

2022



CONSOLIDATED  
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](mailto:sustainability@dolomitienergia.it)

On the cover and inside the disclosure: Alpine biodiversity, an environment to be protected

# **CONSOLIDATED NON-FINANCIAL STATEMENT 2022**

Pursuant to Italian Legislative Decree 254 of 2016

# LETTER TO STAKEHOLDERS

Dear Stakeholders,

The sixth edition of the Dolomiti Energia Group's Non-Financial Statement is an opportunity to share an overview of the activities that have been carried out and the results that have been achieved over the last year by the Group with you, which by nature and by choice has always focused on environmental, economic and social sustainability, putting these aspects at the centre of its strategic and operational guidelines.

For the Dolomiti Energia Group, awareness of the role its activities have in the quality of life of the communities and areas where it operates results in into a corporate culture based on transparency, spirit of service, the centrality of people, respect for the environment, and constant improvement in the daily lives of citizens and customers. The company's management aims to generate competitive services and shared value with the communities.

In 2022, the Group worked hard with its staff to enhance their potential by fostering the development of a welcoming, sustainable and meritocratic culture, open to innovation and focused on internal and external customer satisfaction, as well as by striving to build a working environment that values inclusion, understood as transparent and timely communication, sharing, belonging and empowerment, and providing our people with the necessary skills. The Group launched a series of initiatives during the year to facilitate sustainable mobility for employees' commutes to work and continued to increase the number of electric vehicles in its fleet.

Dolomiti Energia Group's support for the local community led to initiatives such as Etika, the economic, ecological and solidarity-based electricity and gas offer conceived by Cooperazione Trentina together with Dolomiti Energia, which made it possible to develop empowerment and self-determination projects for fragile people as well as social innovation projects focused on young people and schools, and to support initiatives to welcome people fleeing Ukraine because of the war. Etika acts on savings, environment and social inclusion, supporting projects for independent living, for people with disabilities, protecting the environment through the use of 100% green energy and offsetting the CO2 emitted by domestic gas consumption, as well as providing significant cost savings in gas bills.

In 2022, the Group found itself operating in an environment characterised by an increasing level of risk related to the ongoing Russian-Ukrainian conflict. In particular, special attention was paid to the risks asso-

Silvia Arlanch  
Dolomiti Energia Group Chairwoman



ciated with the availability of raw materials and related price increases on the energy markets, as well as the economic and social consequences at national and international level.

Against this complex and challenging backdrop, the Group reaffirmed its commitment to the sustainable development of its businesses, with the aim of increasing its competitiveness in the market and facing future challenges in a responsible manner to ensure sustainable growth.

During the year we continued to implement solutions for the evolution and digitalisation of corporate processes in the context of the administration and advanced management of smart networks and industry 4.0, and the partnership with Microsoft focused on the digital transformation of the Energy & Utilities sector.

During 2022 the Group carried forward its commitment to the implementation of energy-saving initiatives at customer and partner properties, the improvement of the energy efficiency of public lighting in certain municipalities, and the offer for business and retail customers to receive energy exclusively from renewable sources, the production of biomethane and energy from the organic fraction.

Thanks to the maintenance of high levels of separate waste collection in the areas served and the launch of a series of preliminary actions for the introduction of circular economy practices in procurement and in-house catering services, the Group's commitment to the circular economy was further consolidated.

In 2022 the Group continued to make an important contribution to supporting national and provincial strategies in the area of decarbonisation, energy transition and combating climate change. As a result of its commitment, the Dolomiti Energia Group was included in the list of companies known as 'Sustainability Leaders 2022', prepared by Statista in cooperation with Il Sole24Ore. Numerous Italian companies were analysed within the study, which considered three dimensions: environmental, social and economic.

The Group's commitment to reducing climate-changing emissions was expressed in 2022 through the activities of its associate EPQ, a company specialising in flexibility and energy management, and the synergies created with the Group companies Dolomiti Energia Solution and Dolomiti Energia to develop energy communities, storage systems and photovoltaic plants with turnkey offers to make clean energy production accessible to households and businesses. In order to make the community increasingly aware of the

responsible and efficient use of resources, initiatives were also promoted to offer dedicated solutions for savings and for making buildings more energy efficient, analysing and reducing consumption, and offering environmentally neutral electricity and gas by offsetting the CO<sub>2</sub> emitted from their use.

The Dolomiti Energia Group is fully aware of the key role it plays in the energy transition and is ready to face the challenges of sustainability in an increasingly integrated and organic manner. This strategy is based on ethics, transparency, respect for people, safety at work and infrastructure, inclusion, the protection of human rights, responsible consumption, network flexibility and resilience, efficiency and reuse of resources such as sustainable water and land management, accessibility of services, energy transition and decarbonisation.

During 2023, the Group will work to redesign its values, mission and vision starting from the inside, at different levels and with a strategic approach to enhance the narrative capital of the brand, company and people.

During 2023, the Group will be committed to managing the challenges embedded in an ever-changing environment and to providing high-quality services to people to improve their daily lives, with the aim of creating shared long-term value and development and a better future for all.

The Chairwoman  
**Silvia Arlanch**



# TABLE OF CONTENTS

<b>1. THE DOLOMITI ENERGIA GROUP</b>	<b>6</b>
1.1. Company Profile and Main Activities	8
1.2. Mission and Values	11
1.3. Creation of Economic Value	16
<b>2. RESPONSIBLE GOVERNANCE</b>	<b>20</b>
2.1. The Governance Model	22
2.2. Risk Management	27
2.3. Business Continuity, Resilience and Cybersecurity	31
2.4. Business Ethics and Integrity	33
2.5. Sustainability for the Dolomiti Energia Group	38
<b>3. SUSTAINABLE PRODUCTS AND SERVICES</b>	<b>50</b>
3.1. Products and Services Offered	52
3.2. Close to Customers with Affordable, Efficient and Reliable Services	75
<b>4. PEOPLE</b>	<b>84</b>
4.1. Commitment Towards Employees	86
4.2. Attention to Occupational Health and Safety	103
<b>5. PROTECTION OF THE ENVIRONMENT</b>	<b>114</b>
5.1. Managing Environmental Impacts	116
5.2. Energy Consumption	118
5.3. Emissions to air	123
5.4. Waste	131
5.5. Efficient and Sustainable Use of Water	139
5.6. Preservation of Natural Resources and Biodiversity	145
<b>6. SUPPLIERS AND COMMUNITIES</b>	<b>154</b>
6.1. The Supply Chain	156
6.2. Responsible Relations with Communities	159
<b>7. DISCLOSURE PURSUANT TO REGULATION (EU) 2020/852 ON THE TAXONOMY</b>	<b>164</b>
<b>8. APPENDIX</b>	<b>184</b>
8.1. Methodological Note and Guide to Interpretation	186
8.2. GRI Content Index	189
8.3. Reconciliation statement on material topics, the areas covered by Italian Legislative Decree 254/2016 and the GRI Standards	202
8.4. Annexes	204
<b>9. INDEPENDENT AUDITORS REPORT</b>	<b>222</b>

A photograph of a field of tall grasses and dandelions in the foreground, with a blurred mountain range in the background. The text 'THE DOLOMITI ENERGIA GROUP' is overlaid in white, bold, sans-serif font on the left side of the image.

# THE DOLOMITI ENERGIA GROUP





**932,000** tonnes

of carbon dioxide avoided through 100% green supplies (950,000 in 2021)



**93%**

energy fed into the grid from renewable sources (96% in 2021)



**2,362.9** GWh

energy produced (3,835.7 GWh in 2021)



Euro **3,353** million

total revenue and other income (2,181 in 2021)



**1,424**

people (1,418 in 2021)



**63%**

public shareholders



**82.1%**

average separate waste collection (Trento Rovereto) (83.5% in 2021)



Euro **97.6** million

capex (105 million in 2021)

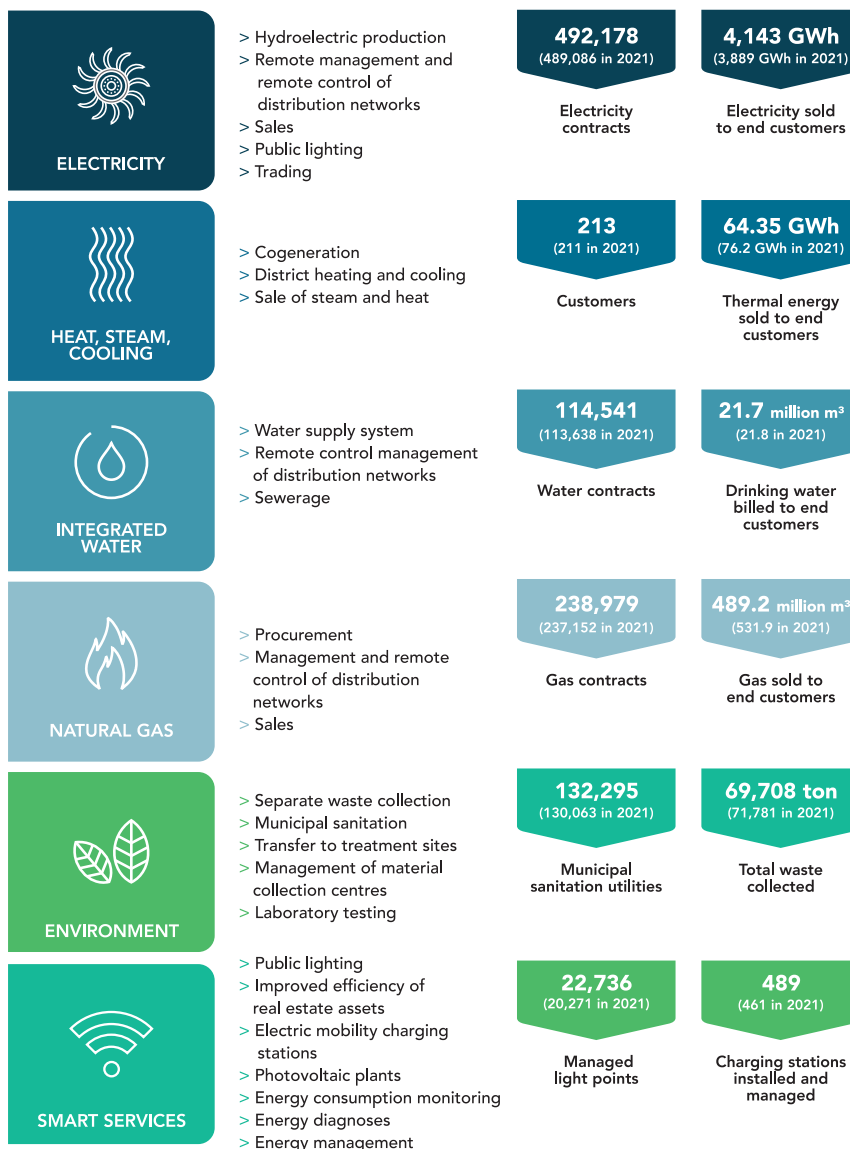
# 1.1.

## COMPANY PROFILE AND MAIN ACTIVITIES

GRI 2-1 | GRI 2-2 | 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. Today the Group is one of the largest multi-utility companies in Italy and 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), trading, public lighting services, in the energy efficiency and e-mobility field and other minor services.

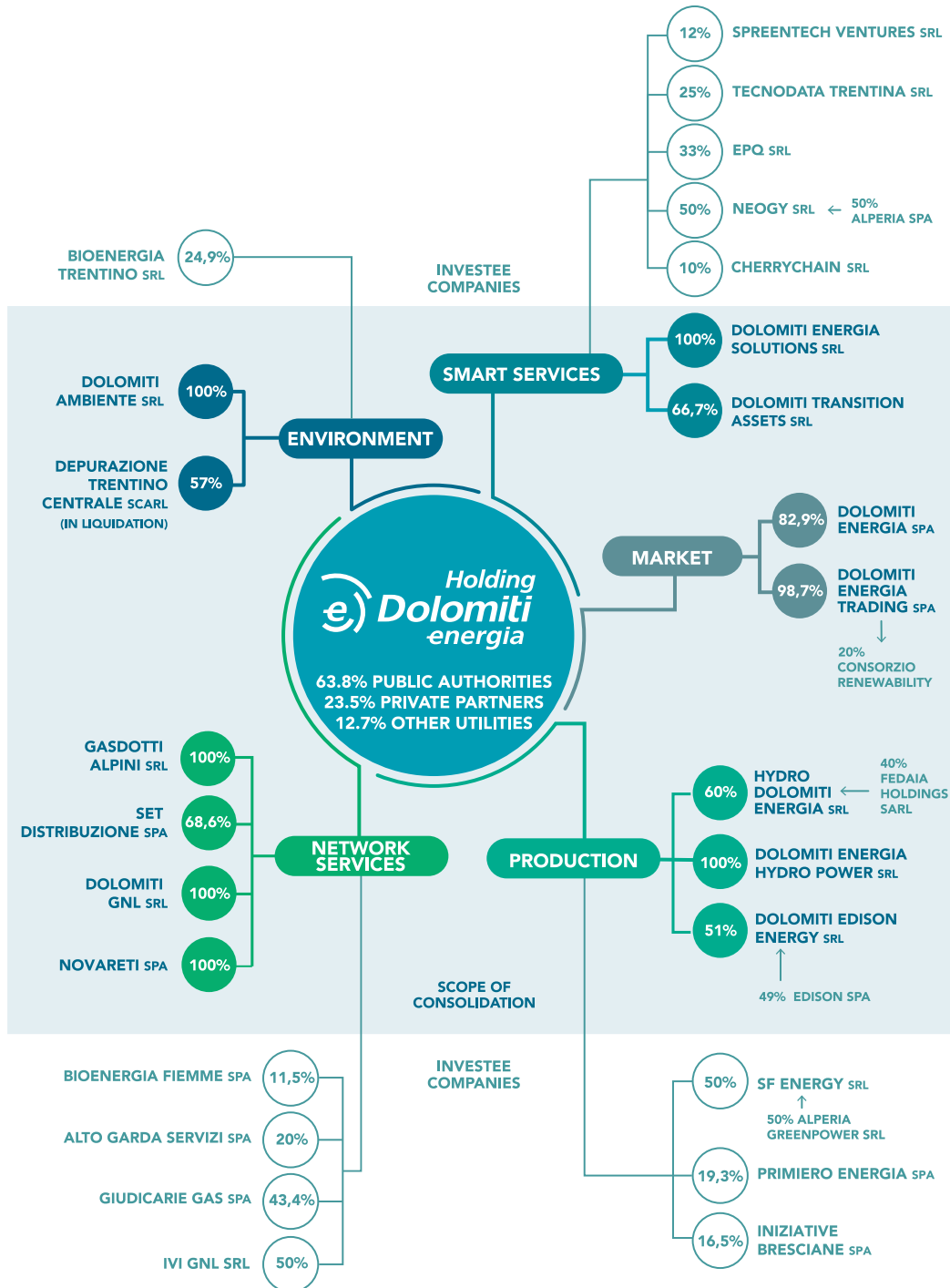
The activities managed by the Group are listed below:



For more information on the quantitative and economic data, please refer to the 2022 Report on Operations published on the website [www.gruppodolomitienergia.it](http://www.gruppodolomitienergia.it)

### 1.1.1. COMPANY STRUCTURE AND OWNERSHIP STRUCTURE

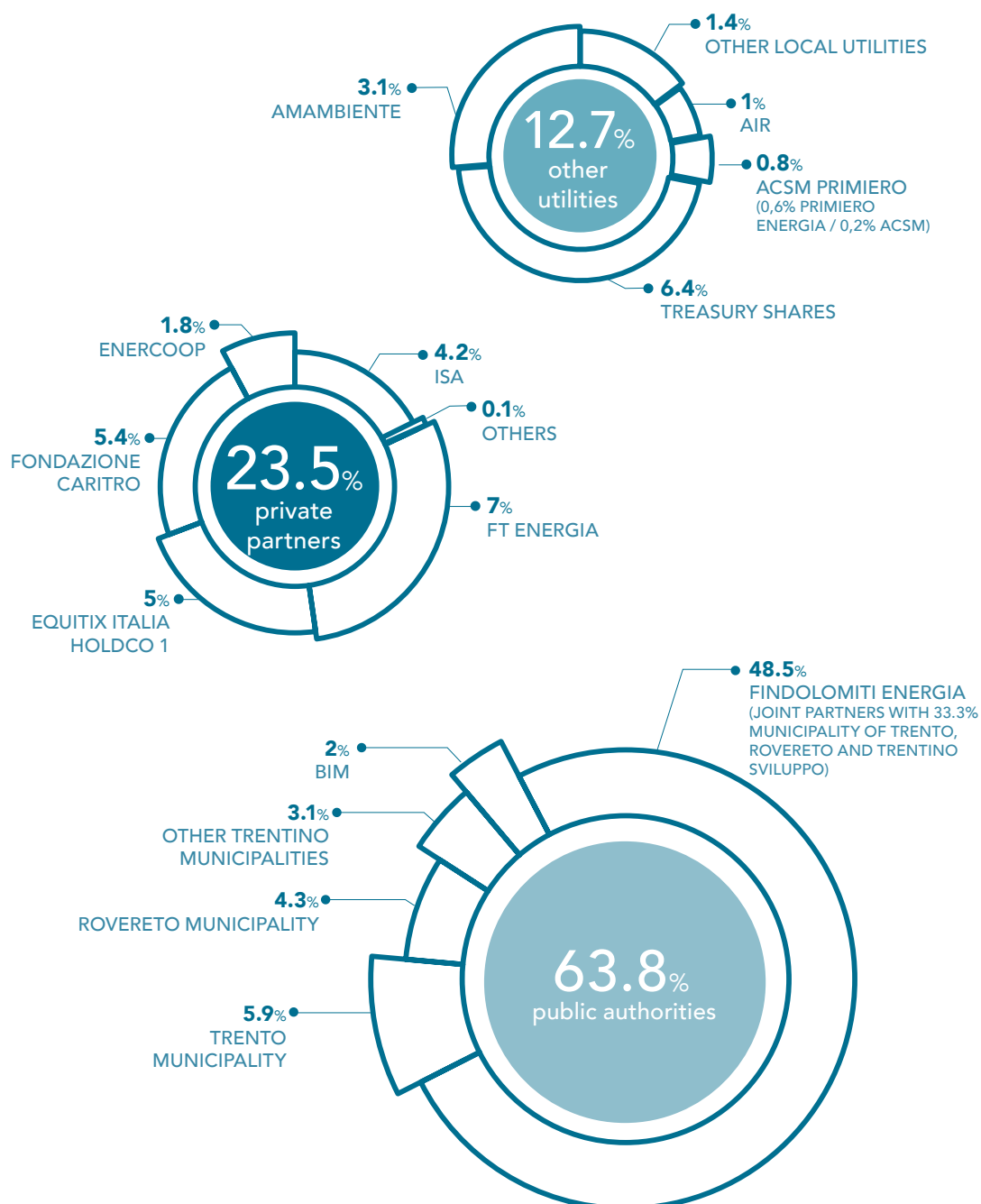
The structure of the Dolomiti Energia Group is presented below:



The Dolomiti Energia Group is fully controlled by Dolomiti Energia Holding S.p.A. on which the various operational companies depend. Dolomiti Energia Holding's reference shareholders are the municipalities of Rovereto and Trento and the Autonomous Province of Trento. The Municipalities of Mori, Ala, Volano, Calliano and Grigno, together with many other Trentino municipalities, also hold investments in the company, totalling 3% of the share capital.

Dolomiti Energia Holding S.p.A. has its registered office in Rovereto, in the province of Trento, and its operational headquarters in Trento, via Fersina 23.

The Dolomiti Energia Group operates mainly in the Trentino region, with the exception of the subsidiary Dolomiti Energia, the Group's sales company, which operates throughout Italy, and the subsidiary Dolomiti Energia Solutions S.r.l., which operates in North-East Italy.



# 1.2.

## MISSION AND VALUES

The historical presence in the province of the companies that gave rise to the Dolomiti Energia Group has reinforced an image which evokes safety, ecology and quality of service in the minds of its customers. The Group seeks to consolidate and reinforce this image, above all in the current period of heated competition and growing market complexity, by demonstrating to its customers and to its stakeholders, inside and outside, its commitment towards a continuous and gradual improvement of the service and of performance, both environmental and related to health and safety. This commitment takes concrete form through strong technological innovation capabilities and attention to social aspects, aimed at efficiently meeting the needs of customers and communities by optimising the processes and singling out integrated and customised solutions focusing on protecting the environment and guaranteeing improvement in the health and safety conditions for the company's personnel and its external collaborators.

The starting point for the strategies of the Dolomiti Energia Group and the first ethical principle characterising its actions is observance of the instructions given by the Competent Authorities in compliance with the applicable laws. The Group has also chosen to play an active role in sustainable development issues, "sustainable by nature and by choice", as they are in line with its way of doing business. The attention paid to sustainability issues, in particular those related to climate change and the environment in general, is the foundation for the framework of values that inspire the policies and operational choices of the Dolomiti Energia Group. These take the form of the following points.

### CUSTOMERS

Knowledge of citizens' needs and its bond with the territory are the primary references of the company's business, which aims at satisfying customers and at integrating and continuously improving the quality of the services it offers. This is why the Dolomiti Energia Group considers having direct contact with the customer and creating a relationship based on the following values as essential:

- **Trust:** building trusting relationships with customers through conduct marked by expertise, reliability, honesty and the habit of guiding customers to the most advantageous solutions;
- **Helpfulness and flexibility:** the ability to adapt to the needs of customers;
- **Clarity** in providing simple and understandable answers;
- **Attention**, listening to customers in order to understand their expectations, even if not obvious;
- **Reliability**, keeping commitments and respecting them, always.



## HUMAN RESOURCES

The Dolomiti Energia Group is aware that the proper operation of an organisation, the achievement of objectives and the improvement of occupational health and safety conditions depend on the support, collaboration and active participation of all the personnel involved.

This is why the Group pays great attention to human resources management issues:

- promoting a sense of belonging to the Group and teamwork;
- creating the conditions for a creative expression of the talents that every person has;
- motivating and involving personnel in development of the projects and attainment of the objectives;
- offering opportunities in the work environment through training plans, personal growth and continuous development and furthering skills, knowledge and abilities;
- creating a relational climate based on openness, fairness and respect for the personal character, thought and opinions of each individual involved;
- promoting a management climate that motivates, recognises and rewards the contribution of the individual and the team.

## INNOVATION

The Dolomiti Energia Group has a strong bond with its territory. Hence the need and desire for continuous improvement with regard to the present and future impact on the surrounding environment. Therefore, the Group is oriented towards investments in social and technological innovation to improve both the protection of natural resources and the sustainability of energy sources, and the health and safety conditions of people.

## CONTINUOUS IMPROVEMENT

For the Dolomiti Energia Group continuous improvement is the cultural, intellectual and motivational bed-rock of the organisation. The ability to rise to challenges at all levels is key to guaranteeing success in the areas of customer services, respecting the environment, in relation to health and safety issues, employee satisfaction and remaining competitive. With this approach the Dolomiti Energia Group therefore aims to promote the culture of quality, health and safety and environmental protection in relation to both its own employees and its external stakeholders.



## VALUES

The mission, values and objectives of the Dolomiti Energia Group are heavily influenced by the public nature of the Group's activities, compliance with current legislation and the sustainable use of natural and local resources, occupational health and safety, research and development of state-of-the-art methods and materials, and constant technological innovation.

## STRATEGY

The Dolomiti Energia Group has modulated its objectives and development strategies in a perspective not only local, but also outside the region and nationwide. In this sense, the Dolomiti Energia Group intends to:

- confirm, strengthen and develop its presence on the territory of reference by providing quality services, with particular attention to issues relating to ecology, safety, sustainability and service excellence;
- aim at a proper balance between the regulated activities and those distinctive of the free market;
- strengthen its presence on the multi-utility market, both as regards production and procurement, and as regards the distribution and marketing of energy products and services, with a particular focus on reducing climate-altering emissions, saving resources, energy efficiency and savings, and the development of smart networks.

In order to achieve these important objectives, the Group companies have identified a series of strategic lines of development particularly in the area of renewable energy production and, more generally, in the development of innovative services connected with the Group's historic activities (energy efficiency, e-mobility, public lighting, the smart city).

# AN HISTORY OF SUSTAINABILITY FOR MORE THAN TWENTY YEARS

**2001**

Trentino Servizi was created from the merger of SIT and ASM, the historical public service companies of Trento and Rovereto.



**2005**

SET Distribuzione took over the electricity distribution activities in Trentino.



**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.



**2014**

Dolomiti Ambiente was established to take care of urban hygiene services in Trento and Rovereto.



