within the context of meritocratic policies, based on the qualifications and the employees' level, involve the application of deserved increases, one off payments, level changes and the application of any additional accessory compensations. A remuneration/meritocratic policy was applied in 2023 with an expenditure budget allocated to each Department and company in the Group. The new policy provides for a scorecard on technical and transversal skills, through which improvement measures can be proposed in terms of category progression, increase of personal bonuses or one-off bonuses.

Furthermore, a variable payment scheme is provided for Executives, part of the Middle Managers and some white-collar workers with core positions, which is based on direct correlation with company performance and individual targets

met ("MbO").

In 2023, the new Performance Management model was implemented which, in addition to taking into account the Group's economic objectives and individual quantitative targets, also provides for the evaluation and measurement of objectives linked to expected cross-cutting behaviours.

Variable remuneration is integrated within a collective incentive tool called the 'performance bonus', based on a system of objective revenue, productivity and quality indicators diversified depending on the activities performed, and designed to guarantee that all personnel contribute to the achievement of the company's objectives. The performance bonus is paid to all employees.

In defining the type of benefits, the Group strictly adheres to Italian law. The benefits envisaged for employed personnel, besides the CCNL (National Collective Bargaining Agreements), also refer to second level negotiations. Generally speaking, benefits are foreseen for health assistance, additional pensions, recreational activities, canteens and restaurants offering special deals for company employees.

A Group corporate welfare package designed to increase employee welfare and that of family members is active. The initiatives and the services included concern health and health services, insurance and pensions, support for children's education and assistance, personal and welfare services for the benefit of the employee. The project foresees the introduction of a flexible welfare quota, which the employee can use on individual initiatives – for example the partial reimbursement of incurred expenses or the purchase of goods and services – chosen among the broad offer envisaged for each different sector. In addition, there is also the possibility of converting

part of the performance bonus into additional hours of paid leave, the amount of which may be doubled by employees with permits under Law 104/09.

Again in 2023, employees were given the opportunity of converting part of their “performance bonus” into provisions and services, in addition to existing contractual and corporate welfare contributions, for themselves or for their family members.

In addition, the agreement for the advance payment of severance pay was signed in 2023.

Generally speaking, the provisions applied to full

time employees are also envisaged for employees on part time contracts, with wages revised based on the actual number of hours worked by the interested person.

As for short-term employees, the allocation of certain recognitions is dependent on the duration of the employment contract.

All employees are covered by collective bargaining agreements: the employment relationship for all Group employees is governed by the CCNL (National Collective Bargaining Agreement), integrated by second level negotiations.

Ratio of basic salary and pay of women to men for each employee category¹⁸

	2023	2022
	RATIO OF AVERAGE SALARY	RATIO OF AVERAGE SALARY
Executives	0.89	0.89
Middle Managers	1.05	1.01
White-collar workers	0.88	0.89
Blue-collar workers	0.80	0.79

The ratio of the annual total remuneration of the highest paid person within the Group to the average annual total remuneration of all employees (excluding the highest paid person) is 4.93 (4.89 in 2022)¹⁹.

As far as the remuneration of the Board of Directors is concerned, the Shareholders’ Meeting of Dolomiti Energia Holding is responsible for defining the amounts.

This remuneration may also be awarded in a variable form, based on the achievement of certain objectives. The Shareholders’ Meeting is also en-

titled to indicate, for the subsequent resolution of the Board of Directors, the maximum amount of the remuneration of the directors holding office. The Shareholders’ Meeting also has the alternative power to determine the amount of the remuneration of all directors, including those holding special offices, in an overall sum. In this case, determination of the remuneration is left to the Board of Directors, within this overall sum, after hearing the opinion of the Board of Statutory Auditors.

In the last term of office, the Shareholders’ Meeting indicated the maximum amount of remuner-

¹⁸ The calculation was made based on the Gross Annual Remuneration actually received by each worker. This was used to then calculate average by category. Women’s pay was compared to men’s pay. The values relating to 2022 are restated following improvements in the calculation methodology.

¹⁹ To define this value, reference was made to the gross annual remuneration calculated taking into account only the fixed and repetitive elements, excluding bonuses and allowances linked to performance and working hours. The ratio of the percentage increase in the annual total remuneration of the person receiving the highest remuneration to the average percentage increase in the annual total remuneration of all employees (excluding the aforementioned person) is 2.07.

ation to be paid to the directors, including those holding special offices (Chief Executive Officer and members of the Executive Committee), delegating the Board of Directors to subsequently allocate the remuneration after consulting the Board of Statutory Auditors, and no variable remuneration was awarded.

With reference to the subsidiaries, the Parent

Company's Executive Committee, on the occasion of the renewal of the subsidiaries' corporate bodies, adopts a resolution on the (fixed and/or variable) remuneration to be paid to the members of their corporate bodies (Chair, Executive and Non-executive Directors) at the respective Shareholders' Meetings and Boards of Directors' meetings appointing the Chief Executive Officer.



4.2

ATTENTION TO OCCUPATIONAL HEALTH AND SAFETY

GRI 3-3 Health, safety and well-being |

GRI 403-1 | GRI 403-2 | GRI 403-3 | GRI 403-4 | GRI 403-5 | GRI 403-6 | GRI 403-7 | GRI 403-8 | GRI 403-9 | GRI 403-10 |

The Group pays great attention to occupational health and safety, and is fully aware of the great social importance of employers and of their responsibility to proactively guarantee and promote the protection of the physical and psychological integrity of their workers, fostering the development of a healthy and suitable workplace and adopting

the best organisational and procedural techniques in order to constantly improve the performance of the Occupational Health and Safety management (OHS) system.

This responsibility applies to both employees and personnel working under the control of third-party suppliers.

THE DOLOMITI ENERGIA GROUP'S HEALTH AND SAFETY OBJECTIVES:

- Maintain OHS in order to ensure the prevention of fatal accidents and the occurrence of occupational diseases.
- Reduce the frequency index of accidents with absence duration ≥ 40 days by at least 5% compared to the frequency index of events with absence duration ≥ 40 days recorded in the previous five years;
- Reduce the combined severity and frequency index of occupational accidents by at least 5% compared to the average index of the last five years.

The Group has adopted an organisation and management model regarding OHS that identifies the employer as the physical person at the apex of all organisations, and attributes to them the full organisational and executive powers to safeguard occupational health and safety.

The Group can count on the Quality, Safety and Environment department, centralised in the Holding company, which supports the employers of the individual companies in standardising procedures and good practices, pooling tools for prevention, risk assessment and management. The staff of the department also fulfil the roles of RSPP/ASPP (Prevention and Protection

Service Manager/Prevention and Protection Service Staff) in some Group companies and carry out internal audits in all Group companies. Two Group companies (Hydro Dolomiti Energia and Dolomiti Edison Energy) have appointed their own internal RSPP.

Each Group company has also defined its own emergency management plans (EMP).

The Prevention and Protection services of the single organisations are generally complemented by the internal company personnel also taking on the role in coordination with the centralised department. The aim of the model is to share the

best experiences and create synergistic relations between all the Prevention and Protection Services thus guaranteeing the organisation the utmost flexibility.

Evacuation tests are carried out periodically at the main sites to identify and resolve any critical issues. In addition, specific sheets are drawn up on related risks and workplaces for the different tasks.

All Group companies, with the exception of Gasdotti Alpini, have their own Health and Safety Management System which complies with the UNI EN ISO 45001 standard according to the specific Group Guidelines and in compliance with the Organisation Management and Control Model pursuant to Italian Legislative Decree 231 and a policy/strategy that is committed to preventing, eliminating and reducing occupational health and safety risks. The policies are displayed in workplaces and published on company portals.

Group companies are subject to an internal audit system in compliance with UNI ISO 45001 and UNI EN ISO 19011 standards. The OHS management systems of Hydro Dolomiti Energia, Dolomiti Edison Energy and Novareti (gas sector) are audited by independent accredited third parties.

Within the framework of companies that have obtained certification in this regard, the employer, specifically appointed by the Board of Directors, coordinates periodic meetings in collaboration with the company doctor, trade unions, the Human Resources Department, the Prevention and Protection Service Manager and other competent professional figures, in order to detect the status of environmental and health and safety management systems and any criticalities to be addressed and managed.

All staff are granted supplementary health care, as established by the specific National Collective Bargaining Agreements applied, which also identify the reference funds for the sector. The Group has also introduced further forms of welfare aimed at promoting the psychological and physical well-being of employees and their families through the provision of services that include the reimbursement of health expenses (e.g., specialist visits, dental care, lenses and glasses, laboratory tests), which can be used through a specific online platform made available to all.

99.81% of employees are covered by an internally audited Health and Safety Management System, of which 42.55% (40.94% in 2022) are covered by an independently certified third-party system. This figure is not available for non-employees.

	UoM	2023	2022	2021
Employees covered	No.	1,541	1,421	1,415
Total employees	No.	1,544	1,424	1,418
Employees covered by OHS	No.	99.81	99.79	99.79

The Group is also committed to the prevention and mitigation of occupational health and safety impacts directly linked by business relationships. More specifically, the outsourced activities are entrusted to suppliers after assessing their technical and professional suitability to perform them. Obligations for the supplier to comply with OHS standards are identified in the business relations,

as are the related costs and charges. Operational activities, in particular those related to works and services, are subject to field monitoring and audits by contractor staff. The results of the audits have an immediate impact on the continuation of activities and are taken into account in the periodic evaluation of the supplier's performance.

4.2.1 COMMITMENT TO SPREADING A CULTURE OF HEALTH AND SAFETY

The Group's objective is not only to comply with applicable regulations, but also to implement a set of actions aimed at continuously improving working conditions. It is thus committed to spreading a culture of safety based on developing the perception of risks, promoting responsible behaviour among the collaborators and sharing responsibilities among all the parties involved in the Group's activities, bar none.

The commitment to spreading a health and safety culture includes the strict compliance with legal requirements and the continuous improvement, through constant updating, of risk assessments, the conformity of all machinery, systems, equipment, protective devices for both the individual and the workplace, information, training and drilling of workers, the adoption of safe procedures and operating practices, the health monitoring of workers, the consultation and participation of workers both directly and via their representatives in the prevention and possible management of emergencies. Furthermore, for a few years now, an important safety conduct project termed BBS (Behaviour Based Safety) has been implemented and applied within SET Distribuzione, Dolomiti Ambiente, and the Holding's operative functions (Laboratory and Warehouse).

The events that occurred and the actions implemented are monitored and periodically reviewed during the meetings between the employers and the Prevention and Protection Service (RSPP) Managers. On these occasions, the results of internal health and safety audits are also reviewed,

which are normally carried out by personnel from the centralised Quality, Safety and Environment department as well as by third parties for OHS systems subject to certification according to UNI EN ISO 45001.

The shared objectives of the companies' employers are:

- continuous improvement of the integrated occupational health and safety risk management system,
- continuous analysis of the critical issues of the processes and of the resources to be protected,
- constant attention to training, educational and communication processes,
- the adoption of the best technologies economically accessible and
- the control and update of working methods.

Achieving the objectives of continuous improvement hinges on the ability to involve each individual worker in taking care of his/her health and safety and that of third parties in the workplace.

The employers have identified the people responsible for covering the role of Prevention and Protection Service Managers for the individual companies.

Risk assessment documents are updated to consider the structural development, the operating conditions and regulatory developments.



**FOCUS ON OCCUPATIONAL HEALTH AND SAFETY:
SET VISITS LUCCHINI STEELWORKS**

In November, SET Distribuzione employees visited the production plant of Lucchini RS steelworks to talk about workplace safety, a topic that has always been dear to the Group. It was a day full of discussion and training, which ended with a theatrical performance to reflect on the consequences of an accident.

4.2.2 HAZARD IDENTIFICATION, RISK ASSESSMENT AND INCIDENT INVESTIGATION

The extreme variety of activities performed by the Group companies exposes workers to risks of various natures. In particular, the main risks to be noted include:

- Risk of an electrical nature and due to falls from heights for electrical distribution company workers;
- Risk of electrical, hydraulic, drowning and fall from height accidents for workers in hydroelectric production and water supply system management companies;
- Risk due to road accidents, mechanical and manual load handling accidents for workers involved in waste management;
- Risk due to fire and exposure to explosive atmospheres (ATEX) for workers employed by the natural gas distribution company;
- Risk of exposure to chemical and biological agents, drowning and falling from a height for workers in collecting societies and sewage treatment plants;
- Risk of electrical, fire, exposure to explosive atmospheres (ATEX) and severely hot conditions for cogeneration workers;
- Risk of exposure to chemical and biological agents, fire and exposure to Explosive Atmospheres (ATEX) for Laboratory workers;

- Risk of ergonomic nature and for the eyesight of workers that spend long hours in front of display screens.

The Occupational Health and Safety System is supported by the development and implementation of a specific software adopted for management (see Simpledo.net). This instrument pursues the improved distribution of information, the prompt planning and management of fulfilments and deadlines, a structured operating control and an efficient environment for the continuous improvement of the system.

Worker Safety Representatives have been appointed in each of the Group's companies (excluding Dolomiti Energia Solutions, Dolomiti Energia Trading, Dolomiti Edison Energy and Gasdotti Alpini). Each company, via its own RSPP, organises consultation and coordination meetings with the Worker Safety Representatives several times a year.

Some of the representations expired in 2021 but the employers have confirmed, also in 2023, their willingness to continue relations with all Workers' Safety Representatives pending the nomination/election of new representatives for all companies.

Percentage of workers represented by the safety committees²⁰

	UoM	2023	2022	2021
Men	%	95.2	94.5	94.6
Women	%	94.8	94.2	94.4

The percentage of workers represented is very high (more than 95% overall). Full coverage would be achieved if Workers' Safety Representatives were appointed even in companies that do not currently have them.

The employers of Group companies carry out risk assessments with the professional input of internal RSPPs, Company Doctors, and external specialists identified from time to time for specific assessments. All the evaluations are updated periodically or when initial conditions change.

The risk prevention and mitigation actions identified in the assessment phase are managed as part of the system improvement actions with the assignment of responsibilities, objectives and timeframes defined within the organisation.

Risk assessment documents and identified actions are subject to periodic review by the organisation.

Workers are involved in the hazard identification and risk assessment phases through direct consultation and their representatives. They also participate in the detection and analysis of near misses through information channels that have been largely digitised for ease of use.

If an employee wishes to report dangerous situations while maintaining anonymity, they can submit the report through the Whistleblowing system.

During initial and periodic training, all workers are informed of their right to immediate interruption of work in the event of serious and imminent danger to safety or health.

Each accident event is analysed at the time of occurrence with the input of any witnesses, supervisors/managers and the RSPP. If necessary, preventive and improvement actions are identified to avoid the recurrence of the event by acting primarily on the material causes, the organisation of work and the training, awareness and behaviour of workers.

Training includes activities arising from regulatory obligations, as well as activities resulting from the risk assessment and from the continual improvement of processes. In detail, the main training courses provided in 2023 concerned:

- General training of newly recruited workers;
- Specific training for newly recruited workers or when a change of jobs involves a change in sector or risk level;
- Special and additional training for supervisors;
- Training for Occupational Health and Safety Managers;
- Education and refresher training for emergency managers (fire, first aid, AED, lifts, environmental emergencies);
- Education and refresher training for the specific task;

²⁰ Considering the Occupational Safety Representatives.

- Education and refresher training in the use of machinery, equipment, PPE and hazardous substances;
- Education and periodic updates for specific figures such as: RSPP (Prevention and Protection Service Managers), ASPP (Prevention and Protection Staff), RLSA (Workers' Safety Repre-

sentatives), Site Safety Coordinators.

The teaching is carried out by qualified personnel both inside and outside the organisation. The teachers are subjected to a skills assessment and their performance is also monitored with the direct involvement of workers. Learning verification methods are included for the training activities.



4.2.3 WORKERS' HEALTH PROMOTION AND OCCUPATIONAL HEALTH SERVICES

The occupational health service is entrusted to external professionals.

In 2023, the call for tenders was renewed for the assignment of the occupational medicine service, which was entrusted to a Coordinating Company Doctor in cooperation with two other Coordinating Company Doctors.

The Doctors support the employers by actively participating in risk assessment activities and workplace inspections to identify hazards and reduce risks. They also have the task of drawing up specific surveillance plans (Health Surveillance Protocols) for each Group company, taking into account the various tasks to which workers are assigned, the relevant risk factors, the age, gender and subjective conditions of individual workers.

Workers have access to the occupational health service not only in the pre-employment phase, but also by means of periodic visits according to the frequencies established by the health surveillance protocols. In addition, preventive medical examinations are carried out in the event of a

change in jobs that exposes workers to risks not previously assessed or after returning from prolonged periods of sick leave.

Workers are informed that they can also request extraordinary medical examinations if necessary. The medical service also includes a specific Listening Desk available to workers, at their simple request, to deal with any situations of personal distress.

The occupational health service is subject to periodic performance evaluation by the relevant internal functions.

In 2023, the health surveillance of workers involved 1460 medical examinations and related health checks depending on the tasks assigned to the workers and the resulting health risk assessment. Considering the increase in the number of employees and the fact that, for some categories of workers, physicals are carried out with multi-year periodicity (2, 3 or 5 years), the figure is deemed to be in line with those of the previous years.

4.2.4 INJURY TRENDS²¹

EMPLOYEES²²

No fatal accidents were recorded again in 2023, and no information was received on cases of

occupational disease attributable to work activities under the Group's control.

²¹ More information on the injury indices calculated without taking commuting accidents into account can be found in the Financial Statements Report.

²² The scope of the analysis includes the companies Dolomiti Energia Holding, Novareti, Dolomiti Ambiente, Dolomiti Energia, Dolomiti Energia Trading, Dolomiti Energia Solutions, SET Distribuzione, Dolomiti Edison Energy, Gasdotti Alpini and Hydro Dolomiti Energia. The Group's accident registers are referred to the INAIL offices in Trento, Rovereto, Verona, Bergamo and Bolzano.

Accidents

2023	UoM	MEN	WOMAN	TOTAL
TOTAL RECORDABLE WORK-RELATED ACCIDENTS	No.	30	1	31
AT WORK	No.	25	1	26
Trento	No.	18	-	18
Rovereto	No.	7	1	8
Other locations	No.	-	-	-
COMMUTING	No.	5	-	5
Trento	No.	2	-	2
Rovereto	No.	3	-	3
Other locations	No.	-	-	-
TOTAL FATALITIES AS A RESULT OF WORK-RELATED ACCIDENTS	No.	-	-	-
AT WORK	No.	-	-	-
COMMUTING	No.	-	-	-
TOTAL WORK-RELATED ACCIDENTS WITH SERIOUS CONSEQUENCES (EXCLUDING DEATHS)	No.	4	-	4
AT WORK	No.	2	-	2
COMMUTING	No.	2	-	2
DAYS OF ABSENCE DUE TO ACCIDENTS	days	629	20	649
AT WORK	days	396	20	416
Trento	days	207	-	207
Rovereto	days	189	20	209
Other locations	days	-	-	-
COMMUTING	days	233	-	233
TOTAL HOURS WORKED (ESTIMATE)	hours	1,901,613	483,645	2,385,258
Trento	hours	1,398,871	345,870	1,744,741
Rovereto	hours	451,032	117,645	568,677
Other locations	hours	51,710	20,130	71,840

Accident rates (including commuting accidents)²³

	2023			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Frequency index - FI (Rate of work-related accidents)	15.78	2.07	13	15.90	8.96	14.53
Mortality rate (Rate of deaths resulting from work-related accidents)	-	-	-	-	-	-
Serious accident frequency index (Rate of work-related accidents with serious consequences - excluding deaths)	2.10	-	1.68	-	-	-
Accident severity index - SI	0.33	0.04	0.27	0.43	0.13	0.37
Combined accident trend index - CAi (FI*SI)	5.218	0.085	3.536	-	-	-

Accident rates (three-year data - excluding commuting accidents)²³

	2023	2022	2021
Frequency index - FI (Rate of work-related accidents)	10.90	10.57	9.61
Frequency index for serious injuries (Rate of serious accidents at work)	0.84	1.76	1.75
Severity index - SI (excluding commuting accidents)	0.17	0.28	0.27
Combined accident trend index - CAi (FI*SI)	1.901	2.965	2.571

There have been no fatal workplace accidents in the last five years.

Excluding commuting accidents, the frequency index was 10.90 compared to the average index of 11.40 calculated on the events of the five-year period 2018-2022.; the severity index was 0.17 against an average index of 0.35 calculated over the five-year period 2018-2022.

In 2023, the combined accident trend index was 1,901 compared to an average of 4,045 for the previous five-year period.

A comparison of the last three periods, excluding commuting accidents, shows xxxxx a substantial stability in the frequency index, compared with the two previous years, with a significant improvement over the average of the previous five years.

²³ Notes on calculations:

Frequency index (FI): (total number of accidents/total hours worked) * 1,000,000

Severity index (SI): (total number of days lost due to accidents/total hours worked)* 1,000

Combined accident trend index (CAi): calculated as the product of the frequency index by the severity index (FI x SI)

Events that did not result in days of absence from work are not considered in the FI calculation.

Absences due to accidents were calculated by adding the days of absence for accidents that occurred in the year of occurrence and ended on 31/12 and the days of absence for accidents that occurred in the previous year and ended in the reference year (only for the part pertaining to the reference year).

The data on the number and duration of accidents are extracted from computerised accident records via Simpledo.net.

The data on occupational diseases were obtained from the HR Department and apply to occupational diseases recognised by INAIL. The data on hours worked were obtained from the HR Department and are aggregated by territorial insurance position as defined with INAIL.

The accident severity index, measured as the total number of days lost due to accidents in relation to the number of hours worked, also shows a clear improvement over both the previous two years and the five-year period 2018-2022.

Among the factors that may have influenced the result is the continuation of the BBS project in the electricity distribution sector (SET). In addition, the 'zero accidents' objective was achieved for Dolomiti Energia, Dolomiti Energia Solutions and Dolomiti Energia Trading.

Dolomiti Edison Energy recorded only one accident, during commuting.

The employers have direct access to accident data by consulting computerised registers. They analyse statistical data on accident trends at regular meetings. In addition, quarterly progressive data are processed for analysis by Management Control and to be sent to the members of the

Boards of Directors. Statistical data are also sent to the Supervisory Bodies on an annual basis

SUPPLIERS²⁴

Suppliers were again asked for data on accidents occurring to their employees when providing services for Dolomiti Energia Group companies in 2023.

The request was sent to 805 suppliers of works, services and supplies on site.

Despite reminders, only 231 (28.70%) responded to the request, moreover, often providing inconsistent information.

For those suppliers who reported values that were considered doubtful, we initiated a verification phase of the correctness of the data submitted. The data collection produced the following results:

	UoM	2023	2022
Accidents	No.	42	28
Days of absence	No.	844	861
Occupational diseases	No.	2	1

The data collected and verified allow for the calculation of frequency and severity indices, but do not fully describe the accident scenario as the

suppliers have not yet systematically provided information on the hours worked to perform the contracts.

²⁴ The data collected by suppliers of works, services and supplies on site who responded to the request for information sent by the Holding are considered.

COMMUNITIES



2,3 million

earmarked for sponsorships and donations as well as support for festivals open to citizens

(over €2.1 million in 2022)



26 national and local trade associations

in which the Group participates with some of its companies

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



11 SUSTAINABLE CITIES AND COMMUNITIES



17 PARTNERSHIPS FOR THE GOALS





5.1

RESPONSIBLE RELATIONS WITH COMMUNITIES

GRI 3-3 Dialogue with local communities and support for local development | GRI 3-3 Awareness-raising regarding consumption efficiency, the use of renewable energy and responsible waste management |

GRI 2-28 | GRI 413-1 |

The Group has a strong link to its service area and pays the utmost attention to the needs that it expresses, actively supporting the local communities by jointly participating in many kinds of initiatives.

Dolomiti Energia Group's focus on the local community has – for many years now – become a constant and tangible support for projects and activities in the fields of art and culture, environmental awareness, sport and associations, that help improve the community's living standards and those of its citizens.

In 2023, the Group allocated an amount of over €2.3 million (€2.1 million in 2022) to sponsorships and donations as well as to supporting festivals open to the general public that made topics such as the economy, respect for the environment, mountains or meteorology accessible, involving the most diverse audiences.

The Group also remained close to people in 2023 through practical and targeted interventions throughout the territory in favour of businesses and families, customers and citizens, and by promoting the healthy values of team sports.

As part of the dissemination of sustainability issues, the heart of the Group's strategy, Management promoted and participated in ESG-related initiatives, conferences and information evenings.

With a view to raising awareness and transparent dialogue with communities, the Group's activities on social networks were expanded in 2023 through new ways of contacting, communicating, educating and informing citizens, customers and communities.



GROUP PRESENCE ON SOCIAL CHANNELS FOR INCREASINGLY TRANSPARENT COMMUNICATION

The Dolomiti Energia Group strongly believes in the importance of sharing knowledge and information, especially when it comes to crucial issues related to sustainability and the environment. With a view to raising awareness and transparent dialogue with communities, the Group's activities on social networks were expanded in 2023 through new ways of contacting, communicating, educating and informing citizens, customers and communities.

For this reason, the Group's YouTube channel has been revamped as a place to share videos covering a wide range of topics, from sustainable resource management to the promotion of eco-friendly practices.

The Group's LinkedIn channel was then implemented to better communicate corporate life, brand values and for talent attraction and recruitment purposes.

The Group's Instagram and Facebook channels are also available and constantly updated, where awareness-raising campaigns on energy efficiency in the home and away from home and the promotion of comprehensive green lifestyles are encouraged every day of the year.

The topics often dealt with environmental, social and economic sustainability and talked about issues of collective interest that are useful for helping consumers become more conscious about how they use resources and for raising their awareness of consumption efficiency and the principles of the circular economy.

In order to generate a positive impact on communities and local areas and to offer families innovative tools able to integrate the energy requirements of individuals with the collective need for greater social and environmental sustainability, partnerships such as Etika and Sinergika were consolidated, which offer concrete and accessible opportunities to save energy, use 100% clean energy and contribute to social and charity projects on a daily basis. For further information on the topic, please refer to chapter 3.2.1. 'Sustainable offers.'

To contribute to the achievement of the UN sustainability goals, the Group translated sustainability into concrete actions to enable the energy transition in the territories where it operates. It offered, to both companies and individuals, services and products in the field of renewable ener-

gy production, energy community development, energy efficiency of real estate and sustainable mobility. There was further development of the gas and electricity distribution networks to make energy services accessible to an ever-greater number of people.

The Group opens its power stations, water supply systems and waste collection centres to schools of all levels, organised groups and citizens on a regular basis. To this end, at the most significant sites, we provide specialised technicians to accompany visitors inside the facilities. This activity allows people to participate in opportunities every year to improve their knowledge and understanding of a world that interacts with all our daily lives by guaranteeing the services necessary for everyday life.

Specifically, the commitment to dissemination and awareness towards clean energy issues also continued in 2023 with the opening of the plants in Riva del Garda, Cogolo, Taio, Bussolengo and Santa Messere to the public. It also continued through Hydrotour Dolomiti, the project aimed at enhancing and raising awareness of Trenti-

no's hydroelectric plants and the territories surrounding them. Visitors were able to discover, accompanied by qualified personnel and thanks to dedicated installations, the various aspects of hydroelectric production and many issues related to environmental and social sustainability.




FOCUS ON EDUCATION: DEGREE AWARDS IN MEMORY OF MASSIMO DE ALESSANDRI

Following the success of the first edition, the second of three editions of the Degree Award in memory of Chairman Massimo de Alessandri was published, disbursed in collaboration with the University of Trento. These are four degree awards worth €1,000 intended for graduates of the master's degree courses of Trento University who have completed theses on topics related to the economic, legal, technical-scientific aspects of energy, such as: the circular economy in public services, network and environmental hygiene services, the digitalisation of services and the impact of existing hydraulic works and hydroelectric buildings on the landscape.

The Group's economic impact is also measured by the support it provides to public spending thanks to its contribution to tax revenue and the remuneration of the capital of its public shareholders, thus favouring further investments beneficial to the community by public bodies. During the year the Group paid taxes and dues worth €357 million (€459 million in 2022). In 2023, the Group also invested €115.4 million (97.6 in

2022), a large part of which was spent to improve its plants, distribution networks and local production facilities, and to strengthen the services benefiting its stakeholders. The remuneration of shareholders will be paid by the Dolomiti Energia Holding 2023 dividend, which will largely benefit the community through the public shareholders of the Parent Company.



 **SUPPORT FOR THE PEOPLE OF EMILIA**

The Dolomiti Energia Group made a concrete effort to help with the damage caused by the floods that occurred during the month of May 2023 in Emilia-Romagna. From 26 to 28 May, 35 Dolomiti Ambiente team members worked tirelessly in Lugo di Romagna to rid the town centre of bulky objects piled up in the streets. A total of ten vehicles set off from Trento, coordinated by the Civil Protection of the Province to tackle the emergency with determination.

5.2 TRADE ASSOCIATIONS

The Group maintains constant dialogue with national and local trade associations to promote petitions, in relation to the various businesses, which may contribute to improving the provision of its services to customers and users and contribute to enhancing its know-how.

In order to promote its interests before Italian and European institutions and to provide special-

ist support for its organisational structures, the Group also actively participates in trade associations, technical committees and strategic work groups set up within them, both in Italy and Europe.

The main ones that the Group is a member of include:

<p>PROXIGAS</p>	<p>Reference association in the gas sector, which in 2022 will aggregate IGAS and Anigas, the historic entity of the sector belonging to Confindustria, which represents companies that are engaged in any one or more of the following activities in the entire gas chain: transport, storage, regasification of liquefied natural gas, distribution and sale of natural gas on the final and wholesale markets, trading, and methane gas for automotive use. Furthermore, the Chairman of the Parent Company is also a member of the Chairman's Committee and the Board of Directors.</p> <p>The Group participates in the Association's Technical Commissions formed to explore the topics of importance for the gas sector, assessing the initiatives to be proposed at the association level.</p> <p>Dolomiti Energia, Novareti</p>
<p>ELETTRICITÀ FUTURA</p>	<p>Created from the merger between Assoelettrica and AssoRinnovabili, it unites the Italian industry of both conventional and renewable electricity, and is the main association of companies operating in the Italian electricity sector.</p> <p>Dolomiti Energia Holding</p>
<p>UTILITALIA</p>	<p>The Federation that brings together all the companies operating in public services related to water, the environment, electrical energy and gas. The Group is also represented in the Executive Board and the Board of Directors as well as in the various specific Commissions, Committees and Transversal Technical Groups set up by the Federation. The organisation has more than 500 members in the water, environment, electricity, and gas sectors.</p> <p>Dolomiti Energia Holding</p>

<p>AIGET Italian Association of Energy Wholesalers and Traders</p>	<p>The Association promotes competition and transparency within the energy markets, fosters the development and standardisation of primary energy products, derivatives and the relevant markets. It analyses with its various partners the critical points that affect the trade of energy products and promotes initiatives aimed at their resolution among grid and market operators, government agencies and competent authorities.</p> <p>Dolomiti Energia Trading</p>
<p>ACCADEMIA AGICI OSSERVATORIO OIR OSSERVATORIO TEE</p>	<p>Agici Finanza d'Impresa is a research and consulting company specialised in the field of utilities, renewables, infrastructure and energy efficiency.</p> <p>Dolomiti Energia Holding is a member through OIR, Osservatorio Internazionale sull'Industria e la Finanza delle Rinnovabili, the international renewables industry and finance observatory launched in 2008 in agreement with the GSE. It systematically analyses the production chains of Italian and international renewables, going beyond the biased outlooks and focusing on industrial issues, innovation and finance. This is also to make proposals for the policy maker.</p> <p>Dolomiti Energia Solutions is also a member of the Osservatorio del Mercato dei TEE (observatory of the energy efficiency certificates market).</p> <p>Dolomiti Energia Holding (International Observatory on Renewable Energy Industry and Finance), Dolomiti Energia Solutions (TEE Market Observatory)</p>
<p>AIAS</p>	<p>The Italian Professional Association for Environment and Safety offers services dedicated to the health and environmental safety sector via conferences, technical documents, regulatory training courses, and coverage of any legal costs for litigation.</p> <p>Dolomiti Energia Holding</p>
<p>UNI</p>	<p>UNI - Ente Italiano di Unificazione is an organisation that draws up and publishes voluntary regulatory documents (UNI standards, technical specifications, technical reports and reference practices) in all industrial, commercial and tertiary sectors.</p> <p>Dolomiti Energia Holding</p>
<p>IT COLD</p>	<p>The Italian National Committee for Large Dams is a cultural and scientific association which seeks to promote and facilitate the study of all problems connected with dams, their construction and operation.</p> <p>Hydro Dolomiti Energia</p>

REF-E, E-Innovation Committee	<p>Think-tank created to investigate the key issues of the transition, analyse, also through case studies, the sustainability of investments in innovative technologies, contextualise the technological options in the various production sectors, and accompany partner companies along the challenging path of the opportunities offered by the energy transition and climate change.</p> <p>Dolomiti Energia Trading</p>
IBC	<p>The Association of Consumer Goods Industries, which brings together producers of consumer goods and seeks to promote the effectiveness and efficiency of the industry in relations with the market, through measures that seek to provide contributions of ideas and projects to boost the production competitiveness.</p> <p>Dolomiti Energia Trading</p>
EU DSO Entity	<p>Association of Electricity Distributors of EU Countries, a non-profit association created following the enactment of European Regulation (EU) 2019/943 with the aim of better representing the electricity distribution companies (DSOs) of the EU Member States.</p> <p>SET Distribuzione</p>

Moreover, the Dolomiti Energia Group also participates through the Parent Company and its subsidiaries in the following National Associations:

- AIRU Associazione Italiana Riscaldamento Urbano- the Italian association for urban heating. Dolomiti Energia Holding is a member.
- AEIT the Italian association of electrotechnics, electronics, automation, computer science and telecommunications. The subsidiaries Hydro Dolomiti Energia and SET Distribuzione are members.
- AIIA Italian Association of Internal Audit. Dolomiti Energia Holding is a member.
- APCE Association for the protection of metal structures from electrolytic corrosion. Novareti is a member.
- • UNICHIM Association for the unification of the chemical industry sector- federated with UNI (the Italian standards body). Dolomiti Energia Holding is a member.
- AITI Trade association that brings together the treasury offices of the leading Italian companies. Dolomiti Energia Holding is a member.
- CTI, the Italian Thermotechnical Committee, a body affiliated to the UNI, conducts legislative and unifying activities in the various thermotechnical sectors and supplies its members with regulatory tools for developing the thermotechnical sector. Novareti is a member.
- CLUSTER ENERGIA, the National Technological Energy Cluster (CTN), a trade association chaired by ENEA with the objective of searching for, developing and growing the next generation of innovative technologies, products and services for the energy sector. SET Distribuzione is a member.

The group also participates in the following local associations:

- ACOST An association of safety coordinators for Trentino. SET Distribuzione is a member.
- APINDUSTRIA An association of small and medium enterprises of Verona. Dolomiti Energia is a member.
- CONFINDUSTRIA TRENTO Sistema Confindustria and Associazione degli Industriali Trentini, part of the Confindustria System. Dolomiti Energia Holding and Dolomiti Energia Solutions are members.
- CONFCOMMERCIO TRENTO, Italian General Confederation of trading companies. Dolomiti Energia Holding, Dolomiti Energia, Dolomiti Energia Trading, Novareti, and Set Distribuzione are members.
- ASSOENERGIA The Confindustria system organisation that offers services linked to the world of energy. Novareti is a member.
- CFP VERONESI A vocational training school.
- ACCADEMIA DEGLI AGIATI A historical local cultural association.



PROTECTION OF THE ENVIRONMENT



980,495 tonnes

of CO₂e avoided by offering the market 100% green electricity supplies
(932,093 tonnes in 2022)



49 hydropower plants

(51 in 2022)
of which 37 (39 in 2022)
are EMAS registered



215,666 tonnes

of CO₂e avoided by offering 100% offset CO₂ gas supplies to the market
(188,106 tonnes in 2022)



5,78 hectares

of forest returned thanks to the burial of electricity distribution networks
(24.5 hectares in 2022)





Hydro
Dolomiti
energia

6.1 MANAGING ENVIRONMENTAL IMPACTS

GRI 2-25 | GRI 2-27 |

The Dolomiti Energia Group has a strong bond with its territory and with the environment, and is well aware that its operations affect economic, social and environmental development and the living standards of the areas where it is present.

In this regard, the Group has adopted a specific Environmental Policy (available on the website) through which it publicly declares its commitment, at all levels, to conduct its activities in a responsible and sustainable manner. With this document,

the Group asks all recipients to follow and respect the indications and conduct contained therein, whether they are directors, employees and collaborators of Dolomiti Energia Group, including its subsidiaries, as well as all those who operate in the name and on behalf of the same.

In particular, the contents of the Environmental Policy are indicated below:

COMPLY WITH PROVISIONS AND WITH TECHNICAL AND LEGISLATIVE STANDARDS	IMPLEMENT AND PERIODICALLY ASSESS THE INTEGRATED QUALITY, ENVIRONMENT, HEALTH, AND SAFETY MANAGEMENT SYSTEM	ANALYSE THE ENVIRONMENTAL RISKS AND OPPORTUNITIES IN THE CONTEXT IN WHICH THE GROUP COMPANIES OPERATE ON A RECURRING BASIS	PERIODICALLY DEFINE ENVIRONMENTAL PROTECTION OBJECTIVES
MANAGE ENVIRONMENTAL IMPACTS RESPONSIBLY	CONSIDER ENVIRONMENTALLY FRIENDLY BEHAVIOUR	PROVIDE ACCURATE AND TIMELY MEASUREMENTS AND REPORTING	PROTECT THE CLIMATE
MANAGE ENERGY, WATER AND OTHER NATURAL RESOURCES SUSTAINABLY	REDUCE WASTE PRODUCTION	ENCOURAGE THE DEVELOPMENT AND DEPLOYMENT OF SUSTAINABLE TECHNOLOGIES AND SERVICES	PROTECT THE NATURAL ENVIRONMENT, ECOSYSTEM AND BIODIVERSITY
COLLABORATE WITH EXTERNAL BODIES	DIALOGUE WITH WORKERS AND THEIR REPRESENTATIVES	WORK WITH STAKEHOLDERS	PROVIDE ACCURATE AND TIMELY MEASUREMENTS AND REPORTING

The main environmental risks linked to the Group companies' business are related to potential emergency events in the waste management sector, in the management of the water cycle, specifically involving the collection of wastewater, the management of hydro-electric production and that of electricity and heat using cogeneration processes.

In real terms, the potential environmental risks identified refer to possible impacts on the contamination of the soil, subsoils and aquifers, on flora, fauna and biodiversity, on polluting emissions and the emission of greenhouse gases into the atmosphere.

Each Group company holds regular meetings (management reviews or meetings) to assess negative impacts, their weight and the need to take corrective or mitigating action.

With regard to environmental impacts, companies with a certified environmental management system draw up an annual register of direct and indirect environmental impacts.

With regard to environmental and safety emergencies, each Group company has defined its own emergency management plan.

All of the Group's operating companies have implemented a model for the prevention of environmental crimes as required by Italian Legislative Decree 231/01, adopting management systems in line with the UNI EN ISO 14001 standard.

At Dolomiti Ambiente, Hydro Dolomiti Energia, Dolomiti Edison Energy, Dolomiti Energia, Dolomiti Energia Solutions and Novareti (only with regard to the gas service and the cogeneration plant in the Industrial Area in Rovereto), the environmental management systems have been subject to certification based on the UNI EN ISO 14001 standard by accredited external bodies.

For Dolomiti Ambiente, Hydro Dolomiti Energia and Dolomiti Edison Energy, EMAS registration was also secured.

6.1.1 QUALITY, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM

As stated, several times within the document, in order to guarantee constant improvement of the quality levels of its services, limit its environmental impact and prevent occupational health and safety risks, the Group has organised the management of certain company processes according to specific and internationally acknowledged standards:

- Certification under the international UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015 schemes of the Integrated Quality/Environmental Management System to guarantee quality standards and ensure close attention is paid to environmental aspects in Dolomiti Energia's commercial services;
- ACCREDIA accreditation according to the UNI CEI EN ISO/ IEC 17025:2018 international standard on the technical and management quality of the chemical and microbiological tests performed in Dolomiti Energia Holding's Analysis Laboratory;
- Environmental Management system certification UNI EN ISO 14001:2015 for the electrical and thermal cogeneration plant operated by Novareti in Rovereto;
- Certification under the standards UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and UNI EN ISO 45001:2023 of the Integrated Quality/Environment/Safety Management System for

the design and management of Novareti's natural gas distribution systems;

- Certification under the UNI EN ISO 14001:2015, UNI EN ISO 45001:2023 international standards and EMAS registration for the Integrated Environmental/Safety Management System for the hydroelectric energy production managed by Hydro Dolomiti Energia and Dolomiti Edison Energy;
- Certification under the UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015 international standards and EMAS registration and UNI EN 45001:2023 for the Integrated Quality/Environment/Safety management system for the waste collection system used in Trento and Rovereto and operated by Dolomiti Ambiente;
- Certification under the UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015 international

standards of the Quality/Environment Management System for the design, management and development of photovoltaic plants and public lighting and for the development and provision of energy services operated by Dolomiti Energia Solutions;

- Certification under the UNI CEI 11352:2014 standard of the provision of energy services (ESCO) by Dolomiti Energia Solutions;
- Implementation throughout the Dolomiti Energia Group companies of occupational health and safety management systems based on the UNI ISO 45001:2018 standard.

Confirming the Group's commitment to environmental compliance, there were no significant fines and non-monetary penalties for non-compliance with environmental laws and/or regulations in 2023.

6.2 ENERGY CONSUMPTION

GRI 3-3 Climate change mitigation and adaptation |

GRI 2-6 | GRI 302-1 | GRI 302-3 | GRI 302-4 | G4 – EU - 2 |

In 2023, the Group consumed 1,203,636.89 GJ (1,417,377.67 GJ in 2022) equivalent to about almost 334 GWh of energy, which is the amount required to meet the annual energy needs of almost about 123,831 households (assuming an average annual consumption of 2,700 kWh/year). Total consumption is the sum of renewable fuel, non-renewable fuel and electricity consumed.

The most energy consuming activities of the Group are the pumping activities at hydroelectric plants and the production of thermal energy for district heating and co-generation. In particular, the latter activities cause the greatest impacts on the environment by the Group, particularly in terms of greenhouse gas emissions.

Total consumption²⁵

	UoM	2023	2022	2021
Non-renewable fuel consumed	GJ	711,495.58	961,323.93	1,022,537.64
Non-renewable fuel consumed	GJ	-	-	-
Electricity, heating, cooling, and steam purchased for consumption	GJ	391,613.10	405,471.31	403,906.78
Electricity, heating, cooling, and steam produced and consumed internally	GJ	100,528.21	50,582.43	85,171.61
TOTAL	GJ	1,203,636.89	1,417,377.67	1,511,616.03

6.2.1 DIRECT ENERGY CONSUMPTION

The Group's direct energy consumption mainly concerns the use of fuel (natural gas) to produce electricity and heat in the plants (cogeneration), as well as non-renewable primary energy flows not directly related to energy production (heating, etc.).

Consumption for heating, cooling and productive

uses is equal to 96% (20,841 litres of diesel and 15,770,535 m³ of natural gas); the consumption of natural gas for heating dropped by approximately 120,562 m³. The calculation was made on the basis of Dolomiti Energia bills and does not consider variables that may have influenced consumption (e.g., temperature).

²⁵ I dati sono stati aggiornati rispetto a quanto pubblicato nelle precedenti Dichiarazioni Non Finanziarie a seguito dell'inclusione dei consumi di gas naturale impiegato nella centrale di Ponti sul Mincio limitatamente alla quota parte di competenza di Dolomiti Energia Holding (5%) e dell'esclusione di SF Energy, società di cui il Gruppo detiene la proprietà al 50%.

Direct internal energy consumption within the organisation by source
(excluding the corporate fleet)²⁵

	UoM	2023	2022	2021
FROM NON-RENEWABLE SOURCES	GJ	654,799.87	915,200.49	967,772.97
Natural gas	GJ	632,307.52	914,030.10	963,033.46
<i>For heating</i>	GJ	28,465.72	33,024.90	39,645.91
<i>For cooling</i>	GJ	-	-	-
<i>For productive uses</i>	GJ	603,841.79	881,005.20	923,387.54
Diesel	GJ	788.24	1,156.01	746.69
<i>For heating</i>	GJ	692.12	1,031.01	641.51
<i>For other uses</i>	GJ	96.12	125.00	105.18
LPG	GJ	21,704.11	14.37	3,992.83
FROM RENEWABLE SOURCES		-	-	-
Biogas	GJ	-	-	-
Biomass	GJ	-	-	-
TOTAL CONSUMPTION	GJ	654,799.87	915,200.49	967,772.97

Consumption related to the fleet of company and fringe benefit vehicles (the latter included from 2023) for the hire company Arval amount-

ed to 1,630,473 litres and is split between diesel (92%), and petrol (8% of which 3% is used in hybrid cars).

Direct internal energy consumption within the organisation by type of fuel - Company fleet²⁶

	u.m.	2023	2022	2021
CARS	GJ	11,335.13	9,050.07	9,862.56
Diesel	GJ	9,422.37	6,662.17	8,612.16
Petrol	GJ	1,912.76	2,387.90	1,250.39
LPG	GJ	-	-	0.01
Methane	GJ	-	-	-
FRINGE BENEFIT CARS	GJ	3,134.33	-	-
Diesel	GJ	1,855.12	-	-
Petrol	GJ	1,279.21	-	-
LPG	GJ	-	-	-
Methane	GJ	-	-	-
VANS AND HEAVY VEHICLES	GJ	45,360.56	37,073.37	44,902.11
Diesel	GJ	44,638.68	36,243.69	43,959.47
Petrol	GJ	721.88	829.68	942.62
LPG	GJ	-	-	0.01
Methane	GJ	-	-	-
TOTAL	GJ	59,830.02	46,123.44	54,764.66

6.2.2 INDIRECT ENERGY CONSUMPTION

Indirect energy consumption is mainly due to electricity consumption by Group companies with reference to offices, production plants, user plants (such as water pumps) and lighting systems under management. The Group has power generation plants (hydroelectric, solar-photovoltaic, cogeneration and thermoelectric) that produced a total of 3,119.2 GWh (2,362.9 GWh in 2022). Consumption is understood as the sum of the energy withdrawn from the network (35.22%) and the energy produced and self-consumed on site (9.04%). It should be noted that, in the energy drawn from the grid, the consumption of electricity supplied by Dolomiti Energia and the elec-

tricity for pumping in hydroelectric power plants acquired on the energy markets have been taken into account.

Compared to the previous reporting period, there were no particular changes in the consumption of electricity withdrawn from the grid. On the other hand, there was an increase in electricity produced by hydropower plants, rising from 2,093 GWh in 2022 to around 3,019 GWh in 2023, as a result of rainfall returning to levels in line with the 10-year historical average, after a long period of marked drought lasting more than a year.

During the previous year, the floating photovol-

²⁶ These consumptions relate only to the Arval rental company, the main one for the Group. Compared to the other company of Group, Leasys data is not included. Thanks to an improvement in the reporting system, the methodology has been refined calculation of fuel consumption of the company fleet by dividing it into cars and vans and heavy vehicles. Also, starting from 2023, the share of hybrid cars has also been included in petrol consumption. In light of a refinement of the data collection process and calculation methodology, starting from 2023, the Group is able to declare the consumption values for fringe benefit cars separately from those of the company fleet.

taic plant on the Dampone reservoir came into operation, contributing around 82 MWh to the production of green energy in 2023. The value of renewable electricity purchased

through guarantees of origin includes 204.78 GJ relating to consumption for electricity charging columns for company vehicles and in fringe benefits at the Group's offices.



Indirect internal energy consumption of the organisation per source²⁷

	UoM	2023	2022	2021
ENERGY PURCHASED FOR CONSUMPTION FROM NON-RENEWABLE SOURCES:	GJ	290,116.51	296,230.09	292,664.91
Electricity from the grid	GJ	283,411.84	289,817.52	284,191.37
Thermal energy	GJ	6,704.68	6,412.57	8,473.54
ENERGY PURCHASED FOR CONSUMPTION FROM RENEWABLE SOURCES (THROUGH GO):	GJ	101,496.59	109,241.22	111,241.87
ENERGY SELF-PRODUCED FROM NON-RENEWABLE SOURCES:	GJ	422,592.64	401,496.14	400,989.34
Electricity ²⁸	GJ	133,512.70	128,757.97	89,355.23
Thermal energy	GJ	274,047.67	256,139.97	297,803.20
Energy for cooling	GJ	15,032.27	16,598.20	13,830.91
ENERGY SELF-PRODUCED FROM RENEWABLE SOURCES:	GJ	10,996,062.69	7,585,449.69	12,875,020.19
Hydroelectricity	GJ	10,993,357.35	7,582,890.00	12,872,544.17
Solar power	GJ	2,705.34	2,559.69	2,476.02
ENERGY FROM NON-RENEWABLE SOURCES SOLD:	GJ	-390,906.26	-401,453.55	-400,913.76
Electricity	GJ	-124,597.90	-128,715.39	-89,279.65
Thermal energy	GJ	-251,276.09	-256,139.97	-297,803.20
Energy for cooling	GJ	-15,032.27	-16,598.20	-13,830.91
ENERGY FROM RENEWABLE SOURCES SOLD:	GJ	-10,927,220.86	-7,534,909.85	-12,789,924.16
Hydroelectricity	GJ	-10,926,376.45	-7,533,773.51	-12,788,970.05
Solar power	GJ	-844.40	-1,136.34	-954.11
Other sources	GJ	-	-	-
TOTAL	GJ	492,141.31	456,053.74	489,078.39

27 This consumption relates only to the rental company Arval, the main one for the Group. With respect to the other Group company, Leasys, the data are not included. Thanks to an improved reporting system, the methods used to calculate the company fleet's fuel consumption have been refined, dividing them into cars and vans and heavy vehicles. Furthermore, starting in 2023, the share of hybrid cars has also been included in petrol consumption. In light of a refinement of the data collection process and the calculation methodology, starting from 2023, the Group has been able to report the consumption values for fringe benefit cars separately from those of the company fleet. The data have been updated from those published in previous Non-Financial Statements, in light of a refinement of the data collection process and calculation methodology, in particular by not considering SF Energy, a company 50% owned by the Group.

28 Part of the self-produced electricity was generated by the two micro cogenerators.

6.2.3 ENERGY INTENSITY

In 2023, the Dolomiti Energia Group recorded an increase in its energy production and a reduction in direct consumption from fossil fuels, such as natural gas and diesel. These trends led to a decrease in the value of its energy intensity, calculated as the ratio of total consumption to

kWh of gross energy produced. Furthermore, due to the increase in the workforce figure, the respective energy intensity rate, which relates the total number of employees to the gross energy production, also decreased compared to the 2022 value.

Energy intensity²⁷

	UoM	2023	2022	2021
Direct internal energy consumption (A)	kWh	196,126,635.39	267,034,432.16	284,038,233.34
Indirect internal energy consumption (B)	kWh	136,705,920.37	126,681,594.89	135,855,107.08
Gross energy production (C)	kWh	3,119,154,140	2,250,676,602	3,713,121,565
Intensity per kWh of gross production (A+B/C)	kWh/kWh	0.11	0.17	0.11
Total number of employees (D)	No.	1,544	1,424	1,418
Energy intensity over the number of employees (A+B/D)	kWh/No. employees	215,565	276,486	296,117

6.2.4 THE GROUP'S COMMITMENT TO REDUCE ENERGY CONSUMPTION

The initiatives undertaken in 2023 to reduce energy consumption included:

- the reduction of network losses;
- the construction of new photovoltaic plants;
- the replacement of heat pumps;
- the replacement of some splits;
- the replacement of a boiler with a new generation hybrid boiler;
- the launch of an efficiency project involving relamping at the new buildings (offices, workshop, changing rooms, etc.). Completion is expected by 2024.

JOURNEY TO CLOUD

With the introduction of the Journey to Cloud (J2C) project, more than 50% of the data centre is now in the cloud; this has enabled a reduction in energy consumption due to the increased efficiencies and synergy of the Azure data centres. The adoption of the Cloud allows a significant reduction of emissions compared to local solutions. A 2018 study found that the use of the Microsoft Azure cloud platform can offer an increase of up to 93% in energy efficiency and up to 98% in emission efficiency compared to on-premises solutions.

Initiatives undertaken to reduce energy consumption²⁹

	2023		2022			2021			
	Type of energy	Amount of reduction (estimate)	Type of energy	Amount of reduction (estimate)		Type of energy	Amount of reduction (estimate)		
		kWh	GJ	kWh	GJ	kWh	GJ		
Replacement of the lighting fixtures with new LED technology, etc.	electricity	-	-	electricity	384	1.3824	electricity	-	-
Replacement of thermal plants	thermal	3,773	13.58	thermal	21,968.90	79.08804	thermal	198,470.16	714.49

²⁹ The data have been updated from those published in previous Non-Financial Statements, in light of a refinement of the data collection process and calculation methodology.



6.3 ATMOSPHERIC EMISSIONS

GRI 3-3 Climate change mitigation and adaptation |

GRI 2-6 | GRI 305-1 | GRI 305-2 | GRI 305-3 | GRI 305-4 | GRI 305-5 | GRI 305-6 | GRI 305-7 | G4 – EU – 5 |

The Dolomiti Energia Group produces electricity mainly from renewable sources such as hydroelectric and solar-photovoltaic power, providing the market and its customers with green energy that is essential for the energy transition. Only two Group companies, namely Novareti through its cogeneration plants and Dolomiti Energia Holding, which owns 5% of the natural gas-fired

thermoelectric power plant at Ponti sul Mincio, emit CO₂ on a massive scale in their energy production activities.

In 2023, there was a significant decrease in total emissions against a reduction in direct (Scope 1) and external direct (Scope 2) emissions that more than compensates for the slight increase in indirect emissions (Scope 3).

Total Emissions^{30&31}

	UoM	2023	2022	2021
Direct (Scope 1)	tCO ₂ e	37,905.66	50,571.15	52,315.97
Direct external (Scope 2) – Location Based	tCO ₂ e	33,554.22	35,221.76	35,002.27
Direct external (Scope 2) - Market Based	tCO ₂ e	36,323.86	37,060.22	36,602.31
Indirect (Scope 3)	tCO ₂ e	1,542.75	1,204.60	-
TOTAL - Location Based	tCO₂e	73,002.63	86,997.51	87,318.23
TOTAL - Market Based	tCO₂e	75,772.27	88,835.97	88,918.28

30 The data have been updated with respect to those published in previous Non-Financial Statements in light of a refinement of the data collection process and calculation methodology and following the inclusion of natural gas consumption used in the Ponti sul Mincio power plant limited to the portion pertaining to Dolomiti Energia Holding (5%) and the exclusion of SF Energy, a company 50% owned by the Group.

31 The factors used to calculate emissions were published by ISPRA (Efficiency and decarbonisation indicators in Italy and in the biggest European Countries. Edition 2023), European residual mix 2022 (AIB 2022) and DEFRA (Department for Environment, Food & Rural Affairs – 2023).

6.3.1 SCOPE 1 EMISSIONS AND OTHER DIRECT EMISSIONS

The trend in direct energy consumption within the organisation, considering the reduction in natural gas consumption and despite the in-

crease in heating oil consumption, leads to a reduction in emissions of approximately 12,702 tCO₂e.

Direct emissions within the organisation by source excluding the corporate fleet (Scope1)³⁰

	UoM	2023	2022	2021
FROM NON-RENEWABLE SOURCES	tCO ₂ e	33,722.41	46,424.33	49,047.70
Natural gas	tCO ₂ e	32,373.58	46,346.03	48,996.41
For heating	tCO ₂ e	1,457.42	1,674.53	2,017.07
For cooling	tCO ₂ e	-	-	-
For productive uses	tCO ₂ e	30,916.16	44,671.50	46,979.34
Diesel	tCO ₂ e	52.35	77.44	50.43
For heating	tCO ₂ e	45.97	69.06	42.21
For other uses	tCO ₂ e	6.38	8.37	8.22
LPG	tCO ₂ e	1,296.47	0.86	0.86
FROM RENEWABLE SOURCES	tCO ₂ e	-	-	-
Biogas	tCO ₂ e	-	-	-
Biomass	tCO ₂ e	-	-	-
OTHER SOURCES - REFRIGERANTS	tCO ₂ e	141.71	519.61	345.19
SF ₆ (replenishments)	tCO ₂ e	141.71	519.61	345.19
TOTAL EMISSIONS	tCO ₂ e	33,864.12	46,943.94	49,392.89

The Group's sources of emissions also include company vehicles. In this regard, in 2023 the committed effort continued to reduce emissions generated by mobility needs through the use of

electric and hybrid cars. Starting from 2023, the values corresponding to the emissions generated by fringe benefit cars have also been included in the reporting.