**2003**

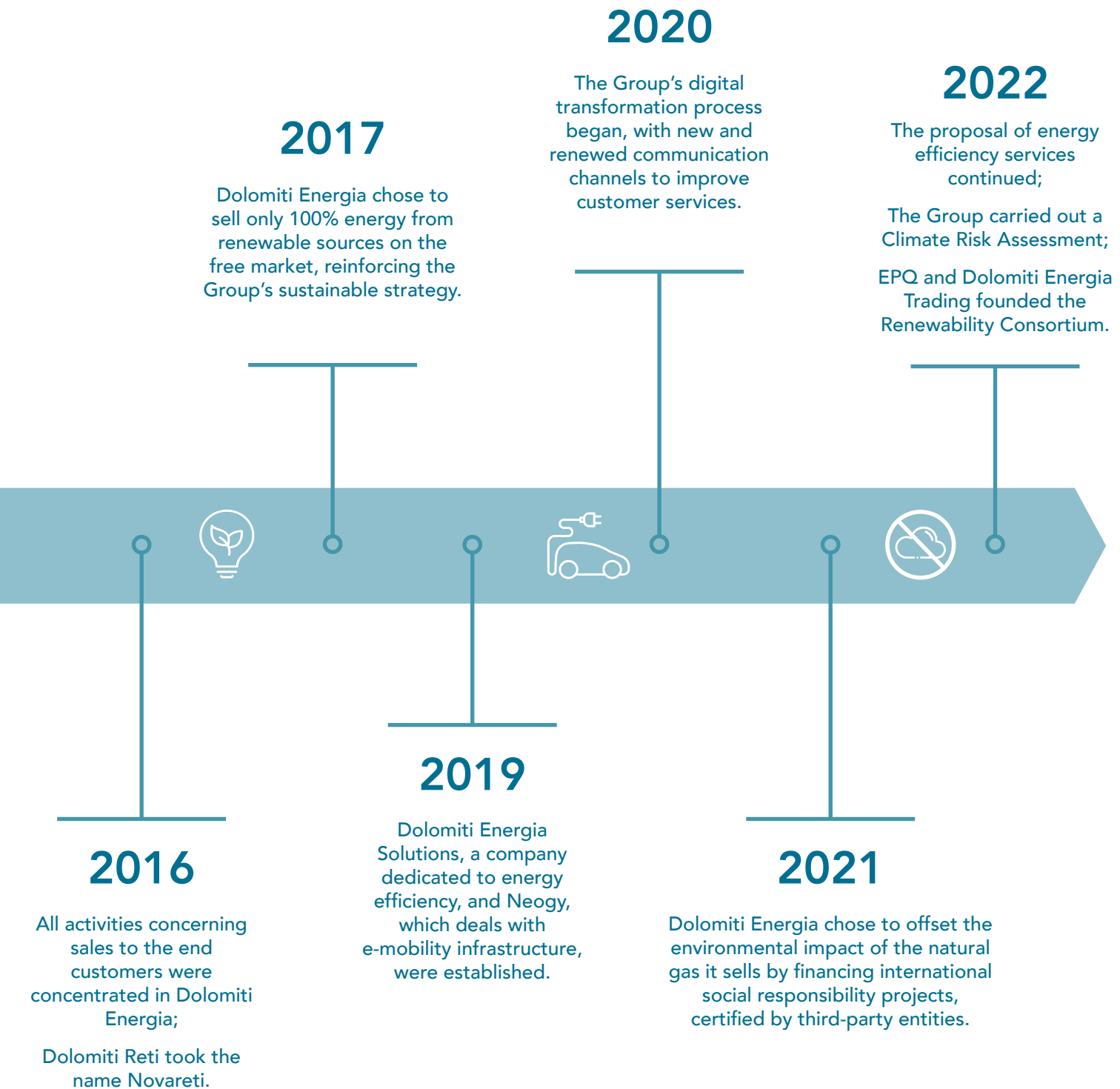
The sales company Trenta was founded, to which the commercial activities of Trentino Servizi and the companies STET and AIR were assigned.

**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.

**2010**

Dolomiti Reti was established to deal with cogeneration, district heating, water cycle, and gas distribution.



# 1.3.

## CREATION OF ECONOMIC VALUE

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

GRI 201-1 | GRI 201-2 |

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 2022. At its core is the creation of shared value for the environment, communities and the economic system. The Group seeks to achieve this 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 raising awareness of the use of green energy and the principles of the circular economy.

### Main Economic and Financial Data<sup>1</sup>

	UoM	2022	2021	2020
Value added	€ million	389.5	375.8	392.3
Leverage (net financial position on shareholders' equity)	€ million	0.8	0.9	0.5
ROI (EBIT/net invested capital)	%	3.4	3.5	7.5
Gross operating margin/revenue and other income	%	5.9	9.5	17.0
ROS (EBIT/turnover)	%	3.5	6.6	12.5
<b>TOTAL REVENUE AND OTHER INCOME</b>	<b>€ million</b>	<b>3,353.7</b>	<b>2,182</b>	<b>1,397</b>
Gross operating margin	€ million	196.5	206.9	237.7
Investments	€ million	97.6	105.7	87.7

Value added is the Group's ability to create wealth through the company's business cost-efficiently, striving to distribute it among the various stakeholders in the social and territorial context in which it operates. 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 2022.

<sup>1</sup> For more information on the economic performance of the Group and its assets and financial position see the 2022 Report on Operations published on the website [www.gruppodolomitienergia.it](http://www.gruppodolomitienergia.it)

	UoM	2022	2021	2020
<b>ECONOMIC VALUE GENERATED BY THE GROUP</b>	<b>€ thousands</b>	<b>3,348,597</b>	<b>2,176,155</b>	<b>1,413,103</b>
Revenue	€ thousands	3,353,712	2,176,715	1,397,413
Other income	€ thousands	1,382	551	18,540
Financial income	€ thousands	926	1,142	1,907
Value adjustments on financial assets	€ thousands	-	-	-
Write-downs	€ thousands	(7,423)	(2,253)	(4,757)
<b>ECONOMIC VALUE DISTRIBUTED BY THE GROUP</b>	<b>€ thousands</b>	<b>(3,278,682)</b>	<b>(2,057,181)</b>	<b>(1,269,453)</b>
Operating expenses	€ thousands	(2,965,593)	(1,801,253)	(1,023,620)
Remuneration of collaborators	€ thousands	(70,188)	(66,815)	(67,387)
Remuneration of lenders	€ thousands	(10,193)	(7,987)	(6,536)
Remuneration of investors	€ thousands	(25,020) <sup>2</sup>	(69,865)	(42,994)
Remuneration of public administration	€ thousands	(205,575)	(108,980)	(126,786)
Sponsorships and donations	€ thousands	(2,113)	(2,281)	(2,130)
<b>ECONOMIC VALUE HELD BY THE GROUP</b>	<b>€ thousands</b>	<b>69,915</b>	<b>118,974</b>	<b>143,650</b>
Amortisation/depreciation and allocations	€ thousands	70,617	59,963	58,194
Other reserves	€ thousands	(702)	59,011	85,456

In 2022, the Group generated € 389 million value added (€ 376 million in 2021). 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.

### 1.3.1. FINANCIAL IMPLICATIONS AND OTHER RISKS AND OPPORTUNITIES DUE TO CLIMATE CHANGE

The social configuration, market positioning and business activities of Group companies make the issue of climate change impacts even more relevant. In fact, the Group suffers the economic and financial impacts associated with physical risks on assets such as networks, plants and infrastructure that must be duly analysed and mitigated.

This is another reason why the Group has chosen to play a constant and active role in sustainable development, both of its own companies and of the territories and communities in which and with which it operates, thanks also to the drive of its shareholders, who are strongly interested in green and smart issues, as demonstrated by the fact that the Autonomous Province of Trento has recently approved the Provincial Strategy for Sustainable Development.

<sup>2</sup> 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.

## 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, such as:*

- *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.*

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.

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 and constantly updated 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.

To this end, a team cross-functional to the various businesses has developed a mapping of climate change risks in the Group in terms of describing the risk scenario, classifying between physical and transitional risks, assessing the impacts and identifying measures to manage, prevent and mitigate these risks, determining the main guidelines for the development of the company's Strategic Plan.

Lastly, the risk assessment carried out was reviewed and deeply analysed in the light of the indicators provided in two probabilistic climate change effect scenarios for Italy, namely RCP 4.5 and RCP 8.5.

# RESPONSIBLE GOVERNANCE







42%

women on the  
Board of Directors  
(33% in 2021)



17%

women executives out of  
total executives  
(21% in 2021)



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. THE BOARD OF DIRECTORS

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 <sup>3</sup>	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	

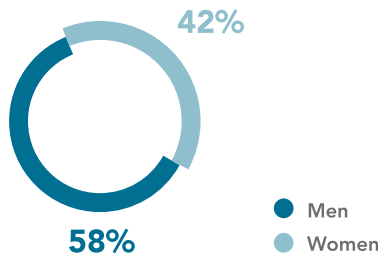
## Composition of the Board of Statutory Auditors

Statutory Auditors	Office
Michele Iori	Chair
William Bonomi	
Maura Dalbosco	
<b>ALTERNATE AUDITORS</b>	
Giovanni Paolo Rao	
Tiziana Depaolo	

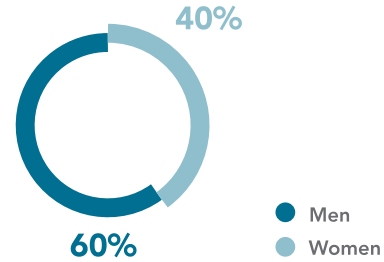
<sup>3</sup> M/m Majority/minority list

## Diversity in the Board of Directors

Directors by gender diversity

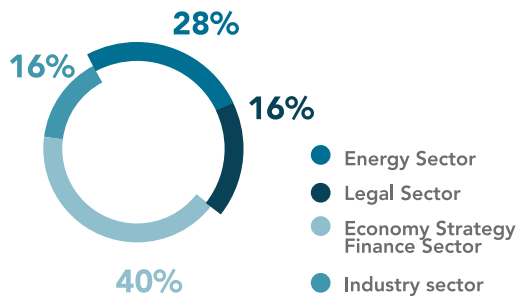


Composition Board of Statutory Auditors

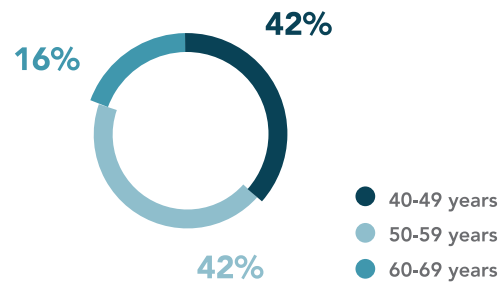


According to the provisions of the law and the company's Articles of Association, the Board of Statutory Auditors consists of three statutory auditors and two alternate auditors, appointed by the Shareholders' Meeting in compliance with the gender balance. The current Board of Statutory Auditors has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

During 2022, the results of a number of projects were shared with the Board of Directors, both purely related to sustainability issues, such as the updating of the materiality analysis, and more cross-cutting initiatives, such as the analyses conducted in connection with the Climate Risk Assessment.

In addition, a multi-year training plan with respect to ESG issues was defined, which will alternately involve members of the Board of Directors, managers and employees, and will provide the opportunity to participate in workshops, seminars or standard training courses.

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, revisions of:

- 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;
- 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 processes.

The Group is also working on the Business Plan for the five-year period 2023-2027, which will include sustainability goals in terms of guidelines that will be broken down annually in the various budgets into specific targets.

In addition, starting in 2023, an ESG Critical Process Control Plan will be prepared by Internal Audit in line with the list of material topics set out in the Non-Financial Statement.



## 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 operation and suitability of the risk management and control 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 commodity 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/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 Internal Control and Risk Management 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 respect for laws and 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, and monitoring compliance with the regulations on company liability pursuant to Italian Legislative Decree 231/01 and anti-corruption.

The Dolomiti Energia Group's assessed risks were mapped on the basis of regulatory, economic, financial, operational, reputational and sanctioning impact and the likelihood of them occurring, taking into account the controls 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 loss/renewal of concessions of historical businesses such as hydroelectric production, distribution, urban hygiene services,
- inflation,
- access to sustainable finance,
- the competitiveness of the business strategy,
- the adequacy of the corporate and organisational structure,
- the supply chain,
- 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 the face of these potential risk scenarios, the Group defines, monitors and adapts specific safeguards, which will be discussed in greater detail in the following chapters, such as:

- the Group Code of Conduct,
- anti-corruption policies and measures,
- environmental, diversity and human rights policies,



- corporate governance mechanisms,
- 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 of these safeguards, and lastly,
- specific support tools such as business plans, IT security measures, control and risk management indicators.

In 2022, the Group Risk Assessment was updated to take into account the changed internal and external context that led to redesigning the Group's key risks and outlining a comprehensive review that will be developed in the new financial year.

In particular, the Group carried out risk analysis activities in 2022 in order to identify the areas at risk and the measures for preventing corruption. The main processes exposed to the risk of corruption in the Dolomiti Energia Group are sales, procurement, consultancy, payments, sponsorships, recruitment, and relations with public or private parties.

This analysis is summarised in a document called 'Matrix of Offences, Risks and Processes' which is shared with the Supervisory Body and the basis for the anti-corruption measures approved by the Boards of Directors.

Also in 2022, the Group focused its Risk Assessment on the impacts of climate change with respect to the Group's business and objectives, applying a process of internal sharing and alignment to identify the physical and transitional risks related to climate change, as well as the appropriate management measures implemented and being planned. In particular, physical risks were assessed according to probabilistic quantitative parameters for two recognised environmental scenarios, RCP 4.5 and RCP 8.5. In this sense, the focus on climate change impacts and opportunities, and ESG issues more generally, is one of the primary guidelines for the Group's strategic planning in the coming period.

### **2.2.1. THE INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM**

The Group's governance, management and 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 and opportunity-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

With this in mind, the Group's businesses and activities are subject to a systematic Risk Assessment process based on their regulatory, economic, financial, operational, reputational, sanctioning and ethical impact and the likelihood of occurrence, taking into account the safeguards developed by the Group to prevent, mitigate and manage these risks while seizing opportunities in terms of environmental, social and governance sustainability.

The risk assessment, strategic planning and control process is periodically assessed and approved by the Board of Directors and supervised by the Board of Statutory Auditors.

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.

Every six months, the Board of Directors is 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.

Lastly, at least once every six months, the Board of Directors receives a report from the Internal Audit Department with reference to the progress and results of the annual Internal Audit Plan defined according to a risk-based logic and approved by the same Board of Directors. The Plan reports the update of the Risk Assessment, the progress and outcome of planned and unplanned audit activities, and any critical issues encountered. 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.

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 of responsibility and with the support of cross-cutting company functions such as Internal Audit and Data Protection, Quality Safety Environment, Planning and Development, examines and evaluates the specific risks of their own processes, identifies their safeguards and ensures their monitoring in terms of adequacy and effectiveness. For example, Dolomiti Ambiente and Dolomiti Energia prepare an annual register of direct and indirect environmental impacts.

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 CONTINUITY, RESILIENCE AND CYBERSECURITY

GRI 3-3 Emergency management, business continuity and cybersecurity ||

GRI 418-1 |

The Dolomiti Energia Group is aware of the crucial role that company information and IT systems play in achieving its strategic goals, in view of the constant growth and evolution of cyber threats, and knows that IT security is an ongoing improvement process. For this reason, it continues to carry out activities and initiatives in various technology, organisational and HR areas, also with a significant impact on the protection of personal data.

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

The Dolomiti Energia Group has adopted various measures to prevent the occurrence of unauthorised access to the corporate information system, thus preventing hacker attacks and limiting their effects if they do occur.

In relation to the topics of emergency management, business continuity and cybersecurity, despite a cyber attack, there were no major impacts on the economy, the environment and people in 2022. In fact, the incident caused the unavailability of some IT platforms in use by the Group, but the provision of services and plant security were never affected.

The Group immediately adopted all measures to limit the effects and spread of the attack by taking the necessary actions to protect all counterparties potentially involved, with the support of a team of IT security experts.

The activities provided in connection with the topic of IT security were conducted within the scope of ordinary activities.

The Group continued its ongoing cybersecurity training programme and also upgraded its cybersecurity systems in line with strategies and technological developments.

In managing its applications, the Group adheres to ENISA (European Union Agency for Cybersecurity) best practices in terms of cybersecurity, 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 has also equipped itself with new technological tools aimed at preventing cyber crime, in particular the activation of two-factor authentication (MFA) for access to corporate tools. It also activated various safeguards to prevent unauthorised access to the company's information system, and extended Security Operating Center monitoring.

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 logbook reports two data breaches for 2022: one related to the theft of an agent's PC, the other to a cyber attack. As mentioned above, in the case of the attack, the Group implemented all appropriate protection and recovery actions, thanks also to pre-existing security and disaster recovery safeguards, and promptly notified the Authority of the cyber attack, constantly updating it on the evolution of the internal analysis and its outcome.

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

	UoM	2022
Complaints from external and confirmed parties	No.	0
Complaints from regulatory bodies	No.	0
Leaks, theft, loss of customer data	No.	2
<b>TOTAL</b>	<b>No.</b>	<b>2</b>

## 2.4.

# BUSINESS ETHICS AND INTEGRITY

GRI 3-3 Ethics, integrity and transparency in business and governance | GRI 3-3 Fighting corruption |

GRI 2-15 | GRI 2-23 | GRI 2-24 | GRI 2-25 | GRI 2-26 | GRI 205-2 | GRI 205-3 |

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, Management 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 its own Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/01 (also 'the 231 Model'), which is aimed at determining full awareness among shareholders, directors, employees 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, offences involving health and safety and the environment, as well as the offences recently introduced by the legislator regarding cultural and landscape heritage.

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, guaranteeing the confidentiality of the whistleblower's identity, prohibiting retaliatory acts and discrimination against the whistleblower for reasons related to the report, and lastly the sanctions to be applied against whoever violates the envisaged protection measures or raises unfounded claims are outlined.

In 2022 the Group also guaranteed the constant updating and adaptation of the Organisation, Management and Control Model on the basis of organisational, regulatory 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 which is developed, adopted and constantly updated 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 company.

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.

For details on the measures, please refer to the documents published at [www.gruppodolomitienergia.it](http://www.gruppodolomitienergia.it).

The Dolomiti Energia Group undertakes to share its anti-corruption measures with all personnel that work for the organisation or on its behalf and to make them available to the public.

In this regard, in 2022 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 relevant legislation. More specifically, new hires correspond to about 6% of the total Group population in 2022 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 hires accounted for 16% of the total number of agents in 2022.

No anti-corruption training was provided to the members of the highest governing body during 2022; however, all of them were attentive to anti-corruption procedures and policies.

There were no reports of corruption in 2022, as in previous years.

### **2.4.1. 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 and/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 hierarchical superior 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 hierarchical superior 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 hierarchical superior 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 hierarchical superior 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 hierarchical superior 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.

## 2.4.2. PROTECTION OF PRIVACY AND INFORMATION

The Dolomiti Energia Group ensures the respect of data subject rights under Article 12 of the GDPR, providing a specific process for the management of the rights that may 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.

Within the framework of companies that have obtained environmental and occupational health and safety certification, 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.

The summary of critical issues detected and managed is traced within the company documents and is linked to reports of the need to strengthen corporate processes with a view to greater efficiency, compliance, effectiveness.



### 2.4.3. TOOLS FOR SUSTAINABLE BUSINESS

The Business Plan is the first and foremost 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.

The Group's values are also reflected in the Human Rights Policy and the Diversity Policy dedicated respectively to the issues of respect for internationally recognised Human Rights and Diversity, which supplement and further what is already set out in the Code of Conduct, promoting a culture of diversity and inclusion that respects the singularity of the individual.

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.

As regards business relations, the Group is characterised by a business strategy that includes offering only green products.

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 implemented by commercial and operational activities 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 subsequent response to the reporter. On the other hand, there are no processes for collecting feedback from users at the moment.

In addition, 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 whether the trend in the number of complaints for the specific aspect is declining, as well as the possible absence of repeated/reiterated complaints.

## 2.5.

# SUSTAINABILITY FOR THE DOLOMITI ENERGIA GROUP

GRI 3-1 | GRI 3-2 |

GRI 2-29 |

Considering the very nature of the services that characterise its business, the Dolomiti Energia Group pays particular attention to sustainability and corporate social responsibility, on which its values and actions are based. This commitment translates into tangible initiatives to reduce the socio-environmental impact of the Group's activities, for example through the sale of 100% certified green energy and gas, the promotion of energy efficiency products and services, proximity to customers with ethical and socially-responsible commercial offers.

Thanks also to the support of the Non-Financial Controlling Department, the Group is renewing its approach to sustainability - 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 environment.

The path continued in 2022 to better integrate sustainability in the new Business Plan being prepared, with an evolution compatible and consistent with some of the shared development goals defined by the UN in its Agenda 2030 and the reference regulatory developments, such as the Corporate Sustainability Reporting Directive (CSRD) and the European Taxonomy.

With regard to reporting, the Group updated the materiality analysis in 2022, began to streamline and refine the data collection process at the companies (updating roles and responsibilities) and is progressively starting 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.

### 2.5.1. STAKEHOLDERS

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 Dolomiti Energia Group, the roles of the various stakeholders often have structured 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.

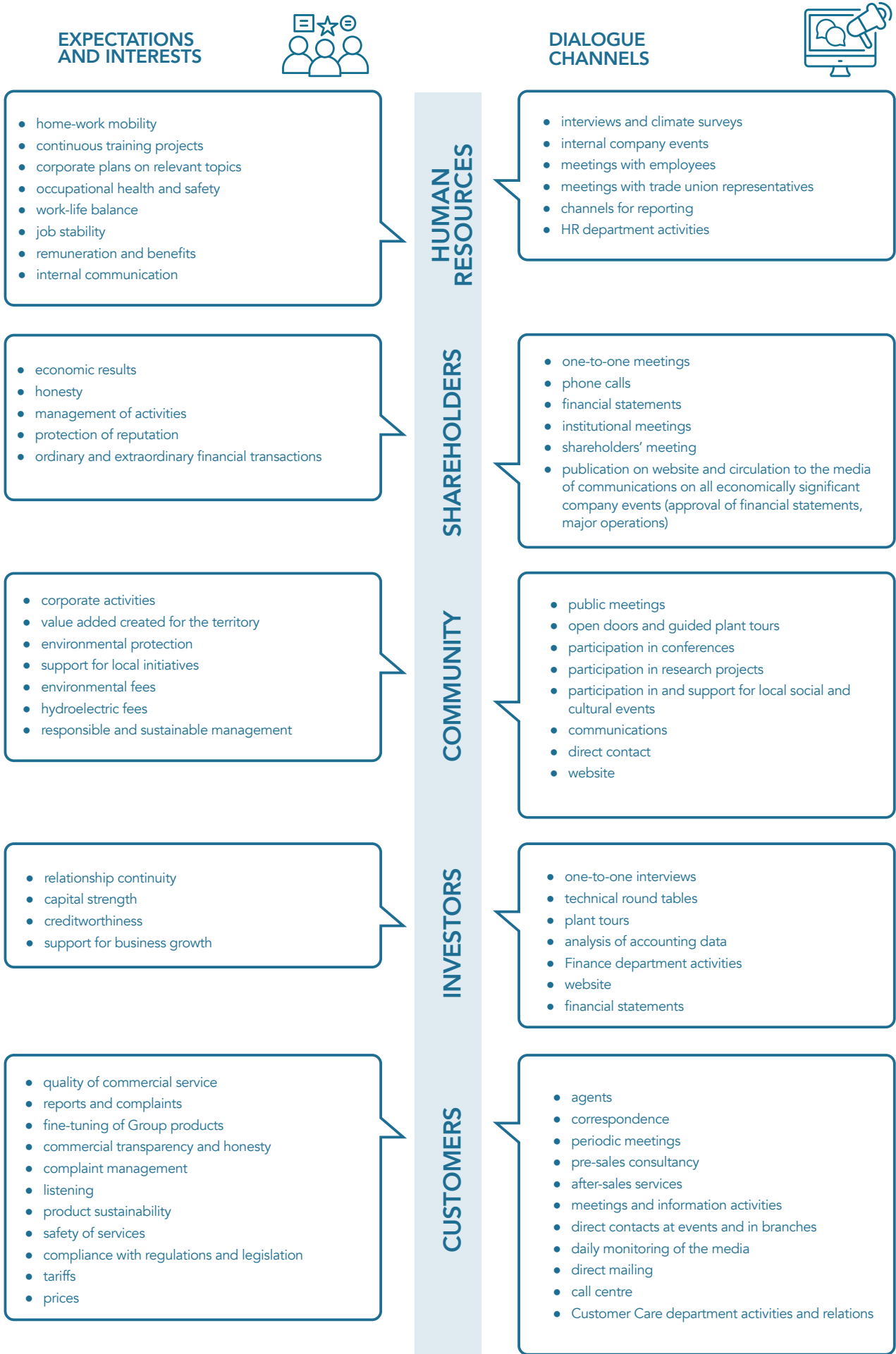
The following shows the Group’s main categories of stakeholders:



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 internal stakeholders promoted in 2022 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 remote work;
- 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.