Direct emissions within the organisation - Company fleet (Scope 1)³²

	UoM	2023	2022	2021
CARS	tCO ₂ e	743.62	684.09	646.53
Diesel	tCO ₂ e	625.84	530.41	566.62
Petrol	tCO ₂ e	117.78	153.64	79.82
Methane	tCO ₂ e	-	0.04	0.09
LPG	tCO ₂ e	-	-	-
FRINGE BENEFIT CARS	tCO ₂ e	288.56		
Diesel	tCO ₂ e	272.94	-	-
Petrol	tCO ₂ e	15.61	-	-
LPG	tCO ₂ e	-	-	-
Methane	tCO ₂ e	-	-	-
VANS AND HEAVY VEHICLES	tCO ₂ e	3,009.37	2,943.12	2,952.51
Diesel	tCO ₂ e	2,964.91	2,887.55	2892.25
Petrol	tCO ₂ e	44.45	55.57	60.17
Methane	tCO ₂ e	-	-	0.04
LPG	tCO ₂ e	-	-	0.01
TOTAL	tCO ₂ e	4,041.54	3,627.21	3,599.05

NO_x, SO_x and other significant atmospheric emissions (by weight)³³

	UoM	2023	2022	2021
NO _x	kg	22,012.02	25,176.05	21,026.00
SO _x	kg	0.77	19	-
Persistent organic pollutants (POP)	kg	-	-	-
Volatile organic compounds (VOC)	kg	0.27	414.35	-
Hazardous atmospheric pollutants (HAP)	kg	-	0.30	-
Particulate matter (PM)	kg	0.53	5.40	-
Other standard categories of atmospheric emissions identified in relevant regulations	kg	3,231.95	7,644.15	-

Emissions of ozone-depleting substances - ODS

	UoM	2023	2022	2021
HCFC emissions	kg	-	- ³⁴	-

³² In the light of a refinement of the data collection process and calculation methodology, from 2023 onwards, the Group has been able to report emissions values generated by fringe benefit cars separately from those of the company fleet.

³³ The values indicated refer to the Ponti sul Mincio thermoelectric power plant, in which the Parent Company has a 5% interest. Complete data for 2021 is not available.

³⁴ The figure has been updated from what was previously published in light of a refinement in the calculation methodology.

6.3.2 INDIRECT SCOPE 2 EMISSIONS

The Dolomiti Energia Group reports the greenhouse gas emissions related to the purchase of electricity and, consequently, the total Scope 2 emissions, both according to the Location-Based and Market-Based methods, as presented below. The former envisages the use of average emission factors related to the specific national energy mixes for electricity production, while the

latter envisages the use of emission factors defined according to the contractual agreements with the electricity supplier or, in the absence of such agreements, the emission factor related to the national 'Residual mix.'

The values below also include the emissions generated by electricity consumption for charging Hybrid and Full Electric vehicles.

Indirect emissions within the organisation - (Scope 2)³⁵

	UoM	2023	2022	2021
Total - Location Based	tCO ₂ e	33,554.22	35,221.76	35,002.27
Total - Market Based	tCO ₂ e	36,323.86	37,060.22	36,602.31

6.3.3 INDIRECT SCOPE 3 EMISSIONS

During the financial year 2023, the Group continued the necessary analysis activities to estimate its Scope 3 emissions for the categories 'Business Travel' and 'Employee Commuting.'

With respect to the first category, the available data, collected with the support of an external agency and relating to the business travel of all Group companies by own car, train and plane and calculated according to the distance-based methodology were included.

With reference to the second category, the data collected for the purpose of drawing up the Home-Work Mobility Plan for the municipalities of Trento and Rovereto were evaluated and the average-data method was used.

The Group has set itself the goal of improving the accuracy of the input data and refining the calculation methodology in the coming years, in order to complete the inventory and thus be able to effectively monitor its impact on the environment and people.

³⁵ The data have been updated from those published in previous non-financial statements, in light of a refinement of the data collection process and calculation methodology, in particular by not considering SF Energy, a company 50% owned by the Group.

Home-work commute

	UoM	2023	2022
Own car	tCO ₂ e	35.53	32.05
Train	tCO ₂ e	2.93	0.52
Plane	tCO ₂ e	6.02	2.43
TOTAL	tCO₂e	44.48	35.00

Spostamenti Casa-Lavoro

	UoM	2023	2022
Trento office via Fersina	tCO ₂ e	628	528
Trento office Tang. Ovest	tCO ₂ e	199	286
Rovereto office via Manzoni	tCO ₂ e	389	325
TOTAL	tCO₂e	1,216	1,139

6.3.4 EMISSION INTENSITY

In 2023, as a result of the reductions in energy consumption, the Dolomiti Energia Group recorded a decrease in Scope 1 and 2 emissions, against a smaller increase in indirect emissions.

Following this result and an increase in gross energy production and the total number of employees, a decrease in both energy intensity ratios was recorded.

Greenhouse gas emission intensity (GHG)³⁵

	UoM	2023	2022	2021
Total direct emissions (Scope 1) (A)	tCO ₂ e	37,905.66	50,571.15	52,315.97
Total Indirect Internal Emissions - Location based (Scope 2) (B)	tCO ₂ e	33,554.22	35,221.76	35,002.27
Total Indirect Internal Emissions - Market based (Scope 2) (C)	tCO ₂ e	36,323.86	37,060.22	36,602.31
Indirect emissions (Scope 3) (D)	tCO ₂ e	1,542.75	1,172.55	-
Total emissions - Location based (A+B+D)	tCO ₂ e	73,002.63	86,965.45	87,318.23
Total emissions - Market based (A+C+D)	tCO ₂ e	75,772.27	88,803.92	88,918.28
Gross energy production (E)	kWh	3,119,154,150.00	2,250,676,600.00	3,713,121,565.00
Intensity per kWh of gross production - Location based (A+B+D/E)	tCO ₂ e /kWh	0.000023	0.000039	0.000024
Intensity per kWh of gross production - Market based (A+C+D/E)	tCO ₂ e /kWh	0.000024	0.000039	0.000024
Total number of workers (F)	n°	1,544	1,424	1,418
Intensity by number of workers - Location based (A+B+D/F)	tCO ₂ e /n°	47.28	61.07	61.58
Intensity by number of workers - Market based (A+C+D/F)	tCO ₂ e /n°	49.08	62.36	62.71



6.4

THE GROUP'S COMMITMENT TO FIT FOR 55

Aware of the urgency and complexity of the climate challenge, the European Union has taken a proactive leadership role in adopting policies aimed at environmental sustainability. Specifically, over the past decades, the EU has driven the transition of Member States towards a low-impact economy through several campaigns and legislative proposals.

A recent example of this commitment is the Fit for 55 legislative package presented in July 2021, which illustrates the EU's determination to revise and strengthen regulations on climate emissions. It is a set of proposals aimed at a coherent and balanced updating of the regulatory framework, whose ultimate goal is to achieve the climate objectives through:

- guaranteeing a fair and socially just transition;
- maintaining and strengthening the innovation and competitiveness of European industry;
- supporting the position of Member State leaders in the global fight against climate change.

In general, 'Fit for 55' refers to the EU's goal of ensuring the reduction of greenhouse gas emissions by at least 55% by 2030, compared to the 1990 level. In order to achieve this result, proposals for legislative revision have been made in several key areas, for example with:

- the EU Emissions Trading System (ETS), introduced in 2005;
- the Social Climate Fund, which aims to address the social and distributional impact of the new emissions trading scheme;

- the Carbon Border Adjustment Mechanism (CBAM), aimed at ensuring that efforts to reduce emissions within the EU are not offset by increased emissions outside its borders through relocation of production to third countries or through increased imports of products with a high environmental impact;
- Member States' annual binding emission reduction targets for sectors not covered by the ETS or other regulations;
- emissions and removals from activities related to land use, land use change and forestry;
- the use of sustainable aircraft fuels and decarbonisation in maritime transport;
- access to infrastructure for recharging and refuelling with alternative fuels;
- taxation of energy products and electricity;
- promoting renewable energy and energy efficiency (including the energy performance of buildings);
- reducing the use of methane in the energy sector;
- promoting the transition from natural gas to renewable (e.g., hydrogen) and low-carbon gases.

In line with the commitment shown by the EU, the Dolomiti Energia Group strives daily to contribute to the more ambitious greenhouse gas emission reduction targets through several initiatives, some of which are presented in the following paragraphs.

6.4.1 OBLIGATIONS FOR THE COGENERATION EMISSIONS OFFSETTING GROUP: THE EU ETS (SCOPE 1)

The European Union Emissions Trading System (EU ETS) is one of the instruments underpinning the EU's policy to combat climate change and reduce greenhouse gas emissions.

By September each year, all companies participating in the EU ETS must surrender a certain amount of emission allowances to the scheme. This is calculated based on the tonnes of CO₂ equivalent emitted as a result of their production activities, net of emission allowances allocated free of charge to certain companies on the basis of harmonised allocation rules valid throughout Europe.

Within the Dolomiti Energia Group:

- the company Novareti S.p.A. has an obligation generated by the operation of its cogeneration plant and receives free allowances from the system;
- as the owner of 5% of the power plant in Ponti sul Mincio (MN), Dolomiti Energia Holding S.p.A. is required to transfer a number of allowances corresponding to its percentage obligation to the account of the company A2A Gencogas S.p.A. owner of the power plant's electrical workshop.

Through service contracts with the aforementioned companies, Dolomiti Energia Trading is responsible for procuring the emission allowances on the market (EUAs, European Union Allowances) needed to meet the obligations of the two companies, supplementing any allowances allocated free of charge to Novareti by the system. For the year 2023, Novareti S.p.A. has an obligation of approximately 10,385 allowances and receives 1,042 free allowances from the system.

Dolomiti Energia Holding S.p.A. contributes its share, approximately 4,579 allowances, to the fulfilment of the obligation of A2A Gencogas S.p.A., estimated at approximately 95,000 allowances.

6.4.2 OBLIGATIONS FOR DISTRIBUTORS IN THE ENERGY SAVING GROUP: EEC (SCOPE 1)

The white certificates mechanism that came into force in 2005 is the main instrument for promoting energy efficiency in Italy.

The Interministerial Decree of 11 January 2017, published in the Official Gazette of the Italian Republic on 3 April 2017, confirmed that for each year after 2016 (in line with previous years), electricity and natural gas distributors (the 'Obligated Parties') with more than 50,000 end customers connected to their distribution network on 31 December of two years prior to the years of obligation are subject to the energy saving obligations.

With Decree of 21 May 2021, the Interministerial Decree of 11 January 2017, as amended by the Decree of the Minister of Economic Development of 10 May 2018, was updated, defining the national quantitative energy saving targets to be pursued by electricity and gas distribution companies for the years 2021-2024 through the white certificates mechanism.

Each distributor of electricity and natural gas subject to the obligations must fulfil them pro rata and these shares are determined by the ratio between the quantity of electricity or natural gas distributed by each of them to the end customers connected to their networks and the quantity of electricity or natural gas distributed throughout the national territory by all the undertakings subject to the obligation, both counted in the calendar year two years preceding each year of the obligation.

ARERA, the Regulatory Authority for Energy, Networks and Environment, annually determines the share of the obligations of each distributor sub-

ject to the obligations and communicates these shares to MASE and GSE.

With DSME Resolution 3/2023 of 31 October 2023, ARERA established the obligations to be met for the obligation year 2023.

The Obligated Parties can fulfil the mandatory savings obligation in two ways:

- by directly implementing energy efficiency projects eligible for the mechanism
- by purchasing securities from other entities admitted to the mechanism

White certificates, also called Energy Efficiency Certificates (EEC), are negotiable securities certifying the achievement of savings in energy end-use through energy efficiency measures and projects. One certificate is equivalent to saving one Tonne of Oil Equivalent (TOE).

Within the Dolomiti Energia Group, the obligations for 2023 were divided as follows:

- A. SET DISTRIBUZIONE fulfilled an obligation of 8,430 EEC;
- B. NOVARETI fulfilled an obligation of 15,399 EEC.

In the main power plants feeding the district heating networks of Trento and Rovereto, cogeneration sections are installed that benefit from Energy Efficiency Certificates, in proportion to the Primary Energy Saving (PES) achieved in each High Yield Cogeneration plant for a period varying from 10 to 15 years from their activation.

In detail, the plants concerned are as follows:

PLANT	CHARACTERISTICS OF THE POWER PLANTS
Le Albere trigeneration plant in Trento	All the plants are equipped with a cogenerator consisting of an internal combustion engine powered by natural gas, a three-phase electric generator, a thermal energy recovery system and a boiler for recovering thermal energy from fumes. In 2023, the previously existing Area Tecnofin cogeneration plant in Rovereto was overhauled with the introduction of a heat pump to recover thermal energy from the second intercooler stage, which would otherwise have been lost to the environment.
Cogeneration plant Industrial Area of Rovereto	
Cogeneration plant Tecnofin area of Rovereto	

6.4.3 THE GROUP'S COMMITMENT TO REDUCING DIRECT (SCOPE 1) EMISSIONS

In 2023, the Group continued to modernise its vehicle fleet with the aim of reducing fuel consumption and limiting its emissions. In particular, fossil-fuelled diesel vehicles were replaced with the acquisition of 20 vehicles with PLUG-IN engines and 22 BEV vehicles.

In addition, a field trial of BEVs used in the management of the Group's networks and facilities was initiated, to test in particular their load capacity and use in intensive operations and extreme weather conditions.

The fleet power conversion highlighted above

will allow a 15% reduction in emissions in the two-year period 2023-2024. The replacement of vehicles is taking place on a delayed schedule due to the vehicle availability crisis that hit the automotive industry in the years 2022 and 2023.

Group car sharing services were also strengthened in 2023, also aimed at reducing the impact of the car fleet with approximately 3,000 trips made by 170 users, totalling 175,000 km driven. The Group intends to further expand car sharing services upon completing the modernisation of the car fleet.

Initiatives aimed at reducing emissions

	UoM	2023	2022	2021
Conversion and retrofitting of equipment (lights, computer equipment, heating, etc.)	tCO ₂ e	1.2	4.1	76.8
Fleet modernisation	tCO ₂ e	31.7	31.8	5.4

Specific concrete initiatives were also implemented by Group companies, in particular:

- SET Distribuzione is continuously involved in initiatives to reduce network losses that indirectly also lead to a reduction in greenhouse

gas;

- The commercial company offers its business clients the '100% offset CO₂' natural gas offer, a CO₂ offsetting project which allows financing the distribution of efficient cooking stoves in certain rural communities in Southern Ethi-

opia to support people and the environment. This project is run in collaboration with COO-PI, an Italian NGO.

- In order to reduce the sweeping dust emitted into the atmosphere, Dolomiti Ambiente

has replaced the suction machines with mechanical sweepers equipped with a fine dust filtration system. The vehicle fleet was also enriched with an electric sweeper.

6.4.4 SUSTAINABLE MOBILITY

The Move-D logo encapsulates all the sustainable mobility initiatives of the Dolomiti Energia Group. It was created to communicate the Group's commitment to mobility under a single brand, while at the same time raising awareness among users and citizens towards environmentally friendly travel options. In particular, the brand is present on the Group's electric fleet, cars, bicycles, car pooling and car sharing.

In 2023, the Group's desire to contribute to reducing emissions and vehicle traffic congestion by promoting sustainable mobility initiatives also outside the main premises of the City of Trento was confirmed. The extension to smaller locations and offices in the municipality of Rovereto takes place on a voluntary basis, independent of legal obligations.

During 2023, the Group updated its strategy for reducing the impact of employee commuting. To this end, all workers at the Trento via Fersina, Trento Tangenziale ovest and Rovereto via Manzoni sites already involved in 2022 were invited to take part in a survey to update the data, check and assess the sustainable mobility initiatives implemented from 2022.

In addition, workers from the Trento via Trieste, Trento Sanseverino, Trento via Braille and Rovereto via Fornaci offices were involved in a survey to collect information on home-work mobility and to also detect the propensity to adopt different mobility solutions. The results of the surveys, to-

gether with the assessment of the structural and logistical conditions of the locations, also contributed to updating the Home-Work Mobility Plans (hereinafter referred to as HWMPs) for the municipalities of Trento and Rovereto.

The implementation of the HWMP involved:

- the recognition and enhancement of remote forms of work (agile and remote work) as a way of reducing emissions, resource consumption and traffic congestion. Over the course of 2023, a saving of more than 1,300,000 vehicle kilometres was estimated across the Group as a result of remote working, with an estimated environmental benefit of approximately 228 tCO₂ avoided.
- encouraging workers to use car-pooling by making the JoJobRT app available, which facilitates matching mobility demand and supply. Carpooling is also supported by the Group through a form of cashback that rewards both driver and passenger. In 2023, the use of the JoJobRT app was extended to include walking, cycling and scooter travel, expanding the range of workers to whom the bonus cashback is granted. The data collected via the app quantified the avoided emissions at around 17 t of CO₂, which were avoided with over 104,000 vehicle km saved; in addition, over 36,000 km and around 6 t of CO₂ were avoided following the most recent extension initiative. On the occasion of the app's first six months of application, a special award ceremony was held for

- the best workers in various rankings: number of trips and number of kilometres saved by carpooling, cycling and walking;
- promoting the use of bicycles for home-work journeys by providing protected parking spaces within the company perimeter of main offices;
 - lastly, promoting the use of local public transport, with the Group contributing to the travel pass costs incurred by employees.



EUROPEAN SUSTAINABLE MOBILITY WEEK

In 2023, on the occasion of the European Sustainable Mobility Week, the Dolomiti Energia Group doubled the cash paid back to employees who carpool or walk, cycle or scooter to work.

6.4.5 THE GROUP'S COMMITMENT TO OFFSETTING EMISSIONS: CARBON CREDITS

Natural gas is a non-renewable fossil fuel and when it burns, it releases carbon dioxide into the atmosphere. To even the score with nature, one solution is to offset the CO₂ from the use of the gas itself. The Group pursues this objective by supporting environmentally sustainable social responsibility projects backed by international associations and NGOs. Over the years, some projects may exhaust the credits attached to them and thus new projects can be found on the market by Dolomiti Energia.

'Offsetting' means buying and cancelling certificates, called carbon credits, generated by international sustainable development projects aimed at reducing the amount of carbon dioxide emitted globally. Each individual credit proves that one tonne of CO₂ was not emitted into the atmosphere.

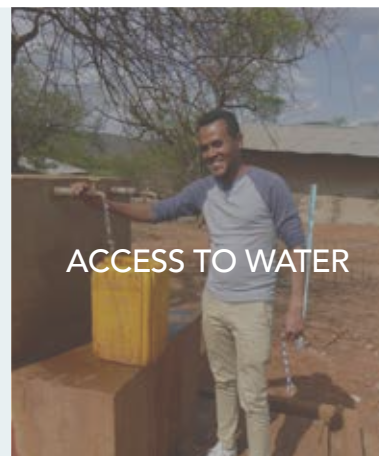
It is precisely through offsetting that the '100% offset CO₂ gas' sold by the Group is carbon-neutral. The '100% offset CO₂ gas' brand associated with the gas offers is the guarantee that Dolomiti

Energia is equalising emissions for the end customer.

Below are the projects that Dolomiti Energia supported in 2023 to offset the emissions generated by the natural gas supplied, thus making it zero impact.

Historically, the population of the Oromia region in Ethiopia has travelled long distances to obtain water, using polluting vehicles. This water then had to be boiled before it could be used due to the high risk of contamination and its lack of monitoring. The project supported by Dolomiti Energia implements running water systems powered by solar energy pumping plants to serve several villages in the region. The aim is therefore to improve the living conditions of communities by promoting greater awareness of environmental conservation and sustainable use of natural resources at local and institutional levels.

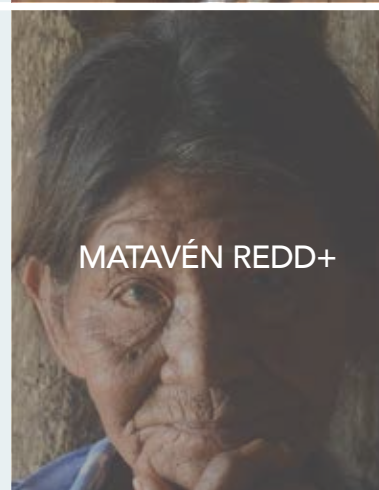
Access to water through aqueducts significantly contributes to the reduction of pollutant emissions, as people no longer have to rely on vehicles to reach water sources, and it is no longer necessary to burn fuel, with consequent CO₂ emissions, to make water drinkable through the boiling process.



ACCESS TO WATER

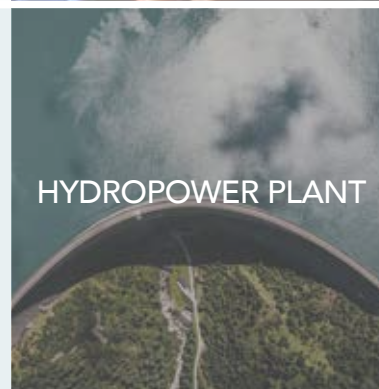
The indigenous reserve in the Matavén forest in eastern Colombia is home to around 16,000 people belonging to six different ethnic groups. The Matavén REDD+ Project has been operating since 2012. Its main objective is to preserve biodiversity and protect and improve the quality of life of the local population.

The project significantly contributes to reducing CO₂ emissions, combating deforestation and protecting biodiversity. Furthermore, it provides services to local people that avoid the use of polluting vehicles and promote a sustainable lifestyle. In order to promote lasting change, the project takes a holistic approach by actively involving the indigenous population and implementing community development activities. These include: improved access to education for children, support for women's empowerment, provision of educational and information opportunities for indigenous people, health services, protection of food security and many other benefits to those living in the Matavén forest.



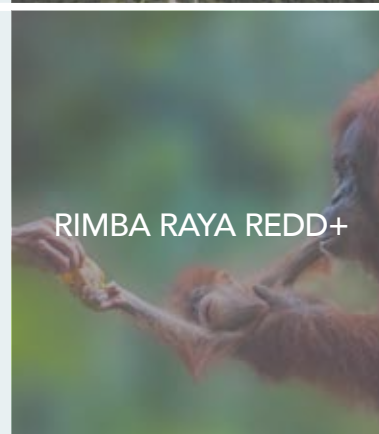
MATAVÉN REDD+

The Musi Hydropower Plant is a project to build a 210 MW run-of-river hydropower plant in the Bengkulu province, located on the island of Sumatra, Indonesia. The main objective of the plant is to exploit the large hydroelectric potential of the area to generate completely clean energy to be distributed in the local grid. This makes it possible to abandon the use of fossil fuels, reduce greenhouse gas emissions, improve air quality for the local population, provide affordable clean energy and create new jobs. In doing so, the project not only contributed to the repopulation of the local forest, but was also certified by Verra as a Verified Carbon Standard.



HYDROPOWER PLANT

The Rimba Raya Biodiversity Reserve is an Infinite EARTH initiative on the island of Borneo, Indonesia. Its primary aim is to preserve the local flora and fauna and promote the social and economic development of the community. Rimba Raya is an example of a sustainable alternative to deforestation and is one of the largest REDD+ projects worldwide. In addition to achieving the Verified Carbon Standard certification, Rimba Raya Redd+ is the first in the world to pursue all 17 UN Sustainable Development Goals. Impacts include the protection of flora and fauna within a reserve the size of Singapore, thus contributing to a decrease in carbon dioxide emissions; the development of livelihood programmes in the surrounding villages, aimed at providing education, job opportunities and hope for the future; and the creation of a buffer zone between the palm oil industry and Tanjung Puting National Park, home to one of the last wild populations of orangutans on Earth.



RIMBA RAYA REDD+

In rural Ethiopia, 75% of households use traditional cookers or inefficient stoves for cooking, using a considerable amount of wood, the only fuel available. This practice not only generates tens of thousands of tonnes of CO₂ each year, but also leads to inhaling fumes that are harmful to health, especially for the women involved in cooking and the children in the home.

As of 2018, Coopi's project seeks to improve the living conditions of communities by raising awareness about environmental protection and the sustainable use of natural resources and by introducing ecological stoves in Ethiopia.

In doing so, the project has contributed to significantly reducing burnt wood and respiratory diseases and emissions, while at the same time stimulating social development through the creation of new jobs for the local population involved in the distribution and training in the use of the stoves.



For 2023, the CO₂ related to a total consumption of 105 million m³ of customer gas (94 million in

2022) was offset, corresponding to approximately 215,666.04 tonnes of avoided CO₂.

6.4.6 THE PURCHASE AND CANCELLATION OF GOS TO ENSURE THE SUPPLY OF 100% GREEN ELECTRICITY

The Guarantee of Origin is an electronic certification of the renewable origin of electricity generated by IGO-qualified plants. For each MWh of renewable electricity fed into the grid by IGO-qualified plants, the GSE issues a GO title, in accordance with Directive 2009/28/EC.

Upon cancellation, a Certificate of Cancellation is generated, on which the ID code of the plant from which the cancelled GOs originate is present. Each cancellation document is also assigned a unique code identifying the certificate.

Starting from 1 January 2013, sales companies

are obliged to procure a quantity of GO certificates equal to the electricity sold as renewable. In order to do this, each company is required by 31 March of the year following that in which the electricity was supplied to end customers to cancel a quantity of GO equal to the electricity sold as renewable and referring to the same year.

For years, the Dolomiti Energia Group has decided to sell only renewable electricity on the free market, and therefore, every year, it cancels a quantity of GO equal to the total amount of energy consumed by its customers.

6.5

MANAGEMENT OF SELF-GENERATED WASTE BY THE GROUP

GRI 3-3 Responsible and sustainable waste management |

GRI 306-1 | GRI 306-2 | GRI 306-3 | GRI 306-4 | GRI 306-5 |

The Group manages self-generated waste and production waste created within the context of various activities through Dolomiti Ambiente and according to a Group procedure³⁶, in order to enable a regular salvage or disposal without hazards for human health, ensuring a high level of environmental protection, while complying with the principles of national and provincial legislation.

- For SET, the production of waste is linked to the maintenance of its networks and distribution plants. Most of SET's hazardous waste is made up of transformers, while its non-hazardous waste is water-based solutions.
- For Novareti, water sector, the production of waste is directly linked to the maintenance activity of the networks and water supply systems. The hazardous waste produced in this case consists of batteries, while the water-based waste solutions qualify as non-hazardous waste.
- The waste produced by the specific activities of Dolomiti Ambiente are mainly due to the running and maintenance of vehicles engaged in the collection of urban waste and by the activities concerning maintenance of both the infrastructure and the container park. The waste is disposed at the authorised

sites depending on the type of material, with preference granted where possible to recovery. For Dolomiti Ambiente, the hazardous waste mainly consists of vehicles or results from vehicle maintenance. Also in this case, water-based waste solutions do not constitute hazardous waste.

- Dolomiti Energia Holding as hazardous waste mainly produces chemical laboratory substances containing or made up of hazardous substances, including mixtures of chemical laboratory substances, while in terms of non-hazardous waste it mainly produced packing wood and furnishing.
- For activities related to companies involved in hydroelectric production, the quantities of waste produced are highly variable from year to year, as they essentially depend on the scheduling of ordinary and extraordinary maintenance activities. Since the waste does not come directly from the production cycle, but from maintenance and operational management activities or the need to renew used oil, it is difficult to achieve a reduction in the quantities produced. In any case, the Group is looking for possible further recovery opportunities.

The Group's commitment to reducing the environmental impact of waste starts with environ-

³⁶ The Group procedure applies to all the activities of Dolomiti Energia Holding, Dolomiti Ambiente, Novareti, SET Distribuzione, Dolomiti Energia Solutions, Hydro Dolomiti Energia, Dolomiti Edison Energy and Dolomiti Energia that produce waste. The procedure does not apply to the public collection service conducted by Dolomiti Ambiente or to the sewage and ecological plant service carried out by Novareti

mentally friendly and compliant management of waste throughout its life cycle. Only a residual part of the self-generated waste goes to landfill and therefore has a negative environmental impact. A large part of the waste is directed to treatment chains that allow for sustainable processing. In addition, before being handed over to authorised entities for disposal or recovery, waste is temporarily stored in specially equipped areas within the facilities, in accordance with the time-frames and quantities laid down by legislation. These areas are also chosen to have the least possible visual impact on the external environment. Waste is stored in a controlled manner,

preventing any risk to humans and the environment; in particular, the separation of hazardous waste from non-hazardous waste is ensured, and liquid spillage and the dispersion of dust or emission of harmful vapours is prevented.

Electronic archiving, the use of certified e-mail and the dematerialisation of documents are used to reduce paper consumption and consequently waste. To limit the impact of the paper consumed, paper from certified and CO2-neutral supply chains is purchased wherever possible. Containers for separate waste collection are provided at each location.



Self-generated waste by composition

2023	UoM	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	t	289.66	265.59	24.07
Waste from electrical and electrical equipment electronic	t	156.01	156.01	-
Batteries and accumulators	t	6.39	5.73	0.66
Cables	t	0.48	0.48	-
Fluorescent lighting	t	0.43	0.43	-
Packaging that contained hazardous substances	t	2.72	2.72	-
Absorbents and filtering materials	t	10.56	10.12	0.44
Mineral/synthetic oils	t	72.28	72.24	0.04
Chemicals	t	37.86	17.86	19.99
Other	t	2.93	-	2.93
NON-HAZARDOUS WASTE	t	4,192.98	2,679.07	1,513.91
Plastics	t	45.09	45.09	-
Wood	t	27.49	27.49	-
Mixed packaging	t	3.83	3.83	-
Metal	t	297.83	297.83	-
Organic waste	t	1,874.21	1,874.21	-
Sewage sludge	t	-	-	-
End-use electrical and electronic equipment	t	86.32	86.32	-
Other	t	1,858.21	344.30	1,513.91
TOTAL WASTE	t	4,482.64	2,944.66	1,537.98

Self-generated waste diverted from disposal by type of recovery operation

2023	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	265.59	265.59
Other recovery operations ³⁷	t	-	265.59	265.59
-Waste from electrical and electronic appliances	t	-	156.01	156.01
-Batteries and accumulators	t	-	5.73	5.73
-Cables	t	-	0.48	0.48
-Fluorescent lighting	t	-	0.43	0.43
-Packaging that contained	t	-	2.72	2.72
-Absorbents and filtering materials	t	-	10.12	10.12
-Mineral/synthetic oils	t	-	72.24	72.24
-Other	t	-	17.86	17.86
RIFIUTI NON PERICOLOSI	t	-	2,679.07	2,679.07
Other recovery operations ³⁷	t	-	2,679.07	2,679.07
-Plastics	t	-	45.09	45.09
-Wood	t	-	27.49	27.49
-Mixed packaging	t	-	3.83	3.83
-Metal	t	-	297.83	297.83
-Organic waste	t	-	1,874.21	1,874.21
-End-use electrical and electronic equipment	t	-	86.32	86.32
-Other	t	-	344.30	344.30
TOTAL WASTE	t	-	2,944.66	2,944.66

³⁷ Includes, for example, handover to suppliers accredited with the recycling chain.

Self-generated waste directed to disposal by disposal method

2023	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	24.07	24.07
Other disposal operations ³⁸	t	-	24.07	24.07
-Batteries and accumulators	t	-	0.66	0.66
-Absorbents and filtering materials	t	-	0.44	0.44
-Mineral/synthetic oils	t	-	0.04	0.04
-Chemicals	t	-	2.93	2.93
-Other	t	-	19.99	19.99
NON-HAZARDOUS WASTE	t	-	1,513.91	1,513.91
Other disposal operations ³⁸	t	-	1,513.91	1,513.91
-Sewage sludge	t	-	-	-
-Other	t	-	1,513.91	1,513.91
TOTAL WASTE	t	-	1,537.98	1,537.98

Residual waste produced at the Trento and Rovereto administrative sites

2023	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
NON-HAZARDOUS WASTE	kg	159,460	159,460	-	207,680	207,680	-
Residual	kg	159,460	159,460	-	207,680	207,680	-
TOTAL WASTE	kg	159,460	159,460	-	207,680	207,680	-

Residual waste generated - diverted from disposal by type of recovery operation

2023	UoM	ROVERETO			TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
NON-HAZARDOUS WASTE	kg	159,460	-	-	207,680	-	-
Preparation for reuse	kg	159,460	-	-	207,680	-	-

Residual waste generated - directed to disposal by type of recovery operation

2023	UoM	ROVERETO			TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
NON-HAZARDOUS WASTE	kg	-	-	-	-	-	-
Disposal at landfills	kg	-	-	-	-	-	-

³⁸ This includes, for example, submission to biological or physical-chemical treatment.

6.6

EFFICIENT AND SUSTAINABLE USE OF WATER

GRI 3-3 Sustainable management and protection of water quality |

GRI 2-6 | GRI 303-1 | GRI 303-2 | GRI 303-3 | GRI 303-4 | GRI 303-5 | GRI 304-3 |

6.6.1 INTEGRATED WATER CYCLE MANAGEMENT

The management of the water cycle by the Dolomiti Energia Group is based on three closely interconnected management tools: cartography, numerical modelling and remote control. In order to manage water resources optimally, an active approach is needed to regulate the state of the network according to consumption. Ordinary activities are planned to optimise internal resources, while extraordinary activities are validated by hydraulic analyses carried out using numerical simulators. Work continued in 2023 for the optimisation of the management of water supply systems by means of advanced simulation and control instruments.

The work to replace the network, the creation of new districts and the automatic management of pressures allow further drops in the water drawn from the source, while keeping consumption to users unchanged.

Moreover, the APC Project continued in 2023,

based on an advanced real-time water network management system which makes it possible to optimise network pressure, reduce leaks, reduce electricity consumption and, in general, increase the efficiency of the water system. The system is managed by a controller coupled to a real-time model, which assesses, in addition to the normal (real and virtual) water parameters of the pipeline, also external factors such as temperature, solar irradiation and the weather forecast: hence, use of the renewable energies obtained from dedicated solar plants is maximised, allowing to best exploit the management of tanks and pumping systems.

The Group is also continuously experimenting new instruments for detecting hidden leaks are being tested continuously, both through virtual simulations and network sensors. In 2023, an additional tool was added for monitoring and managing water districts in order to direct search teams in the event of signs of potential leakage coming from the field.

6.6.2 MANAGING THE IMPACTS OF HYDROPOWER PRODUCTION

Hydroelectric plants allow the production of environmentally friendly energy without the emission of pollutants and with a low environmental impact, as they use a resource that is not consumed, but used in the production process and then released without alteration.

Some Group facilities are located at high altitudes or in areas of naturalistic value such as national or natural parks, biotopes, and river parks. The hydroelectric activity coexists with these conditions and is compliant with applicable regulations. The Malga Mare and Cogolo plants are located within the Stelvio National Park. The Nembia and Santa Massenza plants are part of the Adamello-Brenta Natural Park. Also the Boazzo, Cimego, La Rocca, Santa Massenza, Toblino, Fies, Dro, Torbole, San Floriano (50% owned by the Group), Carzano, Costa Brunella, Grigno, Val Noana and Pradastua plants are part of protected areas (e.g., biotope of Toblino lakes, 'Marocche' of Dro, etc.). The plants in Ala, Bussolengo and Chievo partially affect areas classified as SIC (Sites of Community Interest). Lastly, the San Floriano hydroelectric plant partially falls within the Monte Corno Natural Park.

The water used for hydro-electrical production is collected mainly from rivers and lakes while guaranteeing the ecological flow and the uses of the resource by the lands downstream. A constant amount of water, or a seasonally modulated amount where required, is released downstream of the water collection point in order to safeguard the water flora and fauna and the continuity of the waterway's environment. The hydroelectric power plants and the reservoirs are managed by optimising the resource depending on the variable weather patterns.

The water used for hydroelectric production

in 2023 amounted to 15,955,992.64 Megalitres (13,372,516.64 megalitres in 2022) and, as anticipated, is returned to the environment clean and with no significant change both in temperature and composition, thus ensuring continuity to the aquatic environment.

The assessment of the quality of the Trento region's waterways, in compliance with the European directive on waters, is entrusted to the Water Protection Plan. This plan is an excerpt of the General Plan for the Use of Public Waters. The main document is a map classifying rivers and lakes based on the conservation state of the natural conditions of the associated ecosystem. Data analysis of the map shows that the hydroelectric usage associated with the Group's plants is not particularly critical for the waterways involved.

The Group promotes projects for the protection of the natural ecosystem in the various territories in which it operates. In particular, for years it has developed a constructive collaboration with the Associations of Trentino Fishermen to develop projects and initiatives designed to preserve and replenish public fish stock.

In the context of the impact assessment carried out by Group companies in relation to water resources, it emerges that the environmental aspects with the highest level of risk are:

- Variability of discharged flows, seasonal lag in natural outflows, alteration of solid transport;
- Hydraulic emergencies aimed at managing dams and weirs during floods to prevent blockages of hydraulic works and cope with natural disasters (landslides and mudslides);
- Extreme events: failure of hydraulic works (canals, penstocks, dams).

- In relation to the aspects described above, the Group has adopted the following procedures aimed at identifying and managing possible impacts on water resources:
- altered release of ecological flow: to manage this impact, a management procedure has been defined to control intake works that guarantee ecological flow;
- possible damage to the territory and increase of water turbidity with related harmful impacts on ichthyofauna: a plan shared with the Autonomous Province of Trento, the Regional Agency for Environmental Protection of the Veneto Region and the Autonomous Province of Bolzano is in place for the management of floods in emergency conditions;
- damage to works and persons: hydraulic works are constantly monitored by staff so that any problems can be promptly resolved, and six-monthly checks are also carried out by the Ministry of Infrastructure, which verifies the correct execution of interventions on the works and the condition of the safety organs;
- interference of water resource use with irrigation uses: storage in hydroelectric reservoirs makes it possible to contribute, even in conditions of water resource scarcity, to achieve a sufficient water supply for the irrigation needs of the valleys below. The issuance of these loads is regulated by special agreements with the various stakeholders, including the provincial/regional administration.

Since some hydroelectric plants are located within protected areas, any type of interference potentially impacting the environment is identified in advance, monitored and managed by the staff of the Group's hydroelectric production companies. Any civil and mechanical works located in protected areas are designed to avoid or minimise possible impacts on the environment. It is then submitted for evaluation to the competent bodies responsible for environmental protection and the conservation of protected areas.

The collaboration with public bodies or private entities involved in the management of a given impact is usually defined according to an agreement or convention. For example, for verifying and controlling the correct release of the minimum vital flow, the Group cooperates with fishermen's associations located throughout the territory in order to carry out checks at the intake works and draw up specific inspection reports. Instead, for the management of artificial reservoirs when extreme events take place, the Group works with the Autonomous Province of Trento according to a special procedure for managing flood events in watercourses (Civil Protection Documents for large dams), which is adapted from time to time to the provisions issued by the Province on Civil Protection matters.

Water withdrawals from springs or wells are determined by regular concessions, issued by the competent authority (APRIE, the Provincial Water Resources and Energy Agency), which also assesses whether or not it is necessary to envisage the release of the minimum vital water flow. No water withdrawals have been made from water-stressed areas in the last three years.

The flow of water used by hydroelectric power plants for energy production is returned to the environment unaltered, therefore current legislation does not classify it as consumption.

Discharges related to the activities of the Group's companies involved in hydroelectric production can be associated with civil discharges (imhoff pits or sealed tanks where there is no connection to the public sewerage system) and industrial discharges (cooling water of machinery). The minimum quality standards are those defined by national legislation (Italian Legislative Decree 152/2006) and provincial legislation. All discharges are authorised by a specific Single Territorial Authorisation as defined in Art. 21 of Provincial Law 19 of 17 September 2013.

Every year, the Group companies that adhere to EMAS (EU Eco-Management and Audit Scheme) registration, as part of the required assessments, carry out an evaluation of the direct and indirect negative impacts on the environment potentially connected to the operation of hydroelectric plants (e.g., due to the presence of buildings in the environment and dams in watercourses, reduction of water flows, discharges, etc.) and to the activities carried out by staff (such as maintenance on electrical and mechanical works and civil structures).

The environmental aspects, which are linked to the Group's activities and to which impacts are associated, concern:

- Air emissions (polluted gases, greenhouse gases, dust);
- Discharges into surface water;
- Waste production, recycling, reuse and disposal;
- Land use and contamination;
- Use of materials and natural resources (including fuels and energy);
- Local issues (noise, vibration, odour, dust, visual impact, transport and others);
- Impacts resulting from accidents and emergency situations;
- Impacts resulting from abnormal conditions and foreseeable emergency situations;
- Biological and naturalistic impacts (biodiversity and others).

The possible impacts for each of the above categories were researched while considering any assets and works belonging to the owned and operated facilities and by screening normal and non-normal (start-ups, shutdowns, emergencies, accidents), foreseeable and unforeseeable operating conditions. In addition, ordinary and extraordinary maintenance activities as well as ongoing project activities were considered.

The assessment process is governed by a procedure that calls for the updating (during the Management Review, as required by the integrated safety and environmental management system) of the relevant information contained in a special register of environmental impacts. The assessment of the effects of the production activity is prepared on the basis of EC Regulation 1221/2009 - amended by EU Regulation 1505/2017 and now also by EU Regulation 2018/2026. This regulation assesses the significance of both 'direct' impacts, i.e., under the direct control of the organisation, and 'indirect' impacts, i.e., originating from interaction with third parties (contractors, subcontractors, suppliers, customers, product users) who may, to a reasonable extent, be influenced by the organisation.

For each impact, including those related to water resources, the level of significance, the associated environmental risk and the measure to be taken are calculated. For all environmental aspects, the measures taken also comply with the requirements of the specific sector legislation. For impacts considered significant, a specific procedure is to be adopted.

6.6.3 THE USE OF WATER IN MANAGING URBAN HYGIENE

All the water used in the Dolomiti Ambiente production process is taken from the water supply system and used to wash the vehicles used for waste collection, the waste storage platforms as well as supplying the sanitary facilities. Any waters that are potentially polluted are sent to a biological purification plant owned by the company and located inside the area where production takes place and where the waters are put back into the environment. After treatment, the waste-

water is delivered back into the drainage system in the Trento area. At the Rovereto site, water used for washing is collected in a watertight tank and periodically pumped out to be delivered to treatment plants. Dolomiti Ambiente takes great care to monitor and optimise the processing of wastewater and to safeguard the quality of the water and the of the environment into which it is reintroduced.

6.6.4 WATER CONSUMPTION IN THE GROUP

The tables below illustrate the values relative to water withdrawals, discharges, and by difference, consumption of the entire Group resulting from the activities described in the previous sections, which constitute the three Group businesses that have the greatest impact on the use of water resources, and considering in addition all the impacts, albeit minor, on water that are generated

by the other businesses³⁹. With reference to the consumption at the Via Fersina and Via Manzoni offices, the well-established internal campaign continues to raise awareness among employees of the need to consciously use water resources. To this end, columns have been installed to supply drinking water and therefore avoid the use of plastic bottles.

³⁹ As for the company Novareti Cogenerazione, total water withdrawals increased from 11.35 thousand m³ to 14.77 thousand m³ (+30%), while discharges rose from 4.88 thousand m³ to 8.15 thousand m³ (+67%).

Water withdrawal⁴⁰

	UoM	2023	2022	2021
SURFACE WATER	Megalitres	15,950,707.77	13,368,416.55	17,748,044.34
≤1.000 mg/L total dissolved solids	Megalitres	15,950,707.77	13,368,416.55	17,748,044.34
>1.000 mg/L total dissolved solids	Megalitres	-	-	-
GROUNDWATER	Megalitres	27,416.21	28,466.29	31,857.90
≤1.000 mg/L total dissolved solids	Megalitres	27,416.21	28,466.29	31,857.90
>1.000 mg/L total dissolved solids	Megalitres	-	-	-
SEAWATER	Megalitres	-	-	-
≤1.000 mg/L total dissolved solids	Megalitres	-	-	-
>1.000 mg/L total dissolved solids	Megalitres	-	-	-
PROCESS WATER	Megalitres	4,494.38	2,991.24	9.78
≤1.000 mg/L total dissolved solids	Megalitres	4,481.41	2,984.04	0.00
>1.000 mg/L total dissolved solids	Megalitres	12.97	7.20	9.78
WATER FROM SUPPLY SERVICES	Megalitres	27.06	50.83	39.32
≤1.000 mg/L total dissolved solids	Megalitres	25.26	46.68	32.37
>1.000 mg/L total dissolved solids	Megalitres	1.80	4.15	6.95
TOTAL WATER WITHDRAWAL	Megalitres	15,982,645.42	13,399,924.91	17,779,951.34

Effluents - by destination^{40&41}

	UoM	2023	2022	2021
TOTAL WATER DISCHARGES	Megalitres	15,975,947.22	13,393,048.95	23,097.09
Of which surface water ⁴²	Megalitres	15,950,678.72	13,368,421.05	5.86
Of which groundwater	Megalitres	818.28	1,104.25	-
Of which in seawater	Megalitres	-	-	-
Of which in sewers	Megalitres	19,968.82	20,539.61	23,091.22
Other	Megalitres	4,481.41	2,984.04	-

40 The data have been updated from those published in previous non-financial statements, in light of a refinement of the data collection process and calculation methodology, in particular by not considering SF Energy, a company 50% owned by the Group.

41 In light of this, the figures for 2021 are updated from those published in previous Non-Financial Statements.

42 This is process water

Effluents - by type^{40&41}

	UoM	2023	2022	2021
TOTAL WATER DISCHARGES	Megalitres	15,975,947.22	13,393,048.94	23,076.00
Fresh water (≤ 1.000 mg/L total dissolved solids)	Megalitres	15,951,496.99	13,369,525.30	-
Other water (> 1.000 mg/L total dissolved solids) ⁴³	Megalitres	24,450.23	23,523.64	23,076.00

Water consumption^{40&41}

	UoM	2023	2022
Total water withdrawn	Megalitres	15,982,645.42	13,399,924.91
Total water discharged	Megalitres	15,975,947.22	13,393,048.95
TOTAL WATER CONSUMPTION	Megalitres	6,698.20	6,875.96

43 Novareti manages the clean and dirty water collection service up to the purification plants.

6.7

PRESERVATION OF NATURAL RESOURCES AND BIODIVERSITY

GRI 3-3 Protection of water, soil and ecosystem quality and conservation and restoration of biodiversity|

GRI 2-25 | GRI 304-1 | GRI 304-2 | GRI 304-3 | GRI 304-4 | G4 – EU – 8 |

The Dolomiti Energia Group pays particular attention to protecting the quality of water, soil, ecosystems and preserving and restoring the biodiversity of the places in which it operates, and is committed to carrying out its activities while also considering its own negative impacts and promptly providing for their mitigation. In the direct and indirect impact assessments carried out every year, the degree of risk is classified and associated with an action plan according to an action priority. The reference framework for the

preparation, application and refinement of these tools, as well as for the definition of environmental improvement objectives and targets, are the principles of action formulated through a document setting out the Site Environmental Policy. Group policies communicate the management's commitment to reducing its negative impacts. The effectiveness of the measures adopted is evaluated annually, also by conducting internal audits according to an annual programme.

Sites operating in or adjacent to protected areas or areas of high biodiversity value⁴⁴

OWNERSHIP/ MANAGEMENT	DESCRIPTION ⁴⁵
<p>OWNED BY THE MUNICIPALITY OF ROVERETO AND MANAGED BY DOLOMITI AMBIENTE Mira C.C. Lizzana di Rovereto</p>	<p>Rovereto material collection centre for household and non-household municipal waste. This is an area adjacent to two sites of community interest (national and provincial) due to the presence and reproduction of endangered animal species, such as amphibians and reptiles, that are exclusive and typical of the Alps. (SIC Laghetti di Marco and SIC Monte Zugna) Long-lasting presence of invertebrates linked to the highly natural conditions of the beech forests. Of note is the presence of a large number of species, including hydrophagous beetles that are indicators of good environmental quality. The vegetation around the lakes is represented by typical species in humid environments, with the presence of rare species for Trentino, such as <i>Carex gracilis</i>. The prevailing management objective is the preservation of the mosaic of open and forest environments, with a focus on improving the functionality of wetland environments.</p>
<p>PROPERTY OF DOLOMITI EDISON ENERGY Asta Noce – Val di Non</p>	<p>The S. Giustina Dam is located here, as well as some offices. The area occupies a surface area of 233 m² and is adjacent to the special conversation area Forra S. Giustina. The site is also of considerable importance for the nesting, rest and/or wintering of protected or rapidly declining bird species, and/or that have a localised distribution in the Alps. The main management objective is to maintain biodiversity and the functionality of the ecosystems also through the improvement of their connectivity with the creation of appropriate ecological corridors.</p>
<p>PROPERTY OF DOLOMITI EDISON ENERGY Pozzologo – Altopiano di Pinè Plant</p>	<p>The Serrai lake pumping station at the Piazze dam is adjacent to the special conservation area Paludi di Sternigo. This is a vast marshland area where the vegetation consists of wet meadows of mowed mega-grasses. Sternigo marshes. A group of magno sedge beds has developed along the shores of the lake, which are gradually being invaded by the water reed. Habitats of special interest are present, in particular: Magnocaricion (<i>Caricetum rostratae</i>) (10%), Phragmition (reeds) (15%). This is a vitally important biotope for the reproduction of many species of amphibians and reptiles. The presence of invertebrates also indicates the good natural quality of the running waters.</p>

⁴⁴ Specifically, in addition to the operating sites of the Group companies, the table also indicates plants under management, or parts thereof, which have the potential impact of altering biodiversity.

⁴⁵ The kilometres of the basins in relation to the site occupied by the power plant building and other smaller plant-related works are considered significant.

<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Stelvio National Park</p>	<p>The affected sites adjacent to the Park concern works relating to the Cogolo and Malga Mare hydroelectric plant with a coverage of 1.07 km². They are adjacent to areas of interest for the presence of dense needle-leaved forests, crystal-clear stream and lake waters and white perennial snow. It is home to deer, ibex, chamois and roe deer, and is flown over by the golden eagle.</p>
<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Adamello Brenta Nature Park</p>	<p>The sites affected by the Park concern works related to the Malga Boazzo and Nembia - Santa Massenza hydroelectric plant, covering 1.4 km². The main commitment is to protect the area between the Adamello-Presanella massif and the Brenta Dolomites Group.</p>
<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Lake Toblino</p>	<p>A biotope of provincial interest where there are works related to the Torbole and Toblino hydroelectric plant covering an area of 0.7 km², characterised by sub-Mediterranean vegetation and aquatic avifauna.</p>
<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Carzano</p>	<p>The hydroelectric plants of Carzano, Costa Brunella and Grigno cover an area of 0.04 km² and are adjacent to Val Campella, 'Lagorai' 'Fontanazzo' and 'Pale di San Martino.' The sites are of great ecological importance, not only for the considerable level of naturalness of the fauna, but especially for the presence of silver fir forests, in regression throughout the entire Alpine chain, which are found here in a good state of conservation and with different types of vegetation, testifying to the level of biodiversity still present. The aim is to maintain the site's high vegetation diversity.</p>
<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Marocche di Dro</p>	<p>Biotope of provincial interest where the Fies and Dro hydroelectric power stations are located. The site covers an area of 0.005 km². It is an important area for the nesting, rest and/or wintering of protected or strongly declining bird species, and/or those with a localised distribution in the Alps. Management must be geared towards preserving the environment in its integrity.</p>

<p>PROPERTY OF HYDRO DOLOMITI ENERGIA Monte Baldo di Brentonico and Talpina-Brentonico</p>	<p>This site includes the works pertaining to the Ala and Pra da Stua hydroelectric plant, with a surface area of 0.12 km². It is of significant interest in terms of fauna due to the presence of animal species, glacial remains, which are sharply declining in the alpine area, and the presence of invertebrates that define the good natural conditions of the woods. Management is mainly aimed at conserving the open vegetation environments which, being mostly of anthropogenic origin, are exposed to the consequences of the abandonment of traditional activities.</p>
<p>MANAGED BY HYDRO DOLOMITI ENERGIA Monte Corno Nature Park (BZ)</p>	<p>Works related to the San Floriano hydroelectric plant take place adjacent to the park in an area of 0.016 km². This environment includes numerous plant species that have international and national protection status. All South Tyrol reptiles can be found here. Monte Corno Nature Park is a paradise for birds.</p> <p>The objectives are to conserve the various representatives of the sub-Mediterranean zone, which have their most northerly distribution here; to conserve the various species of flora and fauna in extensive mixed deciduous and fir forests; to conserve biodiversity in peat bogs; and to conserve the biodiversity of the rural environment.</p>
<p>MANAGED BY HYDRO DOLOMITI ENERGIA Fiume Piave dai Maserot alle grave di Pederobba (TV)</p>	<p>The site covers a surface area of 0.02 km² and contains works related to the Bellona 1 and 2 hydroelectric plant.</p> <p>The area is surrounded by two waterways: the Piave river, which is torrential in nature, and the S.Giacomo springs, which flow slowly. In this SIC site, the Lipu Oasis occupies the central part of the six-hectare forest where herons nest (heronry).</p> <p>The focus is on water regulation, cultivation changes, urbanisation and gradual infrastructure.</p>
<p>MANAGEMENT OF SET DISTRIBUZIONE Monte Baldo di Brentonico and Talpina-Brentonico</p>	<p>The Bisoffi PTP equipment (pole-mounted transformer) is adjacent to the special conservation area Talpina Brentonico and covers a surface area of 1 m². Presence of rare species that are disappearing, linked to traditional agriculture. Stopping and breeding site for long-distance migratory birds and breeding habitat for thermophilic species retreating to the Alpine arc. Of note is the recently confirmed presence of at least 5 different species of bats. The main management objective is the conservation of the mosaic of arid meadows interspersed with cultivated fields, groves and hedges which determines the good level of biodiversity of the site.</p>

<p>PROPERTY OF SET DISTRIBUZIONE Names - Vallagarina</p>	<p>The Servis PTP equipment (pole-mounted transformer) falls in the special Servis conservation area and covers a surface area of 1 m². It is a particularly interesting area in terms of its flora: numerous thermophilic species which are very rare in Trentino can be found here. Also noteworthy is the flora of the humid microenvironments, which includes for example the only known station in the region of <i>Plantago altissima</i>. Such environments are also vital for the reproduction of many species of amphibians and reptiles. Main management objective: maintaining high biodiversity (linked above all, but not only, to arid meadows and wet meadows), which originated over the centuries through a delicate balance between natural emergencies and traditional agro-pastoral practices.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Adamello Brenta Nature Park</p>	<p>The Fogaiard PTP equipment (pole-mounted transformer) falls within the special conservation area of the Brenta Dolomites, Adamello Brenta Natural Park, Habitat 2000 for beech forests and covers a surface area of 1 m². Area characterised by the presence of mowing meadows of significant natural and landscape value. Measures resulting from the Park.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Adamello Brenta Nature Park</p>	<p>The Cavaipeda PTP and Cornisello PTP equipment (pole-mounted transformer) falls in the special conservation area of Adamello, Adamello Brenta Natural Park, Natura 2000 Habitat for <i>Picea acidophilous montane</i> and alpine forests and Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>) and covers a surface area of 1 m². Area characterised by the presence and reproduction of endangered animal species, important glacial remains, exclusive and/or typical of the Alps. Invertebrate species associated with forests in good natural condition are present. Measures resulting from the Park.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Lake Toblino</p>	<p>The Toblino PTP equipment (pole-mounted transformer) covers a surface of 1 m² and is adjacent to the special conservation area, namely the Toblino Lake Nature Reserve, a valley lake with a belt of helophytic vegetation, in an environmental and landscape setting of exceptional interest due to the presence of evergreen holm oak woods, here at their northern limit of distribution. The site is also an important area for the nesting, rest and/or wintering of protected or strongly declining bird species at European level. Also noteworthy is the presence of invertebrates from Annex II of the European Habitats Directive, indicators of good naturalness in running waters. The main management objective is maintaining biodiversity and improving ecosystem functionality. To this end, it is important to support all possible interventions with appropriate monitoring of environmental parameters.</p>