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

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

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

- transparency
- punctual and timely communications

- 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

## SUPPLIERS

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

## 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

## COMPANIES OF THE SAME SECTOR/COMPETITORS

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

## MEDIA

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

## 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

During 2022, stakeholder engagement in the materiality analysis updating process took place through dedicated workshop meetings and questionnaires, as detailed in the next section.

Taking into account the updating of reporting standards (GRI Standards) and upcoming developments in the area of sustainability reporting (e.g., CSRD and EFRAG ESRS standards), the Dolomiti Energia Group has decided to adopt an approach of gradual and progressive engagement of the different categories of stakeholders in the context of the materiality analysis, starting for this first year with internal stakeholders, with the aim of extending the assessment to external stakeholders over the next few years.

## 2.5.2. MATERIALITY ANALYSIS

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

Starting from November 2022, the Dolomiti Energia Group began the preparatory activities to update its material topics, taking into consideration the regulatory evolutions of the GRI Reporting Standard, in particular with respect to the GRI Universal Standard 3, 'Material Topics 2021', thus assessing the impacts on people, the economy and the environment related to its activities and value chain.

In particular, the process of determining the list of material topics was structured according to the following steps:



The following were initially considered: the material topics as a result of the most recent analysis carried out, the reference sector and context, the Group's services, the area of operations, internal policies, stakeholder expectations and, as far as applicable, the considerations included in the Sector Standard related to gas. In addition, with a view to synergy, the results of the Climate Risk Assessment carried out by the Internal Audit Department in the previous months were also taken into account.

In the light of this, possible impacts related to the Group's activities were identified and distinguished between positive or negative, actual or potential, and direct or indirect.

The impacts thus identified were assessed through the direct engagement of stakeholders through interactive workshops and the dissemination of dedicated online and paper questionnaires. In particular, Management carried out the evaluations within a workshop where developments in the sustainability reporting environment were also presented.

The online survey instead reached all the more than 1,400 employees, with a response rate above 15%.

Each impact was evaluated while considering its significance and likelihood of occurrence.

In particular, with reference to the significance of the impact, the stakeholders considered:

- Magnitude: understood as the magnitude of the negative impact or the magnitude of the benefits derived from the positive impact;
- 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 impacts only, the degree of difficulty in remedying the damage resulting from the impact was also considered.

The rating scale used ranged from 1 to 5, where 1 represented zero relevance and 5 represented very high relevance.

Similarly, with reference to the likelihood of the impact occurring, a scale of 1 to 5 was used, where 1 represented an impact that was absent and would not occur and 5 represented an impact that was current or had already occurred.

The assessments of all stakeholders involved were subsequently analysed and processed in order to prioritise the impacts. These were clustered into topics in order to define their list.

The identification of the materiality threshold then made it possible to formalise the list of material topics below:

#### RESPONSIBLE AND SUSTAINABLE WASTE MANAGEMENT

Through the company Dolomiti Ambiente, the Dolomiti Energia Group manages urban hygiene services in the municipalities of Trento and Rovereto.

Ensure efficient waste management, thereby preventing damage to the environment and people. The Group is constantly striving to ensure quality service, comply with standards and promote initiatives to reduce waste production.

Furthermore, with respect to the management of waste produced as a result of its activities, the Group is committed to increasing the recycling and recovery rate, reducing landfill and improving its internal circularity.

Impact: Local community, customers, environment

#### OFFERING ENERGY EFFICIENCY AND RENEWABLE ENERGY SOLUTIONS

The Dolomiti Group is aware of its role in the context of the energy transition. By promoting energy from renewable sources, offering tailor-made energy solutions to cut inefficiencies and reduce operating costs, the Group is ready to guide people, companies and public bodies towards the new frontiers of energy.

Impact: Local community, customers, Public Administration, environment



### **SUSTAINABLE MANAGEMENT AND PROTECTION OF WATER QUALITY**

Through the company Novareti, the Dolomiti Energia Group manages the water service in the municipalities of Ala, Aldeno, Brentonico, Calliano, Mori, Nomi, Rovereto, some hamlets of Trambileno, Trento, Vallarsa (limited to some services) and Volano. With respect to this important activity, the Group is careful to provide quality drinking water by focusing on the technical service that guarantees supply continuity.

Impact: Local community, customers, Public Administration, environment

### **QUALITY, SAFETY, CONTINUITY AND AFFORDABILITY OF SERVICES PROVIDED TO CUSTOMERS**

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.

Given the importance of these services, the Group is committed to ensuring reliable and secure supplies at competitive costs. It is also committed to offering concrete and immediate answers to its customers and the community through physical and web-based channels (e.g., call centre available 24 hours a day)

Impact: Local community, customers, Public Administration

### **EMERGENCY MANAGEMENT, BUSINESS CONTINUITY AND CYBERSECURITY**

In recent years, the Group has strengthened - and continues to strengthen - the process of innovation and digitalisation. In this regard, special attention is paid to protecting customer data and training employees on cybersecurity.

Considering its provision of essential services (water, gas, electricity and urban hygiene), the Group works daily to guarantee services, reduce and, if necessary, promptly manage any disruptions.

Impact: Local community, customers, Public Administration

### **TRAINING, PROFESSIONAL DEVELOPMENT AND FAIR PAY**

The Dolomiti Energia Group considers staff training crucial not only in ensuring the presence of the necessary skills but also for the professional and personal development of resources.

A comprehensive and up-to-date training offer is proposed to each employee, covering various topics, from more technical-professional to more general.

The Group is also committed to promoting a meritocratic remuneration policy aimed at motivating, attracting and retaining its people.

Impact: Employees

### **DIALOGUE WITH LOCAL COMMUNITIES AND SUPPORT FOR LOCAL DEVELOPMENT**

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 socio-economic well-being. These include job creation, the distribution of added value, and the promotion of initiatives that aim to involve and enhance the local community.

In light of this, the Group recognises the value of dialogue with its community.

Impact: Local community, Public Administration, shareholders, suppliers

### CLIMATE CHANGE MITIGATION AND ADAPTATION

The activities of the Dolomiti Energia Group and the provision of related services are linked to the production of GHG emissions. Aware of the impact of these emissions on the environment, the Group is committed to initiatives aimed at reducing them, including through the promotion 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. To this end, the Group has carried out a Climate Risk Assessment with the specific objective of identifying, assessing and proposing mitigation solutions for certain physical or transitional risks that could affect the Group's electricity, water and distribution networks, causing damage and jeopardising the guarantee of services offered to the community and customers, as well as the environment.

Impact: Customers, local community, environment

### AWARENESS-RAISING REGARDING CONSUMPTION EFFICIENCY, THE USE OF RENEWABLE ENERGY AND RESPONSIBLE WASTE MANAGEMENT

The Dolomiti Energia Group recognises that it has an important role to play in raising the awareness of customers, the community and stakeholders in general with respect to the use of energy from renewable sources, consumption efficiency and the virtuous management of waste produced.

The Group can contribute to limiting negative impacts on the environment through its commitments in this respect, such as green energy production, promotion of energy-efficient services and products, and green commercial offers.

Impact: Customers, local community, environment

### CREATION OF ECONOMIC VALUE

The Dolomiti Energia Group creates economic value through its business that is then redistributed to employees, shareholders, suppliers, the local community and the Public Administration.

Impact: Employees, shareholders, suppliers, local community, Public Administration

### HUMAN RIGHTS

The Dolomiti Group is committed to protecting human dignity and contributing to people's well-being, valuing diversity and ensuring equal opportunities and dignity.

It is further committed to opposing the employment of minors, forced labour, harassment, discrimination and promoting the freedom of association, occupational health and safety, dignified working conditions, the protection of personal privacy and sustainable social development.

Impact: Employees, suppliers

### TRANSPARENT, CLEAR AND HONEST COMMUNICATION AND MARKETING PRACTICES

The Group is aware of the risks that may arise from non-transparent commercial communication and anti-competitive behaviour, to the detriment of stakeholders and the community.

On this issue, the Group distances itself from forms of greenwashing and misleading communication.

Impact: Customers

### TALENT ATTRACTION, RETENTION AND CORPORATE WELFARE

In addition to enhancing the internal growth of resources, the Dolomiti Group recognises the importance of attracting professional figures in order to create value and maintain a competitive advantage.

It also promotes well-being at work through sound corporate welfare.

Impact: Employees

**FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

The Group is committed to fostering free association and collective bargaining. All Group employees are guaranteed freedom of association and trade union membership.

Impact: Employees

**ETHICS, INTEGRITY AND TRANSPARENCY IN BUSINESS AND GOVERNANCE**

Aware of the extreme relevance of these issues, 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.

Impact: Customers, shareholders

**HEALTH, SAFETY AND WELL-BEING**

Attention to the health and safety of employees 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 suitable working environment, adopting the best organisational and procedural techniques in order to continuously improve the performance of the occupational health and safety management system

This awareness is also reflected in training courses in order to maintain a consistently low accident rate.

Data on the accident rate of non-employee workers is currently not available but the organisation has taken steps to fill this gap. No less important is the focus on protecting the mental and physical health of employees, which the Group demonstrates by promoting work-life balance.

Impact: Employees

**SUSTAINABLE AND RESILIENT SUPPLY CHAIN**

The Dolomiti Energia Group relies on suppliers to procure energy raw materials and perform services to support its business. Parameters of technical quality, sustainability and cost-effectiveness are considered during the selection and evaluation of the offer.

Given its role, the Group is committed to promoting and disseminating ESG principles in its supply chain.

Impact: Suppliers

**CONSIDERATION OF ESG-RELATED RISKS AND OPPORTUNITIES IN BUSINESS DEVELOPMENT AND STRATEGY**

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 made possible by a corporate culture and the commitment of Management that considers the risks and opportunities for the business arising from ESG issues in the day-to-day conduct of business and for strategy purposes.

Impact: Shareholders

**PROTECTION OF WATER, SOIL AND ECOSYSTEM QUALITY AND CONSERVATION AND RESTORATION OF BIODIVERSITY**

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.

Impact: Local community, environment

The list of material topics, as well as the analyses carried out in this context, were shared and approved by the Parent Company's Board of Directors.

In the course of the analyses carried out, the Group also assessed the possible impacts on human rights resulting from its activities and value chain, in accordance with the indications of Italian Legislative Decree 254/16 and the new GRI Standards in 2021.

The protection of human rights in the conduct of its business is central to the Dolomiti Energia Group and the risks connected to this area are monitored through:

- Human Rights Policy
- Code of Conduct
- Monitoring initiatives (e.g., regular meetings of HR function with internal and external workers' representatives).

### 2.5.3. EVOLUTION OF THE MATERIALITY ANALYSIS

In light of the evolutions that have affected the sustainability and regulatory reference context and in order to strengthen its awareness of sustainability reporting, when updating the materiality analysis, the Group started a progressive approach to non-financial reporting as currently outlined by the Corporate Sustainability Reporting Directive (CSRD) and the related standards developed by the European Financial Reporting Advisory Group (EFRAG).

Of particular importance is the introduction of the concept of 'dual materiality', according to which the following must be considered:

- on the one hand Impact Materiality ('inside-out' perspective) that provides information on the impact of an organisation's activity on sustainable development and
- on the other hand, Financial Materiality ('outside-in' perspective), which instead aims to represent how environmental, social and governance issues can positively or negatively influence a company's development, performance, cash flow and positioning and thus ultimately create or erode its economic-financial value.

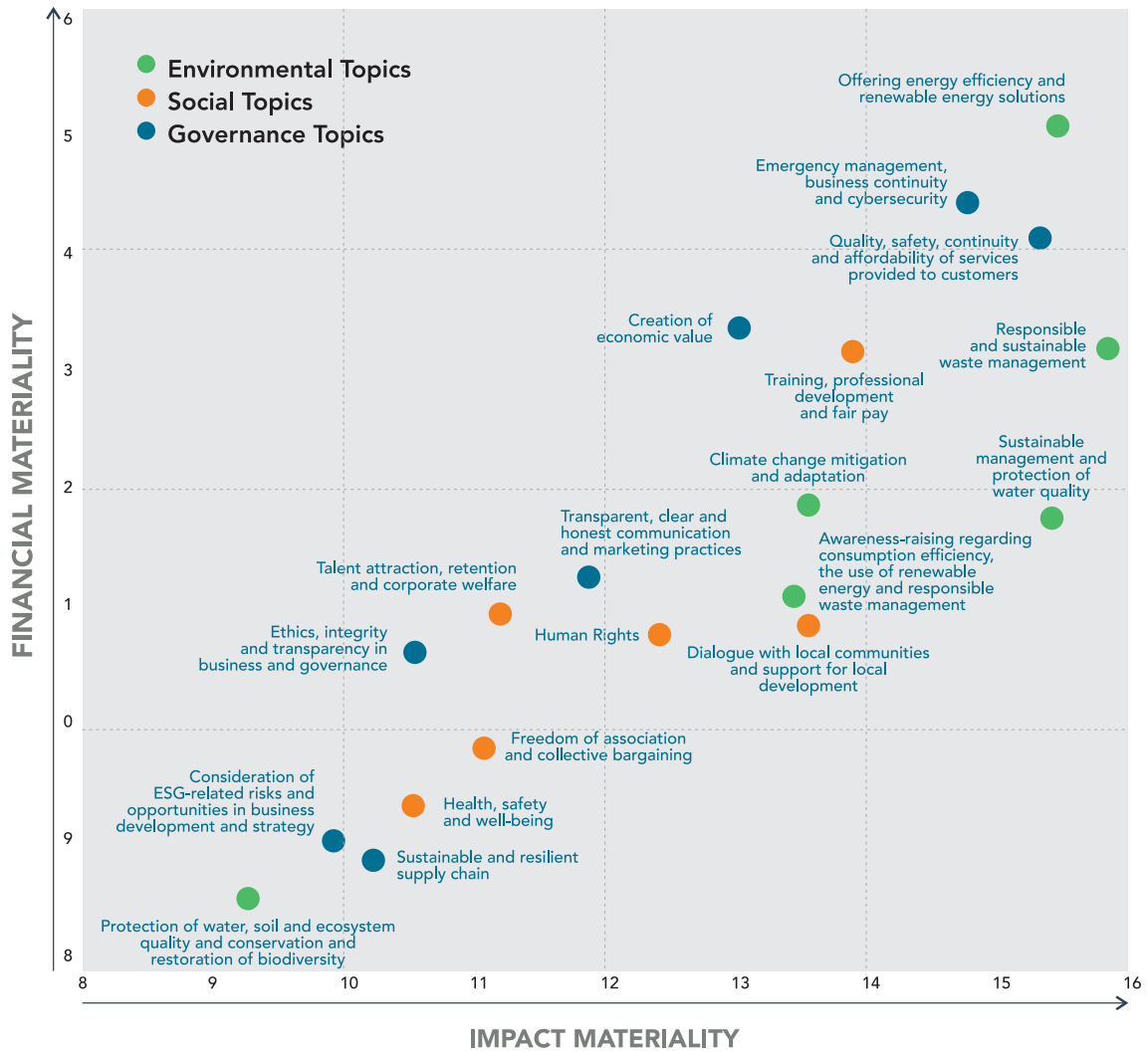
In view of this, the Dolomiti Energia Group integrated within its materiality calculation an assessment from the perspective of Financial Materiality, considering the publications of the main standard setters available at the time the analysis was conducted and not yet binding.

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 stakeholders involved in this exercise were asked to express their views on both impact relevance and financial relevance, as well as the likelihood of impacts occurring, with a qualitative assessment based on a five-level scale.

The matrix representing the issues considered relevant from the perspective of Impact Materiality and Financial Materiality is shown below. All the topics found to be material in the materiality analysis conduct-

ed according to GRI Reporting Standard 3 'Material Topics' (Impact Materiality) and whose process was described in the previous section were also found to be material from a Financial Materiality perspective



# SUSTAINABLE PRODUCTS AND SERVICES







**2,362.9** GWh

of produced energy fed into the grid, of which 93% from renewable sources



**69,708** tonnes

of waste collected in the municipalities of Trento and Rovereto



**291.4** m<sup>3</sup>

of gas distributed



**337,803**

electricity customers



**114,541**

water cycle customers



# 3.1

## PRODUCTS AND SERVICES OFFERED

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 interlocutors are citizens (domestic customers) and companies (business customers) in the Province of Trento and throughout Italy: understanding their expectations, offering them timely and innovative services to be proposed to the greatest number of people at favourable conditions, enhancing communication and facilitating accessibility, are all social responsibility objectives that the Group is committed to achieving with concrete initiatives.

The Dolomiti Energia Group takes care of electricity management in the most comprehensive manner: Hydro Dolomiti Energia, Dolomiti Edison Energy, Dolomiti Hydro Power, the hydroelectric branch of Dolomiti Energia Holding and SF Energy produce it while favouring the use of renewable sources, Dolomiti Energia sells it throughout Italy to meet people's needs, and SET Distribuzione brings it to the homes of citizens and to the headquarters of companies through more than 12,000 km of networks. Dolomiti Energia Trading is the company that performs electricity and natural gas portfolio optimisation activities for the Group.

With respect to the latter, its distribution to private individuals and companies is guaranteed by Novareti with a network of more than 2,600 km, reaching over 237,000 end customers. Furthermore, the Group offers electricity and gas supplies whose CO2 emissions are entirely offset, which not only protects the environment, but also enables customers to finance solidarity projects.

The Group is also involved in liquefied natural gas plants and networks through Dolomiti GNL.

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.

The Dolomiti Energia Group is also present at every stage of the water cycle: Novareti withdraws water from springs and aquifers, makes it drinkable and distributes it in nine municipalities in Trentino, located mainly in the Adige Valley, through a complex system of remote-controlled networks and water supply systems.

Dolomiti Ambiente is the Group company that deals with separate waste collection, urban hygiene and material collection centres in the municipalities of Trento and Rovereto. For cities to be truly clean, the active cooperation of people is crucial. This is why it concretely supports citizens, so that together we can achieve the common goal of cleaner, circular cities.



The Group also manages the public lighting service in some municipalities. In particular, 2,617 light points were managed by SET Distribuzione and 20,119 by Dolomiti Energia Solution in 2022 in the municipalities of Buscate (MI) and Chiampo (VI), among others. In this context, relamping interventions were carried out in 2022, resulting in a reduction in consumption of 270,509.72 kWh and 973.8 GJ (1,033,576.22 kWh in 2021, or 3,720.87 GJ).

Finally, smart services offered by the Group mainly relate to electric mobility, energy sustainability and efficiency in homes, businesses and infrastructure. The proposals are constructed with innovation in mind as the key to the technological, but also social, development of communities and territories. Also in this case, respect for the environment is one of the prerequisites of the Group's work.

To be able to always guarantee the utmost safety for citizens, workers and the environment the production plants, networks and waterworks are monitored round the clock. This continuous oversight enables us not only to guarantee regular, prompt and efficient services on a daily basis, but also to detect critical situations and emergencies and to find prompt solutions to them.

#### **NEW, MORE EFFICIENT AND SUSTAINABLE PRINTERS**

*In 2020, the Dolomiti Energia Group launched a programme to replace the printers and multifunctional equipment in the Group's offices and warehouses, with the aim of pursuing five main objectives, namely:*

- 1. Introduce instruments that ensure savings in energy consumption;*
- 2. Introduce printing logic to reduce the number of 'superfluous' prints;*
- 3. Ensure healthier environments by using less polluting instruments;*
- 4. Increase the level of security and privacy by only allowing printing after authentication on the device;*
- 5. Simplify and improve the user experience by allowing printing from any printer and in any office, always choosing the same printer.*

*All the objectives were pursued on a path that ended in 2022, gradually replacing all printers with new models:*

- 1. Cold printing, which guarantees lower energy consumption and elimination of toner pollution;*
- 2. Centralised printer management via an application server that lets employees avoid having to choose and configure printers;*

*In addition, the introduction of the 'Follow Me' feature that allows printing only after authentication with the printer has significantly reduced unnecessary printing and increased security by ensuring that documents are sent to correctly configured devices for printing.*



### 3.1.1. ELECTRICITY PRODUCTION<sup>4</sup>

In 2022, the Dolomiti Energia Group produced 2,362.9 GWh (in 2021 3,835.7 GWh) of electricity, net of self-consumption, in the hydroelectric, cogeneration and photovoltaic plants, and at the turbogas plant in Ponti sul Mincio. Production from hydropower accounted for 93% (96% in 2021) of the total: this figure is down from last year due to the lack of rainfall and the resulting drought.



#### HYDROELECTRIC PRODUCTION

The Group develops its production capacity in the field of hydroelectric power with directly operated power stations located in Trentino-Alto Adige and Veneto. This energy is generated by Hydro Dolomiti Energia, Dolomiti Energia Holding, SF Energy, Dolomiti Edison Energy and Dolomiti Edison Energia Hydro Power. Producing energy from environmentally friendly sources such as water plays an important role in protecting the environment, as it reduces greenhouse gas emissions and the use of other forms of energy production with considerable environmental impact.

#### Installed capacity

	2022	2021	2020 <sup>5</sup>
MWh	1,634.4	1,634.4	1,454.3

#### Energy generated<sup>6</sup>

	2022	2021	2020
GWh	2,204.9	3,675.1	4,219.7

4 The data on energy produced, net of self-consumption, have been updated from those published in previous Non-Financial Statements, in light of a refinement of the data collection process and calculation methodology.

5 The data relative to Dolomiti Edison Energy is not shown, as Edison was responsible for the operational management of the plants until 01/07/2020

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 addition to HDE, DEH, DEHP and DEE, SF Energy (50%) was included in the calculation of hydroelectric power generated.

Goals and Initiatives	Goal Year	State of Progress	Description
Horizon 2020 'OSMOSE' project	2022	●●●	<p>Within the European Framework Programme for Research and Innovation, the activities in connection with the Horizon 2020 project called "OSMOSE" were concluded in 2022; the leader is the French TSO RTE and the project involves the main European grid operators (TERNA, REE, ELES, REN and ELIA), several Universities, Research Centres and industrial partners including Hydro Dolomiti Energia.</p> <p>The purpose of the OSMOSE project was to demonstrate the technical feasibility of an "optimal" mix of flexibility solutions, able to maximise the technical-economic efficiency of the European electrical system, assuring its security and reliability.</p> <p>Hydro Dolomiti Energia was particularly involved in the work packages relating to experimental activities aimed at the use of hydroelectric generation and pumping plants for balancing the cross-border electricity grid.</p>
European HORIZON project named SUNRISE 'Strategies and Technologies for United and Resilient Critical Infrastructures and Vital Services in Pandemic-Stricken Europe'	2025	●●●	<p>Hydro Dolomiti Energia began participating in the SUNRISE project in 2022, which envisages the involvement of 41 partners at European level, including 18 European regulatory authorities and critical infrastructure operators. The project is dedicated to the development of active cooperation and joint response strategies within European Critical Infrastructures (CI) in order to increase the competence and equipment of CIs to assess, cope with and adequately manage risks created by future pandemics.</p>
Experimentation with new production methods with low environmental impact	2024	●●●	<p>Experiments continued in 2022 on new production methods with a lower environmental impact through the installation of a floating photovoltaic plant on the Dampone reservoir (Dolomiti Energia Holding) and the experimentation of hydrokinetic turbines on the Biffis canal (Hydro Dolomiti Energia).</p> <p>These initiatives include investments in the development of the plant fleet with the involvement of in-house staff and specialised suppliers in the design and implementation phase, and the involvement of research institutes. The activities are partially completed, with possible further implementation and development during 2023-2024.</p>
Adoption of water supply forecasting software	2024	●●●	<p>As of 2022, the use and implementation of specialised software is planned for customising physical models on the relevant catchment areas, with the dual aim of optimising production (better 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 internal staff, with a new resource exclusively dedicated to the project, and the involvement of research institutes.</p> <p>As of 2022, about 20% of the plants have been implemented.</p> <p>Further development and completion is planned for 2023-2024.</p>
Automation of intake works	2027	●●●	<p>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.</p> <p>The activity has been implemented for three intake works. Further developments are planned over the next five years.</p>

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 will define the modalities.



## THERMOELECTRIC PRODUCTION

Dolomiti Energia Holding operates in the field of thermoelectric production through its 5% ownership of a combined-cycle turbogas power plant located in Ponti sul Mincio. Production in 2022 was 46.1 GWh (corresponding to the 5% share), compared to 49 GWh in 2021.

### Total installed thermoelectric capacity<sup>7</sup>

	2022	2021	2020
MWh	19 out of a total 380	19 out of a total 380	19 out of a total 380

### Thermoelectric energy generated<sup>7</sup>

	2022	2021	2020
GWh	46.1	49	42



## COGENERATION

Through the company Novareti, the Group owns the gas turbine and power-driven cogeneration plants in Rovereto and the "Le Albere" trigeneration power plant in Trento.

The two cogeneration plants in Rovereto and the Trento power plant are natural gas-fuelled and generate electricity in a combined cycle with residual heat that is partly used for the district heating of town buildings. Only the Trento power plant also delivers cold water for cooling buildings.

The cogeneration plants ensure greater 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.

<sup>7</sup> The Group holds 5% of the share capital

## Installed capacity cogeneration

2022		
ELECTRIC POWER MWH	Thermal power in MWt	Cooling MWt
8.8	71.5	7.4

## Energy generated by cogeneration and fed into the grid

	UoM	2022	2021	2020
Steam produced	GWh	-	3.5 <sup>8</sup>	18.3
Heating and cooling	GWh	75.8	86.6	77.3
Electricity production	GWh	35.8	24.8	26.0
<b>TOTAL</b>	<b>GWh</b>	<b>111.6</b>	<b>114.9</b>	<b>120.8</b>



## PHOTOVOLTAIC

The photovoltaic plants generate electricity by using solar radiation with practically nil environmental impact.

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 particular, the company Dolomiti Energia Solutions also 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. Together with the Autonomous Province of Trento, in 2022 Dolomiti Energia Solutions developed a specific promotional initiative for photovoltaic systems in the residential sector, La mia casa Green. 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.

In the course of 2022, 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, which granted non-repayable subsidies for the construction of photovoltaic systems in residential areas.

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.

<sup>8</sup> The steam turbine underwent extraordinary maintenance during 2020 and therefore steam production decreased in 2021. In March 2021, the last contract for steam supply ended.

### Installed capacity

	2022	2021	2020
kWh	781.6	781.6	683.2

### Energy generated

	2022	2021	2020
GWh	0.3	0.3	0.3



## 3.1.2. ELECTRICITY DISTRIBUTION

SET Distribuzione is a subsidiary of the Dolomiti Energia Group, a leader in the sector, 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.

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

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. It also monitors any environmental incidents, such as oil spills, and ensures that they are properly handled and efficiently resolved.

The electricity distribution network had a leakage rate of 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 0.02%.

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

## Losses in energy transmission and distribution

	UoM	2022	2021	2020
Technical losses	kWh	56,142.2	60,896.3	55,828.6
Non-technical (commercial) losses	kWh	-	-	-

Service interruption frequency index<sup>9</sup>

	UoM	2022		2021		2020	
		Annual value	Goal ARERA	Annual value	Goal ARERA	Annual value	Goal ARERA
low concentration area	minutes	1.4	4.3	1.3	4.3	1.8	4.3
medium concentration area	minutes	0.8	2.2	0.6	2.2	0.5	2.3
high concentration area	minutes	0.7	1.2	0.3	1.2	0.2	1.2

Average service interruption duration index<sup>10</sup>

	UoM	2022		2021		2020	
		Annual value	Goal ARERA	Annual value	Goal ARERA	Annual value	Goal ARERA
low concentration area	minutes	24.6	68.0	28.9	68.0	30.8	68.0
medium concentration area	minutes	14.9	45.0	19.9	45.0	10.3	45.0
high concentration area	minutes	14.9	28.0	5.7	28.0	8.9	28.0

## Number of service disconnections for non-payment

	2022
< 48 hours	278
48 hours - 1 week	120
1 week - 1 month	162
1 month - 1 year	24
> 1 year	0

<sup>9</sup> Average annual number of interruptions for low-voltage customers due to long interruptions without warning. The value indicated actually refers to the previous year, since ARERA publishes the results and awards the premiums in the year following the reference year.

<sup>10</sup> Average annual minutes of interruptions for low-voltage customers due to long interruptions without warning.

### Total electricity distributed

	UoM	2022	2021	2020
Total energy fed into the grid	kWh	2,534,202.1	2,557,575.9	2,496,899.6

### Length of electricity distribution network<sup>11</sup>

	UoM	2022	2021	2020
Medium voltage	Km	3,562	3,524	3,507
<i>of which</i>				
Not underground	Km	1,133	1,166	1,205
Underground	Km	2,429	2,358	2,302
Low voltage	Km	9,058	8,859	8,754
<i>of which</i>				
Not underground	Km	808	824	838
Underground	Km	8,250	8,035	7,916
<b>TOTAL</b>	<b>km</b>	<b>12,620</b>	<b>12,383</b>	<b>12,261</b>

### Customers connected to the low and medium voltage electricity distribution network

		2022	2021	2020
Total customers (medium and low voltage)	No.	337,803	334,627	332,889

<sup>11</sup> The Group is not involved in the transmission of electricity





### 3.1.3. GAS DISTRIBUTION

Through its subsidiary Novareti, the Dolomiti Energia Group distributes gas to over 168,470 private users and companies (more than 168,000 users also in 2021), in the provinces of Trento, Verona and Bolzano through a network present in 90 municipalities in the province of Trento, Valle dell'Adige, Valsugana and Tesino, in the Non valley, in the Laghi valley, on the Paganella plateau, in the valleys of Cembra, Fiemme and Fassa and on the plateaus of Folgaria, Lavarone, Luserna and in the municipality of Cavalese, as well as in two municipalities outside the province: Salorno and Brentino Belluno.

291.4 million cubic metres of gas were distributed in 2022 (341.8 in 2021).

#### Gas distribution network length

	2022	2021	2020
km	2,695	2,652	2,428

#### Customers connected to the gas distribution network

	2022	2021 <sup>12</sup>	2020
No.	168,470	168,766	159,126

The Group systematically searches for leaks and maintenance along the gas distribution network in compliance with the standards and directives of the national authority ARERA. 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 required 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, for the purposes of service quality parameters, achieved during the year was 99% (99.5% in 2021).

<sup>12</sup> The management of gas distribution activities began in 2021 in the Isera and Pergine Valsugana Municipal Authorities, previously managed by Isera S.r.l. and STET S.p.A., respectively, for a total increase in Redelivery Points of approximately 9,700 units and of the managed network by approximately 135 km, which required a major commitment in terms of personnel and investments to adapt the infrastructures to the Novareti standard.



### 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 reduces emissions of carbon dioxide, sulphur dioxide and nitrogen oxide pollution.

There are also economic advantages: despite the strong volatility of natural 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 that are generally diesel-fuelled.*

*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

The distribution of heat by Novareti along the 29 km district heating network satisfies energy needs in Rovereto and the innovative "Le Albere" district of Trento, where chilled water is also distributed for air conditioning.

Customers connected to the district heating distribution network

		2022	2021	2020
Total customers	No.	213	211	208



### 3.1.6. SALE OF ENERGY AND GAS

Through its trading company Dolomiti Energia, the Group sells energy, gas, services and energy efficiency products to customers in the free market throughout Italy. It instead operates under the Trenta brand on the enhanced protection service market.

The number of total energy and gas customers served at year-end in 2022 amounted to 731,000, up from 726,000 in 2021.

*The sale of electricity from renewable sources such as hydropower and solar-photovoltaics, guaranteed through GO certification, avoided the emission of 1,006,849.644 tCO<sub>2</sub>e in 2022 (1,685,405.08 in 2021)*



### 3.1.7. INTEGRATED WATER CYCLE

Through the company Novareti, the Group is active in all phases of the water cycle: in the capture, purification and distribution of water and in the management of sewerage networks serving more than 76,000 users (about 200,000 inhabitants) in nine municipalities in Trentino, mainly in Valle dell'Adige. During the year, the integrated water system distributed 27.4 million cubic metres of water (30.8 in 2021) along the 1,466 km of fully geo-localised network.

#### Water cycle customers

	UoM	2022	2021	2020
domestic uses	No.	96,887	64,169	65,946
other uses	No.	14,003	9,511	9,543
other supplies	No.	3,651	2,592	2,658
<b>TOTAL</b>	<b>No.</b>	<b>114,541</b>	<b>76,272</b>	<b>78,147</b>

#### Length of water supply system network

	UoM	2022	2021	2020
Trento	km	846.60	681.38	681.41
Rovereto	km	279.10	174.47	174.47
Other municipalities	km	342.00	257.67	284.50
<b>TOTAL</b>	<b>km</b>	<b>1,46770<sup>13</sup></b>	<b>1,111.52</b>	<b>1,139.38</b>

<sup>13</sup> From 2022, all connections are included in the accounting. Only those in Trento were considered until 2021.

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.

With respect to 2021, water service management for the Municipality of Civezzano ceased as of January 2022, while water service management for the Municipality of Isera was taken over as of April 2022.

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](http://www.novareti.eu).

Novareti also has three 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.

The losses were around 29% in 2022

## Losses in water transmission and distribution

	UoM	2022	2021	2020
Technical losses	m <sup>3</sup>	4,834,592	7,170,117	6,916,322
Non-technical (commercial) losses	m <sup>3</sup>	3,105,118	4,033,423	3,227,703
<b>TOTAL</b>	<b>m<sup>3</sup></b>	<b>7,939,710</b>	<b>11,203,540</b>	<b>10,144,025</b>

Goals and Initiatives	Deadline	State of Progress	Description
Configuration of new smart meters	2024	● ○ ○	All new smart meters were installed by the end of 2022, while the transfer and testing of all signals from the old devices to the new ones will continue during 2023 and 2024. These activities are entrusted to a technician and field teams, and are expected to be completed by the first half of 2024.
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 2022. 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 2022, completion was at 45%.
Acquisition of the cartography of the newly managed municipality, Isera, with reference to the use of the cartography on the APRIE portal and the field survey with the municipality's technicians	2022	● ● ●	The cartography of the municipality of Isera was acquired in 2022. A technician (assisted by operational teams) coordinated the activity, which was completed by importing the network into the GIS management system.
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 2022, 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.
Enhancement of leak detection activities on the Trento Municipality Water Supply System network	ongoing activity	● ○ ○	The number of kilometres of network covered was increased in 2022. A new leak search team was introduced in order to make the activity more capillary, entrusted to two operational teams with the support of a new van and a new laptop.

### 3.1.8. URBAN CLEANING



Municipal waste collection and the cleaning of paved public areas (excluding parks and green areas) is managed by Dolomiti Ambiente in the municipalities of Trento and Rovereto in the name and on behalf of the two respective Administrations by virtue of two distinct service agreements. The total population served is 88,363 residents (88,630 in 2021).

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

DOOR-TO-DOOR COLLECTION OF MUNICIPAL WASTE FOR DOMESTIC AND NON-DOMESTIC USERS	COLLECTION CENTRES WHERE ALL THE MUNICIPAL WASTE SUPPLY CHAINS, HAZARDOUS INCLUDED, CAN DELIVER	SWEEPING AND WASHING OF PAVED PUBLIC AREAS WITH WASTE WATER FROM OTHER PRODUCTION PROCESSES	CUSTOMISED COLLECTION OF HAZARDOUS WASTE (SUCH AS BATTERIES AND MEDICINES) FROM SPECIFIC BUSINESSES	HOME COLLECTION OF LAWN WASTE UPON REQUEST	HOME COLLECTION OF BULKY WASTE BY PHONE CALL
---	---	--	---	--	--

The special waste collection, transport and treatment services are instead mainly addressed to handicraft and trade activities.

In 2022, 69,708 tonnes of municipal waste were collected, down from the volumes collected in 2021, which amounted to 71,781 tonnes.

The percentage of separate collection in Trento and Rovereto is 82.1%, calculated net of the share of waste from sweeping and bulky waste sent to recycling.

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.

Dolomiti Ambiente considers environmental sustainability not as an abstract concept, but as 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').

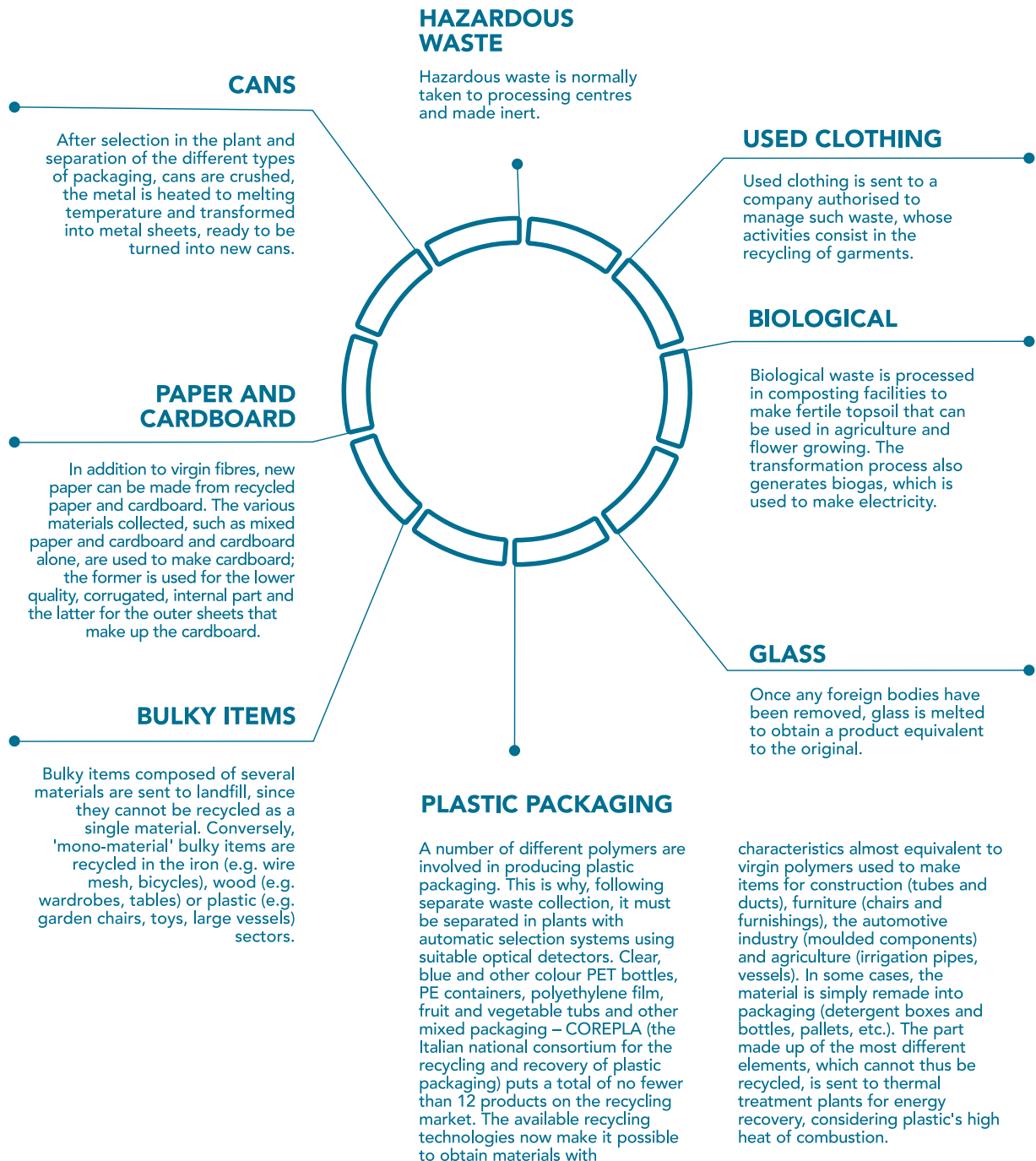
In addition, in the coming years Dolomiti Ambiente plans to use purified waste water from other production processes of Group companies for the urban cleaning service.

The main objective of Dolomiti Ambiente, in concert 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 the International Agreements, in particular those of Paris.

Goals and Initiatives	Deadline	State of Progress	Description
Electric mobility	2030	● ○ ○	<p>In 2022, Dolomiti Ambiente intensified 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 is appreciated not only by citizens, who see a reduction in noise pollution, but also by workers, who gain a clear improvement in the quality of their work. The resulting benefits include reduced fuel consumption, reduced noise pollution and noise stress (the decibels are halved), and the elimination of exhaust gases that would be inhaled by operators.</p> <p>In addition, a Life Cycle Assessment was conducted in 2022 which showed that the decision to invest in e-mobility significantly reduces energy consumption as well as the negative impacts on the environment.</p>
Digitalisation of services	2024-2026	● ● ○	<p>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 and a fixed period in which to collect the bags, resulting in queues and wasted 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 citizens' quality of life.</p> <p>Thanks to the new portal and a new app, it is also possible to access all of Dolomiti Ambiente's services via smartphone, thereby reducing the environmental impact of the service offered.</p>



## WHAT HAPPENS TO THE WASTE AFTER SEPARATE COLLECTION?



## Waste collected in Trento and Rovereto

Waste by composition	UoM	2022					
		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
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>121.51</b>	<b>120.94</b>	<b>0.58</b>	<b>328.73</b>	<b>327.17</b>	<b>1.57</b>
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
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>16,981.55</b>	<b>15,094.67</b>	<b>1,886.87</b>	<b>52,275.23</b>	<b>48,730.61</b>	<b>3,544.62</b>
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	-
Metal packaging	t	-	-	-	-	-	-
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	-
<b>TOTAL WASTE</b>	<b>t</b>	<b>17,103.06</b>	<b>15,215.61</b>	<b>1,887.45</b>	<b>52,603.97</b>	<b>49,057.78</b>	<b>3,546.19</b>

## Waste destined for disposal by disposal method

		2022					
Waste by composition		Collected in Rovereto			Collected in Trento		
	UoM	IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>0.58</b>	<b>0.58</b>	<b>0.48</b>	<b>1.09</b>	<b>1.57</b>
Incineration (including energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	-	-	-	-	-
Other disposal operations <sup>14</sup>	t	-	0.58	0.58	0.48	1.09	1.57
- WEEE	t	-	-	-	-	-	-
- Other (Batteries, medicines, etc.)	t	-	0.58	0.58	0.48	1.09	1.57
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>1,886.87</b>	<b>1,886.87</b>	<b>2,155.16</b>	<b>1,389.46</b>	<b>3,544.62</b>
Incineration (including energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	-	-	97.40	535.66	633.06
- Bulky objects	t	-	-	-	-	-	-
- Other (Batteries, medicines, etc.)	t	-	-	-	-	-	-
- Used clothing	t	-	-	-	-	-	-
- Residual	t	-	-	-	97.40	535.66	633.06
- Sweeping	t	-	-	-	-	-	-
Other disposal operations <sup>14</sup>	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
- Other (Batteries, medicines, etc.)	t	-	-	-	-	-	-
- Residual	t	-	1,666.98	1,666.98	1,978.70	266.86	2,245.56
- Sweeping	t	-	-	-	-	-	-
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>1,887.45</b>	<b>1,887.45</b>	<b>2,155.64</b>	<b>1,390.55</b>	<b>3,546.19</b>

<sup>14</sup> This includes, for example, delivery to mechanical biological treatment plants

## Waste non destined for disposal by type of recovery operation

Waste by composition	UoM	2022					
		Collected in Rovereto			Collected in Trento		
		IN SITU	AT AN EXTERNAL SITE	TOTAL	IN SITU	AT AN EXTERNAL SITE	TOTAL
<b>HAZARDOUS WASTE</b>	<b>t</b>	-	<b>120.94</b>	<b>120.94</b>	<b>66.46</b>	<b>260.71</b>	<b>327.17</b>
Recovery/Preparation for reuse	t	-	-	-	-	-	-
Recycling	t	-	-	-	-	-	-
Other recovery operations <sup>15</sup>	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
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	-	<b>15,094.67</b>	<b>15,094.67</b>	<b>33,847.63</b>	<b>14,882.98</b>	<b>48,730.61</b>
Recovery/Preparation for reuse	t	-	-	-	2,153.77	-	2,153.77
-Residual	t	-	-	-	2,153.77	-	2,153.77
Recycling	t	-	-	-	2,255.55	-	2,255.55
-Organic waste	t	-	-	-	2,255.55	-	2,255.55
Other recovery operations <sup>15</sup>	t	-	15,094.67	15,094.67	29,438.31	14,882.98	44,321.29
-Paper and cardboard	t	-	2574.63	2574.63	4307.31	4080.30	8387.61
-Glass	t	-	1,477.29	1,477.29	4,096.79	983.83	5,080.62
-Lawn cuttings	t	-	1,071.90	1,071.90	1,323.65	1,751.91	3,075.56
-Organic waste	t	-	3,919.87	3,919.87	11,034.83	233.49	11,268.32
-Metal packaging	t	-	-	-	-	-	-
-Multi-material	t	-	1,495.54	1,495.54	3,512.20	1,294.18	4,806.38
-Bulky objects	t	-	241.07	241.07	137.42	366.60	504.02
-Wood	t	-	982.46	982.46	415.10	1,911.74	2,326.84
-Inert	t	-	996.66	996.66	346.23	2,153.68	2,499.91
-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	-	1,353.20	1,353.20	2,934.09	574.00	3,508.09
-Sweeping	t	-	302.55	302.55	994.67	-	994.67
<b>TOTAL WASTE</b>	<b>t</b>	-	<b>15,215.61</b>	<b>15,215.61</b>	<b>33,914.09</b>	<b>15,143.69</b>	<b>49,057.78</b>

<sup>15</sup> Includes, for example, waste delivered to suppliers that have agreements with the recycling chain

## Distribution of Waste collected in Trento and Rovereto

WASTE BY COMPOSITION	2022			
	Collected in Rovereto		Collected in Trento	
	kg per capita	t	kg per capita	t
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
Metal packaging	-	-	-	-
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
<b>TOTAL</b>	<b>421.08</b>	<b>17,103.06</b>	<b>435.83</b>	<b>52,603.97</b>

## Kg of waste collected per capita in Trento and Rovereto

Waste by composition	UoM	2022					
		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
<b>HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>2.98</b>	<b>2.97</b>	<b>0.01</b>	<b>2.72</b>	<b>2.71</b>	<b>0.01</b>
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
<b>NON-HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>418.10</b>	<b>371.65</b>	<b>46.46</b>	<b>433.11</b>	<b>403.74</b>	<b>29.37</b>
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	-
<b>TOTAL WASTE</b>	<b>Kg per capita</b>	<b>421.08</b>	<b>374.63</b>	<b>46.47</b>	<b>435.83</b>	<b>406.45</b>	<b>29.38</b>

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. In 2022, the two landfills in Trento and Rovereto continued to sort bulky waste for recovery, which further contributed to the increase in the percentage of separate waste collection.

### Laboratory

*The laboratory of Dolomiti Energia Holding is specialised in chemical analyses, the quality control of drinking water and the analysis of soils and waste and supports both the Group's companies and the many Trentino municipalities for which it performs analyses on the potability of the water in the water supply networks and on the wastewater coming from the purification processes. 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 clientele.*

*ACCREDIA certifies its competence, independence and impartiality according to the international standard UNI CEI EN ISO/IEC 17025:2005, 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. New instrumentation was recently purchased for the accreditation of the new parameters required by the evolving drinking water regulations.*

*Overall, 11,829 samples were examined during the year (12,691 in 2021), 55% of which for third parties (58.5% in 2021).*



## 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 413-1 | GRI 417-2 |

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

With regard to the quality, safety and continuity of the services provided to customers, the Group works daily to make them more effective and timely, avoiding delays and inefficiencies.

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

- DolomitiEnergyPoint: the Group has ten customer branches open throughout the provincial districts (Trento, Rovereto, Mezzolombardo, Pergine Valsugana, Borgo Valsugana, Panchià, Tione di Trento, Arco, Cles del Garda) with opening hours designed to enable customers to access services outside working hour constraints. In this regard, on some days of the week the offices in Rovereto and Trento are open to the public during extended afternoon hours. Also in order to facilitate access to services, Dolomiti Energia provides a booking service for 2022 allowing customers to schedule access to the branches, without any inconvenience and waiting. Bookings can be managed both online and by calling the company's toll-free numbers.
- separate telephone channel for retail and business customers, with personal assistants dedicated to large customers;
- website: the Dolomiti Energia sales site was revamped in 2022 with a focus on user experience both for identifying commercial proposals and for requesting transactions and information.
- new myDOLOMITI reserved area online: those who prefer to manage their contracts remotely can use a reserved area where customers can search for information on their contracts, payments, amounts due and consumption, send self-readings and request bill instalments.
- WhatsApp channel and online chat: made available to customers during 2022 and accessible directly from the digital area at [www.dolomitienergia.it](http://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.