<p>PROPERTY OF SET DISTRIBUZIONE Valsugana - low</p>	<p>The Cenon di Sopra PTP and Cavallara PTP (pole-mounted transformer) equipment fall within the Val Campelle special conservation area and cover a surface area of 1 m², and within the Lagorai special protection area, Natura 2000 Habitat site for Acidophilous montane and Picea alpine forests. Highly natural environment. It includes forests, mountain grasslands, high-altitude rocky environments and various types of wetlands. There are notable floristic rarities and endemisms, in addition to the presence of exceptional vegetation aspects. As many as 35 habitats of community interest have been registered in this area. In Vanoi and Val Campelle, there are silver fir forests of considerable interest, as the species is in decline in the Alpine arc. The site is of significant interest for the presence and reproduction of endangered animal species, important glacial remains, exclusive and/or typical of the Alps. Wildlife species include the Chamois, Roe Deer, Marmot, Mountain Hare, Fox, Marten, Ermine. Among the birds, there is a notable wide variety of galliformes: Capercaillie, Black Grouse, Rock Ptarmigan, Francolin, Rock Partridge. The golden eagle is nesting, the Bearded Vulture is incidental. There is a good presence of daytime and nocturnal birds of prey. The presence of species on the western edge of their range such as the three-toed woodpecker and the black salamander is noteworthy. Presence of Annex II invertebrates, indicators of forests with a high degree of naturalness.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Stelvio National Park - Trentino sector</p>	<p>The equipment Piazzola PTP, Maset PTP, Sonrabbi PTP, M. Ponteve PTP, Ferraion PTP, Vertice 4 PTP, Gaggio PTP, St. Cazuffi PTP, Asilo PTP, Cogolo Parco PTP (pole-mounted transformer) fall within and are adjacent to the Stelvio special conservation area, Stelvio National Park - TN sector, occupying a surface area of 1 m². Excellent conservation status of the high-altitude ecosystems, which are virtually intact. The site is of significant national and/or provincial interest for the presence and reproduction of endangered animal species, important glacial remains, exclusive and/or typical of the Alps. Measures resulting from the Park.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Valle del Chiese</p>	<p>The Dos Cedrina PTP equipment (pole-mounted transformer) adjacent to the Condino Special Area of Conservation and Natura 2000 Habitat for Castanea sativa woodland occupies a surface area of 1 m². Interesting examples of thermophilous vegetation and flora, among which the arboreal heather is of considerable botanical interest. The main management objective is to maintain traditional farming and forestry practices that have created and maintained a good level of biodiversity over time.</p>

<p>PROPERTY OF SET DISTRIBUZIONE Sarca Valley</p>	<p>The Gaggiol PTP equipment (pole-mounted transformer) falls within the expansion of the Marocche di Dro special conservation area, as well as a nature reserve and Natura 2000 habitat for western Mediterranean and Thermophilic scree. It covers a surface area of 1 m². Exceptional detrital environment on the valley floor with a very suggestive moonscape, of great interest for the phenomena of colonisation by vegetation. The Marocche di Dro are a particularly interesting geographical feature due to their particular conformation, which originated over time from a series of landslides in a moraine environment. The plants that grow there have also adapted to the marked aridity and humus-poor conditions. The fauna is also closely conditioned by the microclimatic characteristics. Reptiles and birds associated with the bush and shrubs are abundant. Management must be geared towards preserving the environment in its integrity.</p>
<p>PROPERTY OF SET DISTRIBUZIONE La Rocchetta – Mezzolombardo (TN)</p>	<p>The Moncovo PTP equipment (pole-mounted transformer) is adjacent to the La Rocchetta special protection area and occupies a surface area of 1 m², a site of considerable importance also for the nesting, rest and/or wintering of highly active bird species declining at European level. For this reason, it has also been designated as a Special Protection Area under the Birds Directive. The management objective is to maintain the ecosystems in a good state of conservation by introducing where appropriate the most suitable measures to improve connectivity with other similar natural or natural-like complexes. Natura 2000 Habitat Site and Nature Reserve.</p>
<p>MANAGEMENT OF SET DISTRIBUZIONE Valsugana - low</p>	<p>The Ittica Selva PTP equipment (pole-mounted transformer) is adjacent to the Fontanazzo special protection area, occupies a surface area of 1 m², and is a biotope of vital importance for the reproduction of many amphibian and reptile species. The site is also an important area for the nesting, rest and/or wintering of protected or strongly declining bird species at European level. Important site inhabited by invertebrates of Annex II of the European Habitats Directive linked to humid sites and today in strong decline, and of invertebrates indicators of good naturalness of flowing waters. The main management objective is to maintain high levels of biodiversity and improve ecosystem functionality and connectivity, including through the creation of suitable ecological corridors. Also a Natura 2000 Habitat Site and Nature Reserve.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Valle delle Giudicarie</p>	<p>The Condotta PTP equipment (pole-mounted transformer) falls in the Palù di Boniprati special conservation area and occupies a surface area of 1 m². The presence of a transitional peat bog with a rather substantial peat thickness (up to 70 cm) is notable. The peat bog has a significant natural value, both from a botanical perspective and in terms of its fauna, as it is a vitally important biotope for the reproduction of amphibians and reptiles. Natura 2000 Habitat Site and Nature Reserve.</p>

<p>PROPERTY OF SET DISTRIBUZIONE Valsugana - high</p>	<p>The Zont PTP equipment (pole-mounted transformer) is adjacent to the ZSC Assizzi Vignola special conservation area and occupies a surface area of 1 m². The area is a residual nucleus of great vegetational interest, of mesophilous deciduous forests of the hilly plain, in the process of regression throughout the pre-Alpine belt. The main management objective is therefore the enhancement, through appropriate silvicultural practices, and the conservation of the residual nuclei of mesophilous deciduous forests of the hilly plain. Also Natura 2000 Habitat site.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Mori (TN)</p>	<p>The Manzano PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the ZSC Manzano special conservation area, a site representative of a relic of traditional agro-pastoral landscape, in which the vast expanse of arid-steppe meadows, which are home to a number of floristic rarities (for example orchids) of considerable interest, some of which are linked to traditional agro-pastoral practices. The main management objective is therefore to maintain, also through targeted actions, the presence of the mosaic of arid meadows interspersed with groves, cultivated fields and hedges and with it the high levels of biodiversity that still characterise the site. Natura 2000 Habitat site.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Monte Baldo di Brentonico</p>	<p>The Doss Casina PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and falls within the special ZSC conservation area of Monte Baldo di Brentonico, a vegetal landscape in balance between naturalness and traditional silvo-pastoral activities; the presence of endemic species is exceptional. The site is also of interest from the point of view of its fauna, due to the presence of animal species, glacial remains, which are in sharp decline in the Alpine area, as well as the presence of invertebrates linked to forests in good natural condition. Management will therefore mainly be aimed at conserving the open vegetation environments which, being mostly of anthropogenic origin, are exposed to the consequences of the abandonment of traditional activities. Natura 2000 Habitat site.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Valle dei laghi</p>	<p>The Maso Travolt PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the ZSC Terlago special conservation area, appreciable for the rich aquatic vegetation (hydrophytes), bank flora and the presence of dry meadows rich in orchids. It is also an important area for the nesting, rest and/or wintering of protected or strongly declining bird species, and/or those with a localised distribution in the Alps. The main management objective is the conservation of the high territorial diversity linked above all to humid environments and arid areas, which are highly vulnerable. Natura 2000 Habitat site.</p>

<p>PROPERTY OF SET DISTRIBUZIONE Valle dei laghi</p>	<p>The Lido PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the ZSC Terlago special conservation area, appreciable for the rich aquatic vegetation (hydrophytes), bank flora and the presence of dry meadows rich in orchids. It is also an important area for the nesting, rest and/or wintering of protected or strongly declining bird species, and/or those with a localised distribution in the Alps. The main management objective is the conservation of the high territorial diversity linked above all to humid environments and arid areas, which are highly vulnerable. Natura 2000 Habitat site.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Val di Cembra</p>	<p>The S. Colomba PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the special conservation area ZSC Lago di Santa Colomba, almost completely occupied by the lake and a peat bog adjacent and hydraulically connected to it. Around the lake there is a belt of reeds that in some areas tend to expand at the expense of more interesting types of vegetation. The lake and the vegetation complex on the banks and in the vicinity are fortunately still in a fairly good state of preservation. Therefore, the main conservation objective is to preserve the vegetation of the peri-lake and peat bog environments. Monitoring the floristic and chemical-physical characteristics of the peat bog and water, controlling all possible causes of eutrophication, and controlling any expansion of the reed thicket are important. Natura 2000 Habitat site.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Cimego (TN) – Valle del Chiese</p>	<p>The Porte CIM PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the Natura 2000 Habitat Site for <i>Castanea sativa</i> forests.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Mezzolombardo (TN) – La Rocchetta</p>	<p>The Maso Cimana PTP equipment (pole-mounted transformer) occupies a surface area of 1 m² and is adjacent to the area outlined as the expansion project of the La Rocchetta biotope.</p>
<p>PROPERTY OF SET DISTRIBUZIONE Adamello Brenta Nature Park.</p>	<p>The Nembia primary cabin occupies a surface area of 12 m² and falls within the special conservation area of the Brenta Dolomites, Adamello Brenta Natural Park, Natura 2000 Habitat Site for beech forests. Area characterised by the presence of mowing meadows of significant natural and landscape value. Measures resulting from the Park.</p>
<p>PROPERTY OF NOVARETI - GAS SERVICE Val di Fiemme</p>	<p>The gas user reduction group no. 332 G001 occupies a surface area of 3 m² and falls within the Molina – Castello special protection area, a site of considerable importance for the nesting, rest and/or wintering of protected or rapidly declining bird species. The main management objective is therefore to conserve the grassy vegetation, especially steppe vegetation.</p>

<p>PROPERTY OF NOVARETI - GAS SERVICE Valsugana - low</p>	<p>The final gas reduction group no. 017 G056 occupies a surface area of 18 m² and is adjacent to the Fontanazzo special protection and special conservation area. It is a beautiful example of a valley floor alder grove, an environment which has unfortunately become rare. The wet forest is very impressive in places due to the presence of canals that are now abandoned and completely submerged by vegetation. This is a vitally important biotope for the reproduction of many amphibian and reptile species. The site is also an important area for the nesting, rest and/or wintering of protected or strongly declining bird species at European level. Important site inhabited by invertebrates of Annex II of the European Habitats Directive linked to humid sites and today in strong decline, and of invertebrates indicators of good naturalness of flowing waters. The main management objective is to maintain high levels of biodiversity and improve ecosystem functionality and connectivity, including through the creation of suitable ecological corridors. Natura 2000 Habitat Site and Nature Reserve.</p>
<p>PROPERTY OF NOVARETI - GAS SERVICE Mezzolombardo (TN) – La Rocchetta</p>	<p>The initial gas reduction group no. 045 G005 and final gas reduction group no. 045 G007 occupy a total surface area of 48 m² and are adjacent to the special protection area and the special conservation area La Rocchetta, a relic of willow riparian vegetation, an environment that is increasingly in decline and has now become rare. The site is also of importance for the nesting, rest and/or wintering of bird species that are in sharp decline at European level. For this reason it has also been designated as a Special Protection Area under the Birds Directive. The management objective is to maintain the ecosystems in a good state of conservation by introducing where appropriate the most suitable measures to improve connectivity with other similar natural or natural-like complexes. Natura 2000 Habitat Site and Nature Reserve.</p>
<p>PROPERTY OF NOVARETI - GAS SERVICE Val di Fiemme</p>	<p>The final gas reduction groups no. 311 G006 and initial gas reduction group no. 311 G005 cover a surface area of 3 m² and are adjacent to the special lake conservation area (Val di Fiemme), a site linked to the relict presence of <i>Myricaria germanica</i>, a typical species of undisturbed river beds, which occupies floods of rivers or streams with high flow rates, often near confluences. This presence is of considerable phytogeographic importance as the species with its habitat is strongly declining throughout the Alps and has almost completely disappeared in Trentino. The main aim of management is therefore the conservation of <i>Myricaria germanica</i> vegetation and the restoration of degraded areas. Natura 2000 Habitat site.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Trento (TN)</p>	<p>The Doss Trento Reservoir is adjacent to the Natura 2000 Habitat site called Doss Trento and occupies an area of 34.3 m². In fact, in addition to historical and cultural interests, the Reserve has interesting floristic and vegetational aspects and is a very important station from a bio-geographical point of view.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Rovereto (TN)</p>	<p>The Campana dei Caduti Reservoir is adjacent to the Natura 2000 Habitat site - Monte Zugna for the presence of hop hornbeam species and occupies a surface area of 87 m².</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Rovereto (TN)</p>	<p>The Spino spring falls within a larger area of particularly valuable landscapes of extremely high naturalistic forestry-pastoral value and occupies a surface area of 220 m².</p>

<p>PROPERTY OF NOVARETI - WATER SERVICE Trento (TN)</p>	<p>Pozzo Spini is adjacent to the Foci dell'Avisio special conservation area, as well as a Nature Reserve, and occupies a surface area of 535 m². The site is important due to the presence of a fragment of valley floor riparian environment, a rare environment that has been destroyed almost everywhere. It is particularly significant for the nesting, rest and/or wintering of bird species that are in sharp decline at European level. Of note is the presence of lepidoptera included in Annex II of the Habitats Directive, indicators of wetlands with a conservation level and invertebrates, indicators of good naturalness of flowing waters. The main management objective lies in maintaining the level of biodiversity, improving the functionality of ecosystems and establishing ecological corridors that allow better ecological continuity.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Ravina di Trento (TN)</p>	<p>The Ravina Reservoir and the new Ravina Spring plants occupy a surface area of 177 m² and are adjacent to the Ravina Ravine special conservation area, a wild environment with forests, shrubbery and alpine meadows. The site is of significant interest for the presence of endangered animal species, glacial remains, exclusive or typical of the Alps that find suitable conditions for reproduction here. The main management objective is therefore the conservation of the high naturalness levels of the site, which is almost inaccessible for large stretches.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Nomi (TN)</p>	<p>The Sorgente and Bersaglio reservoirs in Nomi are within the Servis special conservation area and occupy a surface area of 87m². Particularly interesting area from a floristic point of view: there are numerous thermophilic species which are very rare in Trentino. Also noteworthy is the flora of the humid microenvironments, which includes for example the only known station in the region of <i>Plantago altissima</i>. These environments are also vital for the reproduction of many amphibian and reptile species. Main management objective: maintaining high biodiversity (linked above all, but not only, to arid meadows and wet meadows), which originated over the centuries through a delicate balance between natural emergencies and traditional agro-pastoral practices.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Nomi (TN) - Vallagarina</p>	<p>The Montecorona Reservoir is adjacent to the Servis special conservation area and occupies a surface area of 62 m². This area is particularly interesting from a floristic point of view: numerous thermophilous species that are very rare in Trentino can be found here. Also noteworthy is the flora of the humid microenvironments, which includes for example the only known station in the region of <i>Plantago altissima</i>. These environments are also vital for the reproduction of many amphibian and reptile species. Main management objective: maintaining high biodiversity (linked above all, but not only, to arid meadows and wet meadows), which originated over the centuries through a delicate balance between natural emergencies and traditional agro-pastoral practices.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Mori (TN)</p>	<p>The Nomesino, Manzano and Corniano reservoirs are within the Manzano Special Area of Conservation and occupy a surface area of 109 m². The site is a relic of traditional agro-pastoral landscape, in which the vast expanse of arid-steppe meadows, which are home to a number of floristic rarities (for example orchids) of considerable interest, some of which are linked to traditional agro-pastoral practices. The main management objective is therefore to maintain, also through targeted actions, the presence of the mosaic of arid meadows interspersed with groves, cultivated fields and hedges and with it the high levels of biodiversity that still characterise the site.</p>

<p>PROPERTY OF NOVARETI - WATER SERVICE Avio (TN)</p>	<p>The Pealda Dx spring in Avio is within the Monti Lessini west special conservation area and occupies a surface area of 26 m². Area with a high degree of biodiversity, low anthropisation and rich in rare species. The site is of significant interest for the presence and reproduction of animal species, glacial remains typical of the Alps, which also find suitable conditions for reproduction here. The presence of xylophages of Annex II of the Habitats Directive 92/43/EEC, indicators of mature and intact broadleaf forests, is also significant. The most important management objective is to preserve the mosaic of plant formations, paying particular attention to open areas.</p>
<p>PROPERTY OF NOVARETI - WATER SERVICE Ala (TN)</p>	<p>The Torte spring in Ala is within the Talpina - Brentonico special conservation area, occupying a surface area of 9 m² where rare species linked to a traditional agriculture that is disappearing can be found. Stopping and breeding site for long-distance migratory birds and breeding habitat for thermophilic species retreating to the Alpine arc. Of note is the recently confirmed presence of at least 5 different species of bats. The main management objective is the conservation of the mosaic of arid meadows interspersed with cultivated fields, groves and hedges which determines the good level of biodiversity of the site.</p>
<p>PROPERTY OF NOVARETI- SEWERAGE SERVICE Nomi (TN) - Vallagarina</p>	<p>The Nomi lifting plant is adjacent to the Servis special conservation area and occupies a surface area of 12 m². Particularly interesting area from a floristic point of view: there are numerous thermophilic species which are very rare in Trentino. Also noteworthy is the flora of the humid microenvironments, which includes for example the only known station in the region of <i>Plantago altissima</i>. These environments are also vital for the reproduction of many amphibian and reptile species. Main management objective: maintaining high biodiversity (linked above all, but not only, to arid meadows and wet meadows), which originated over the centuries through a delicate balance between natural emergencies and traditional agro-pastoral practices.</p>

Within the areas containing species included in the national conservation list and the IUCN red list, the Group takes into consideration the species, for example, of fish potentially affected by the activities of the hydroelectric plants of the Hydro companies Dolomiti Energia, SF Energy, Dolomiti Edison Energy and Dolomiti Energia Holding.

In the field of electricity distribution, a project

was also completed to protect quadrupeds near SET Distribuzione's Primary Cabins. Accidental incidents of quadrupeds (cats or martens) accidentally coming into contact with live equipment in the vicinity of the Primary Cabins were considered here. In particular, the medium-voltage busbars of the HV/MV transformers were insulated to prevent contact with the above-mentioned quadrupeds. The bars were insulated with heat-shrinkable tapes.



'LET'S CLEAN UP THE LENO' INITIATIVE

The Group company Dolomiti Ambiente participated in the 'Let's clean up the Leno' initiative in May 2023, in collaboration with the Municipality of Rovereto. It was a day during which citizens, associations and volunteers dedicated their time to cleaning the banks of the city stream and surrounding areas. Abandoned waste, rubbish and various objects were collected and sorted by the participants once they reached the final destination of the route along the bike path, near Borgo Sacco.

6.7.1 SAFEGUARDING BIODIVERSITY IN HYDROELECTRIC PRODUCTION

The impacts connected to the activities of the Group's hydroelectric production companies on the environmental components, including the protection of water quality, soil, ecosystems and the conservation and restoration of biodiversity, essentially refer to the possible damage caused by the presence of hydraulic works throughout the territory, including in emergency situations or extreme events, and deriving from ordinary and extraordinary maintenance activities on the works related to the plants.

Significant direct impacts on water quality potentially related to the operation of hydroelectric plants concern the alteration of outflows and solid transport in watercourses, possible damage to land and increased turbidity in watercourses in conjunction with extreme weather events due to dam management and weirs designed to prevent the blockage of reservoirs and the collapse of hydraulic works (such as canals, penstocks, dams) with possible damage to people and property.

There is also a potential impact of soil contamination due to spills that could occur as a result of leaks of oil and other hazardous substances from hydraulic circuits for lubrication and electrical insulation, from the hydraulic controls of manoeuvring devices, or from tanks and reservoirs used for storage.

In order to prevent impacts on and in the soil, the Group's hydroelectric production companies carry out the routine maintenance of equipment containing oil and other hazardous substances, alarm systems capable of signalling the possible presence of hazardous substances in process water, staff training and awareness-raising also through the performance of emergency spill simulations, the use of above-ground tanks - where possible of reduced size - and the control and

maintenance of efficient trap tanks and underground double-chamber tanks. Special management procedures are provided for this purpose.

In the area of water discharges, the impacts identified concern the possible release of pollutants into watercourses from power plant drainage water or water used in open-cycle cooling circuits, and the dispersion of hydrocarbons into surface waters as a result of ruptures or leaks in hydraulic systems.

For the mitigation and prevention of impacts on water discharges, trap tanks are provided that are capable of separating oil accidentally present in process or drainage water from machinery and power plants before it is returned to the environment. These tanks are also guarded by special alarm systems that detect the presence of oil. Management procedures are provided for this purpose.

In addition, an annual self-monitoring sampling campaign is carried out on all water discharges connected to the hydroelectric plants.

The impacts potentially related to ecosystems and biodiversity concern the transitory modification of the water regime of the watercourses affected by the reservoir emptying operations and the consequent downstream release of sediments with effects on the river ecosystem (reservoir emptying, water turbidity, downstream movement of fish fauna, etc.) and the possible imbalance of the variety and density of fish populations along the different river stretches due to the presence of the weirs and the consequent modification of the natural runoff, reduced by the presence of the intake works - impact resolved by the release of the ecological flow. This release improves life in the underlying riverbeds

and also contributes to improving the balance of the ecosystems concerned. The flow rate values and release methods are prescribed by the Autonomous Province of Trento, in agreement with the Adige Basin Authority, in accordance with the provisions of the General Plan for the Use of Public Waters and the Water Protection Plan. Downstream of the intake works, the ecological flow has created a particularly favourable habitat for the reproduction of fish fauna, as the flow rate has reduced variations which favour both the laying and hatching of eggs and the subsequent growth of the fry.

The actions taken to prevent or mitigate impacts on water resources basically involve the implementation and maintenance of an efficient flow control system for the correct release of ecological flow and the civil structures of the hydraulic works. As far as flood management is concerned, the Emergency Flood Management Plan is active in cooperation with the provincial and regional authorities of the watercourses affected by the dams managed by the Group companies.

In addition to the above, the Group companies indirectly acquire useful information on the state of the bodies of water on which the hydroelectric plants interfere through the results of the measurement campaigns carried out by the provincial administration through its competent services and reported in the Water Protection Plan: this describes the state of the water and the impact of anthropic activities on surface and groundwater, as well as measures to improve existing criticalities. Analysis of the data in the map shows that the hydroelectric usage associated with the Group's plants is not particularly critical for the waterways involved.

In addition, there is a potential positive impact on the ecosystems and territory downstream of the barrages due to the management of the artificial reservoirs in the event of floods: in particular, thanks to weather forecasts and proper man-

agement through the interception organs of the weirs present on some of the main watercourses, the initial attenuation of the flood wave can be carried out due to the accumulation capacity of the reservoirs (lamination effect), thus considerably reducing the risk of flooding of the watercourse downstream of the weir.

As stated in the Integrated Environment and Safety Strategy, the Group's hydroelectric power generation companies are committed to carrying out all activities related to hydroelectric power generation in an environmentally friendly manner and in compliance with EU, national and provincial regulations. In addition, it pays attention to how facilities are inserted in the territory, considering the landscape aspects of existing and to-be-built structures and infrastructures, and the influence of the facilities on the solid transport of the watercourses. The organisation's environment and processes are systematically and critically analysed and evaluated in order to pursue improvement through the adaptation of operating procedures, the definition of targeted objectives and targets, and the involvement of suppliers and contractors in the improvement of environmental performance.

The Group annually assesses and defines the measures to be taken to prevent possible negative impacts and checks that these measures are complied with in the course of the activities of its internal staff and those of its suppliers.

Some of the Group's companies have an integrated environmental and safety management system through which they keep processes and activities under control in order to pursue the continuous improvement of environmental performance at the sites where they operate.

The effectiveness of the actions taken is constantly monitored through the use of control and alarm systems installed at facilities and related works.

Given the relevance of these aspects, the Group is committed to actively involving stakeholders in the management of actions taken to reduce and mitigate possible impacts. For example, with regard to dam management during flood events, the Group actively collaborates with the provincial authorities in both the forecasting and operational phases.

In addition, in 2023, Hydro Dolomiti Energia completed the 'Extraordinary Alto Garda fish restocking 2019-2022' project, promoted by the Basso Sarca Fishers Association. This project sought to restore the local fish fauna through the consistent introduction of fish into the waters of the Sarca River, the Rimone channel and the Cavidine, Toblino and Santa Massenza Lakes, in addition to what is already envisaged by the provincial management plans, in order to cope with the depletion caused by the Vaia storm of 2018

and the increasing predation by some species of fish-eating birds. In general, however, an annual restocking of fish fauna in the basins is planned, in agreement with the fishermen's associations, the quantity of which is monitored through an indicator in their Environmental Statements.

Also with reference to listening to stakeholders, the Group has adopted a procedure for collecting suggestions from employees and third parties in order to continuously improve its environmental management.

The Environmental Policy adopted by the companies with EMAS certification and an environmental management system that includes the drafting and adoption of specific policies is communicated to external companies that frequently operate on the plants, and is also included in the documentation for requests for new supplies.

THE IMPETUS PROJECT

The IMPETUS project involving Hydro Dolomiti Energia involves testing and defining solutions to help the Valle dei Laghi (located in western Trentino, where there are also some hydroelectric plants) adapt to the effects of climate change. IMPETUS is a four-year project aimed at accelerating Europe's response to climate change. The Valle dei Laghi site constitutes the 'Mountains-montano' case study of the IMPETUS project. It is one of seven sites in different bioclimatic regions of Europe where innovative solutions to strengthen resilience to climate change will be tested and demonstrated; the other sites are in Germany, Greece, Norway, Spain, Latvia and the Netherlands.

6.7.2 SAFEGUARDING BIODIVERSITY IN ELECTRICITY DISTRIBUTION

The Group fulfils its commitment to safeguarding biodiversity in electricity distribution by paying special attention to areas of environmental importance, such as Special Protection Areas, Sites of Community Importance, Provincial Nature Reserves, Local Reserves, Biotopes and Special Areas of Conservation where the company operates.

More specifically, the presence of electricity grids and sub-cabins can have an impact on the natural environment, which is why SET Distribuzione undertakes works every year that also aim to return portions of the forest to the natural environment in which we live.

Digitally mapping these areas enables SET Distribuzione to design its new plants minimising their environmental impact, for example by moving the plants outside the protected areas, choosing construction solutions or materials that are more suitable for the type of natural environment in which they will be located.

To this end, the company's systems have been traced: consisting of linear elements, they are made up of kilometres of medium and low voltage lines and sometimes intersect with protected areas.

Distribution network in sensitive areas in terms of biodiversity

	UoM	2023		2022	
		Underground	Overhead	Underground	Overhead
Medium voltage grid	km	45	27	45	27
Low voltage grid	km	61	9	58	9

Many investments have been made over the years that have led to the return of wooded areas to the territory, carried out by burying cables, ensuring the protection of birdlife, the containment of electromagnetic fields and, more generally, the resto-

ration of landscapes.

Since 2014, some 208 hectares of forest, corresponding to approximately 313 football pitches, have been recovered.

Woodland restored by burying/insulating cables

	UoM	2023	2022	2021
Returned forest	hectares	5,78	24,50	17,03

Another safeguarding activity is the reduction of pole-mounted transformers in the most protected areas, so as to avoid the possibility of pollutant spills in the event of a breakdown or adverse

weather conditions. With this in mind, for some years now SET Distribuzione has only been building new sections of medium-voltage (MV) line in underground cable or overhead cable for special

situations, and no new pole-mounted transformers have been built. The new MV/LV transformers are all insulated with vegetable oil.

Power lines require constant maintenance to reduce the probability of failure. In this sense, the presence of tall trees near bare overhead conductor power lines can also create fault situations, as well as reduce the resilience of the power grid. Spills and discoveries of polluting materials are always followed with meticulous precision by SET Distribuzione staff. Any environmental incidents (whether spills or finds) are properly dealt with while observing strict protocols for the proper disposal and clean-up of the affected area.

Spills are mostly due to accidental damage from bad weather which damages structures such as pole-mounted transformers and causes leaks of pollutant (insulating oil). Should such incidents occur, the affected area is immediately analysed and redeveloped through works and excavations.

Thanks in part to projects aimed at reducing the likelihood of such incidents, SET Distribuzione did not encounter any significant spills in 2023.

For some years now, SET Distribuzione has been collaborating with the Sustainable Development and Protected Areas Service of the Autonomous Province of Trento to carry out mitigation work on the impact of power lines on birdlife (eagle owls, etc.). The interventions refer to the insulation of conductors and insulators in particular areas, mapped by the Autonomous Province of Trento. In 2023, SET Distribuzione completed a number of interventions begun in 2022 in the Val di Non area, in addition to the interventions carried out in previous years in the Adige Valley, Alta Val di Cembra, Sarca Valley, Brentonico Plateau, and Nago. Below are some examples of the most significant support carried out in 2023: The trials represent a further step in the sustainability process undertaken by SET Distribuzione to provide a service such as electricity distribution, which is essential for everyday life, with a lower environmental impact.

6.7.3 SAFEGUARDING BIODIVERSITY IN GAS DISTRIBUTION

Awareness of the importance of Novareti's relationship with the land plays a key role in the decisions that are made regarding environmental protection. Novareti has adopted a specific policy on environmental matters in which it has publicly stated its commitment to do business responsibly and sustainably, acknowledging the importance of what has been internationally approved in this field.

Specifically, the possible risks from gas distribution activities consist of impacts on soil and subsoil, odour contamination and emissions of climate-changing gases into the atmosphere.