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 also continued, which eliminates paper bills with obvious benefits both from an environmental point of view and in terms of simplified accessibility, also for past bills thanks to a convenient digital archive that is always accessible.

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

Work also began on the 'Butterfly Project' - which started in May 2022 and will continue over the next few years - aimed at revising and modernising the management systems in use by the Group, with a view to improving them to meet emerging business needs.

The usual updating and training activities for operators continued in 2022, with a focus on evolving scenarios and trends in energy and gas commodity prices.

### **3.2.1. CUSTOMER RELATIONS AND COMMUNICATION: TRANSPARENCY AND FAIRNESS**

The Group is committed to acting in accordance with the principles of economic, environmental and social sustainability in its actions, in order to ensure the consistent and sustainable long-term development of its business, so as to make an active, direct and informed contribution to the well-being of its stakeholders and the growth of the economic and social systems it serves.

It is therefore committed to set up a relationship with final customers based on trust, on 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, accountability and fulfilling all its obligations, at all times. 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 concretely contributed to actions to limit the high utility bills recorded during 2022 and defined

by general and sector regulations, including:

- possible instalment payments of energy and gas bills for households (up to ten instalments for bills issued until 20 June 2022);
- recognition of a social bonus for physical and economic hardship (for households with a gradually increased ISEE);
- adherence to the convention defined by the Autonomous Province of Trento in order to provide a one-off contribution of €180.00 to holders of household utilities residing in the province;
- calculation and communication to all eligible companies of the portion of the tax credit that can be used to curb part of the increase in energy costs;
- definition of the agreement with SACE for the management of guarantees and instalments for companies.

The Group also 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 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 pages presenting offers are subject to evaluation by the Compliance Department in order to verify that all the information required by the regulations in force is included and that the information presented is complete and user-friendly. The documents produced after this evaluation, and before being published and made available for sale, are subject to approval by the Compliance and Market Management Departments, respectively.

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.

Furthermore, a 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 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 falls within the regulatory perimeter. Lastly with regard to direct marketing communications, these are created in familiar, non-technical language and are sent only after verification of the consent given by the customer.

## LISTENING AND CUSTOMER SATISFACTION

With the aim of offering an increasingly higher level of customer care and service, in 2022 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.

Although no direct surveys have been conducted to measure the level of customer satisfaction, the Dolomiti Energia Group uses indirect methods based on monitoring indicators such as service delivery times, complaints and response times.

During the year 2022, 72 non-conformities were recorded relating to the various Group companies in terms of quality, safety and the environment as a result of internal/external audits, feedback from stakeholders and/or supervisory bodies.

The recorded findings of the various Group companies were taken into account, including non-conformities relating to suppliers, as they were considered to be the responsibility (albeit indirectly) of the companies.

Management reviews are carried out regularly (at least once a year) using a certified management system, in which data on non-conformities are analysed.

### 3.2.2. SUSTAINABLE OFFERS

The Group's commercial company offers diversified energy products and tariff plans, suitable to satisfy the various requirements 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.

Some 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.

For customers that are more concerned about environmental issues, the Group offers gas supplies that are '100% CO2 offset' and energy produced exclusively from renewable sources as '100% clean energy' certified through Guarantees of Origin, charging stations for electric mobility or offers that are linked to the sale of products and services for energy efficiency.

*By supplying 100% green energy in its offers, Dolomiti Energia offset 3,655,266 GO certificates for 2022, which will avoid the emission of 932,093 tonnes of CO<sub>2</sub> into the atmosphere (949,784 tonnes in 2021).*

During 2022, the Group increased 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.

The services offered by some Dolomiti Energia Group companies in the field of energy efficiency in 2022 are listed below.

## **FOR COMPANIES**

### **Puro LED**

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.

*The Puro LED services underwritten in 2022 enabled our clients, thanks to their energy saving, to avoid the production of 249 tons/year of CO<sub>2</sub>.*

### **Ecotab, the power quality solution**

Ecotab 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 amount 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 efficiency measures carried out in 2022 made it possible to avoid 40 tonnes of CO<sub>2</sub>/year thanks to energy consumption savings.*

### **Energy audits and monitoring**

The 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.

### **Electric car charging stations**

The Group offers its customers recharging and refuelling stations for electric cars to be installed in homes, public and private spaces that make a decisive contribution to promoting and supporting electric mobility. During 2022, the number of devices increased compared to 2021: from 443 to 489 throughout the region. All the energy provided is generated by renewable hydroelectric systems. Thanks to this activity, the national-based consumption of 629.08 tonnes of oil equivalent and the emission di 1,851.31 tonnes of CO<sub>2</sub> was avoided in 2022.

## **FOR PRIVATE CUSTOMERS**

### **The Naturalmente Sostenibile package**

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

- an annual report in digital format on the amount of CO<sub>2</sub> saved and on the environmental impacts generated;
- the monthly contribution in terms of CO<sub>2</sub> 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% CO<sub>2</sub> 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: the first eco-fair cooperative energy purchasing group**

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), to act on savings, environment and social inclusion. The offer envisages the implementation of inclusive social projects in favour of people with disabilities and protects the environment through the use of 100% green energy and the offsetting of CO<sub>2</sub> emitted from domestic gas consumption, thereby also guaranteeing the customer savings. Thanks to the activated contracts, new projects - 19 to be precise - were able to be financed in 2022, supporting some 74 people in fragile conditions.

*Thanks to this initiative, over the years it has been possible to avoid the emission into the atmosphere of 84,334 tonnes of CO<sub>2</sub>, equal to the amount absorbed by 2.8 trees<sup>16</sup>.*

Cumulative fundraising associated with Etika contract subscriptions (for which Dolomiti Energia donates €10 per active contract each year to the Etika Solidarity Fund) amounts to over three million euros.

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**

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.

### **Ecobonus 110%**

In 2022, the Group supported its customers 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 aims at upgrading more than 200 housing units from an energy and earthquake-proof point of view, ensuring a jump of two energy classes.

<sup>16</sup> Data calculated by estimating the absorption capacity of a tree (e.g., beech) in a forest context and aged 25 years at 40 kg of CO<sub>2</sub>. This value can be influenced by several allometric variables such as tree type, season, tree age, context in which the tree is planted, diameter and height.

The efficiency gains are 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 photovoltaic systems

The objectives of the interventions are to reduce consumption, increase the patrimonial value of the property and access the tax benefits provided by the State Superbonus.





# PEOPLE





**105**

new hires in 2022  
(127 in 2021)



**45.29**

average employee age  
(45.51 in 2021)



**21.7%**

female employees  
(21.4% in 2021)



**96.8%**

of employees with  
permanent contracts  
(96.5% in 2021)



**34.7%**

of employees are under 40  
(34.9% in 2021)



# 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 | 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 personnel.

As at 31 December 2022, the Group's total personnel amounted to 1424 people. 54.56% of personnel are white collar workers, 39.81% are blue collar workers, 4.35% are managers and 1.26% are top managers. 10.46% of staff are under 30 years of age, 24.22% are between 31 and 40 years of age, 25.77% are between 41 and 50 years of age and 39.53% are over 50 years of age.

The Dolomiti Energia Group 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 fundamental 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.

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. The employees who believe they have been discriminated against can refer the incident to the Supervisory Body and/or to its line manager who shall take steps to verify the actual infringement of the Code of Conduct.

The Dolomiti Energia Group opposes all forms of mobbing whether horizontal or vertical within its organisation and has established that relations between employees, at all levels, should be based on criteria of correctness, collaboration, loyalty and mutual respect. It is also committed to protecting the privacy of its employees according to current legislation, undertaking not to communicate or disseminate personal data without the interested party's consent, except when required by law.

The acquisition, processing and conservation of said information is carried out according to specific procedures designed to avoid unauthorised third parties become privy to it. In order to facilitate the collection of reports from employees or external third parties, regarding any offences or conduct that goes against the company rules, the Dolomiti Energia Group has implemented various collection channels:

- e-mail of the Group Corruption Prevention Manager published on the company's website where any illegal conduct may be reported;
- e-mail of the Supervisory Body of each Group company where any illegal conduct may be reported;



- a format on the company website which enables the forwarding of reports to the Group Corruption Prevention Manager without using one's own e-mail and also in anonymous form;
- a box for the collection of hard copy reports, on the main company premises, that are managed directly by the Corruption Prevention Officer;
- confidential computerised channel accessible from the website of the Dolomiti Energia Group and of each of the Group's subsidiaries.

Other reports from other channels that are in any case addressed to the company premises, e-mail or official postal addresses are also assessed.

During the year, one report was received concerning working practices that the company has taken on board through the various departments. None concerned any events of corruption.

To properly apply internal procedures, regular audits are performed both by the Internal Audit department and by the Quality Safety Environment department.

#### **DAY OF COMMUNICATION**

*Several Communication Days were organised again in 2022 as moments for sharing results, best practices, new goals and strategies. These events are a genuine opportunity for creating dialogue with business contacts and for socialising with colleagues, while enhancing and stimulating the sense of belonging to the Group.*

The 'Listening Desk', a service run by external medical specialists available to support and guide workers affected by conditions of discomfort or malaise arising from work and/or personal issues, was kept active in 2022. The Group's commercial company also renewed its 'Family Audit Executive' certification initiatives in 2022 to promote work-life balance and more flexible time management for its staff.

This confirmed the value of the certification as an acknowledgement of the Group's awareness and attention to the management of human resources and organisational processes that are consistent with the reconciliation needs of employees and their families, with the promotion of equal opportunities and with the growth of both corporate and territorial welfare

In addition, the project on in-company mobility and the home-to-work pathway is progressing, all initiatives that fall under the 'MOVE-D' project.

#### **MOVE-D: THE GROUP'S COMMITMENT TO 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 (e.g., JoJob app) and car sharing initiatives, etc. During 2022, the project was enriched with the formalisation of the Home-Work Mobility Plan involving the Trento and Rovereto sites (for more details, see the box 'Promotion of sustainable mobility and reduction of environmental impacts of home-work travel' in the chapter 'Atmospheric Emissions')*

In 2022, 69% of the total workforce had access to remote work. 20% of (non-operational) employees work remotely on a regular basis.

### 4.1.2. 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, occupational health and safety, dignified working conditions, the protection of personal privacy and sustainable social development.

Any requests from individuals interested in privacy issues are handled by the Data Protection Officer as a matter of course. 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. Processes are in place to remedy and mitigate possible negative impacts.

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](mailto:risorseumane@dolomitienergia.it), which is monitored on a daily basis.

Complaints or enquiries on work-related issues can also be received from employee representatives (internal and external) with whom our department meets/discusses regularly.

During the year just ended, there were no major complaints on labour issues.

### 4.1.3. 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 also been a measure aimed at limiting the spread of the pandemic, as well as 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.

In 2022, the number of workers in protected categories was 93 (62 men and 31 women), while it was 95 in 2021 (67 men and 28 women) and 48 in 2020 (31 men and 17 women).

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

	2022		
	UoM	MEN	WOMEN
< 30 years	%	100	-
31-40 years	%	67	33
41-50 years	%	48	52
> 50 years	%	74	26
<b>TOTAL</b>	<b>%</b>	<b>67</b>	<b>33</b>

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

		2022		
	UoM	TOTAL	MEN %	WOMEN %
Executives <= 30 years	No.	-	-	-
Executives 31-40 years	No.	-	-	-
Executives 41-50 years	No.	-	-	-
Executives > 50 years	No.	-	-	-
<b>TOTAL EXECUTIVES</b>	<b>No.</b>	<b>-</b>	<b>-</b>	<b>-</b>
White-collar workers <= 30 years	No.	3	100	-
White-collar workers 31 - 40 years	No.	14	64	36
White-collar workers 41 - 50 years	No.	25	44	56
White-collar workers > 50 years	No.	25	60	40
<b>TOTAL WHITE-COLLAR WORKERS</b>	<b>No.</b>	<b>67</b>	<b>57</b>	<b>43</b>
Blue-collar workers <= 30 years	No.	2	100	-
Blue-collar workers 31 - 40 years	No.	4	75	25
Blue-collar workers 41 - 50 years	No.	2	100	-
Blue-collar workers > 50 years	No.	17	94	6
<b>TOTAL BLUE-COLLAR WORKERS</b>	<b>No.</b>	<b>25</b>	<b>92</b>	<b>8</b>
Middle Managers 31 - 40 years	No.	-	-	-
Middle Managers 41 - 50 years	No.	-	-	-
Middle Managers > 50 years	No.	1	100	-
<b>TOTAL MIDDLE MANAGERS</b>	<b>No.</b>	<b>1</b>	<b>100</b>	<b>-</b>
<b>TOTALS</b>	<b>No.</b>	<b>93</b>	<b>67</b>	<b>33</b>

The Group guarantees the absence of discrimination in the recruitment, hiring, training, management, development and remuneration of staff, as set out in the company's Code of Ethics. The Group focuses on developing 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 UTILITALIA - 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.

An incident of verbal discrimination against a non-EU citizen occurred in one of the Group companies. The planned disciplinary action was promptly taken against the person who carried out the deviant behaviour. The seriousness of the incident resulted in the most severe disciplinary measure envisaged in the contract.

#### 4.1.4. TALENT ATTRACTION AND RETENTION

*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 year 2022 saw, also due to the situation related to the global health emergency, a strong acceleration of digitalisation in all processes managed by Human Resources. In order to adapt to this change, the Dolomiti Energia Group has implemented a transformation process that aims to completely shift the entire recruiting process to digital.*

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.

It therefore encourages the maintenance of high levels of employability, supports and enhances the internal growth of its resources, takes care of diversity and inclusion aspects and promotes well-being at work through sound corporate welfare.

Priority is given to organic growth aimed at enhancing the skills present in the company. In fact, many vacancies are first filled internally through job postings shared on the intranet and company notice boards.

The ability to innovate and continuous evolution cannot disregard the enhancement of human capital and the development of professionalism and talent, as well as the wealth deriving from the diversity of its composition. The Dolomiti Energia Group's objective is to become 'The Place To Be', i.e., the workplace where everyone can best express their potential and aspirations, contributing to the success and sustainability of the business.

The Group uses different channels to reach out to the outside world in the search for talent:

- '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/talented professionals for the role sought.

Talent management and retention are of key importance and are considered a strategic factor for employee development.

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

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/university graduates who share its values (sustainability, transparency, innovation and reliability) 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.

'Act responsibly to give the planet we live in a better future'.

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 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.

Also called life skills, these skills are naturally more difficult to identify in a normal interview, and are assessed in the assessment phase. For example, we talk about listening and empathy, problem solving, strategic thinking, team working, flexibility and change management.

Thanks to its standardised and objective nature, 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.

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. In this case, we are referring to redundancies, hirings or retirements that do not undermine the organisational stability and continuity of the company's production.

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..

#### **4.1.5. SKILLS DEVELOPMENT AND TRAINING**

The Dolomiti Energia Group is committed to the training and development of its people, at all levels and in the various fields of competence.

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.

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 development of people has gained increasing interest for both employers and department managers, with Human Resources sponsoring more and more. 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.

Training focuses on the four clusters identified when defining the training catalogue: Health, Safety & Environment, Technical Skills, Digital Skills and Life Skills.

More and more attention is being paid to continuous staff training, with the imminent launch of a dedicated corporate training platform that will enable online training courses to accompany in-person training, which were resumed in 2022.

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 Dolomiti Energia 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.

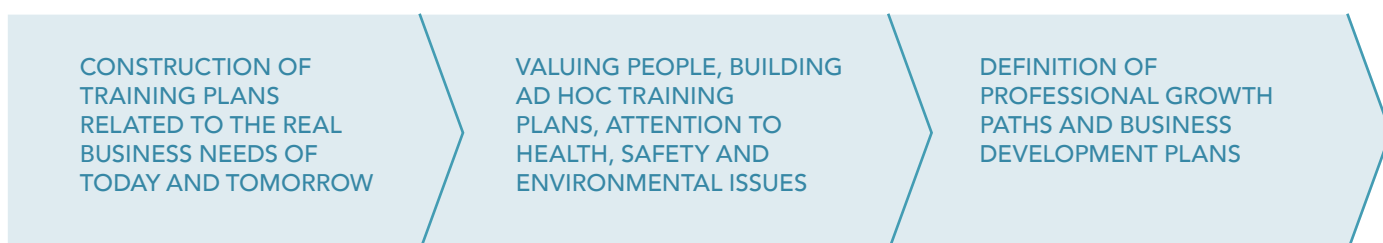
The development and maintenance of technical area skills is a prerequisite for the Group's people in order to perform their work more and more excellently and to improve processes. Failure to develop role skills results in a missed opportunity for both the Group and the individual. The same applies to 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. For core and potential positions, this development is accompanied by a training course to enhance and develop skills.

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.



**ONBOARDING**

*In 2022, an Onboarding process was implemented to accompany the induction of new resources into the Group. This process includes a standard training pathway and other specific pathways depending on placement.*

Among the successful pathways created during 2022, we would like to mention the two 'Team Management' pathways consisting of training modules focusing on Leadership, Communication and Negotiation that involved the managers of the Dolomiti Energia, Dolomiti Energia Trading and Dolomiti Energia Solutions companies.

The success of these training sessions triggered the implementation of the 'Communicate well in order to be effective' course for a number of Novareti company managers. This last course, which ended in January 2023, featured modules focusing on the topics of Relationship and Communication, Conflict Management and Stress Management.

2022 also saw the emergence of an organisational role definition project to rewrite job descriptions. Starting with a few companies, the activity will eventually involve the whole Group. The correct definition of the activities associated with each role is the starting point for the Mapping of Desired and Existing Skills, which in turn is the basis for the construction of company and intra-company development and growth plans.

**Hours of training per employee, by gender and category**

	2022		
	UoM	MEN	WOMEN
Executives	No.	458	122
Middle Managers	No.	2,116	439
White-collar workers	No.	13,744	7,006
Blue-collar workers	No.	13,827	118
<b>TOTAL</b>	<b>No.</b>	<b>30,145</b>	<b>7,685</b>

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

	2022		
	UoM	MEN	WOMEN
Executives	No.	31	41
Middle Managers	No.	42	40
White-collar workers	No.	28	24
Blue-collar workers	No.	25	13
<b>TOTAL</b>	<b>No.</b>	<b>27</b>	<b>25</b>

In 2022, the number of training hours provided increased by 15%, from 32,929 in 2021 to 37,830.

As in 2021, the percentage of employees who attended at least one training course in 2022 was 99%.

The percentage of training initiatives delivered that covered health and safety was 57% (45% in 2021), while technical specialised training amounted to 30% (32% in 2021).

169 hours of training were provided on human rights policies or procedures, involving 14% of employees.

#### 4.1.6. DOLOMITI ENERGIA GROUP STAFF

The number of employees remained substantially stable compared to the previous year, increasing by six.

More than 50% of exits were due to retirements, and consequently most of the recruitments covered the respective exits.

##### Employees by age group and gender

	2022			2021			2020		
	NO.	MEN	WOMEN	NO.	MEN	WOMEN	NO.	MEN	WOMEN
< 30 years	149	of which 83%	17%	151	of which 83%	18%	146	of which 69%	31%
31-40 years	345	of which 71%	29%	344	of which 70%	30%	322	of which 68%	32%
41-50 years	367	of which 72%	28%	358	of which 72%	28%	376	of which 74%	26%
>50 years	563	of which 86%	14%	565	of which 86%	14%	590	of which 87%	13%
<b>TOTAL</b>	<b>1,424</b>	<b>of which 78%</b>	<b>22%</b>	<b>1,418</b>	<b>of which 79%</b>	<b>21%</b>	<b>1,434</b>	<b>of which 79%</b>	<b>21%</b>

##### Employees by contractual category and gender

	2022			2021			2020		
	NO.	MEN	WOMEN	NO.	MEN	WOMEN	NO.	MEN	WOMEN
Executives	18	of which 83%	17%	19	of which 79%	21%	19	of which 84%	16%
Middle Managers	62	of which 82%	18%	58	of which 81%	19%	54	of which 82%	18%
White collar workers	777	of which 63%	37%	768	of which 63%	37%	758	of which 63%	37%
Blue-collar workers	567	of which 98%	2%	573	of which 99%	1%	603	of which 99%	1%
<b>TOTAL</b>	<b>1,424</b>	<b>of which 78%</b>	<b>22%</b>	<b>1,418</b>	<b>of which 79%</b>	<b>21%</b>	<b>1,434</b>	<b>of which 79%</b>	<b>21%</b>

## Total number of employees by gender and contractual classification

	UoM	2022		2021		2020	
		MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
Executives	No.	15	3	15	4	16	3
Middle Managers	No.	51	11	47	11	44	10
White-collar workers	No.	491	286	485	283	477	281
Blue-collar workers	No.	558	9	567	6	597	6
<b>TOTAL</b>	<b>No.</b>	<b>1,115</b>	<b>309</b>	<b>1,114</b>	<b>304</b>	<b>1,134</b>	<b>300</b>

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

	UoM	FULL TIME			PART TIME		
		2022	2021	2020	2022	2021	2020
<b>TOTAL</b>	<b>No.</b>	<b>1,281</b>	<b>1,272</b>	<b>1,307</b>	<b>143</b>	<b>146</b>	<b>127</b>
<b>OF WHICH MEN TOTAL</b>	<b>No.</b>	<b>1,083</b>	<b>1,082</b>	<b>1,119</b>	<b>32</b>	<b>32</b>	<b>15</b>
Executives	No.	15	15	16	-	-	-
Middle Managers	No.	51	47	44	-	-	-
White-collar workers	No.	484	475	468	7	10	9
Blue-collar workers	No.	533	545	591	25	22	6
<b>OF WHICH WOMEN TOTAL</b>	<b>No.</b>	<b>198</b>	<b>190</b>	<b>188</b>	<b>111</b>	<b>114</b>	<b>112</b>
Executives	No.	3	4	3	-	-	-
Middle Managers	No.	10	10	9	1	1	1
White-collar workers	No.	176	170	170	110	113	111
Blue-collar workers	No.	9	6	6	-	-	-

## Employees by classification and gender on permanent contracts

	UoM	2022	2021	2020
<b>TOTAL</b>	<b>No.</b>	<b>1,379</b>	<b>1,368</b>	<b>1,386</b>
<b>OF WHICH MEN TOTAL</b>	<b>No.</b>	<b>1,083</b>	<b>1,080</b>	<b>1,103</b>
Executives	No.	15	14	15
Middle Managers	No.	51	47	44
White-collar workers	No.	481	471	464
Blue-collar workers	No.	536	548	580
<b>OF WHICH WOMEN TOTAL</b>	<b>No.</b>	<b>296</b>	<b>288</b>	<b>283</b>
Executives	No.	3	4	3
Middle Managers	No.	11	11	10
White-collar workers	No.	276	267	264
Blue-collar workers	No.	6	6	6

## Number of employees, by contractual category and age

	2022					2021					2020				
	< 30	31-40	41-50	> 50	TOTAL	< 30	31-40	41-50	> 50	TOTAL	< 30	31-40	41-50	> 50	TOTAL
Executives	-	1	6	11	18	-	1	7	11	19	-	1	8	10	19
Middle Managers	-	5	25	32	62	-	6	24	28	58	-	5	22	27	54
White-collar workers	84	210	207	276	777	83	221	191	273	768	77	202	196	283	758
Blue-collar workers	65	129	129	244	567	68	116	136	253	573	69	114	150	270	603
<b>TOTAL</b>	<b>149</b>	<b>345</b>	<b>367</b>	<b>563</b>	<b>1,424</b>	<b>151</b>	<b>344</b>	<b>358</b>	<b>565</b>	<b>1,418</b>	<b>146</b>	<b>322</b>	<b>376</b>	<b>590</b>	<b>1,434</b>

## Fixed-term employment contracts active as at 31 December

	2022			2021			2020		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
No.	32	13	45	34	16	50	31	17	48

## 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
<b>TOTAL</b>			<b>448</b>	<b>637</b>	<b>30</b>	<b>243</b>	<b>53</b>	<b>13</b>	<b>1,424</b>



## Hires by gender and age

	UoM	2022			2021			2020		
		MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
< 30 years	No.	38	6	44	41	10	51	37	7	44
31-40 years	No.	19	12	31	35	9	44	26	11	37
41-50 years	No.	18	7	25	19	8	27	19	4	23
> 50 years	No.	5	-	5	5	-	5	7	-	7
<b>TOTAL</b>	<b>No.</b>	<b>80</b>	<b>25</b>	<b>105</b>	<b>100</b>	<b>27</b>	<b>127</b>	<b>89</b>	<b>22</b>	<b>111</b>

## Terminations by gender and age

	UoM	2022			2021			2020		
		MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
< 30 years	No.	12	1	13	8	4	12	9	3	12
31-40 years	No.	11	8	19	9	4	13	3	3	6
41-50 years	No.	7	7	14	4	4	8	3	-	3
> 50 years	No.	49	4	53	39	5	44	47	2	49
<b>TOTAL</b>	<b>No.</b>	<b>79</b>	<b>20</b>	<b>99</b>	<b>60</b>	<b>17</b>	<b>77</b>	<b>62</b>	<b>8</b>	<b>70</b>

Hiring rate by gender and age<sup>17</sup>

	2022		2021		2020	
	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
< 30 years	30.6%	24.0%	32.8%	38.5%	30.3%	29.2%
31-40 years	7.8%	11.9%	14.5%	8.8%	11.9%	10.7%
41-50 years	6.8%	6.9%	7.3%	8.1%	6.8%	4.1%
>50 years	1.0%	0.0%	1.0%	0.0%	1.4%	0.0%
<b>TOTAL</b>	<b>7.2%</b>	<b>8.1%</b>	<b>8.9%</b>	<b>8.9%</b>	<b>7.8%</b>	<b>7.3%</b>

Termination rate by gender and age<sup>17</sup>

	2022		2021		2020	
	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
< 30 years	9.7%	4.0%	6.4%	15.4%	7.4%	12.5%
31-40 years	4.5%	7.9%	3.7%	3.9%	1.4%	2.9%
41-50 years	2.6%	6.9%	1.5%	4.0%	1.1%	0.0%
>50 years	10.2%	7.4%	8.0%	6.5%	9.1%	2.7%
<b>TOTAL</b>	<b>7.1%</b>	<b>6.5%</b>	<b>5.4%</b>	<b>5.6%</b>	<b>5.5%</b>	<b>2.7%</b>

<sup>17</sup> Percentage of total employees by age group and gender as at 31 December.

## Non-employed workers<sup>18</sup>

	2022		
	MEN	WOMEN	TOTAL
No.	10	16	26

### INTERNSHIPS AND APPRENTICESHIPS

In 2022, 21 internships and apprenticeships were organised (25 in 2021) which involved students from vocational institutes, secondary schools and universities.

The average duration of the internships was 90 days (93 days in 2021).

### 4.1.5. 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 bargaining agreements. 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).

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, depending on the qualification and position within the organisation, the application of additional accessory compensations. A remuneration/meritocratic policy was drawn up in 2022, to be applied from 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, for the population of Executives and partly for Middle Managers and some white-collar workers in core positions, a variable payment scheme is provided based on direct correlation with company performance and individual targets met ("MbO").

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

<sup>18</sup> These are exclusively workers with fixed-term staff leasing contracts who are guaranteed the same treatment as employees employed on a fixed-term basis.  
The number of workers on staff leasing contracts increased gradually during 2022, and in particular three people were added in the first quarter, nine in the second and 27 in the third.  
As at 31 December 2021, there were 26 staff leasing workers in the Group. In 2021 there were 20.

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 Italian Law 104/09.

Again in 2022, 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.

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.

Freedom of association and collective bargaining are central themes integral to the respective national collective bargaining agreements.

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.

#### Ratio of basic salary and pay of women to men for each employee category<sup>19</sup>

	RATIO OF AVERAGE SALARY 2022
Executives	90%
Middle Managers	101%
White-collar workers	89%
Blue-collar workers	79%

<sup>19</sup> The calculation was made based on the Gross Annual Remuneration actually received by each worker. This was used to then calculate average by category. Men's pay was compared to women's pay.

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 4.89%<sup>20</sup>.

Determining the amount of remuneration to be paid to directors and the Chair is one of the tasks of the Shareholders' Meeting of Dolomiti Energia Holding.

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

In the last term of office in Dolomiti Energia Solutions and in Dolomiti DGNL, some managing directors received variable remuneration based on the achievement of certain objectives.

Managerial staff are covered by the CCNL for Industry Managers, applying all the provisions of the contract. Staff classified as executives and middle managers are allocated a variable annual MbO linked to corporate objectives and individual objectives for the current year.

In 2022, the new Performance Management model was created and implemented - operational as of 2023 - 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.

---

<sup>20</sup> 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 0%.

## 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.

The Covid-19 emergency continued in the first semester of 2022: the Group had promptly adapted to the state of crisis as soon as it arose and continued to manage it by complying with the prohibitions, obligations and recommendations issued by the Authorities to safeguard the health and safety of its employees and customers, as well as implementing measures and provisions aimed at mitigating the spread of the virus, adapting them to the operational needs of the various companies and with the specific intention of maintaining the continuity and availability of services in safe conditions.

### *The Dolomiti Energia Group's health and safety objectives:*

- *Maintain OSH in order to ensure the prevention of fatal accidents and the occurrence of occupational diseases.*
- *Reduce the frequency index of accidents with absence duration  $\geq$  40 days by at least 5% compared to the frequency index of events with absence duration  $\geq$  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 OSH 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. In fact, there are companies such as Dolomiti Edison Energy that have appointed their own RSPP.

Each Group company has also defined its own emergency management plan (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 have their own Health and Safety Management System which complies with the UNI OHSAS 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 SSL management systems of Hydro Dolomiti Energia, Dolomiti Edison Energy and Novarti (gas sector) are certified in accordance with UNI ISO 45001 and are also audited by independent accredited third parties.

An OSH management system inspired by ISO 45001:2018 is implemented in all Group companies, with the sole exception of Gasdotti Alpini.

As of December 2022, Dolomiti Ambiente's OSH system was also subjected - with positive results - to a conformity assessment by an independent accredited third party (IMQ-CSQ).

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, etc.), which can be used through a specific online platform made available to all employees.

99.79% of employees are covered by an internally audited Health and Safety Management System, of which 40.94% are covered by an independently certified third-party system. This figure is not available for non-employees.

	UoM	2022	2021	2020
No. employees covered	No.	1,421	1,415	1,368
No. employees	No.	1,424	1,418	1,434
% employees covered	%	99.79	99.79	95.40

The Group is also committed to the prevention and mitigation of occupational health and safety impacts directly linked by business relationships.

Outsourced activities are entrusted to suppliers after assessing their technical and professional suitability to perform them.

Obligations for the supplier to comply with OSH 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 has always focused on protecting the health and safety of its collaborators (and more generally everyone involved in the activities of the Group's companies), and pursues not only the objective of complying with applicable regulations, but also implementing 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 workers and sharing responsibilities among all the parties involved in the Group's activities, without exceptions.

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 sectors (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. The results of internal health and safety audits which are normally carried out by the staff of the central Quality, Safety and Environment department are also reviewed on these occasions.

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.

#### 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 noted are:

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

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



The representations expired in 2021 but the employers have confirmed, also in 2022, their willingness to continue relations with all Workers' Safety Representatives pending the nomination/election of new representatives.

The extension of OSH management systems covers the activities and workplaces of all Group companies.

#### Percentage of workers represented by the safety committees<sup>21</sup>

	2022	2021	2020
Men	94.5%	94.6%	97.6%
Women	94.2%	94.4%	95.6%

The percentage of workers represented is very high (over 94%). Full coverage could 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 instrumental 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.

In addition to compulsory activities resulting from regulatory obligations, training also includes training

<sup>21</sup> Considering the Occupational Safety Representatives

resulting from risk assessment and continuous process improvement. In detail, the main training courses provided in 2022 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 training for emergency managers (fire, first aid, AED, lifts, environmental emergencies);
- Education and training for the specific task;
- Education and training in the use of machinery, equipment, PPE and hazardous substances;
- Training for specific figures such as: RSPP (Prevention and Protection Service Managers), ASPP (Prevention and Protection Staff), RLSA (Workers' Safety Representatives), 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 2022, the Group had one coordinating Company Doctor and three coordinated Company Doctors. The Doctors support the employers by actively participating in risk assessment activities and workplace inspections to identify hazards and reduce risks.

The Company Doctors draw 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 2022, the health surveillance of workers involved 1,214 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 TRENDS<sup>22</sup>

Il perimetro dell'analisi comprende le società Dolomiti Energia Holding, Novareti, Dolomiti Ambiente, Dolomiti Energia, Dolomiti Energia Trading, Dolomiti Energia Solutions, SET Distribuzione, Dolomiti Edison Energy, Gasdotti Alpini e Hydro Dolomiti Energia. I registri degli infortuni del Gruppo sono riferiti alle sedi INAIL di Trento, Rovereto, Verona e Vimercate. Nel corso del 2021 non è stato registrato nessun incidente mortale e non sono pervenute informazioni su casi di malattia professionale riconducibili ad attività lavorative sotto il controllo del Gruppo.

#### EMPLOYEES<sup>23</sup>

No fatal accidents were recorded during 2022, and information was received on one case of occupational disease attributable to work activities under the Group's control, which will be discussed in more detail in the following sections.

---

<sup>22</sup> More information on the injury indices calculated without taking commuting accidents into account can be found in the Financial Statements Report.

<sup>23</sup> 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 and Vimercate.

## Accidents

2022	UoM	Men	Women	Total
<b>TOTAL NUMBER OF RECORDABLE WORK-RELATED ACCIDENTS</b>	No.	29	4	33
<b>AT WORK</b>	No.	24	-	24
Trento	No.	21	-	21
Rovereto	No.	3	-	3
Other locations	No.	-	-	-
<b>COMMUTING</b>	No.	5	4	9
Trento	No.	3	3	6
Rovereto	no.	2	1	3
Other locations	No.	-	-	-
<b>TOTAL NUMBER OF FATALITIES AS A RESULT OF WORK-RELATED ACCIDENTS</b>	No.	-	-	-
<b>AT WORK</b>	No.	-	-	-
<b>COMMUTING</b>	No.	-	-	-
<b>TOTAL NUMBER OF WORK-RELATED ACCIDENTS WITH SERIOUS CONSEQUENCES (EXCLUDING DEATHS)</b>	No.	-	-	-
<b>AT WORK</b>	No.	-	-	-
<b>COMMUTING</b>	No.	-	-	-
<b>DAYS OF ABSENCE DUE TO ACCIDENTS</b>	days	789	60	849
<b>AT WORK</b>	days	637	-	637
Trento	days	521	-	521
Rovereto	days	116	-	116
Other locations	days	-	-	-
<b>COMMUTING</b>	days	152	60	212
Trento	days	113	30	143
Rovereto	days	39	30	69
Other locations	days	-	-	-
<b>TOTAL NUMBER OF HOURS WORKED (ESTIMATE)</b>	hours	1,824,239	446,357	2,270,596
Trento	hours	1,365,604	320,328	1,685,932
Rovereto	hours	412,252	106,237	518,489
Other locations	hours	46,383	19,792	66,175

**Accident rates (including commuting accidents)**

2022	Men	Women	Total
Frequency index (rate of work-related accidents)	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)	-	-	-
Accident severity index	0.43	0.13	0.37

**Accident rates (three-year data - excluding commuting accidents)<sup>24</sup>**

	2022	2021	2020
Frequency index (Rate of work-related accidents)	10.57	9.61	5.90
Severity index (excluding commuting accidents)	0.28	0.26	0.17

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

In 2022 there were four accidents with an absence of more than 40 days.

The frequency index was 1.8 compared to the average index of 2.2 calculated over the five-year period 2017-2021.

In 2022, the combined index was 2.965 compared to an average of 5.045 in the previous five-year period.

No information was received on cases of occupational disease attributable to work activities under the control of the Dolomiti Energia Group in 2022.

When comparing the periods, excluding commuting accidents, there was an increase in the frequency index, measured as the number of incidents in relation to hours worked, from 5.90 in 2020 to 9.61 in 2021. However, the 2020 figure is considered to be anomalous as the number of accidents detected was also affected by the Covid-19 pandemic at national level. The comparison with the frequency indices of previous years confirms a reduction from 13.85 in 2019 to 9.61 in 2021.

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 an increase in the figure compared to the previous year, but still improved compared to 2019.

Among the factors that may have influenced the result is the continuation of the BBS project in the waste collection (Dolomiti Ambiente) and electricity distribution (SET) sectors. In addition, the "zero accidents"

**24 Notes on calculations:**

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

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

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

The rates also include commuting accidents.

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.

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

objective was achieved for Dolomiti Energia Holding, Dolomiti Edison Energy, Dolomiti Energia Solutions and Dolomiti Energia Trading.

Dolomiti Energy recorded only one accident, when 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 data are revised for Management Control and to be sent to members of the Board of Directors. Statistical data are also sent to the Supervisory Bodies on an annual basis.

## SUPPLIERS<sup>25</sup>

Suppliers were again asked for data on accidents occurring to their employees when providing services for Dolomiti Energia Group companies in 2022.

The request was made to around 487 suppliers.

Despite reminders, only 164 (33.68%) responded to the request, providing, moreover, often inconsistent information.

For the 35 suppliers who in the first draft reported accidents during the period, we started activities to check the correctness of the data, shown below:

	UoM	1st semester 2022	2nd semester 2022	Total
Accidents	No.	15	13	28
Days of absence	No.	457	404	861
Occupational diseases	No.	-	1	1

The data collected and verified do not allow for the calculation of frequency and severity indices, as the suppliers have not yet fully systematically reported information on the hours worked in the execution of contracts.

<sup>25</sup> In 2022, information was provided with respect to one case of occupational disease (lumbosacral discopathy) attributable, according to the supplier, to work activities under the control of the Dolomiti Energia Group. The most significant event as regards severity in terms of days of absence concerned an accident at a construction site at a Group hydroelectric power plant involving a worker who, during handling, was run over and crushed to the ground by a metal pulley of considerable weight, sustaining injuries and fractures that led to his hospitalisation. After hospital discharge, his absence from work lasted until the end of the year and is still ongoing; in 2022 it resulted in 280 days of absence. During the year, another minor accident occurred at a photovoltaic plant construction site outside the region, which resulted in the crushing and subsequent amputation of the phalanx of a finger of the hand, and the worker's absence from work for 20 days.



# PROTECTION OF THE ENVIRONMENT







**88,363** taxpayers

using the  
Urban Hygiene service  
(88,630 in 2021)



**51** hydropower plants

of which 39 are  
EMAS registered



# 5.1.

## MANAGING ENVIRONMENTAL IMPACTS

GRI 2-25 |

In light of the activities it manages, 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.

At Group level, analyses are carried out periodically on the context and the various risks involved, and mitigation actions and the opportunity for further improvement are identified.

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.

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 and Novareti (limited 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.

For Dolomiti Ambiente, Hydro Dolomiti Energia and Dolomiti Edison Energy, EMAS registration was also secured.

## 5.2. 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 2022, the Group consumed 1,431,592.66 GJ (1,518,192.23 GJ in 2021), equivalent to approximately 397 GWh of energy, which is the amount required to meet the annual energy needs of almost 147,000 households (assuming an average annual consumption of 2,700 kWh/year). Non-renewable fuel consumed accounted for 67.74% of total consumption, which includes consumption related to the company's fleet of vehicles, relative to the renter Arval, which amounted to 1,438,897.98 litres, divided between diesel (93.27%), petrol (6.73%) and methane/LPG (0.01%), energy contributions taken from the grid (28.64%) and, finally, energy produced and self-consumed on site (3.61%). It should be noted that, in the energy drawn from the grid, the consumption of electricity supplied by Dolomiti Energia and the electricity for pumping in hydroelectric power plants have been taken into account.

The most energy consuming activities of the Group are the pumping at hydroelectric plants and the production of thermal energy for district heating and cogeneration. In particular, the latter activities cause the greatest impacts on the environment by the Group, particularly in terms of greenhouse gas emissions.

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.).

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 2,362.9 GWh (3,835.7 GWh in 2021).

The total electricity demand, given by the sum of the energy withdrawn and the energy self-consumed, was about 126 GWh, equivalent to about 455 GJ (136 GWh in 2021 equivalent to over 491,000 GJ). This consumption was provided by 99% renewable energy, therefore with no CO<sub>2</sub> emissions.

### Direct internal energy consumption within the organisation by source excluding corporate fleet<sup>26</sup>

	UoM	2022	2021	2020
<b>FROM NON-RENEWABLE SOURCES</b>	<b>GJ</b>	<b>915,228.55</b>	<b>963,834.23</b>	<b>995,461.44</b>
Natural gas	GJ	914,030.10	963,033.46	994,191.49
For heating	GJ	33,024.90	39,645.91	35,818.20
For cooling	GJ	-	-	-
For productive uses	GJ	881,005.20	923,387.54	958,373.28
Diesel	GJ	1,184.08	786.40	1,255.60
For heating	GJ	1,031.01	641.51	1,085.84
For other uses	GJ	153.07	144.90	169.76
LPG	GJ	14.37	14.37	14.36
<b>FROM RENEWABLE SOURCES</b>		-	-	-
Biogas	GJ	-	-	-
Biomass	GJ	-	-	-
<b>TOTAL CONSUMPTION</b>	<b>GJ</b>	<b>915,228.55</b>	<b>963,834.23</b>	<b>995,461.44</b>

### Direct internal energy consumption within the organisation by type of fuel - Company fleet<sup>27</sup>

	UoM	2022	2021	2020
<b>CARS</b>	<b>GJ</b>	<b>10,572.88</b>	<b>9,862.56</b>	<b>9,284.52</b>
Diesel	GJ	8,138.50	8,612.16	8,862.88
Petrol	GJ	2,434.38	1,250.39	421.63
Methane	GJ	0.00	0.01	0.01
LPG	GJ	-	-	-
<b>VANS AND HEAVY VEHICLES</b>	<b>GJ</b>	<b>43,986.62</b>	<b>44,902.11</b>	<b>42,727.74</b>
Diesel	GJ	43,106.17	43,959.47	41,814.65
Petrol	GJ	880.45	942.62	913.09
Methane	GJ	-	0.01	0.01
LPG	GJ	-	-	-
<b>TOTAL</b>	<b>GJ</b>	<b>54,559.50</b>	<b>54,764.66</b>	<b>52,012.27</b>

<sup>26</sup> The figures for 2021 and 2020 have been updated with respect to those published in previous Non-Financial Statements as a result of the inclusion of the consumption of natural gas used in the Ponti sul Mincio power plant, limited to the portion pertaining to Dolomiti Energia Holding (5%).

<sup>27</sup> 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.

Direct external energy consumption of the organisation by source<sup>28</sup>

	UoM	2022	2021	2020
<b>FROM NON-RENEWABLE SOURCES</b>	<b>GJ</b>	<b>296,272.68</b>	<b>292,740.49</b>	<b>215,820.59</b>
PURCHASED FOR CONSUMPTION:	GJ	296,230.09	292,664.91	215,780.72
Electricity	GJ	289,817.52	284,191.37	208,493.31
Thermal energy	GJ	6,412.57	8,473.54	7,287.42
Energy for cooling	GJ	-	-	-
Steam	GJ	-	-	-
SELF-PRODUCED:	GJ	401,496.15	400,989.34	434,936.94
Electricity	GJ	128,715.39	89,279.65	93,543.96
Thermal energy	GJ	256,139.97	297,803.20	266,301.53
Energy for cooling	GJ	16,598.20	13,830.91	11,825.42
Steam	GJ	-	-	63,226.17
Other sources <sup>29</sup>	GJ	42.59	75.58	39.87
OF WHICH SOLD (-):		(-) 401,453.55	(-) 400,913.76	(-) 434,897.07
Electricity	GJ	(-) 128,715.39	(-) 89,279.65	(-) 93,543.96
Thermal energy	GJ	(-) 256,139.97	(-) 297,803.20	(-) 266,301.53
Energy for cooling	GJ	(-) 16,598.20	(-) 13,830.91	(-) 11,825.42
Steam	GJ	-	-	(-) 63,226.17
Other sources <sup>29</sup>	GJ	-	-	-
OF WHICH SELF-CONSUMED:		(-) 42.59	(-) 75.58	(-) 39.87
Electricity	GJ	-	-	0.00
Thermal energy	GJ	-	-	0.00
Energy for cooling	GJ	-	-	0.00
Steam	GJ	-	-	0.00
Other sources <sup>29</sup>	GJ	(-) 42.59	(-) 75.58	(-) 39.87
<b>FROM RENEWABLE SOURCES</b>	<b>GJ</b>	<b>165,531.94</b>	<b>206,852.83</b>	<b>263,044.44</b>
PURCHASED FOR CONSUMPTION (by means of GO):	GJ	113,873.97	120,341.78	173,035.68
OF WHICH SELF-PRODUCED:	GJ	7,990,547.33	13,317,769.71	15,282,077.94
Hydroelectricity	GJ	7,987,987.64	13,315,293.69	15,279,532.35
Solar power	GJ	2,559.69	2,476.02	2,545.59
OF WHICH SOLD (-):	GJ	(-) 7,938,889.37	(-) 13,231,258.65	(-) 15,192,069.18
Hydroelectricity	GJ	(-) 7,937,753.03	(-) 13,230,304.54	(-) 15,191,049.84
Solar power	GJ	(-) 1,136.34	(-) 954.11	(-) 1,019.33
OF WHICH SELF-CONSUMED:	GJ	(-) 51,657.97	(-) 86,511.06	(-) 90,008.76
Hydroelectricity	GJ	(-) 50,234.61	(-) 84,989.15	(-) 88,482.51
Solar power	GJ	(-) 1,423.35	(-) 1,521.91	(-) 1,526.26
<b>TOTAL</b>	<b>GJ</b>	<b>461,804.62</b>	<b>499,593.33</b>	<b>478,865.04</b>

28 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.

29 Electricity produced by the two micro-cogenerators

Total consumption<sup>28</sup>

	2022	2021	2020
	GJ	GJ	GJ
Non-renewable fuel consumed	969,788.05	1,018,598.90	1,004,745.97
Non-renewable fuel consumed	-	-	-
Electricity, heating, cooling, and steam purchased for consumption	410,104.06	413,006.69	388,816.41
Electricity, heating, cooling, and steam produced internally	8,392,043.47	13,718,759.05	15,717,014.88
Electricity, heating, cooling, and steam sold (-)	(-) 8,340,342.92	(-) 13,632,172.42	(-) 15,626,966.25
<b>TOTAL</b>	<b>1,431,592.67</b>	<b>1,518,192.23</b>	<b>1,483,611.01</b>

## Energy intensity

	UoM	2022	2021	2020
Direct internal energy consumption (A)	kWh	269,385,570.77	282,944,139.83	290,964,920.59
Direct external energy consumption (B)	kWh	128,279,060.27	138,775,923.66	133,018,066.23
Gross energy production (C)	kWh	2,362,889,740.91	3,835,714,560.02	4,365,261,133.94
Energy intensity (A+B/C)	kWh/kWh	0.17	0.11	0.10
Total number of employees (D)	No.	1.424	1.418	1.434
Energy intensity over the number of employees (A+B/D)	kWh/No. employees	279,259	297,405	295,665

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 a decrease in the electricity produced by the hydroelectric power plants, from 3,665 GWh in 2021 to 2,205 GWh in 2022 due to the low availability of water resources caused by the drought in 2022.

During the year, the floating photovoltaic plant on the Dampone reservoir came into operation, contributing around 37.6 MWh to the production of green energy.

Natural gas consumption was reduced by about 170,000 cubic metres. The calculation was made on the basis of Dolomiti Energia bills and does not consider variables that may have influenced consumption (e.g., temperature).

## 5.2.1. THE GROUP'S COMMITMENT TO REDUCE ENERGY CONSUMPTION

The initiatives undertaken in 2022 to reduce energy consumption included:

- the reduction of network losses;
- the replacement of some boilers;
- the launch of an efficiency project involving relamping at the new buildings (offices, workshop, changing rooms, etc.). It is expected to be completed by 2023-2024.

Initiatives undertaken to reduce energy consumption<sup>30</sup>

	2022			2021			2020		
	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	384	1.3824	electricity	-	-	electricity	2,000,000.46	75.60
Replacement of thermal plants	thermal	21,968.90	79.08804	termica	198,470.16	714.49	thermal	6,604.00	23.77
Installation of heat pumps	-	-	-	-	-	-	electricity	64,803.00	233.29

<sup>30</sup> 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.



## 5.3. EMISSIONS TO AIR

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 CO<sub>2</sub> in their energy production activities.