In carrying out its activities, Novareti adopts a preventive approach based on context analysis and risk assessment in order to prevent or limit

possible negative effects and seize opportunities when they arise. The primary objective is the pursuit of business growth through the technological innovation of equipment and development of human resources to promote a service that complies with legislation and the best standards of the market in which it operates. The respect for people and attention to sustainability are also essential, as well as strategic factors and opportunities for growth in pursuit of the company's development goals.

The protection of the environment, health and safety are therefore considered a priority and are fundamental in the planning and performance of every work activity of the company.

The effectiveness of the system and the implementation of the strategy require the awareness, commitment and responsibility of all, which is why Novareti is committed to increasing the 'culture for quality, environment, health and safety' of the people working in and on behalf of the company. To encourage continuous improvement in the quality level of its services and to limit its environmental impact, Novareti has organised its

management according to precise, internationally recognised company standards. In particular, Novareti boasts an integrated management system for quality, environment, health and safety, compliant with UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and UNI EN ISO 45001:2023 standards, as an organisational model capable of measuring and continuously improving company performance.

6.7.4 SAFEGUARDING BIODIVERSITY IN WASTE COLLECTION AND URBAN HYGIENE

Dolomiti Ambiente's commitment to the protection of natural resources and biodiversity is carried out through daily monitoring actions. In particular, in order to reduce the risk of soil and water contamination, particularly for the Tangenziale Ovest site in Trento, projects were started in 2022 for the redevelopment of the integrated centre, the buildings housing the offices and operating spaces, the area's water collection system, and the refurbishment with relocation of the biological purification plant, still in progress as at 31 December 2023.

As explained in section 3.1.8, one of the company's primary objectives is also the transition to increasingly electric mobility, which is also aimed at

mitigating and preventing the negative impacts on the soil caused each year by oil spills from sweepers and mechanical vehicles; in 2022, a biodegradable type of hydraulic oil was also introduced to reduce impacts.

In order to foster continuous improvement in the quality level of its services and to limit its environmental impact, Dolomiti Ambiente has adopted an integrated management system for quality, environment, health and safety, which complies with UNI EN ISO 9001:2015, UNI EN ISO 14001:2015 and UNI EN ISO 45001:2023 standards, as well as EMAS registration as an organisational model capable of measuring and continuously improving company performance.

6.8

DISCLOSURE PURSUANT TO REGULATION (EU) 2020/852 ON THE TAXONOMY

GRI 3-3 Consideration of ESG-related risks and opportunities in business development and strategy |

GRI 2-27 | GRI 206-1 |







The European Taxonomy was designed and defined to help companies and investors take real steps and make informed choices towards a resilient, low-carbon, resource-efficient economy. It is an important tool in the strategy outlined to steer the transition to a low-carbon economy and help to achieve the objectives of the European Green Deal. It provides clear and structured guidance for identifying economic activities that significantly contribute to environmental sustainability goals, enabling market participants to make informed investment and policy decisions. This integrated approach is designed to ensure comparability, consistency and to protect investors from greenwashing practices. It is essential to address the complex and interconnected environmental chal-

lenges the world faces today.

Introduced through EU Regulation 2020/852, the Taxonomy clearly and precisely defines the conditions an economic activity must fulfil in order to be considered environmentally sustainable.

The first EU Delegated Regulation 2021/2139 was published in 2021, covering two objectives: climate change mitigation and climate change adaptation. This first list of environmentally sustainable activities was supplemented, again for the same objectives, in 2022 with the publication of EU Delegated Regulation 2022/1214 relating to the Gas and Nuclear sectors.

Finally, EU Delegated Regulations 2023/2485 and 2023/2486 completed and supplemented the regulatory framework in 2023.

 <p>CLIMATE CHANGE MITIGATION</p>	 <p>CLIMATE CHANGE ADAPTATION</p>
 <p>SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES</p>	 <p>CIRCULAR ECONOMY</p>
 <p>POLLUTION PREVENTION AND CONTROL</p>	 <p>PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS</p>

To be considered environmentally sustainable - and consequently 'aligned' with the Taxonomy - an activity must:

- contribute substantially to at least one of the six environmental objectives, and therefore comply with the technical screening criteria set out;

- not cause significant harm to any of the other environmental objectives, i.e., ‘Do No Significant Harm’ (DNSH);
- comply with the minimum safeguards (such as the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight core conven-

tions identified in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights).

If the activity does not meet the above points but is nevertheless described within the Delegated Regulations, it is defined as eligible and not aligned.

6.8.1 THE COMMITMENT OF THE DOLOMITI ENERGIA GROUP

The Group has again started the process of analysing the renewed regulatory framework in order to update the Taxonomic indicators in 2023. The project involved the business managers and various departments of the parent company in

order to identify which among the activities carried out can be considered eligible or eligible and aligned on the basis of the Delegated Regulations, and identify the corresponding proportions of turnover, CapEx and OpEx.



In a first step, the analysis took into account the NACE codes (and the corresponding ATECO codes) of each company in the scope. In this regard, it should be noted that following a methodological refinement, SF Energy was excluded from the scope considered for 2023.

Subsequently, an assessment was carried out on the merits of the economic activities actually conducted by the Group companies in order to verify their correspondence with the descriptions included in the Delegated Regulations. The outcome of this mapping made it possible to identify

which economic activities could be considered ‘eligible’ and which ‘non-eligible.’

More specifically, with reference to financial year 2023, the list of activities was updated and supplemented with the eligible activities set out in Delegated Regulations (EU) 2022/2485 and (EU) 2023/2486: the former includes new economic activities relating to the first two objectives, while the latter presents the list of environmentally sustainable economic activities relating to the remaining four environmental objectives. The aforementioned regulations require that only eli-

gibility be analysed starting from 1 January 2024, while alignment will be required from 1 January 2025.

Once the eligible economic activities were identified, in order to ascertain their alignment, the following were then analysed and evaluated:

- the technical screening criteria specifically envisaged for the economic activity and the environmental objective;
- compliance with the “Do No Significant Harm” principle in relation to the other five environmental objectives.

Finally, pursuant to Art. 18 of Regulation (EU) 2020/852, for each eligible economic activity, compliance with the minimum safeguard requirements and in particular with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the principles and rights established by the International Labour Organisation (ILO) and the International Bill of Human Rights was assessed. In this respect, the Group’s procedures and processes were analysed for compliance with human and labour rights, corruption, taxation and competition.

- Human Rights: The Group’s commitment is manifested not only in the Code of Ethics, but also through the adoption of the Human Rights Policy, which is inspired by international principles and guidelines, such as those published by the United Nations and the ILO. It applies to directors, employees and associates, including subsidiaries and whoever working in the name and on behalf of the Dolomiti Energia Group;
- Anti-Corruption: Observance of the laws and the committed fight against corruption are clearly established in the Group Code of Conduct, given tangible form in the working practices and methods defined and circulated through the company procedures, and sup-

ported, promoted and monitored through a system of communication, training and constant monitoring.

- The Code of Conduct is aimed at defining and disseminating the Group’s ethical principles and rules of conduct that must be observed by all those who - within the scope of their functions and responsibilities - work to achieve the Group’s corporate objectives, in order to mitigate the Group’s risks and foster the achievement of corporate objectives through a culture of fairness, integrity, transparency and competence that must be the hallmark of corporate activities. The Group Code of Conduct is approved by the Board of Directors of the Parent Company and is adopted by the Boards of Directors of the single subsidiaries.
- Management of tax practices: The Dolomiti Energia Group recognises the importance of correct and precise administration of its financial flows and resources in order to protect the interests of its stakeholders, including, in particular, shareholders, the Public Administration and the reference Community. The Dolomiti Energia Group consists of companies with registered offices in Italy; therefore, in compliance with tax legislation, all the companies pay taxes to the national tax authorities.
- Competitive practices: On 15 November 2023, the proceedings initiated by the AGCM against Dolomiti Energia S.p.A., and other players in the sector, for alleged unilateral changes in supply conditions were concluded. In its ruling, the AGCM recognised that in general the company’s conduct was correct, censuring only an interpretation of the rule linked to some particular situations determined by the overlap in time between the communications sent to customers and the entry into force of the rule itself. In any case, the penalty determined was extremely low (€50,000), also considering the prompt and total cooperation that the company provided to the AGCM and

the fact that after the issuance of its measures, the company promptly ordered the suspension of the application of the proposed new contractual conditions, essentially eliminating any negative impact on end customers. The company has always had as its primary objective the protection of the customer relationship and considers compliance with the law a fundamental value. It has always acted in good faith, with transparency and with the aim of offering the best contractual conditions feasible in a market context that has seen an increase and volatility in prices absolutely out of control and an objective difficulty in interpreting the

regulations of an exceptional nature that have been issued, confirmed by the fact that similar conduct has also been charged to many other market operators. The company therefore believes that it has always acted correctly and reserves the right, after analysing the measure in detail, to act as set out in the regulations so that the correctness of its actions be fully acknowledged.

As a result of the verifications described above, it was possible to identify eligible and aligned economic activities with reference to the different businesses managed.

 ELECTRICITY	<p>COMPREHENDS ALIGNED ACTIVITIES</p>	 NATURAL GAS	<p>COMPREHENDS ELIGIBLE ACTIVITIES</p>
 HEAT, STEAM, COOLING	<p>COMPREHENDS ELIGIBLE ACTIVITIES</p>	 ENVIRONMENT	<p>COMPREHENDS ALIGNED ACTIVITIES</p>
 INTEGRATED WATER	<p>COMPREHENDS ALIGNED ACTIVITIES</p>	 SMART SERVICES	<p>COMPREHENDS ALIGNED ACTIVITIES</p>

6.8.2 ECONOMIC RESULTS

After identifying the eligible activities and the activities aligned with the Taxonomy, the Group gathered the relevant economic data required to calculate the key performance indicators (KPIs) required by Regulation (EU) 2021/2178 et seq. through an analysis and mapping of the cost and profit centres associated with the previously identified activities.

In cases where the economic activities were eligible and aligned with environmental objectives, the economic data were counted only once for calculation purposes and the KPIs were calculated in the light of the guidance provided in the aforementioned regulation.

The results of the analysis show that the Group is active in five sectors identified by the Taxonomy: 'Energy', 'Water Supply, Sewerage, Waste Treatment and Decontamination', 'Construction and

Real Estate Activities' (which includes the installation of energy efficiency devices and renewable energy technologies), 'Research, Development and Innovation Close to the Market' and 'Manufacturing Activities' (which includes the manufacture and installation (and related services) of leakage control technologies that reduce and prevent leaks in water supply systems and the manufacture of automotive and mobility components).

The templates for illustrating the Key Performance Indicators (KPIs) as defined in Annex II of Regulation (EU) 2021/2178 et seq. (see Delegated Regulation (EU) 2022/1214 and 2023/2486), and the standard templates for the public disclosure of information referred to in Article 8, par. 6 and 7 in Annex XII, are set out in chapter '7.4 Annexes - Taxonomy KPIs.'



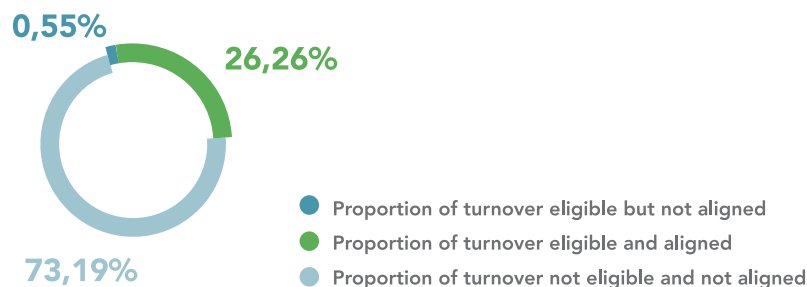
THE TURNOVER INDICATOR

With reference to the year 2023, 26.26% of turnover is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 0.55% to eligible but non-aligned economic activities.

The remaining 73.19% consists of non-eligible revenues from economic activities that are currently outside the scope of the Taxonomy.

Considering, on the other hand, the allowable proportion of turnover of 26.81% of total turnover, 97.94% of this is Taxonomy-aligned. This means that, if we were to consider the activities currently envisaged by the Taxonomy that are carried out by the Group and eligible, almost all of them would be able to contribute to the achievement of the six environmental objectives defined by the Regulation.

Turnover KPI



For the purpose of calculating the numerator of the turnover indicator, net revenues - identified on the basis of the consolidated financial statements - deriving from products and services, including intangible ones, associated respectively with the eligible and eligible and aligned economic activities were included. In the context of a continuous improvement process, during the revision and updating of the turnover KPI calculation process, the need was identified to change the approach used to define the denominator; specifically, for 2023, total net revenue (excluding other revenue) was considered as quantified in the 2023 consolidated financial statements. In order to ensure comparability and transparency, it should be noted that the turnover KPI for 2022, if the denominator had been the net revenue value with the approach identified for 2023, would have been 16.87% for the aligned portion and 0.94% for the eligible portion.

In the numerator, in line with last year, non-Group (consolidated) revenues were taken into account, as well as intra-group revenues for the hydroelectric production and gas and energy cogeneration and metering activities only.

In fact, the Group plays a key role in the country's energy transition, which is also realised through the production and sale of renewable energy produced by its plants. Disregarding this activity, since it is placed on the market through the Group's trading company, would mean penalising a fundamental element within the value chain of a sector that is central to the transition of the Italian and European energy system⁴⁶. The same would occur if the sale of electricity and heat invoiced to a trading company of the Group, which in turn has the contractual relationship with end customers, were to be excluded from revenue.

⁴⁶ The Taxonomy currently prescribes considering consolidated economic data (thus making the necessary inter-company eliminations). These indications are not consistent with the Group's structure and operation, in which the energy produced by the production companies is marketed through another Group company. This approach does not contribute to providing an accurate representation of the activities of the Dolomiti Energia Group, which is instead distinguished by its ability to produce - and supply to its customers - energy from renewable sources.

THE CAPITAL EXPENDITURE INDICATOR

For the year 2023, 69.23% of capital expenditure is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 0.31% to

eligible but non-aligned economic activities.

The remaining portion, 30.46%, refers to capital expenditure incurred by the Group in the exercise of economic activities that currently do not fall within the scope of the Taxonomy.

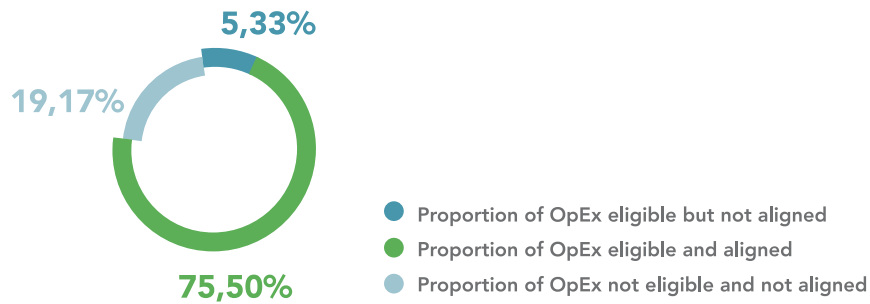


For the purpose of calculating the capital expenditure KPI, CapEx recognised in the assets of the consolidated balance sheet associated with the Group's eligible and aligned economic activities were included in the numerator, while additions to tangible and intangible assets considered before depreciation, amortisation, impairment and any revaluation were included in the denominator.

THE OPERATING EXPENDITURE INDICATOR

For the year 2023, 75.50% of operating expenditure is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 5.33% to eligible but non-aligned economic activities.

The remaining 19.17% consists of non-eligible operating expenditure incurred for economic activities that are currently outside the scope of the Taxonomy.



For the calculation of the KPI related to operating expenses, the numerator included operating costs - part of the denominator - relating to the Group's eligible and aligned economic activities respectively, while the denominator included non-capitalised direct costs related to research and development, building renovation measures, short-term rental, maintenance and repair as well as any other direct expenditure related to

the day-to-day maintenance of property, plants and equipment, either by the company or by third parties to whom these tasks are outsourced, including human resources training needs.

With reference to plant maintenance, the costs of purchasing the materials needed for maintenance work and the personnel costs attributable to such work were included.

APPENDIX





7.1

METHODOLOGICAL NOTE AND GUIDE TO INTERPRETATION

GRI 2-2 |

The publication of the Consolidated Non-Financial Statement, (hereinafter also referred to as the 'Statement') represents the instrument through which the Dolomiti Energia Group transparently communicates to all its stakeholders what has been done during the year with reference to environmental, social, ethical and economic issues, and how it intends to direct future orientations with a view to continuous improvement.

Now in its seventh edition, the Statement is prepared annually in accordance with Italian Legislative Decree 254/2016 (Articles 3 and 4) and following the international reference standards for sustainability reporting 'Global Reporting Initiative Sustainability Reporting Standards' - GRI Standards, published in 2021, as well as the Electric Utilities Sector Supplement, with an 'in accordance' level of application, which provides for the reporting of all the indicators under GRI 2 Universal Standard - General Disclosures and any disclosure directly attributable to the issues to be considered significant following the Materiality Analysis conducted.

ESMA's recommendations, which were also the subject of a Consob call for attention, on climate-related aspects and issues, with particular reference to the disclosure required by the European Taxonomy (Regulation (EU) 2020/852 and related Delegated Acts), Scope 3 indirect emissions, the setting of targets, initiatives and the description of progress achieved, were taken into account to the extent available for the purpose of preparing the Statement.

The identification and reporting of the contents of the Statement considered the following principles of the GRI Standards:

- Accuracy
- Balance
- Clarity
- Comparability
- Completeness
- Context of sustainability
- Timeliness
- Verifiability

The qualitative and quantitative data and information contained in the Statement refer to the Group's performance for the year ended 31 December 2023 and provide comparisons with the previous two financial years.

Where restatements have been made with respect to previous years' figures, this has been explicitly stated in the document.

For each topic, the Statement provides a framework of sustainability indicators useful for ensuring an understanding of the Group's activities, its performance and the positive or negative impact produced by them, with reference to issues relating to the environment, society, the business environment, staff, respect for human rights and the fight against corruption.

An attempt has been made within the document to give equal prominence to the positive and negative aspects, providing a commentary on the results obtained, where deemed appropriate.

The contents presented in the Statement have been identified as relevant for both the Group and for stakeholders through a materiality analysis process, defined in accordance with the new GRI 3 - Material Topics 2021. The organisation's most significant impacts on the economy, the environment and people, including impacts on their human rights, were referred to the evaluation of stakeholders who voted to identify and prioritise the material topics for the 2023 Statement (see '1.7.2 Materiality Analysis'). Following this process, the GRI Standards reference disclosures and related disclosures to be reported were then identified.

All the data and information refer to the companies included within the scope of consolidation used for the Consolidated Financial Statements as at 31 December 2023, unless otherwise specified (see '7.1.1 Reporting Perimeter').

The data collection process was coordinated by the Group's Non-Financial Controlling Department, with the support of the ESG Department, by means of a non-financial reporting system that included a web-based information system, the

use of data collection forms and meetings with the responsible functions to update qualitative aspects. The non-financial data and information were provided by the heads of the various corporate departments of the companies within the scope of reference using this system. Their subsequent control and approval were handled by the Managers responsible for Business, by the Managers in charge of Staff Functions and lastly by the Non-Financial Controlling and ESG Departments.

The document was subjected to a limited review by an external company, according to the criteria indicated in the "Independent Auditors' Report" that can be viewed at the end of the Statement.

The Statement:

- was approved by the Board of Directors on 29 March 2024 along with the draft Separate Financial Statements and the Consolidated Financial Statements;
- was drafted in compliance with Italian Decree no. 254/2016 and constitutes a separate document from the Report on Operations, but is an integral part of the documentation relative to the 2023 Consolidated Financial Statements;
- supplements and completes the Report on Operations and other related documentation.

7.1.1 REPORTING PERIMETER

The Consolidated Financial Statements were prepared based on the accounts of both the Parent Company and its subsidiaries, duly adjusted to conform them to the EU IFRS accounting principles.

The Group's scope of consolidation for the year 2023 consists of, in addition to the parent company Dolomiti Energia Holding S.p.A, the following subsidiaries: Dolomiti Energia S.p.A, Dolomiti Energia Solutions S.r.l., Società Elettrica Trentina

per la distribuzione elettrica S.p.A, Novareti S.r.l., Hydro Dolomiti Energia S.r.l., Dolomiti Edison Energy S.r.l., Dolomiti Energia Trading S.r.l., Dolomiti GNL S.r.l., Dolomiti Energia Hydro Power S.r.l., Gasdotti Alpini S.r.l., Dolomiti Transition Asset S.r.l., Dolomiti Energia Wind Power S.r.l. and Dolomiti Ambiente S.r.l.

There are no differences between the list of entities included in financial reporting and the list included in non-financial sustainability reporting.

7.1.2 CONSOLIDATION PRINCIPLES

With reference to the criteria adopted by the Group to define the consolidation area and the

related consolidation principles, please refer to the Financial Statements.

7.2

GRI CONTENT INDEX

To facilitate the search for information within the Statement, an analytical index of the indicators envisaged by the GRI Standards Guidelines is provided below.

A brief content description is provided for each indicator, with reference to the section in this document or to any comments and the indication of any omissions.

Statement of use	The Dolomiti Energia Group has reported in accordance with the GRI Standards for the period 1 January - 31 December 2023
GRI 1 considered	GRI 1: Fundamental Principles 2021
GRI Sector Standard applicable	Not available

GRI content index 2023

GRI Standard/ Other Framework	Disclosure	Reference Section	
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	2-1 Organizational details	1.1 Who We Are	
	2-2 Entities included in the organization's sustainability reporting	7.1 Methodological Note and Guide to Interpretation	
	2-3 Reporting period, frequency and contact point		
	2-4 Restatements of information		
	2-5 External assurance	8. Independent Auditors' Report	
	2-6 Activities, value chain and other business relationships	1.1 Who We Are 2.4 Creation of Economic Value 3.1 The Group's Businesses 3.2 Close to Customers with Affordable, Efficient and Reliable Services 6.2 Energy Consumption 6.3 Atmospheric Emissions 6.6 Efficient and Sustainable Use of Water	
	2-7 Employees	4.1 Commitment Towards Employees	
	2-8 Workers who are not employees	4.1 Commitment Towards Employees	
	2-9 Governance structure and composition	2.1 The Governance Model	
	2-10 Nomination and selection of the highest governance body	2.1 The Governance Model	
	2-11 Chair of the highest governance body	2.1 The Governance Model	
	2-12 Role of the highest governance body in overseeing the management of impacts	2.1 The Governance Model 2.2 Risk Management	
	2-13 Delegation of responsibility for managing impacts	2.1 The Governance Model	
	2-14 Role of the highest governance body in sustainability reporting	2.1 The Governance Model	
	2-15 Conflicts of interest	2.3 Business Ethics and Integrity	
	2-16 Communication of critical concerns	2.1 The Governance Model 2.2 Risk Management	
	2-17 Collective knowledge of the highest governance body	2.1 The Governance Model	
	2-18 Evaluation of the performance of the highest governance body		
	2-19 Remuneration policies	4.1 Commitment Towards Employees	
	2-20 Process to determine remuneration	4.1 Commitment Towards Employees	
	2-21 Annual total compensation ratio	4.1 Commitment Towards Employees	

Notes	Omission		
	Request omitted	Reason for omission	Description
<p>Sustainability reporting has an annual frequency, in this case from 1 January 2023 to 31 December 2023. Its publication date coincides with that of the Group's Consolidated Financial Statements. For any enquiries, please refer to the following e-mail address: sustainability@dolomitienergia.it. It should be noted that, with respect to previous publications, there have been reformulations of the shared disclosures which are duly noted in the body of the text.</p> <p>Where restatements have been made with respect to previous years' figures, this has been explicitly stated in the document.</p>			
<p>As of 2023, there is still no system in place to monitor the performance of the highest governing body in overseeing the management of business impacts on the economy, environment and people. The Group undertakes to set up a monitoring system in the coming years.</p>			

GRI Standard/ Other Framework	Disclosure	Reference Section
	2-22 Statement on sustainable development strategy	Letter to stakeholders
	2-23 Policy commitments	2.3 Business Ethics and Integrity
	2-24 Embedding policy commitments	2.3 Business Ethics and Integrity
	2-25 Processes to remediate negative impacts	2.3 Business Ethics and Integrity 4.1 Commitment Towards Employees 6.1 Managing Environmental Impacts 6.7 Preservation of Natural Resources and Biodiversity
	2-26 Mechanisms for seeking advice and raising concerns	2.3 Business Ethics and Integrity
	2-27 Compliance with laws and regulations	6.1 Managing Environmental Impacts 6.8 Disclosure pursuant to Regulation (EU) 2020/852 on the Taxonomy
	2-28 Membership associations	5.1 Responsible Relations with Communities
	2-29 Approach to stakeholder engagement	1.7 Sustainability for the Dolomiti Energia Group
	2-30 Collective bargaining agreements	4.1 Commitment Towards Employees
MATERIAL TOPICS		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	1.7 Sustainability for the Dolomiti Energia Group
	3-2 List of material topics	1.7 Sustainability for the Dolomiti Energia Group
SUSTAINABLE AND RESILIENT SUPPLY CHAIN		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Creation of Economic Value
GRI 204 - Procurement Practices 2016	204-1 Proportion of spending on local suppliers	2.4 Creation of Economic Value
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	2.4 Creation of Economic Value
CONSIDERATION OF ESG-RELATED RISKS AND OPPORTUNITIES IN BUSINESS DEVELOPMENT AND STRATEGY		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.1 The Governance Model 2.4 Creation of Economic Value 6.8 Disclosure pursuant to Regulation (EU) 2020/852 on the Taxonomy
CREATION OF ECONOMIC VALUE		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Creation of Economic Value
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	2.4 Creation of Economic Value
	201-2 Financial implications and other risks and opportunities due to climate change	2.4 Creation of Economic Value
	201-4 Financial assistance received from government	2.4 Creation of Economic Value
DIALOGUE WITH LOCAL COMMUNITIES AND SUPPORT FOR LOCAL DEVELOPMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	5.1 Responsible Relations with Communities
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and supported services	5.1 Responsible Relations with Communities
	203-2 Significant indirect economic impacts	3.2 Close to Customers with Affordable, Efficient and Reliable Services
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	3.2 Close to Customers with Affordable, Efficient and Reliable Services 5.1 Responsible Relations with Communities
HUMAN RIGHTS		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees

GRI Standard/ Other Framework	Disclosure	Reference Section
DIVERSITY, INCLUSION, AND EQUAL OPPORTUNITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	2.1 The Governance Model 4.1 Commitment Towards Employees
	405-2 Ratio of basic salary and remuneration of women to men	4.1 Commitment Towards Employees
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	4.1 Commitment Towards Employees
ETICA, INTEGRITÀ E TRASPARENZA AZIENDALE E DI GOVERNANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.3 Business Ethics and Integrity
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	6.8 Disclosure pursuant to Regulation (EU) 2020/852 on the Taxonomy
TRAINING, PROFESSIONAL DEVELOPMENT AND FAIR PAY		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	4.1 Commitment Towards Employees
	404-2 Programmes for upgrading employee skills and transition assistance programmes	4.1 Commitment Towards Employees
EMERGENCY MANAGEMENT, BUSINESS CONTINUITY AND CYBERSECURITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.3 Business Ethics and Integrity
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	2.3 Business Ethics and Integrity
RESPONSIBLE AND SUSTAINABLE WASTE MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	6.5 Management of Waste Generated by the Group 7.4 Annexes
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	6.5 Management of Waste Generated by the Group 7.4 Annexes
	306-2 Management of significant waste-related impacts	3.1 The Group's businesses 6.5 Management of Waste Generated by the Group
	306-3 Waste generated	3.1 The Group's businesses 6.5 Management of Waste Generated by the Group
	306-4 Waste diverted from disposal	3.1 The Group's businesses 6.5 Management of Waste Generated by the Group
	306-5 Waste directed to disposal	3.1 The Group's businesses 6.5 Management of Waste Generated by the Group
SUSTAINABLE MANAGEMENT AND PROTECTION OF WATER QUALITY		
GRI 3: Material Topics 2021	3-3 Management of material topics	6.6 Efficient and Sustainable Use of Water
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	3.1 The Group's businesses 6.6 Efficient and Sustainable Use of Water
	303-2 Management of water discharge-related impacts	3.1 The Group's businesses 6.6 Efficient and Sustainable Use of Water
	303-3 Water withdrawal	3.1 The Group's businesses 6.6 Efficient and Sustainable Use of Water
	303-4 Water withdrawal	3.1 The Group's businesses 6.6 Efficient and Sustainable Use of Water
	303-5 Water consumption	3.1 The Group's businesses 6.6 Efficient and Sustainable Use of Water
TRANSPARENT GOVERNANCE		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Creation of Economic Value
GRI 207: Taxes 2019	207-4 Reporting by country	2.4 Creation of Economic Value 5.1 Responsible Relations with Communities