The Group's activities require the use of SF<sub>6</sub> (sulphur hexafluoride) as an insulator inside some electrical equipment, as it reduces space requirements and ensures greater safety. However, some of this gas may leak into the atmosphere through seals or, in some cases, during pressure restoration operations. The Group is committed to keeping these losses under control in order to limit the related emissions. In this regard, starting in 2021, the Group's electricity distribution company SET Distribuzione strengthened its intervention on secondary sub-cabin medium-voltage circuit breakers by using an eco-efficient gas mixture capable of reducing global warming potential (GWP) by 99.99% compared to SF<sub>6</sub>.

The Group's sources of emissions also include company vehicles. In this regard, in 2022 the committed effort continued to reduce emissions generated by mobility needs through the use of electric cars.

### EUROPEAN UNION EMISSIONS TRADING SYSTEM (EU ETS)

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 April 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 CO<sub>2</sub> 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 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 is required to transfer a number of allowances corresponding to its percentage obligation to the account of the company a2a gencogas S.p.A, the 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 2022, the company Novareti had an obligation of approximately 10,654 allowances and received 1,641 allowances from the system free of charge. Dolomiti Energia Holding S.p.A. had an obligation of approximately 18,805 allowances, of which zero were allocated by the system.

## Direct emissions within the organisation by source excluding the corporate fleet (Scope 1)

	UoM	2022	2021	2020
<b>FROM NON-RENEWABLE SOURCES</b>	t. CO <sub>2</sub> e	<b>46,426.21</b>	<b>49,049.01</b>	<b>45,911.50</b>
Natural gas	t. CO <sub>2</sub> e	46,346.03	48,996.41	45,826.74
For heating	t. CO <sub>2</sub> e	1,674.53	2,017.07	1,651.02
For cooling		0.00	0.00	0.00
For productive uses	t. CO <sub>2</sub> e	44,671.50	46,979.34	44,175.72
Diesel	t. CO <sub>2</sub> e	79.32	51.74	83.91
For heating	t. CO <sub>2</sub> e	69.06	42.21	72.56
For other uses	t. CO <sub>2</sub> e	10.25	9.53	11.34
LPG	t. CO <sub>2</sub> e	0.86	0.86	0.86
<b>FROM RENEWABLE SOURCES</b>	t. CO <sub>2</sub> e	-	-	-
Biogas	t. CO <sub>2</sub> e	-	-	-
Biomass	t. CO <sub>2</sub> e	-	-	-
<b>OTHER SOURCES - REFRIGERANTS</b>	t. CO <sub>2</sub> e	<b>0.52</b>		
SF <sub>6</sub> (replenishments)	t. CO <sub>2</sub> e	0.52	0.35	0.28
<b>TOTAL EMISSIONS</b>	t. CO <sub>2</sub> e	<b>46,426.73</b>	<b>49,049.35</b>	<b>45,911.78</b>

The trend in direct energy consumption within the organisation, considering the reduction in natural gas consumption and despite the increase in heating oil consumption, leads to a reduction in emissions of approximately 2,600 tCO<sub>2</sub>e.

## Direct emissions within the organisation - Company fleet (Scope 1)

	UoM	2022	2021	2020
<b>CARS</b>	t. CO <sub>2</sub> e	<b>698.85</b>	<b>646.53</b>	<b>619.22</b>
Diesel	t. CO <sub>2</sub> e	545.17	566.62	592.27
Petrol	t. CO <sub>2</sub> e	153.64	79.82	26.84
Methane	t. CO <sub>2</sub> e	0.04	0.09	0.11
LPG	t. CO <sub>2</sub> e	-	-	-
<b>VANS AND HEAVY VEHICLES</b>	t. CO <sub>2</sub> e	<b>2,943.12</b>	<b>2,952.51</b>	<b>2,852.53</b>
Diesel	t. CO <sub>2</sub> e	2,887.55	2,892.25	2,794.29
Petrol	t. CO <sub>2</sub> e	55.57	60.17	58.13
Methane	t. CO <sub>2</sub> e	-	0.04	0.10
LPG	t. CO <sub>2</sub> e	-	0.01	-
<b>TOTAL</b>	t. CO <sub>2</sub> e	<b>3,641.97</b>	<b>3,599.05</b>	<b>3,471.75</b>

### Indirect emissions within the organisation (Scope 2)<sup>31</sup>

	2022	2021	2020
	tCO <sub>2</sub> e	tCO <sub>2</sub> e	tCO <sub>2</sub> e
Total - Location Based	35,627.12	35,798.51	38,396.33
Total - Market Based	37,060.22	36,602.31	27,331.34

### INDIRECT EMISSIONS OF THE ORGANISATION (SCOPE 3)

During the financial year 2022, the Group started 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.

Although this is a first estimation, the Group has set itself the goal of improving the accuracy of the input data and refining the calculation methodology in order to complete the inventory and thus be able to effectively monitor its impact on the environment and people.

#### Business trips

	UoM	2022
Own car	tCO <sub>2</sub> e	32.05
Train	tCO <sub>2</sub> e	0.52
Plane	tCO <sub>2</sub> e	2.43
<b>TOTAL</b>	<b>tCO<sub>2</sub>e</b>	<b>35.00</b>

#### Home-work commuting

	UoM	2022
Trento headquarter via Fersina	tCO <sub>2</sub> e	528
Trento headquarter Tang. Ovest	tCO <sub>2</sub> e	286
Rovereto headquarter via Manzoni	tCO <sub>2</sub> e	325
<b>TOTAL</b>	<b>tCO<sub>2</sub>e</b>	<b>1,139</b>

<sup>31</sup> 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.

Cogeneration NOX SOX, and other significant emissions (by weight)<sup>32</sup>

	UoM	2022	2021	2020
NOX	kg	25,176.05	21,026.00	34,188.00
SOX	kg	19	-	-
Persistent organic pollutants (POP)	kg	-	-	-
Volatile organic compounds (VOC)	kg	414.35	-	-
Hazardous atmospheric pollutants (HAP)	kg	0.30	-	-
Particulate matter (PM)	kg	5.40	-	-
Other standard categories of atmospheric emissions identified in relevant regulations	kg	7,644.15	-	-

## Emissions of ozone-depleting substances - ODS

	UoM	2022	2021	2020
HCFC emissions	kg	11 <sup>33</sup>	-	90

Total Emissions<sup>34&35</sup>

	2022	2021	2020
	tCO2e	tCO2e	tCO2e
Direct (Scope 1)	50,068.70	52,648.40	49,383.53
Direct external (Scope 2) – Location Based	35,627.12	35,798.51	38,396.33
Direct external (Scope 2) - Market Based	37,060.22	36,602.31	27,331.34
Indirect (Scope 3)	1.174.00	-	-
<b>TOTAL - LOCATION BASED</b>	<b>86,869.82</b>	<b>88,446.91</b>	<b>87,779.86</b>
<b>TOTAL - MARKET BASED</b>	<b>88,302.92</b>	<b>89,250.71</b>	<b>76,714.87</b>

32 The values indicated refer to the Ponti sul Mincio thermoelectric power plant, in which the Parent Company has a 5% interest. The data are not available for previous years.

33 This is the restoration of R-134, which was lost due to a fault in a refrigeration unit.

34 The figures for 2021 and 2020 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 the consumption of natural gas used in the Ponti sul Mincio power plant, limited to the portion pertaining to Dolomiti Energia Holding (5%).

35 The factors used to calculate emissions were published by TERNA (International Comparisons 2019), European residual mix 2021 (AIB 2022) and DEFRA (Department for Environment, Food & Rural Affairs - 2022).

## Greenhouse gas emission intensity (GHG)

	UoM	2022	2021	2020
Total direct emissions (Scope 1) (A)	tCO <sub>2</sub> e	50,068.70	52,648.40	49,383.53
Total emissions - Location based (Scope 2) (B)	tCO <sub>2</sub> e	35,627.12	35,798.51	38,396.33
Total emissions - Market based (Scope 2) (C)	tCO <sub>2</sub> e	37,060.22	36,602.31	27,331.34
Indirect emissions (Scope 3) (D)	tCO <sub>2</sub> e	1,174.00	-	-
Total emissions - Location based (A+B+D)	tCO <sub>2</sub> e	86,869.82	88,446.91	87,779.86
Total emissions - Market based (A+C+D)	tCO <sub>2</sub> e	88,302.92	89,250.71	76,714.87
Gross energy production (E)	kWh	2,362,889,740.91	3,835,714,560.02	4,365,261,133.94
Intensity - Location based (A+B+D/E)	tCO <sub>2</sub> e /kWh	0.000037	0.000023	0.000020
Intensity - Market based (A+B+C/E)	tCO <sub>2</sub> e /kWh	0.000037	0.000023	0.000018
Total number of workers (F)	n°	1,424	1,418	1,434
<b>Intensity by number of workers - Location based (A+B+D/F)</b>	<b>tCO<sub>2</sub>e /n°</b>	<b>61.0</b>	<b>62.4</b>	<b>61.2</b>
<b>Intensity by number of workers - Market based (A+C+D/F)</b>	<b>tCO<sub>2</sub>e /n°</b>	<b>62.0</b>	<b>62.9</b>	<b>53.5</b>

### **PROMOTION OF SUSTAINABLE MOBILITY AND REDUCTION OF ENVIRONMENTAL IMPACTS IN THE HOME-WORK COMMUTING.**

During 2022, the Group updated its strategy for reducing the impact of employee commuting. All workers at the Trento via Fersina, Trento Tangenziale ovest and Rovereto via Manzoni sites were invited to participate in a survey to collect information on home-work mobility, also indicating any propensity to adopt different mobility solutions.

The results of the survey, combined with the assessment of the structural and logistical conditions of the locations, contributed to the design of the Home-Work Mobility Plans (hereinafter referred to as HWMPs) for the municipalities of Trento and Rovereto. For the municipality of Rovereto, the implementation of the HWMP took place on a voluntary basis.

The implementation of the HWMP involved:

- the recognition and valorisation of remote forms of work (agile and remote work) as a way of reducing emissions, resource consumption and traffic congestion. During 2022, 34,314 days of remote work were carried out throughout the Group, representing approximately 11% of the total 308,928 days worked for the year. With reference to the three main sites of Trento and Rovereto, the number of remote working days was 27,735 and resulted in an estimated emission saving of about 206 t CO<sub>2</sub>;
- the encouragement of workers to carpool by making available, as of November, a special app - JoJob - which facilitates the matching of demand for mobility and the corresponding supply. Carpooling is also supported by the Group through a form of cashback that rewards both driver and passenger. The data collected via the app in less than two months quantified the avoided emissions as being around 1 tonne of CO<sub>2</sub>. In the first two months of 2023, the use of carpooling has already resulted in a further reduction in emissions of around 2.7 tonnes of CO<sub>2</sub>;
- the use of local public transport is promoted by the Group through a contribution to the subscription costs incurred by employees;
- the use of bicycles for home-work commuting is promoted by providing protected parking spaces within the company perimeter;
- a number of free charging stations for e-bikes have been added as of 2023: some of these are also accessible to Group customers at the Rovereto via Manzoni and Trento via Fersina sites

### 5.3.1. THE GROUP'S COMMITMENT TO REDUCING EMISSIONS

In 2022, the Group continued to progressively modernise its vehicle fleet with the aim of reducing consumption, limiting emissions and increasing both the quality of the service offered and the well-being at work of the employees who use them. In fact, new electric vehicles (both cars and work vehicles) were introduced into the company fleet to replace diesel vehicles, totalling 31 vehicles in Trento and 11 in Rovereto.

Initiatives aimed at reducing emissions<sup>36</sup>

	UoM	2022	2021	2020
Conversion and retrofitting of equipment (lights, computer equipment, heating, etc.)	t CO <sub>2</sub> e	4.13	76.80	20.86
Fleet modernisation	t CO <sub>2</sub> e	31.77	5.37	-

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% CO<sub>2</sub> offset" natural gas offer, a CO<sub>2</sub> offsetting project which finances the distribution of efficient cooking stoves in certain rural communities in Southern Ethiopia to support people, in addition to the environment. This project is run in conjunction with Dolomiti Energia and in collaboration with COOPI, 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.

*For 2022, we offset the CO<sub>2</sub> related to the overall consumption of 94 million cubic metres of our customers' gas, corresponding to approximately 188,106 tonnes of CO<sub>2</sub> avoided.*

<sup>36</sup> The table does not consider reductions in Co2e2e emissions related to public lighting efficiency measures for 2020.



## 5.4. WASTE

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-produced waste and production waste created within the context of various activities through Dolomiti Ambiente and according to a Group procedure<sup>37</sup>, 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 environmental-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 an environmental impact. A large part of the

---

<sup>37</sup> 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.

waste is destined for treatment chains that allow for sustainable processing.

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 CO<sub>2</sub>-neutral supply chains is purchased wherever possible. Containers for separate waste collection are provided at each location. 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.

## Waste produced internally by composition

2022	UoM	Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>191.96</b>	<b>102.54</b>	<b>89.42</b>
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	0.00	4.63
Other	t	92.02	7.23	84.79
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>2,615.95</b>	<b>1,441.77</b>	<b>1,174.18</b>
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
<b>TOTAL WASTE</b>	<b>t</b>	<b>2,807.91</b>	<b>1,544.32</b>	<b>1,263.60</b>

## Waste intended for disposal by disposal method

2022	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>89.41</b>	<b>89.41</b>
Incineration (including energy recovery)	t	-	-	-
Incineration (without energy recovery)	t	-	-	-
<i>Disposal at landfills</i>	t	-	-	-
Other disposal operations <sup>38</sup>	t	-	89.41	89.41
- Waste from electrical and electronic appliances	t	-	-	-
- Batteries and accumulators	t	-	-	-
- Cables	t	-	-	-
- Fluorescent lighting	t	-	-	-
-Packaging that contained hazardous substances	t	-	-	-
- Absorbents and filtering materials	t	-	-	-
- Mineral/synthetic oils	t	-	-	-
- Other	t	-	4.63	4.63
- Chemicals	t	-	84.79	84.79
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>1,174.18</b>	<b>1,174.18</b>
Disposal at landfills	t	-	-	-
Other disposal operations <sup>38</sup>	t	-	1,174.18	1,174.18
- Plastics	t	-	-	-
- Wood	t	-	-	-
- Mixed packaging	t	-	-	-
- Metal	t	-	-	-
- Organic waste	t	-	-	-
- Sewage sludge	t	-	149.86	149.86
-End-use electrical and electronic equipment	t	-	-	-
- Other	t	-	1,024.32	1,024.32
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>1,263.59</b>	<b>1,263.59</b>

<sup>38</sup> This includes, for example, submission to biological or physical-chemical treatment.

## Self-produced waste not destined for disposal by type of recovery operation

2022	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>102.54</b>	<b>102.54</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	-	-
Other recovery operations <sup>39</sup>	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	-	-	-
- Chemicals	t	-	7.23	7.23
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>1,441.78</b>	<b>1,441.78</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	-	-
Other recovery operations <sup>39</sup>	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
- Sewage sludge	t	-	-	-
- End-use electrical and electronic equipment	t	-	78.35	78.35
- Other	t	-	361.67	361.67
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>1,544.32</b>	<b>1,544.32</b>

<sup>39</sup> Includes, for example, handover to suppliers accredited with the recycling chain.

Residual waste produced at Trento and Rovereto headquarters<sup>40</sup>

2022	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	kg	-	-	-	-	-	-
Residual	kg	-	-	-	-	-	-
<b>NON-HAZARDOUS WASTE</b>	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
<b>TOTAL WASTE</b>	kg	126,870	58,120	68,750	182,560	53,760	128,800

## Residual waste generated - destined for disposal by type of recovery operation

2022	UoM	ROVERETO COLLECTIONS			TRENTO COLLECTIONS		
		On site	At an external site	Total	On site	At an external site	Total
<b>HAZARDOUS WASTE</b>	kg	-	-	-	-	-	-
Incineration (including energy recovery)	kg	-	-	-	-	-	-
Incineration (without energy recovery)	kg	-	-	-	-	-	-
Disposal at landfills	kg	-	-	-	-	-	-
Other disposal operations	kg	-	-	-	-	-	-
<b>NON-HAZARDOUS WASTE</b>	kg	68,750.00	-	68,750.00	128,800.00	-	128,800.00
Incineration (including energy recovery)	kg	-	-	-	-	-	-
Incineration (without energy recovery)	kg	-	-	-	-	-	-
Disposal at landfills	kg	68,750.00	-	68,750.00	128,800.00	-	128,800.00
Other disposal operations	kg	-	-	-	-	-	-

<sup>40</sup> This is the residue collected at the two sites in Trento and Rovereto. In the second half of the year, as the Rovereto and Trento landfills were exhausted, they were equipped for the biostabilisation of residual waste.

## Residual waste generated - non destined for disposal by type of recovery operation

2022	UoM	ROVERETO COLLECTIONS			TRENTO COLLECTIONS		
		On site	At an external site	Total	On site	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>kg</b>	-	-	-	-	-	-
Preparation for reuse	kg	-	-	-	-	-	-
Recycling	kg	-	-	-	-	-	-
Other recovery operations	kg	-	-	-	-	-	-
<b>NON-HAZARDOUS WASTE</b>	<b>kg</b>	<b>58,120.00</b>	-	<b>58,120.00</b>	<b>53,760.00</b>	-	<b>53,760.00</b>
Preparation for reuse	kg	58,120.00	-	58,120.00	53,760.00	-	53,760.00
Recycling	kg	-	-	-	-	-	-
Other recovery operations	kg	-	-	-	-	-	-

### 5.4.1. 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 ISO 45001:2018 of the Integrated Quality/Environment Management System for the design and management of Novareti's natural gas distribution systems;
- Implementation throughout the Dolomiti Energia Group companies of occupational health and safety management systems based on the UNI ISO 45001:2018 standard;
- Certification under the UNI EN ISO 14001:2015, UNI ISO 45001:2018 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 for the Integrated Quality/Environment 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 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 for the provision of energy services (ESCO) by Dolomiti Energia Solutions.

Furthermore, SET Distribuzione, Dolomiti Ambiente and Dolomiti Energia Holding (solely for the Laboratory and Warehouse) are continuing a process on occupational safety based on behaviour-based safety training.

The Dolomiti Energia sales company has obtained the basic Family Audit certification, which certifies the company's awareness and commitment to reaching an ideal balance between working life and personal and family life of the people working for it.



# 5.5.

## 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 | GRI 304 – 4 |

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, 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 2022 amounted to 13,510,656.94 megalitres: as anticipated, it 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.

Impacts on water resources are defined and analysed according to the procedure described above. 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 the control of the correct release of the minimum vital water flow, the Group's companies cooperate with fishermen's associations, while for the management of artificial reservoirs in the event of extreme events, they work with the Autonomous Province of Trento on 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 itself on Civil Protection.

## Water withdrawal

	2022	2021	2020
	Megalitres	Megalitres	Megalitres
<b>SURFACE WATER</b>	<b>13,479,148.58</b>	<b>17,965,907.70</b>	<b>19,009,674.45</b>
≤1.000 mg/L total dissolved solids	13,479,148.58	17,965,907.70	19,009,674.45
>1.000 mg/L total dissolved solids	-	-	-
<b>GROUNDWATER</b>	<b>28,466.29</b>	<b>31,857.90</b>	<b>30,649.12</b>
≤1.000 mg/L total dissolved solids	28,466.29	31,857.90	30,649.12
>1.000 mg/L total dissolved solids	-	-	-
<b>SEAWATER</b>	<b>-</b>	<b>-</b>	<b>-</b>
≤1.000 mg/L total dissolved solids	-	-	-
>1.000 mg/L total dissolved solids	-	-	-
<b>PROCESS WATER</b>	<b>2,991.24</b>	<b>9.78</b>	<b>5,168.63</b>
≤1.000 mg/L total dissolved solids	2,984.04	-	5,161.48
>1.000 mg/L total dissolved solids	7.20	9.78	7.15
<b>WATER FROM SUPPLY SERVICES</b>	<b>50.83</b>	<b>39.32</b>	<b>56.66</b>
≤1.000 mg/L total dissolved solids	46.68	32.37	34.31
>1.000 mg/L total dissolved solids	4.15	6.95	22.35
<b>TOTAL WATER WITHDRAWAL</b>	<b>13,510,656.94</b>	<b>17,997,814.70</b>	<b>19,045,548.86</b>

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.

## Water discharges - by destination<sup>41</sup>

	UoM	2022	2021	2020
<b>TOTAL WATER DISCHARGES</b>	Megalitri	<b>13,503,780.98</b>	<b>17,990,085.48</b>	<b>19,038,515.38</b>
Of which surface water <sup>42</sup>	Megalitres	13,479,153.08	17,965,913.56	19,009,677.97
Of which groundwater	Megalitres	1,104.25	1,080.70	879.39
Of which in seawater	Megalitres	-	-	-
Of which in sewers	Megalitres	20,539.61	23,091.22	22,796.54
Other	Megalitres	2,984.04	-	5,161.48

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.

<sup>41</sup> In light of this, the figures for 2021 and 2020 are updated from those published in previous Non-Financial Statements.

<sup>42</sup> This is process water.

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.

#### Water discharges - by type<sup>43</sup>

	UoM	2022	2021	2020
<b>TOTAL WATER DISCHARGES</b>	Megalitres	<b>13,503,780.98</b>	<b>17,990,085.48</b>	<b>19,038,515.38</b>
Fresh water ( $\leq 1.000$ mg/L total dissolved solids)	Megalitres	13,480,257.33	17,966,994.26	19,010,557.36
Other water ( $> 1.000$ mg/L total dissolved solids) <sup>43</sup>	Megalitres	23,523.65	23,091.22	27,958.02

#### Water consumption

	2022
	<b>Megalitres</b>
Total water withdrawn	13,510,656
Total water discharged	13,503,780
<b>TOTAL WATER CONSUMPTION</b>	<b>13,751</b>

With regard to the consumption of water from the water supply system at the Dolomiti Energia Group's sites in Trento and Rovereto, there were no significant changes between 2021 and 2022: for the former there was a drop from 6,277 cubic metres to 5,846 cubic metres (-7%), while for the latter it rose from 3,180 cubic metres to 3,203 cubic metres.

As far as the company Novareti Cogenerazione is concerned, total water withdrawals fell from 16,730 cubic metres to 11,356 cubic metres (-32%), while discharges fell from 11,186 cubic metres to 4,882 cubic metres (-56%).

<sup>43</sup> Novareti manages the clean and dirty water collection service up to the purification plants.

### 5.5.1. THE GROUP'S COMMITMENT TO REDUCE WATER CONSUMPTION

The management of the water cycle in 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 2022 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 2022, 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, both through virtual simulations and network sensors.

With reference instead to the Group's 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, water dispensers have been installed to supply drinking water and thus avoid the use of plastic bottles.

Furthermore, 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 water that is potentially polluted is sent to a biological purification plant owned by the company and located inside the same area where production takes place and where the water is put back into the environment. After treatment, the wastewater 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 of the environment into which it is reintroduced.

## THE IMPACTS OF HYDROELECTRIC PRODUCTION

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 that are 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, 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.

The procedure for identifying water-related impacts follows the same logic used for the other aspects.

## 5.6. 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 |

The Dolomiti Energia Group pays particular attention to the flora and fauna of the places in which it operates, undertaking to carry out its activities while considering the needs of the surrounding ecosystem and to see to or cooperate in a timely manner to correct any negative impacts that may occur in the context of the businesses of the Group companies.

The effectiveness of the measures taken to mitigate impacts is assessed annually and internal audits are scheduled to periodically verify the effectiveness of the actions taken.

### Sites operating in or adjacent to protected areas or areas of high biodiversity value

Ownership/Management	Site	Description <sup>44</sup>
Owned by the municipality of Rovereto and managed by Dolomiti Ambiente	CRM Rovereto - location Mira C.C. Lizzana	Material collection centre for household and non-household municipal waste. This is an area of significant national and provincial interest due to the presence and reproduction of endangered animal species, such as amphibians and reptiles, that are exclusive and typical of the Alps. Of note is the presence of a large number of species, including hydrophagous beetles that are indicators of good environmental quality. 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.
Property of Dolomiti Edison Energy	Asta Noce – Val di Non	The S. Giustina Dam is located here, as well as some offices. The area occupies 233 m <sup>2</sup> . The main management objective is to maintain the biodiversity and functionality of the ecosystems, including by improving their connectivity through the creation of appropriate ecological corridors.

<sup>44</sup> 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.