GRI Standard/ Other Framework	Disclosure	Reference Section
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	4.1 Commitment Towards Employees
COMBATING CORRUPTION		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.3 Business Ethics and Integrity
GRI 205: Anti-Corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	2.3 Business Ethics and Integrity
	205-3 Confirmed incidents of corruption and actions taken	2.3 Business Ethics and Integrity
CLIMATE CHANGE MITIGATION AND ADAPTATION		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Creation of Economic Value 3.1 The Group's Businesses 6.2 Energy Consumption 6.3 Atmospheric Emissions
GRI 302: Energy 2016	302-1 Internal energy consumption within the organisation	6.2 Energy Consumption
	302-3 Energy intensity	6.2 Energy Consumption
	302-4 Reduction of energy consumption	6.2 Energy Consumption
GRI 305: Emissions 2016	302-5 Reductions in energy requirements of products and services	3.1 The Group's Businesses 6.4 The Group's commitment to FiT for 55
	305-1 Direct (Scope 1) GHG emissions	6.3 Atmospheric Emissions
	305-2 Energy indirect (Scope 2) GHG emissions	6.3 Atmospheric Emissions
	GRI 305-3 Other indirect (Scope 3) GHG emissions	6.3 Atmospheric Emissions
	305-4 GHG emissions intensity	6.3 Atmospheric Emissions
	305-5 Reduction of GHG emissions	3.2 Close to Customers with Affordable, Efficient and Reliable services 6.3 Atmospheric Emissions 6.4 The Group's commitment to FiT for 55
	305-6 Emissions of ozone-depleting substances (ODS)	6.3 Atmospheric Emissions
G4: General standard disclosure for the electric utility sector	EU 5 Allocation of emission quotas and compliance with Kyoto Protocol	6.3 Atmospheric Emissions
OFFERING ENERGY EFFICIENCY AND RENEWABLE ENERGY SOLUTIONS		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.2 Close to Customers with Affordable, Efficient and Reliable Services
G4: General standard disclosure for the electric utility sector	EU 1 Installed capacity	3.1 The Group's Businesses
	EU 2 Net energy produced	3.1 The Group's Businesses 6.2 Energy Consumption
	EU 3 Number of customers, divided by type	3.1 The Group's Businesses
	EU 4 Length of the distribution network	3.1 The Group's Businesses
TRANSPARENT, CLEAR AND HONEST COMMUNICATION AND MARKETING PRACTICES		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.2 Close to Customers with Affordable, Efficient and Reliable Services
GRI 417 - Marketing and Labelling 2016	417-2 Incidents of non-compliance concerning product and service information and labelling	3.2 Close to Customers with Affordable, Efficient and Reliable Services

GRI Standard/ Other Framework	Disclosure	Reference Section
QUALITY, SAFETY, CONTINUITY AND AFFORDABILITY OF SERVICES PROVIDED TO CUSTOMERS		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.2 Close to Customers with Affordable, Efficient and Reliable Services
G4: General standard disclosure for the electric utility sector	EU 12 Energy transmission losses as a percentage of total energy fed into the grid	3.1 The Group's Businesses
	EU 26 Percentage of population not served in the electrical energy distribution area	3.1 The Group's Businesses
	EU 27 Number of service disconnections for non-payment	3.1 The Group's Businesses
	EU 28 Service interruption frequency index	3.1 The Group's Businesses
	EU 29 Service interruption average duration index	3.1 The Group's Businesses
HEALTH, SAFETY AND WELL-BEING		
3-3 Management of material topics	4.2 Attention to Occupational Health and Safety	4.2 Attenzione alla salute e sicurezza sul lavoro
403-1 Occupational health and safety management system	4.2 Attention to Occupational Health and Safety	4.2 Attenzione alla salute e sicurezza sul lavoro
	403-2 Hazard identification, risk assessment and incident investigation	4.2 Attention to Occupational Health and Safety
	403-3 Occupational health services	4.2 Attention to Occupational Health and Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety communication	4.2 Attention to Occupational Health and Safety
	403-5 Worker training on occupational health and safety	4.2 Attention to Occupational Health and Safety
	403-6 Promotion of worker health	4.2 Attention to Occupational Health and Safety
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	4.2 Attention to Occupational Health and Safety
	403-8 Workers covered by an occupational health and safety management system	4.2 Attention to Occupational Health and Safety
	403-9 Work-related injuries	4.2 Attention to Occupational Health and Safety
	403-10 Work-related ill health	4.2 Attention to Occupational Health and Safety
AWARENESS-RAISING REGARDING CONSUMPTION EFFICIENCY, THE USE OF RENEWABLE ENERGY AND RESPONSIBLE WASTE MANAGEMENT		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.1 The Group's Businesses 5.1 Responsible Relations with Communities
G4: General standard disclosure for the electric utility sector	EU 8 Research and development activities and expenditure aimed at providing reliable electricity and promoting sustainable development	3.1 The Group's Businesses 6.7 Preservation of Natural Resources and Biodiversity
TALENT ATTRACTION, RETENTION AND CORPORATE WELFARE		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	4.1 Commitment to Employees 2.3 Business Ethics and Integrity
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.1 Commitment Towards Employees
custom KPIs (NOT GRI)	Compulsory maternity and/or paternity leave	

GRI Standard/ Other Framework	Disclosure	Reference Section	
PROTECTION OF WATER, SOIL AND ECOSYSTEM QUALITY AND CONSERVATION AND RESTORATION OF BIODIVERSITY			
GRI 3: Material Topics 2021	3-3 Management of material topics	3.1 The Group's Businesses 6.7 Preservation of Natural Resources and Biodiversity	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased or managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	6.7 Preservation of Natural Resources and Biodiversity	
	304-2 Significant impacts of activities, products and services on biodiversity	6.7 Preservation of Natural Resources and Biodiversity	
	304-3 Habitats protected or restored	6.6 Efficient and Sustainable Use of Water 6.7 Preservation of Natural Resources and Biodiversity	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	6.7 Preservation of Natural Resources and Biodiversity	
custom KPIs (NOT GRI)	Km of network in sensitive areas in terms of biodiversity		

7.3

7.3

RECONCILIATION STATEMENT ON MATERIAL TOPICS, THE AREAS COVERED BY ITALIAN LEGISLATIVE DECREE 254/2016 AND THE GRI STANDARDS

Material Topic	Topic-specific GRI Reference Standards	Applications of Italian Legislative Decree 254/2016	Reporting Perimeter	
			Impacts Internal to the Group	Impacts External to the Group
Sustainable and resilient supply chain	Procurement Practices (GRI 204) Supplier Environmental Assessment (GRI 308)	Supply Chain Human Rights Environment	Group	Suppliers Environment Community
Consideration of ESG-related risks and opportunities in business development and strategy	General Disclosure (GRI 2) Economic Performance (GRI 201)	Supply Chain Human Rights Environment	Group	Suppliers Environment Community Shareholders Institutions Banks and financial institutions
Creation of economic value	Economic Performance (GRI 201)	Society	Group	Customers Community Shareholders Institutions Banks and financial institutions
Dialogue with local communities and support for local development	Indirect Economic Impacts (GRI 203) Local Communities (GRI 413)	Society Environment	Group	Customers Community Institutions Competitors Investors Suppliers Shareholders Media
Human Rights	General Disclosures (GRI 2)	Human Rights Staff Society	Group	Customers Community Human Resources
Diversity, inclusion, and equal opportunity	Diversity and Equal Opportunity (405) Non-discrimination (406)	Human Rights Staff Society	Group	Customers Community Human Resources
Ethics, integrity and transparency in business and governance	General Disclosure (GRI 2) Anti-competitive Behaviour (GRI 206)	Society Staff Human Rights Anti-corruption Supply Chain	Group	Customers Community Institutions Competitors Investors Human Resources Suppliers Shareholders Media
Training, professional development and fair pay	Training and Education (GRI 404)	Staff	Group	"Human resources Customers"

Transparent governance	"Economic performance (GRI 201) Taxes (GRI 207)"	"Company Personnel Environment"	Group	"Community Customers Media Environment Investors Institutions Banks and financial institutions"
Emergency management, business continuity and cybersecurity	Customer Privacy (418)	"Society Environment Staff"	Group	"Community Customers Human Resources Shareholders Media Environment"
Responsible and sustainable waste management	Waste (GRI 306)	Environment	Group	"Environment Community"
Sustainable management and protection of water quality	"General Disclosure (GRI 2) Water and Effluents (GRI 303)"	Environment	Group	"Environment Community Customers"
Freedom of association and collective bargaining	Freedom of Association and Collective Bargaining (GRI 407)	"Human Rights Staff"	Group	Human Resources
Combating corruption	Anti-Corruption (205)	Anti-corruption	Group	"Community Institutions Investors Banks and financial institutions"
Climate change mitigation and adaptation	"General Disclosure (GRI 2-27) Energy (GRI 302) Water and Effluents (GRI 303) Biodiversity (GRI 304) Emissions (GRI 305)"	Environment	Group	"Environment Community"
Offering energy efficiency and renewable energy solutions	"General Disclosures (GRI 2) Electric Utilities Sector Disclosures (G4-EU)"	Environment	Group	"Customers Environment Community Shareholders"
Transparent, clear and honest communication and marketing practices	Marketing and Labelling (GRI 417)	Society	Group	"Customers Community Media"
Quality, safety, continuity and affordability of services provided to customers	"General Disclosures (GRI 2) Electric Utilities Sector Disclosures (G4-EU)"	Society	Group	"Customers Community"
Health, safety and well-being	Occupational Health and Safety (GRI 403)	"Society Staff Human Rights Supply Chain"	Group	Human Resources
Awareness-raising regarding consumption efficiency, the use of renewable energy and responsible waste management	"Electric Utilities Sector Disclosures (G4-EU) Water and Effluents (GRI 303) Waste (GRI 306)"	Environment	Group	"Community Environment"
Talent attraction, retention and corporate welfare	Employment (GRI 401)	"Staff Human Rights"	Group	"Human Resources Customers Shareholders"
Protection of water, soil and ecosystem quality and conservation and restoration of biodiversity	"General Disclosures (GRI 2) Biodiversity (GRI 304) Local Communities (GRI 413)"	Environment	Group	"Environment Community"

7.4 ANNEXES

WASTE (GRI 306)

Self-generated waste by composition

2022	UoM	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	t	191.96	102.54	89.42
Waste from electrical and electronic appliances	t	45.75	45.75	-
Batteries and accumulators	t	6.77	6.77	-
Cables	t	0.75	0.75	-
Fluorescent lighting	t	0.31	0.31	-
Packaging that contained hazardous substances	t	3.59	3.59	-
Absorbents and filtering materials	t	9.12	9.12	-
Mineral/synthetic oils	t	29.02	29.02	-
Chemicals	t	4.63	-	4.63
Other	t	92.02	7.23	84.79
NON-HAZARDOUS WASTE	t	2,615.95	1,441.78	1,174.18
Plastics	t	37.94	37.94	-
Wood	t	11.21	11.21	-
Mixed packaging	t	3.77	3.77	-
Metal	t	150.60	150.60	-
Organic waste	t	798.24	798.24	-
Sewage sludge	t	149.86	-	149.86
End-use electrical and electronic equipment	t	78.35	78.35	-
Other	t	1,385.98	361.67	1,024.32
TOTAL WASTE	t	2,807.91	1,544.32	1,263.60

2021	UoM	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	t	269.4	250.8	18.6
Waste from electrical and electronic appliances	t	61.8	61.1	0.7
Batteries and accumulators	t	77.6	77.6	-
Cables	t	1.1	1.1	-
Fluorescent lighting	t	1.0	1.0	-
Packaging that contained hazardous substances	t	3.9	3.9	-
Absorbents and filtering materials	t	11.1	11.1	-
Mineral/synthetic oils	t	63.8	63.8	-
Chemicals	t	1.5	1.4	0.1
Other	t	47.6	29.8	17.8
NON-HAZARDOUS WASTE	t	4,462.9	2,890.6	1,572.3
Plastics	t	63.9	63.9	-
Wood	t	18.9	18.9	-
Mixed packaging	t	4.6	4.6	-
Metal	t	161.6	161.6	-
Organic waste	t	2,196.7	2,196.7	-
Sewage sludge	t	111.3	-	111.3
End-use electrical and electronic equipment	t	55.9	55.9	-
Other	t	1,850	389	1,461
TOTAL WASTE	t	4,732.3	3,141.4	1,590.9

Self-generated waste directed to disposal by disposal method

2022	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	89,41	89,41
Other disposal operations ⁴⁷	t	-	89,41	89,41
-Chemicals	t	-	84,79	84,79
-Other	t	-	4,63	4,63
NON-HAZARDOUS WASTE	t	-	1.174,18	1.174,18
Other disposal operations ⁴⁶	t	-	1.174,18	1.174,18
-Sewage sludge	t	-	149,86	149,86
-Other	t	-	1.024,32	1.024,32
TOTAL WASTE	t	-	1.263,59	1.263,59

2021	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	21.2	21.2
Other disposal operations ⁴⁶	t	-	21.2	21.2
-Mineral/synthetic oils	t	-	0.1	0.1
-Other	t	-	21.1	21.1
NON-HAZARDOUS WASTE	t	-	1,572.8	1,572.8
Disposal at landfills	t	-	22.9	22.9
-Other	t	-	22.9	22.9
Other disposal operations ⁴⁶	t	-	1,549.9	1,549.9
-Sewage sludge	t	-	111.3	111.3
-End-use electrical and electronic equipment	t	-	0.5	0.5
-Other	t	-	1,438.1	1,438.1
TOTAL WASTE	t	-	1,594	1,594

47 This includes, for example, submission to biological or physical-chemical treatment.

Self-generated waste diverted from disposal by type of recovery operation

2022	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	102.54	102.54
Other recovery operations ⁴⁸	t	-	102.54	102.54
-Waste from electrical and electronic appliances	t	-	45.75	45.75
-Batteries and accumulators	t	-	6.77	6.77
-Cables	t	-	0.75	0.75
-Fluorescent lighting	t	-	0.31	0.31
-Packaging that contained hazardous substances	t	-	3.59	3.59
-Absorbents and filtering materials	t	-	9.12	9.12
-Mineral/synthetic oils	t	-	29.02	29.02
-Other	t	-	7.23	7.23
NON-HAZARDOUS WASTE	t	-	1,441.78	1,441.78
Other recovery operations ⁴⁷	t	-	1,441.78	1,441.78
-Plastics	t	-	37.94	37.94
-Wood	t	-	11.21	11.21
-Mixed packaging	t	-	3.77	3.77
-Metal	t	-	150.60	150.60
-Organic waste	t	-	798.24	798.24
-End-use electrical and electronic equipment	t	-	78.35	78.35
-Other	t	-	361.67	361.67
TOTAL WASTE	t	-	1,544.32	1,544.32

48 Includes, for example, waste delivered to suppliers that have agreements with the recycling chain.

2021	UoM	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	183.8	183.8
Other recovery operations ⁴⁷	t	-	183.8	183.8
-Waste from electrical and electronic appliances	t	-	61.1	61.1
-Batteries and accumulators	t	-	10.6	10.6
-Cables	t	-	1.1	1.1
-Fluorescent lighting	t	-	1.0	1.0
-Packaging that contained hazardous substances	t	-	3.9	3.9
-Absorbents and filtering materials	t	-	11.1	11.1
-Mineral/synthetic oils	t	-	63.8	63.8
-Chemicals	t	-	1.4	1.4
-Other	t	-	29.8	29.8
NON-HAZARDOUS WASTE	t	-	2,682.6	2,682.6
Other recovery operations ⁴⁷	t	-	2,682.5	2,682.5
-Plastics	t	-	63.9	63.9
-Wood	t	-	18.9	18.9
-Mixed packaging	t	-	4.6	4.6
-Metal	t	-	161.6	161.6
-Organic waste	t	-	2,196.7	2,196.7
-End-use electrical and electronic equipment	t	-	56.1	56.1
-Other	t	-	180.8	180.8
TOTAL WASTE	t	-	2,866.4	2,866.4

Residual waste⁴⁹ produced at sites

2022	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
NON-HAZARDOUS WASTE	kg	126,870	58,120	68,750	182,560	53,760	128,800
Residual	kg	126,870	58,120	68,750	182,560	53,760	128,800
TOTAL WASTE	t	126,870	58,120	68,750	182,560	53,760	128,800

2021	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
NON-HAZARDOUS WASTE	kg	125,550	-	125,550	200,140	-	200,140
Residual	kg	125,550	-	125,550	200,140	-	200,140
TOTAL WASTE	kg	125,550	-	125,550	200,140	-	200,140

Residual waste generated - directed to disposal by type of recovery operation

2022	UoM	ROVERETO			TRENTO		
		Rovereto collections - On site	Rovereto collections - At an external site	Rovereto collections - Total	Trento collections - On site	Trento collections - At an external site	Trento collections - Total
RIFIUTI NON PERICOLOSI	kg	68,750.00	-	68,750.00	128,800.00	-	128,800.00
Conferimento in discarica	kg	68,750.00	-	68,750.00	128,800.00	-	128,800.00

Residual waste generated - diverted from disposal by type of recovery operation

2022	UoM	ROVERETO			TRENTO		
		Rovereto collections - On site	Rovereto collections - At an external site	Rovereto collections - Total	Trento collections - On site	Trento collections - At an external site	Trento collections - Total
RIFIUTI NON PERICOLOSI	kg	58,120.00	-	58,120.00	53,760.00	-	53,760.00
Preparazione per il riutilizzo	kg	58,120.00	-	58,120.00	53,760.00	-	53,760.00

49 The tables consider the residual waste produced at the two main sites at Via Manzoni in Rovereto and at Via Fersina in Trento. In the second half of the year, as the Rovereto and Trento landfills were exhausted, they were equipped for the biostabilisation of residual waste.

Distribution of Waste produced in Trento and Rovereto

2022	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	t	121.51	120.94	0.58	328.73	327.17	1.57
WEEE	t	77.28	77.28	-	202.87	202.87	-
Other (Batteries, medicines, etc.)	t	44.24	43.66	0.58	125.87	124.30	1.57
NON-HAZARDOUS WASTE	t	16,981.55	15,094.67	1,886.87	52,275.23	48,730.61	3,544.62
Paper and cardboard	t	2,574.63	2,574.63	-	8,387.61	8,387.61	-
Glass	t	1,477.29	1,477.29	-	5,080.62	5,080.62	-
Lawn cuttings	t	1,071.90	1,071.90	-	3,075.56	3,075.56	-
Organic waste	t	3,919.87	3,919.87	-	13,523.87	13,523.87	-
Multi-material	t	1,495.54	1,495.54	-	4,806.38	4,806.38	-
Bulky objects	t	460.96	241.07	219.89	1,170.02	504.02	666.00
Wood	t	982.46	982.46	-	2,326.84	2,326.84	-
Inert	t	996.66	996.66	-	2,499.91	2,499.91	-
WEEE	t	198.85	198.85	-	555.02	555.02	-
Metal	t	250.76	250.76	-	616.69	616.69	-
Other (Batteries, medicines, etc.)	t	72.44	72.44	-	221.11	221.11	-
Used clothing	t	157.45	157.45	-	476.45	476.45	-
Residual	t	3,020.18	1,353.20	1,666.98	8,540.48	5,661.86	2,878.62
Sweeping	t	302.55	302.55	-	994.67	994.67	-
TOTAL WASTE	t	17,103.06	15,215.61	1,887.45	52,603.97	49,057.78	3,546.19

2021	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	t	128	128	0.05	383	382	0.8
WEEE	t	87.2	87.2	-	234	234	-
Other (Batteries, medicines, etc.)	t	41.2	41.2	0.05	149.1	148.3	0.8
NON-HAZARDOUS WASTE	t	17,890.2	15,141.1	2,749.2	53,379.3	49,284.3	4,095
Paper and cardboard	t	2,683.4	2,683.4	-	8,639.8	8,639.8	-
Glass	t	1,549.8	1,549.8	-	5,053.7	5,053.7	-
Lawn cuttings	t	1,253.3	1,253.3	-	3,492.3	3,492.3	-
Organic waste	t	4,168.7	4,168.7	-	13,164.6	13,164.6	-
metal packaging	t	-	-	-	23.4	23.4	-
Multi-material	t	1,537.6	1,537.6	-	4,860.1	4,860.1	-
Bulky objects	t	650.3	642.6	7.74	1,375.8	1,103.8	272
Wood	t	1,056.6	1,056.6	-	2,535.8	2,535.8	-
Inert	t	929.9	929.9	-	2,503.9	2,503.9	-
WEEE	t	217	217	-	635.4	635.4	-
Metal	t	211.2	211.2	-	736.01	736.01	-
Other (Batteries, medicines, etc.)	t	69.3	69.3	-	256.3	234.4	22
Used clothing	t	179.7	179.7	-	533	533	-
Residual	t	3,048.2	360.2	2,688.1	8,254	4,635.2	3,618.7
Sweeping	t	335.1	281.7	53.4	1,317.7	1,135.4	182.3
TOTAL WASTE	t	18,018.6	15,269.5	2,749.3	53,762.4	49,666.6	4,095.8

Waste directed to disposal by disposal method

2022	UoM	Collected in Rovereto			Collected in Trento		
		In situ	At an external site	Total	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	0.58	0.58	0.48	1.09	1.57
Other disposal operations ⁵⁰	t	-	0.58	0.58	0.48	1.09	1.57
-Other (Batteries, medicines, etc.)	t	-	0.58	0.58	0.48	1.09	1.57
NON-HAZARDOUS WASTE	t	-	1,886.87	1,886.87	2,155.16	1,389.46	3,544.62
Disposal at landfills	t	-	-	-	97.40	535.66	633.06
-Residual	t	-	-	-	97.40	535.66	633.06
Other disposal operations ⁴⁹	t	-	1,886.87	1,886.87	2,057.76	853.8	2,911.56
-Bulky objects	t	-	219.89	219.89	79.06	586.94	666.00
-Residual	t	-	1,666.98	1,666.98	1,978.70	266.86	2,245.56
TOTAL WASTE	t	-	1,887.45	1,887.45	2,155.64	1,390.55	3,546.19

2021	UoM	Collected in Rovereto			Collected in Trento		
		In situ	At an external site	Total	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	0.1	0.1	-	0.8	0.8
Other disposal operations ⁴⁹	t	-	0.1	0.1	-	0.8	0.8
-Other (Batteries, medicines, etc.)	t	-	0.1	0.1	-	0.8	0.8
NON-HAZARDOUS WASTE	t	-	2,749.2	2,749.2	2,153.7	1,939.4	4,095.0
Disposal at landfills	t	-	53.4	53.4	530.9	1703.6	2,234.5
-Bulky objects	t	-	-	-	2	-	2
-Other (Batteries, medicines, etc.)	t	-	-	-	-	21.9	21.9
-Residual	t	-	-	-	346.6	1681.7	2,028.3
-Sweeping	t	-	53.4	53.4	182.3	-	182.3
Other disposal operations ⁴⁹	t	-	2,695.8	2,695.8	1,624.8	235.8	1,860.5
-Bulky objects	t	-	7.7	7.7	44.9	225.2	270.1
-Residual	t	-	2,688.1	2,688.1	1,579.9	10.6	1,590.4
TOTAL WASTE	t	-	2,749.3	2,749.3	2,153.7	1,940.2	4,095.8

⁵⁰ This includes, for example, delivery to mechanical biological treatment plants.

Waste diverted from disposal by type of recovery operation

2022	UoM	Collected in Rovereto			Collected in Trento		
		In situ	At an external site	Total	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	120.94	120.94	66.46	260.71	327.17
Other recovery operations ⁵¹	t	-	120.94	120.94	66.46	260.71	327.17
-WEEE	t	-	77.28	77.28	39.59	163.28	202.87
-Other (Batteries, medicines, etc.)	t	-	43.66	43.66	26.87	97.43	124.30
NON-HAZARDOUS WASTE	t	-	15094.67	15094.67	33847.63	14882.98	48730.61
Recovery/Preparation for reuse	t	-	-	-	2153.77	-	2153.77
-Residual	t	-	-	-	2153.77	-	2153.77
Recycling	t	-	-	-	2255.55	-	2255.55
-Organic waste	t	-	-	-	2255.55	-	2255.55
Other recovery operations ⁵⁰	t	-	15094.67	15094.67	29438.31	14882.98	44321.29
-Paper and cardboard	t	-	2574.63	2574.63	4307.31	4080.30	8387.61
-Glass	t	-	1477.29	1477.29	4096.79	983.83	5080.62
-Lawn cuttings	t	-	1071.90	1071.90	1323.65	1751.91	3075.56
-Organic waste	t	-	3919.87	3919.87	11034.83	233.49	11268.32
-Multi-material	t	-	1495.54	1495.54	3512.20	1294.18	4806.38
-Bulky objects	t	-	241.07	241.07	137.42	366.60	504.02
-Wood	t	-	982.46	982.46	415.10	1911.74	2326.84
-Inert	t	-	996.66	996.66	346.23	2153.68	2499.91
-WEEE	t	-	198.85	198.85	88.55	466.47	555.02
-Metal	t	-	250.76	250.76	92.78	523.91	616.69
-Other (Batteries, medicines, etc.)	t	-	72.44	72.44	54.44	166.67	221.11
-Used clothing	t	-	157.45	157.45	100.25	376.20	476.45
-Residual	t	-	1353.20	1353.20	2934.09	574.00	3508.09
-Sweeping	t	-	302.55	302.55	994.67	-	994.67
TOTAL	t	-	15215.61	15215.61	33914.09	15143.69	49057.78

⁵¹ Includes, for example, waste delivered to suppliers that have agreements with the recycling chain

2021	UoM	ROVERETO			TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
HAZARDOUS WASTE	t	-	128.4	128.4	70.8	311.5	382.3
Other recovery operations ⁵⁰	t	-	128.4	128.4	70.8	311.5	382.3
-WEEE	t	-	87.2	87.2	45	189	234
-Other (Batteries, medicines, etc.)	t	-	41.2	41.2	25.8	122.5	148.3
NON-HAZARDOUS WASTE	t	-	15,142.6	15,142.6	33,460.2	15,826.1	49,286.3
Recovery/Preparation for reuse	t	-	-	-	3,996.0	-	3,996.0
-Residual	t	-	-	-	3,996.0	-	3,996.0
Recycling	t	-	-	-	1,005	-	1,005
Other recovery operations ⁵⁰	t	-	15,143.6	15,143.6	28,456.6	15,826.1	44,282.9
-Paper and cardboard	t	-	2,683.4	2,683.4	5,065.0	3,574.8	8,639.8
-Glass	t	-	1,549.8	1,549.8	3,821.1	1,232.6	5,053.7
-Lawn cuttings	t	-	1,253.1	1,253.1	1,062.6	2,429.7	3,492.3
-Organic waste	t	-	4,168.7	4,168.7	11,917.2	242.5	12,159.7
-Metal packaging	t	-	-	-	19.4	4	23.3
-Multi-material	t	-	1,539.5	1,539.5	3,552.9	1,307.2	4,860.1
-Bulky objects	t	-	642.6	642.6	217.5	886.3	1,103.8
-Wood	t	-	1,056.6	1,056.6	509.6	2,026.1	2,535.8
-Inert	t	-	929.9	929.9	400.6	2,103.3	2,503.9
-WEEE	t	-	216.9	216.9	102	533.5	635.4
-Metal	t	-	211.2	211.2	122.5	613.5	736.1
-Other (Batteries, medicines, etc.)	t	-	69.4	69.4	47.3	187.1	234.4
-Used clothing	t	-	179.7	179.7	93.8	439.2	533.0
-Residual	t	-	360.1	360.1	392.4	246.3	638.7
-Sweeping	t	-	281.7	281.7	1,135.3	-	1,135.4
TOTAL WASTE	t	-	15,271.0	15,271.0	33,531.0	16,137.6	49,668.6

Distribution of Waste collected in Trento and Rovereto

2022	Collected in Rovereto		Collected in Trento	
	kg per capita	t	kg per capita	t
WASTE BY COMPOSITION				
Paper and cardboard	63,39	2.574,63	69,49	8.387,61
Glass	36,37	1.477,29	42,09	5.080,62
Lawn cuttings	26,39	1.071,90	25,48	3.075,56
Organic waste	96,51	3.919,87	112,05	13.523,87
Multi-material	36,82	1.495,54	39,82	4.806,38
Bulky objects	11,35	460,96	9,70	1.170,02
Wood	24,19	982,46	19,28	2.326,84
Inert	24,54	996,66	20,71	2.499,91
WEEE	6,80	276,13	6,28	757,88
Metal	6,17	250,76	5,11	616,69
Other (Batteries, medicines, etc.)	2,86	116,68	2,87	346,98
Used clothing	3,88	157,45	3,95	476,45
Residual	74,36	3.020,18	70,76	8.540,48
Sweeping	7,45	302,55	8,24	994,67
TOTAL	421,08	17.103,06	435,83	52.603,97

2021	Collected in Rovereto		Collected in Trento	
	kg per capita	t	kg per capita	t
WASTE BY COMPOSITION				
Paper and cardboard	63.39	2,683.44	69.49	8,639.82
Glass	36.37	1,549.78	42.09	5,053.74
Lawn cuttings	26.39	1,253.29	25.48	3,492.30
Organic waste	96.51	4,168.68	112.05	13,164.63
Metal packaging	0.00	-	-	23.38
Multi-material	36.82	1,537.59	39.82	4,860.11
Bulky objects	11.35	650.32	9.70	1,375.84
Wood	24.19	1,056.57	19.28	2,535.78
Inert	24.54	388.85	20.71	2,503.92
WEEE	6.80	304.09	6.28	869.42
Metal	6.17	211.18	5.11	733.37
Other (Batteries, medicines, etc.)	2.86	651.71	2.86	405.43
Used clothing	3.88	179.73	3.95	533.04
Residual	74.36	3,048.20	70.76	8,253.97
Sweeping	7.45	335.12	8.24	1,317.71
TOTAL	421.08	18,018.55	435.83	53,762.46

Kg of waste collected per capita in Trento and Rovereto

2022	UoM	Collected in Rovereto			Collected in Trento		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE	Kg per capita	2.98	2.97	0.01	2.72	2.71	0.01
WEEE	Kg per capita	1.90	1.90	-	1.68	1.68	-
Other (Batteries, medicines, etc.)	Kg per capita	1.08	1.07	0.01	1.04	1.03	0.01
NON-HAZARDOUS WASTE	Kg per capita	418.10	371.65	46.46	433.11	403.74	29.37
Paper and cardboard	Kg per capita	63.39	63.39	-	69.49	69.49	-
Glass	Kg per capita	36.37	36.37	-	42.09	42.09	-
Lawn cuttings	Kg per capita	26.39	26.39	-	25.48	25.48	-
Organic waste	Kg per capita	96.51	96.51	-	112.05	112.05	-
metal packaging	Kg per capita	0.00	0.00	-	-	-	-
Multi-material	Kg per capita	36.82	36.82	-	39.82	39.82	-
Bulky objects	Kg per capita	11.35	5.94	5.41	9.70	4.18	5.52
Wood	Kg per capita	24.19	24.19	-	19.28	19.28	-
Inert	Kg per capita	24.54	24.54	-	20.71	20.71	-
WEEE	Kg per capita	4.90	4.90	-	4.60	4.60	-
Metal	Kg per capita	6.17	6.17	-	5.11	5.11	-
Other (Batteries, medicines, etc.)	Kg per capita	1.78	1.78	-	1.83	1.83	-
Used clothing	Kg per capita	3.88	3.88	-	3.95	3.95	-
Residual	Kg per capita	74.36	33.32	41.04	70.76	46.91	23.85
Sweeping	Kg per capita	7.45	7.45	-	8.24	8.24	-
TOTAL WASTE	Kg per capita	421.08	374.63	46.47	435.83	406.45	29.38

2021	UoM	Collected in Rovereto			Collected in Trento		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
HAZARDOUS WASTE		3.1	3.1	-	3.1	3.1	-
WEEE	Kg per capita	2.1	2.1	-	1.9	1.9	-
Other (Batteries, medicines, etc.)	Kg per capita	1.0	1.0	-	1.2	1.2	-
NON-HAZARDOUS WASTE	Kg per capita	440.8	373	67.8	441.9	408	33.9
Paper and cardboard	Kg per capita	66.1	66.1	-	71.6	71.6	-
Glass	Kg per capita	38.2	38.2	-	41.8	41.8	-
Lawn cuttings	Kg per capita	30.9	30.9	-	28.9	28.9	-
Organic waste	Kg per capita	102.8	102.8	-	109.0	109.0	-
metal packaging	Kg per capita	0.00	0.00	-	0.2	0.2	-
Multi-material	Kg per capita	37.9	37.9	-	40.2	40.2	-
Bulky objects	Kg per capita	16	15.8	0.2	11.3	9.1	2.2
Wood	Kg per capita	26.0	26.0	-	21.0	21.0	-
Inert	Kg per capita	22.9	22.9	-	20.7	20.7	-
WEEE	Kg per capita	5.3	5.3	-	5.3	5.3	-
Metal	Kg per capita	5.2	5.2	-	6.1	6.1	-
Other (Batteries, medicines, etc.)	Kg per capita	1.7	1.7	-	2.1	1.9	0.2
Used clothing	Kg per capita	4.4	4.4	-	4.4	4.4	-
Residual	Kg per capita	75.1	8.9	66.3	68.4	38.4	30
Sweeping	Kg per capita	8.3	6.9	1.3	10.9	9.4	1.5
TOTAL WASTE	Kg per capita	443.9	376.1	67.8	445	411.1	33.9

HEALTH AND SAFETY (GRI 403)

Accidents

	UoM	MEN			WOMEN			TOTAL		
		2022	2021	2020	2022	2021	2020	2022	2021	2020
TOTAL ACCIDENTS	No.	29	23	13	4	1	1	33	24	14
AT WORK	No.	24	22	12	-	-	1	24	22	13
Trento	No.	21	18	10	-	-	1	21	18	11
Rovereto	No.	3	4	2	-	-	-	3	4	2
Other locations (Verona + Vimercate)	No.	-	-	-	-	-	-	-	-	-
COMMUTING	No.	5	1	1	4	1	-	9	2	1
Trento	No.	3	1	1	3	-	-	6	1	1
Rovereto	No.	2	-	-	1	1	-	3	1	-
Other locations (Verona + Vimercate)	No.	-	-	-	-	-	-	-	-	-
ABSENCES DUE TO ACCIDENTS	days		614	400		39	12		653	412
At work	days	637	612	376	0	-	12	637	612	388
Commuting	days	152	2	24	60	39	-	212	41	25

Hours worked

	UoM	2022	2021	2020
Trento	hours	1,685,932	1,379,857.5	1,670,619
Rovereto	hours	518,489	419,772.4	475,090
Other locations (Verona + Vimercate)	hours	66,175	42,105.7	58,972
TOTAL (ESTIMATED)	hours	2,270,596	1,841,735.6	2,204,681

Accident rates – excluding commuting accidents⁵²

	2022	2021	2020
Severity index	0.28	0.26	0.18
Frequency index	10.57	9.61	5.90

⁵² Severity index: (total number of days lost due to accidents/total hours worked)* 1,000
Frequency index: (total number of accidents/total hours worked) * 1,000,000.

DIVERSITY AND EQUAL OPPORTUNITY (405)

Workers by geographical area

2022	UoM	MEN			WOMEN			Total
		Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	
Executives	No.	12	3	-	3	-	-	18
Middle Managers	No.	35	13	3	9	2	-	62
White-collar workers	No.	273	199	19	231	42	13	777
Blue-collar workers	No.	128	422	8	-	9	-	567

2021	UoM	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Total
Executives	No.	12	3	-	4	-	-	19
Middle Managers	No.	33	12	2	9	2	-	58
White-collar workers	No.	274	194	17	222	47	14	768
Blue-collar workers	No.	133	427	7	-	6	-	573

2020	u.m.	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Totale
Executives	No.	13	3	-	3	-	-	19
Middle Managers	No.	30	12	2	8	2	-	54
White-collar workers	No.	260	199	18	220	47	14	758
Blue-collar workers	No.	132	462	3	-	6	-	603

KPI EUROPEAN TAXONOMY

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities - Disclosure covering the year 2023

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
		Currency	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES								
A.1 Environmentally sustainable activities (Taxonomy-aligned)								
Electricity generation using solar photovoltaic technology	CCM 4.1	0,00	0,000%	Yes	N/EL	N/EL	N/EL	N/EL
Electricity generation from hydropower	CCM 4.5	397.397.832,67	18,103%	Yes	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	CCM 4.9	86.235.864,50	3,928%	Yes	N/EL	N/EL	N/EL	N/EL
Production of heat/cool from geothermal energy	CCM 4.22	0,00	0,000%	No	N/EL	N/EL	N/EL	N/EL
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	15.365.955,72	0,700%	Yes	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste in source segregated fractions	CCM 5.5	32.537.026,98	1,482%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	36.568.932,62	1,666%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	40.484,20	0,002%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	CCM 7.5	5.679.503,16	0,259%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	2.327.564,10	0,106%	Yes	N/EL	N/EL	N/EL	N/EL
Professional services related to energy performance of buildings	CCM 9.3	205.736,42	0,009%	Yes	N/EL	N/EL	N/EL	N/EL
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		576.358.900,37	26,256%	26,26%	0,00%	0,00%	0,00%	0,00%
of which enabling		131.058.085,00	5,970%	5,97%	0,00%	0,00%	0,00%	0,00%
of which transitional		0,00	0,000%	0,00%				

DNSH Criteria										
Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) with the Taxonomy, year 2022 (18) [inserire nota presente in riga 57]	Category enabling activity (19)	Category transitional activity (20)
Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,00217%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	11,90364%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	2,56143%	A	
N/EL	No	No	No	No	No	No	No	0,00474%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,40692%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,95950%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,77382%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,00743%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,17040%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,08159%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,00331%	A	
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	16,875%		
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	3,598%	A	
	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,000%		T

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)								
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
District heating/cooling distribution	CCM 4.15	9.264.042,52	0,422%	EL	N/EL	N/EL	N/EL	N/EL
Production of heat/cool from geothermal energy	CCM 4.22	64.450,74	0,003%	EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	CCM 4.29	2.750.887,00	0,125%	EL	N/EL	N/EL	N/EL	N/EL
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	46.173,58	0,002%	EL	N/EL	N/EL	N/EL	N/EL
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		12.125.553,84	0,552%	0,55%	0,00%	0,00%	0,00%	0,00%
A. Turnover of Taxonomy-eligible activities (A.1+ A.2)		588.484.454,21	26,808%	26,81%	0,00%	0,00%	0,00%	0,00%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES								
Turnover of Taxonomy-non-eligible activities		1.606.674.858,79	73,192%					
Total		2.195.159.313,00	100,000%					

	Share of turnover / Total turnover	
	Aligned with the taxonomy by objective	Eligible for the taxonomy by objective
CCM	26,26%	0,55%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

52 In the context of a continuous improvement process, during the review and update of the KPI calculation process related to turnover, the need was identified to change the approach followed to define the denominator in 2022: in particular, the table discloses the data for 2022 if the approach adopted in 2023 had been followed, i.e., considering total net revenues (excluding other revenues and income and excluding revenues from work on leased assets) as quantified in the relevant consolidated financial statements.

DNSH Criteria											
Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) with the Taxonomy, year 2022 (18) [inserire nota presente in riga 57]	Category enabling activity (19)	Category transitional activity (20)	
EL; N/EL											
N/EL								0,370%			
N/EL								0,000%			
N/EL								0,570%			
N/EL								0,001%			
0,00%								0,942%			
0,00%								577.447.113,69			

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities - Disclosure covering year 2023

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
	Currency	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES								
A.1 Environmentally sustainable activities (Taxonomy-aligned)								
Electricity generation using solar photovoltaic technology	CCM 4.1	620.121,00	0,496%	Yes	N/EL	N/EL	N/EL	N/EL
Electricity generation from hydropower	CCM 4.5	6.304.657,97	5,043%	Yes	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	CCM 4.9	44.254.189,53	35,395%	Yes	N/EL	N/EL	N/EL	N/EL
Storage of electricity	CCM 4.10	7.288.041,87	5,829%	Yes	N/EL	N/EL	N/EL	N/EL
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	7.796.179,63	6,235%	Yes	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste in source segregated fractions	CCM 5.5	4.660.729,42	3,728%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0,00	0,000%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	95.658,68	0,077%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	CCM 7.5	15.582.543,47	12,463%	Yes	N/EL	N/EL	N/EL	N/EL
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		86.602.121,57	69,265%	69,26%	0,00%	0,00%	0,00%	0,00%
of which enabling		67.220.433,55	53,763%	53,76%	0,00%	0,00%	0,00%	0,00%
of which transitional		0,00	0,000%	0,00%				

DNSH Criteria										
Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) for the taxonomy, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,387%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	6,221%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	31,807%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	5,753%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8,545%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	1,463%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,043%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,025%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7,458%	A	
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	61,703%		
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	45,087%	A	
								0,000%		T

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)								
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
Manufacture and installation (and related services) of leakage control technologies that allow reducing and preventing leaks in water supply systems	WTR 1.1	6.840,00	0,005%	N/EL	N/EL	EL	N/EL	N/EL
Drainage systems	WTR 2.3	151.274,03	0,121%	N/EL	N/EL	EL	N/EL	N/EL
District heating/cooling distribution	CCM 4.15	112.521,10	0,090%	EL	N/EL	N/EL	N/EL	N/EL
Production of heat/cool from geothermal energy	CCM 4.22	40.545,00	0,032%	EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	CCM 4.29	35.571,50	0,028%	EL	N/EL	N/EL	N/EL	N/EL
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	0,00	0,000%	EL	N/EL	N/EL	N/EL	N/EL
<i>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</i>		346.751,63	0,277%	0,15%	0,00%	0,13%	0,00%	0,00%
<i>A. CapEx of Taxonomy-eligible activities (A.1+ A.2)</i>		86.948.873,20	69,542%	69,42%	0,00%	0,13%	0,00%	0,00%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES								
<i>CapEx of Taxonomy-non-eligible activities</i>		38.081.435,80	30,46%					
<i>Total</i>		125.030.309,00	100,000%					

	Share of turnover / Total turnover	
	Aligned with the taxonomy by objective	Eligible for the taxonomy by objective
CCM	69,26%	0,15%
CCA	0,00%	0,00%
WTR	0,00%	0,13%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

DNSH Criteria										
Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) for the taxonomy, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
EL; N/EL										
N/EL								0,000%		
N/EL								0,000%		
N/EL								0,122%		
N/EL								0,000%		
N/EL								0,881%		
N/EL								0,677%		
0,00%								1,681%		
0,00%								63.408.753,96		

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities - Disclosure covering year 2023

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
		Currency	%	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL	Yes; No; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES								
A.1 Environmentally sustainable activities (Taxonomy-aligned)								
Electricity generation from hydropower	CCM 4.5	11.561.366,70	26,68%	Yes	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	CCM 4.9	3.162.959,21	7,30%	Yes	N/EL	N/EL	N/EL	N/EL
Production of heat/cool from geothermal energy	CCM 4.22	0,00	0,00%	No	N/EL	N/EL	N/EL	N/EL
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	2.702.475,45	6,24%	Yes	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste in source segregated fractions	CCM 5.5	1.772.124,75	4,09%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	11.359.655,73	26,22%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	21.762,60	0,05%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	CCM 7.5	902.728,27	2,08%	Yes	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	1.228.288,86	2,83%	Yes	N/EL	N/EL	N/EL	N/EL
Professional services related to energy performance of buildings	CCM 9.3	500,00	0,00%	Yes	N/EL	N/EL	N/EL	N/EL
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		32.711.861,57	75,50%	75,50%	0,00%	0,00%	0,00%	0,00%
of which enabling		16.675.894,67	38,49%	38,49%	0,00%	0,00%	0,00%	0,00%
of which transitional		0,00	0,00%	0,00%				

DNSH Criteria										
Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) for the taxonomy, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
Yes; No; N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	24,606%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	6,627%	A	
N/EL	No	No	No	No	No	No	No	0,012%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	5,537%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	3,170%		
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	32,743%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,026%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,598%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	2,438%	A	
N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,004%	A	
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	75,761%		
0,00%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	42,437%	A	
	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0,000%		T

Financial year 2023	2023			Criteria for substantial contribution				
Economic activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)								
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL
District heating/cooling distribution	CCM 4.15	1.201.254,73	2,77%	EL	N/EL	N/EL	N/EL	N/EL
Production of heat/cool from geothermal energy	CCM 4.22	3.913,00	0,01%	EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	CCM 4.29	751.988,21	1,74%	EL	N/EL	N/EL	N/EL	N/EL
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	354.176,50	0,82%	EL	N/EL	N/EL	N/EL	N/EL
<i>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</i>		2.311.332,44	5,33%	5,33%	0,00%	0,00%	0,00%	0,00%
<i>A. OpEx of Taxonomy-eligible activities (A.1+ A.2)</i>		35.023.194,01	80,833%	80,83%	0,00%	0,00%	0,00%	0,00%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES								
<i>OpEx of Taxonomy-non-eligible activities</i>		8.304.781,57	19,17%					
<i>Total</i>		43.327.975,58	100,000%					

	Share of turnover / Total turnover	
	Aligned with the taxonomy by objective	Eligible for the taxonomy by objective
CCM	75,50%	5,33%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

DNSH Criteria											
	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of turnover aligned (A.1.) or eligible (A.2.) for the taxonomy, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
EL; N/EL											
	N/EL								1,240%		
	N/EL								0,000%		
	N/EL								4,027%		
	N/EL								0,235%		
	0,00%								5,502%		
	0,00%								38.172.396,16		

Model 1 - Nuclear and fossil gas activities

Attività legate all'energia nucleare		
1	The company carries out, finances or has exposures to research, development, demonstration and creation of innovative power generation plants that produce energy from nuclear processes with a minimum amount of waste from the fuel cycle.	NO
2	The company carries out, finances or has exposures to the construction and safe operation of new nuclear power plants for the generation of electricity or process heat, including for district heating purposes or for industrial processes such as hydrogen production, and improvements in their safety, with the help of the best available technology.	NO
3	The company carries out, finances or has exposures to the safe operation of existing nuclear power plants that generate electricity or process heat, including for district heating or for industrial processes such as the production of hydrogen from nuclear energy, and improvements in their safety.	NO
Activities related to fossil gases		
4	The company carries out, finances or has exposures to the construction or operation of power generation plants using gaseous fossil fuels.	SI
5	The company carries out, finances or has exposures to the construction, upgrading and operation of combined heat/cooling and power generation plants using gaseous fossil fuels.	SI
6	The company carries out, finances or has exposures to the construction, upgrading and operation of heat generation plants producing heat/cooling using gaseous fossil fuels	SI

Model 2 - Economic activities aligned with the Taxonomy (Denominator)

		Proportion (present information in monetary amounts and percentages)					
		CCM + CCA		CCM		CCA	
Row	Economic activities	Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of economic activity aligned with the taxonomy in section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
2	Amount and proportion of economic activity aligned with the taxonomy in section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
3	Amount and proportion of economic activity aligned with the taxonomy in section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
4	Amount and proportion of economic activity aligned with the taxonomy in section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
5	Amount and proportion of economic activity aligned with the taxonomy in section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
6	Amount and proportion of economic activity aligned with the taxonomy in section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
7	Amount and proportion of other economic activities aligned with the taxonomy not included in rows 1 to 6 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
8	Total amount and proportion of other economic activities aligned with the taxonomy in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%

Model 3 - Economic activities aligned with the Taxonomy (Numerator)

		Proportion (present information in monetary amounts and percentages)					
Row	Economic activities	CCM + CCA		CCM		CCA	
		Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of economic activity aligned with the taxonomy in section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
2	Amount and proportion of economic activity aligned with the taxonomy in section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
3	Amount and proportion of economic activity aligned with the taxonomy in section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
4	Amount and proportion of economic activity aligned with the taxonomy in section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
5	Amount and proportion of economic activity aligned with the taxonomy in section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
6	Amount and proportion of economic activity aligned with the taxonomy in section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
7	Amount and proportion of other economic activities aligned with the taxonomy not included in rows 1 to 6 in the numerator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
8	Total amount and proportion of economic activities aligned with the taxonomy in the numerator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%

Model 4 - Taxonomy-eligible economic activities which are not aligned with the taxonomy

		Proportion (present information in monetary amounts and percentages)					
		CCM + CCA		CCM		CCA	
Row	Economic activities	Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
2	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
3	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
4	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	2.750.887	0,125%	2.750.887	0,125%	-	0,000%
5	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	46.174	0,002%	46.174	0,002%	-	0,000%
6	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
7	Amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy not included in rows 1 to 6 in the denominator of the applicable KPI	-	0,000%	-	0,000%	-	0,000%
8	Total amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy in the denominator of the applicable KPI	2.797.061	0,127%	2.797.061	0,127%	-	0,000%

Model 4 - Taxonomy-eligible economic activities which are not aligned with the taxonomy

		Proportion (present information in monetary amounts and percentages)					
		CCM + CCA		CCM		CCA	
Row	Economic activities	Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
2	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
3	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
4	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	35.572	0,028%	35.572	0,028%	-	0,00%
5	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	-	0,00%	-	0,00%	-	0,00%
6	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
7	Amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy not included in rows 1 to 6 in the denominator of the applicable KPI	-	0,000%	-	0,000%	-	0,000%
8	Total amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy in the denominator of the applicable KPI	35.572	0,028%	35.572	0,028%	-	0,000%

Model 4 - Taxonomy-eligible economic activities which are not aligned with the taxonomy

		Proportion (present information in monetary amounts and percentages)					
		CCM + CCA		CCM		CCA	
Row	Economic activities	Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.26 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
2	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.27 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
3	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.28 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
4	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	751.988	1,736%	751.988	1,736%	-	0,00%
5	"Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.30 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI"	354.177	0,817%	354.177	0,817%	-	0,00%
6	Amount and proportion of Taxonomy-eligible economic activity but not aligned with the taxonomy in section 4.31 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0,00%	-	0,00%	-	0,00%
7	Amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy not included in rows 1 to 6 in the denominator of the applicable KPI	-	0,000%	-	0,000%	-	0,000%
8	Total amount and proportion of other Taxonomy-eligible economic activities but not aligned with the taxonomy in the denominator of the applicable KPI	1.106.165	2,553%	1.106.165	2,553%	-	0,000%

The background of the page is a photograph of an industrial facility, possibly a water treatment plant, with a strong blue color cast. A vertical metal pipe runs through the center, with a large handwheel at its base. A metal railing is visible in the foreground and middle ground. The overall scene is clean and technical.

INDEPENDENT AUDITORS REPORT

GRI 2-5 |





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(Translation from the Italian original which remains the definitive version)

Independent auditors' report on the consolidated non-financial statement pursuant to article 3.10 of Legislative decree no. 254 of 30 December 2016 and article 5 of the Consob Regulation adopted with Resolution no. 20267 of 18 January 2018

*To the board of directors of
 Dolomiti Energia Holding S.p.A.*

Pursuant to article 3.10 of Legislative decree no. 254 of 30 December 2016 (the “decree”) and article 5.1.g) of the Consob (the Italian Commission for listed companies and the stock exchange) Regulation adopted with Resolution no. 20267 of 18 January 2018, we have been engaged to perform a limited assurance engagement on the 2023 consolidated non-financial statement of the Dolomiti Energia Group (the “group”) prepared in accordance with article 4 of the decree and approved by the board of directors on 29 March 2024 (the “NFS”).

Our procedures did not cover the information set out in “6.8 Disclosure pursuant to Regulation (EU) 2020/852 on the Taxonomy” section of the NFS required by article 8 of Regulation (EU) 852 of 18 June 2020.

Responsibilities of the directors and board of statutory auditors (“Collegio Sindacale”) of Dolomiti Energia Holding S.p.A. (the “parent”) for the NFS.

The directors are responsible for the preparation of an NFS in accordance with articles 3 and 4 of the decree and the “Global Reporting Initiative Sustainability Reporting Standards” issued by GRI - Global Reporting Initiative (the “GRI Standards”) and the sector supplement “*Electric Utilities Sector Supplement*”, which they have identified as the reporting standards.

The directors are also responsible, within the terms established by the Italian law, for such internal control as they determine is necessary to enable the preparation of an NFS that is free from material misstatement, whether due to fraud or error.

Moreover, the directors are responsible for the identification of the content of the NFS, considering the aspects indicated in article 3.1 of the decree and the group’s business and characteristics, to the extent necessary to enable an understanding of the group’s business, performance, results and the impacts it generates.

The directors’ responsibility also includes the design of an internal model for the management and organisation of the group’s activities, as well as, with reference to the aspects identified and disclosed in the NFS, the group’s policies and the identification and management of the risks generated or borne.



Dolomiti Energia Holding S.p.A.

Independent auditors' report

31 December 2023

The *Collegio Sindacale* is responsible for overseeing, within the terms established by the Italian law, compliance with the decree's provisions.

Auditors' independence and quality control

We are independent in compliance with the independence and all other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards, the IESBA Code) issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. In the year of this assignment our company applied International Standard on Quality Control 1 (ISQC Italia 1) and, accordingly, maintained a system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditors' responsibility

Our responsibility is to express a conclusion, based on the procedures performed, about the compliance of the NFS with the requirements of the decree and the GRI Standards. We carried out our work in accordance with the criteria established by "International Standard on Assurance Engagements 3000 (revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information" ("ISAE 3000 revised"), issued by the International Auditing and Assurance Standards Board applicable to limited assurance engagements. This standard requires that we plan and perform the engagement to obtain limited assurance about whether the NFS is free from material misstatement. A limited assurance engagement is less in scope than a reasonable assurance engagement carried out in accordance with ISAE 3000 revised, and consequently does not enable us to obtain assurance that we would become aware of all significant matters and events that might be identified in a reasonable assurance engagement.

The procedures we performed on the NFS are based on our professional judgement and include inquiries, primarily of the parent's personnel responsible for the preparation of the information presented in the NFS, documental analyses, recalculations and other evidence gathering procedures, as appropriate.

Specifically, we performed the following procedures:

1. Analysing the material aspects based on the group's business and characteristics disclosed in the NFS, in order to assess the reasonableness of the identification process adopted on the basis of the provisions of article 3 of the decree and taking into account the reporting standards applied.
2. Analysing and assessing the identification criteria for the reporting scope, in order to check their compliance with the decree.
3. Comparing the financial disclosures presented in the NFS with those included in the group's consolidated financial statements.
4. Gaining an understanding of the following:
 - the group's business management and organisational model, with reference to the management of the aspects set out in article 3 of the decree;
 - the entity's policies in connection with the aspects set out in article 3 of the decree, the achieved results and the related key performance indicators;
 - the main risks generated or borne in connection with the aspects set out in article 3 of the decree.

Moreover, we checked the above against the disclosures presented in the NFS and carried out the procedures described in point 5.



Dolomiti Energia Holding S.p.A.
 Independent auditors' report
 31 December 2023

5. Understanding the processes underlying the generation, recording and management of the significant qualitative and quantitative information disclosed in the NFS.

Specifically, we held interviews and discussions with the parent's management personnel and personnel of Dolomiti Energia S.p.A., Dolomiti Ambiente S.r.l., Dolomiti Energia Solutions S.r.l., Set Distribuzione S.p.A. and of Novaresti S.p.A.. We also performed selected procedures on documentation to gather information on the processes and procedures used to gather, combine, process and transmit non-financial data and information to the office that prepares the NFS.

Furthermore, with respect to significant information, considering the group's business and characteristics:

- at group level,
 - a) we held interviews and obtained supporting documentation to check the qualitative information presented in the NFS and, specifically, the business model, the policies applied and main risks for consistency with available evidence,
 - b) we carried out analytical and limited procedures to check, on a sample basis, the correct aggregation of data in the quantitative information;
- with regard Rovereto and Trento plants., which we have selected on the basis of their business, contribution to the key performance indicators at consolidated level and location, to meet their management and obtain documentary evidence supporting the correct application of the procedures and methods used to calculate the indicators.

Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the 2023 consolidated non-financial statement of the Dolomiti Energia Group has not been prepared, in all material respects, in accordance with the requirements of articles 3 and 4 of the decree and the GRI Standards and the sector supplement "*Electric Utilities Sector Supplement*".

Our conclusion does not extend to the information set out in the "6.8 Disclosure pursuant to Regulation (EU) 2020/852 on the Taxonomy" section of the NFS required by article 8 of Regulation (EU) 852 of 18 June 2020.

Verona, 10 April 2024

KPMG S.p.A.

(signed on the original)

Massimo Rossignoli
 Director of Audit

The attached report of the independent auditors and the NFD to which it refers are compliant with those filed at the registered office of Dolomiti Energia Holding SpA and, after the date of the report, KPMG SpA did not carry out any audit work aimed at updating its contents.

We wish to thank all of our colleagues
who worked on producing this document

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