Property of Dolomiti Edison Energy	Pozzolago - Altopiano di Pinè Plant	<p>This is a vast marshland area where the vegetation consists of wet meadows of mowed mega-grasses. The pumping station for Lake Serraià is located here, at the Piazza dam. 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%).</p> <p>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>
Property of Hydro Dolomiti Energia	Stelvio National Park	<p>Works related to the Cogolo and Malga Mare hydroelectric plant take place here and cover an area of 1.07 km<sup>2</sup>.</p> <p>The site consists of dense needle-leaved forests, crystal-clear streams and lake waters and white perennial snows. It is home to deer, ibex, chamois and roe deer, and is flown over by the golden eagle.</p>
Property of Hydro Dolomiti Energia	Adamello Brenta Nature Park	<p>Work is carried out here on the Malga Boazzo and Nembia - Santa Massenza hydroelectric plant. It covers an area of 1.4 km<sup>2</sup>. The main commitment is to protect the area between the Adamello-Presanella massif and the Brenta Dolomites Group.</p>
Property of Hydro Dolomiti Energia	Lake Toblino	<p>A biotope of provincial interest where works related to the Torbole and Toblino hydroelectric plant take place and covering an area of 0.7 km<sup>2</sup>, characterised by sub-Mediterranean vegetation and aquatic avifauna.</p>
Property of Hydro Dolomiti Energia	Carzano	<p>Work is carried out here on the Carzano, Costa Brunella and Grigno hydroelectric plant. The area covered is 0.04 km<sup>2</sup>. The site is of great ecological importance, not only because of its very high level of naturalness, but also and above all because of 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>



Property of Hydro Dolomiti Energia	Marocche di Dro	Biotope of provincial interest where the Fies and Dro hydroelectric power stations are located. The site covers an area of 0.005 km <sup>2</sup> . 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 guided by the integral preservation of the environment.
Property of Hydro Dolomiti Energia	Monte Baldo di Brentonico and Talpina-Brentonico	Works related to the Ala and Pra da Stua hydroelectric plant. The surface area of the site is 0.12 km <sup>2</sup> , and it is of significant interest from the point of view of 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 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.
Managed by Hydro Dolomiti Energia	Monte Corno Nature Park (BZ)	Works related to the San Floriano hydroelectric plant take place here, in an area of 0.016 km <sup>2</sup> . There are numerous plant species with international and national protection status in this environment. All the reptiles found in South Tyrol can be found here. Monte Corno Nature Park is a paradise for birds. 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.
Managed by Hydro Dolomiti Energia	Fiume Piave dai Maserot alle grave di Pederobba (TV)	The site covers an area of 0.02 km <sup>2</sup> and contains works related to the Bellona 1 and 2 hydroelectric plant. The focus is on water regulation, cultivation changes, urbanisation and gradual infrastructure.

The Group also evaluates the fish species potentially affected by the activities of the hydroelectric plants of the companies Hydro Dolomiti Energia, SF Energy, Dolomiti Edison Energy and Dolomiti Energia Holding<sup>45</sup>.

In the past, a project was also completed to safeguard quadrupeds near the 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.

### 5.6.1. 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.

<sup>45</sup> In particular, the species listed in the IUCN (International Union for Conservation of Nature) 'Red List' and national lists that find their habitat in the organisation's areas of operation are the eel, the Lake Garda carp, the marble trout (considered - according to the IUCN Red List - a critically endangered species), the Mediterranean barbel, the tench (considered endangered) and the stone loach (considered vulnerable).

In addition, an annual 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, the 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, it indirectly acquires 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 management 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.

The Group is actively involved in the management of impacts resulting from its activities, and for each identified impact there are management and control measures and proposals for resolving the impact.

Furthermore, in order to concretely contribute to the implementation of the environmental policy, the Group companies have a series of operational and management tools, commensurate with their characteristics and with the direct and indirect environmental impacts produced by their activities. 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.

As stated in the Integrated Environment and Safety Policy, 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, it actively collaborates with the provincial authorities in both the forecasting and operational phases. In addition, for the verification and control of the correct release of the ecological flow, the Group cooperates with the fishermen's associations located in the area, which carry out controls at the intake works on behalf of the company itself and draw up specific inspection reports.

For example, Hydro Dolomiti Energia supports the 'Extraordinary fish restocking Alto Garda 2019-2022' project promoted by the Basso Sarca Fishers Association. This project aims to restore the local fish fauna through the consistent introduction of fish into the waters of the Sarca River, the Rimone River and the Cavedine, 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.

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.*

**5.6.2. ELECTRICITY DISTRIBUTION**

The Group realises its commitment to safeguarding biodiversity through SET Distribuzione.

It pays special attention to environmentally relevant areas, such as Special Protection Areas, Sites of Community Interest, Provincial Nature Reserves, Local Reserves, Biotopes and Special Areas of Conservation where the company has operations.

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.

	UoM	Underground	Overhead
Medium voltage grid	km	130	44
Low voltage grid	km	131	13

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 restoration of landscapes.

Since 2014, some 202 hectares of forest, corresponding to approximately 304 football pitches, have been recovered.

## Woodland restored by burying/insulating cables

2022	2021	2020
ha	ha	ha
24,50	17,03	24,40

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 encountered only one significant spill in 2022.

Over the years, a number of partnerships have been established to safeguard areas of high environmental value by carefully researching the market for construction solutions and materials that significantly reduce the risk of incurring environmental damage as a result of accidents. This is the case of a power transformer installed in 2021 in an area on the edge of the Adamello-Brenta Nature Park, serving the Nembia Primary Cabin. A new type of biodegradable and recyclable oil (NYTRO® BIO 300X) was used for this transformer, which was installed for the first time in Italy by SET Distribuzione in cooperation with SIEMENS Energy Transformers and Nynas. This innovation was extended in 2022 to other new plants planned as part of the broader programme to upgrade the electricity distribution service.

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 2022, SET Distribuzione started some interventions in the Val di Non area, and in previous years interventions were carried out in Valle dell'Adige, Alta Val di Cembra, Valle del Sarca, Altopiano di Brentonico, and Nago.

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.

### 5.6.3. 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.

Compliance with legislation, industry standards, signed commitments and the expectations and needs of stakeholders is the basis for the development and growth of business processes and consequently for customer and stakeholder satisfaction, for the protection of the environment, and for the health and safety of workers.

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 45001:2018 standards, as an organisational model capable of measuring and continuously improving company performance.

### 5.6.4. 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, in particular for the Tangenziale ovest site in Trento, work was planned for 2022 on the integrated centre, a new oil separator on the water collection system in the parking area, and the relocation of the sewage treatment plant.

Despite mitigation and prevention actions, a hydraulic oil spill occurred from a mini-sweeper in the historic centre of Trento in 2022. The driver immediately activated containment and repair measures.



# SUPPLIERS AND COMMUNITIES







**54.5%**

percentage of expenditure on local suppliers for purchasing goods and services (52.8% in 2021)



**100%**

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

# 6.1.

## THE SUPPLY CHAIN

GRI 3-3 Sustainable and resilient supply chain |

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 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

These principles permeate the management of the procurement process as a whole, from the qualification rules and the monitoring of suppliers' requirements and performance, to the rules for the collection and evaluation of offers and compliance with the use of standardised contract clauses.

In the context of supply chain management, stakeholder engagement takes place through an approach that combines the positive effects produced by the relationship with stakeholders with those generated by the creation of shared value.

All areas involved in the creation of shared value and the entire system of relations with the stakeholder world contribute to the concept of fair and widespread prosperity.

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.

Contracts for supplies of energy raw materials also include a clause concerning compliance with current anti-corruption laws.

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, hydroelectric power generation, energy efficiency and information technology, are partly regulated by the new Public Contracts Code, and partly detailed in company regulations.

These instruments envisage the evaluation of the offer according to the parameters of technical quality, sustainability and cost-effectiveness.

In order to expand its supplier portfolio, the Sourcing unit of the Procurement Department also carries out market scouting, through meetings with potential suppliers.

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.

For the coming year, also with a view to expanding sustainability reporting, the Group plans to launch, together with the technical areas of the businesses involved, a project to collect data on materials purchased and to analyse actions that can be implemented to manage their impact.

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 amounts to 54.55% (52.86% in 2021) of suppliers of raw materials and services for all the Group's companies, equal to an expenditure of over Euro 3.6 billion (1.65 billion in 2021).

In 2022, 594 new suppliers were selected on the basis of environmental sustainability criteria (355 in 2021).

## 6.2.

# RESPONSIBLE RELATIONS WITH COMMUNITIES

GRI 3-3 Dialogue with local communities and support for local development |

GRI 2-28 | GRI 413-1 |

The Group has a strong link to the territory where it operates and pays the utmost attention to the needs that they express, actively supporting the local communities through joint participation in initiatives of various kinds.

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 2022, the Group allocated an amount of over Euro 2.1 million (over Euro 2.3 million in 2021) 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 2022 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 initiatives, conferences and information evenings.

In order to generate a positive impact on communities and territories, and 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 make an everyday contribution to initiatives to protect the environment and safeguard future generations or social and charity projects (for further information, see the chapter '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 production from renewable sources through initiatives related to photovoltaics, and support for the development of energy communities, the growth of energy efficiency in real estate, sustainable electric mobility and biomethane. 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.

Although partially limited by the aftermath of the pandemic, the commitment to disseminate and raise awareness of clean energy issues continued by opening the Riva del Garda, Bussolengo and Santa Massenza power plants to the public, and in particular with Hydrotour Dolomiti, a project aimed at enhancing and raising awareness of the hydroelectric plants in Trentino and the surrounding areas.

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.

2022 saw the continuation of the planning and preparatory activities for the future creation of a panoramic walkway at the Diga di Santa Giustina plant, in cooperation with local institutions.

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 Euro 459 million (311 in 2021).

In 2022, the Group also invested Euro 97.6 million (105.7 in 2021), 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 2022 dividend, which will largely benefit the community through the public shareholders of the Parent Company.

In terms of communication, the Group's activities on social networks were consolidated in 2022 through new ways of contacting, communicating, educating and informing citizens, customers and communities.

Awareness-raising campaigns on energy efficiency in and around the home and the promotion of comprehensive green lifestyles were promoted every day of the year.

The topics often dealt with environmental, social and economic sustainability issues, with the aim of recounting topics of collective interest useful for making consumers more aware of their use of resources and raising their awareness of consumption efficiency and the principles of the circular economy.

### 6.2.1. 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 specialist 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:

<b>PROXIGAS</b>	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. 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.	Dolomiti Energia, Novareti
<b>ELETTRICITÀ FUTURA</b>	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.	Dolomiti Edison Energy, Dolomiti Energia Holding
<b>UTILITALIA</b>	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.	Dolomiti Energia Holding
<b>AIGET - Italian Association of Energy Wholesalers and Traders</b>	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.	Dolomiti Energia Trading
<b>ACCADEMIA AGICI - OSSERVATORIO OIR – OSSERVATORIO TEE</b>	Agici Finanza d'Impresa is a research and consulting company specialised in the field of utilities, renewables, infrastructure and energy efficiency. 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. Dolomiti Energia Solutions is also a member of the Osservatorio del Mercato dei TEE (observatory of the energy efficiency certificates market).	Dolomiti Energia Holding (International Observatory on Renewable Energy Industry and Finance), Dolomiti Energia Solutions (TEE Market Observatory)
<b>AIAS</b>	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.	Dolomiti Energia Holding
<b>UNI</b>	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.	Dolomiti Energia Holding
<b>IT COLD</b>	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.	Hydro Dolomiti Energia

<b>REF-E, E-Innovation Committee</b>	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.	Dolomiti Energia Trading
<b>IBC</b>	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.	Dolomiti Energia Trading
<b>EU DSO Entity</b>	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.	SET Distribuzione

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 is also a member of the following organisations in order to represent its interests with local institutions:

- 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.

# TAXONOMY







# 7.

## 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

In the strategy outlined by the European Union to drive the transition to a low-carbon economy and finance sustainable and inclusive growth, a central role is assigned to the European Union Taxonomy (henceforth the 'Taxonomy'), which is a useful tool to facilitate businesses, investors and policy makers towards the transition to a low-carbon, resilient and resource-efficient economy.

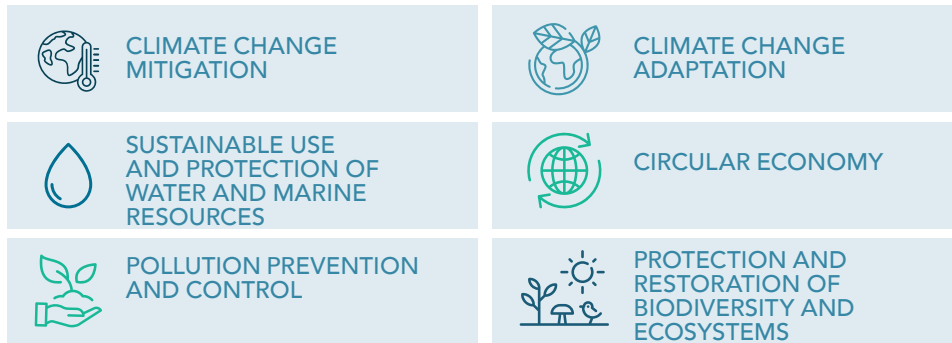
Given the systemic nature of the global environmental challenges, the European Union has recognised the need to adopt a harmonised, forward-looking approach to environmental sustainability that addresses climate change, the loss of biodiversity, the global overconsumption of resources, food scarcity, ozone layer depletion, ocean acidification, freshwater system deterioration and the change in land use, as well as the emergence of new threats, including the release of new hazardous chemicals into the environment and their combined effects.

Introduced through Regulation (EU) 2020/852, the Taxonomy defines the conditions that an economic activity must fulfil in order to be considered environmentally sustainable, at a harmonised level.

To date, only the delegated acts related to the first two objectives, i.e., climate change mitigation and adaptation, have been published.

In particular, economic activities that are environmentally sustainable - and thus 'aligned' with the taxonomy - can be considered environmentally sustainable if they:

- contribute substantially to at least one of the six environmental objectives;
- comply with the technical screening criteria set by the European Commission;
- do not cause significant harm to any of the other environmental objectives, i.e., 'Do No Significant Harm' (DNSH);
- respect 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 conventions identified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights).



Article 10 of Delegated Regulation (EU) 2021/2178 requires the disclosure, as of 2023, of specific key performance indicators ('KPIs') and accompanying information in terms of turnover, capital expenditure and operating expenditure.

### 7.1 THE COMMITMENT OF THE DOLOMITI ENERGIA GROUP

During 2021, the Dolomiti Energia Group worked on a project that involved various Departments of the Parent Company as well as the heads of the companies, identifying the eligible economic activities in the context of the climate change mitigation and adaptation objectives based on Delegated Regulation (EU) 2021/2139 and published 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 within the scope. Subsequently, the economic activities actually carried out by the Group companies were assessed in order to verify their correspondence with the descriptions included in Delegated Regulation (EU) 2021/2139.

Thanks to this mapping, the 'eligible' and 'non-eligible' economic activities were identified within the Group's scope of consolidation.

With reference to the financial year 2022, the analysis previously carried out was updated by also considering Delegated Regulation (EU) 2022/1214 concerning the fossil gas and nuclear energy sectors - despite its negligible relevance for the Group's economic activities - as applicable as of 1 January 2023.

All the eligible activities were then analysed and evaluated for:

- the technical screening criteria;
- the 'Do Not Significant Harm' principle in order to verify that the economic activity does not cause significant harm to the other environmental objectives.

During this phase, the results of the climate risk assessment activity already initiated and periodically updated by the Group with the support of the Internal Audit Department were also considered. In particular, thanks to the contributions of the heads of each business and the technical contacts in each area of competence, the physical climate risks affecting each business were identified and subsequently assessed. The assessment considered the projections and future scenarios represented by the so-called RCP4.5 and RCP8.5 representative concentration pathways and made it possible to gradually gain more and more awareness of the climate risks affecting each activity, assess their vulnerability and consider the need to adopt adaptation solutions that aim to reduce the significance of such risks.

Lastly, pursuant to Article 18 of Regulation (EU) 2020/852, the economic activities were also assessed against the minimum safeguard requirements and in particular 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.

The Dolomiti Energia Group endorses the importance of these aspects. Its commitment to respect the minimum safeguards and act in a responsible and ethical manner is also demonstrated by the adoption of the Code of Conduct, the Human Rights Policy and the Diversity Policy.

During 2022, the Italian Antitrust Authority (AGCM) initiated a preliminary investigation proceeding against Dolomiti Energia and other operators in the sector for the alleged unlawfulness of certain unilateral changes in the price of electricity and gas supply sent to customers prior to the entry into force of Article 3 of the Aiuti bis Decree, ordering, by way of precautionary measure, that they be suspended until 30 April 2023.

Believing that it acted in a legitimate and correct manner, Dolomiti Energia challenged the suspension measure adopted by the AGCM before the Regional Administrative Court of Lazio, applying for precautionary suspension.














In an order published on 9 December 2022, the Regional Administrative Court, after observing that the case 'requires the appropriate in-depth examination of the merits', set the public hearing for the merits without, however, suspending the effectiveness of the contested measure. Dolomiti Energia therefore challenged the order of the Regional Administrative Court with an appeal before the Council of State in order to insist on the suspension of the AGCM's measure pending the judgement on the merits.

The Council of State, by order of 13 January 2023, upheld the precautionary appeal filed by Dolomiti Energia limited to the expiring/expired economic conditions, postponing instead any further assessment concerning 'the finalisation' to the judgement on the merits set for 22 February 2023.

At present, the outcomes of the hearing on the merits of 22 February 2023 at the Lazio Regional Administrative Court are not known, however, Dolomiti Energia believes that it has adopted absolutely lawful commercial conduct, in a context of extreme uncertainty involving all operators, and it therefore remains confident as it awaits the Regional Administrative Court's ruling and the conclusion of the proceedings initiated by the Authority.

As already mentioned, the judgement concerns an issue that involved the entire sector and was also addressed by the Milleproroghe Decree, through which the Italian government intervened, confirming the possibility for electricity and natural gas supply companies to update their contractual economic conditions upon their expiry, subject to the contractual notice periods.

As a result of the checks described above, a mapping of the Group’s economic activities is presented below:

<b>DOLOMITI ENERGIA GROUP ELIGIBLE ACTIVITIES</b>	 District heating distribution  Electricity generation from gaseous fossil fuels (T)  Cogeneration from gaseous fossil fuels (T)
<b>DOLOMITI ENERGIA GROUP ALIGNED ACTIVITIES</b>	 Electricity generation from solar sources Installation of photovoltaic plants (E)  Hydroelectric power generation and related storage systems  Electricity distribution (E)  Water supply  Separate waste collection  Heat production from geothermal energy  Electric mobility (E)  Installation, maintenance and repair of energy efficiency devices (E) Professional services related to energy efficiency (E)
<b>DOLOMITI ENERGIA GROUP NON-ELIGIBLE ACTIVITIES</b>	 Electricity and gas trading and sales  Gas and LNG distribution

- (E) Enabling activities: economic activities which, through their products or services, enable other activities to make a substantial contribution to one or more environmental objectives, as long as they do not entail a dependence on assets that may jeopardise those objectives in the long term.
- (T) Transitional activity: activities that contribute to the pathway to comply with the Paris Agreement and for which there are no viable low-carbon alternatives.



## 7.2. THE 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 KPIs required by Regulation (EU) 2021/2178 through analysis and mapping of the cost and profit centres associated with the previously identified activities.

In cases where the economic activities were found to be eligible and aligned with respect to both climate objectives, the economic data were only counted once for calculation purposes.

The KPIs for turnover, CapEx, OpEx were calculated in the light of the guidance and accounting principles described in the above-mentioned regulation.

The analysis results highlight that the Group is active in four sectors identified by the Taxonomy, namely '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) and 'Research, development and Innovation close to the market'.

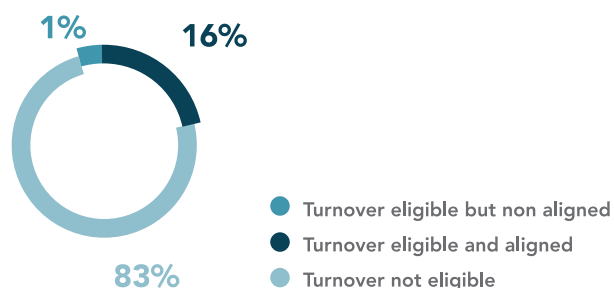
The economic and financial items used for the indicators required by the Taxonomy were identified through general accounting.

### THE TURNOVER INDICATOR

With reference to the year 2022, 16.31% of turnover is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 0.91% to eligible but non-aligned economic activities.

The remaining 82.78% 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 17.22% of total turnover, 95% of this is Taxonomy-aligned. This means that if the activities currently included in the Taxonomy are considered, i.e. Taxonomy-eligible activities, almost all of them are able to contribute to the climate change mitigation objective.



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, while the denominator includes total direct revenues (excluding other revenues) as quantified in the 2022



financial statements.

In particular, the consolidated turnover taking into account eliminations was considered, excluding electricity and gas trading and marketing activities, the latter being carried out by the Group's trading company. The entire supply chain was valorised for the eligible and aligned activities. The Group plays a key role in the country's energy transition, which is also realised through the promotion and sale of renewable energy produced by its plants. Disregarding this activity means penalising a fundamental element within the value chain of a sector that is central to the transition of the Italian and European energy system<sup>46</sup>.

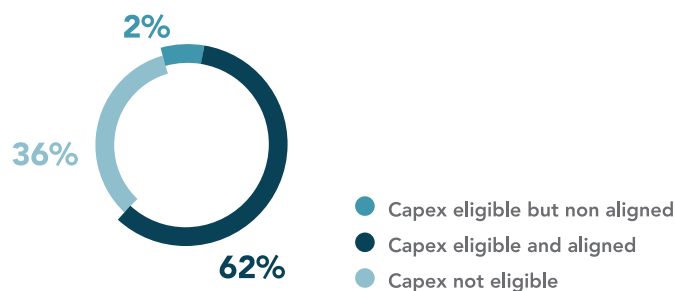
With the entry into force of Regulation (EU) 1214/2022, a number of fossil gas-related energy activities have entered the scope of the Taxonomy as transitional activities that can contribute to climate change mitigation.

For the Dolomiti Energia Group, these activities fall within the scope of eligibility but not alignment. In order to allow for comparison, it should be noted that if these eligible assets had been taken into account, the indicator for the year 2021 would have been 21.23% (instead of 20.32%).

## THE CAPITAL EXPENDITURE INDICATOR

For the year 2022, 61.70% of capital expenditure is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 1.68% to eligible but non-aligned economic activities.

The remaining 36.62% consists of non-eligible capital expenditure incurred for economic activities that are currently outside the scope of the Taxonomy.



For the purpose of calculating the capital expenditure KPI, the denominator includes additions to tangible and intangible assets before depreciation, impairment and any revaluation, while the numerator includes capital expenditure - part of the denominator - recognised respectively in the assets of the consolidated financial statement related to the Group's eligible and eligible and aligned economic activities.

<sup>46</sup> 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 instead stands out for its ability to produce - and supply to its customers - energy from renewable sources.

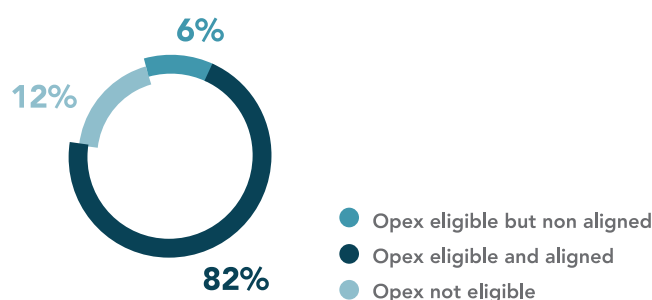
The eligible and aligned investments mainly concern, for the financial year 2022, the water supply system and the electricity distribution network.

The capital expenditure indicator for 2021, if natural gas activities included within the scope of Regulation (EU) 1214/2022 had also been taken into account, would have been 59.91% (instead of 57.06%).

## THE OPERATING EXPENDITURE INDICATOR

For the year 2022, 82.43% of operating expenditure is related to environmentally sustainable economic activities (i.e., eligible and aligned) and 5.9% to eligible but non-aligned economic activities.

The remaining 11.67% consists of non-eligible operating expenditure incurred for economic activities that are currently outside the scope of the Taxonomy.



The denominator includes 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 the training needs of human resources, while the numerator includes operating costs - part of the denominator - related respectively to the Group's eligible and eligible and aligned economic activities.

With reference to plant maintenance, the costs of purchasing the materials needed for maintenance work and the staff costs attributable to such work were included.

The indicator for operating expenses for the financial year 2021, if the natural gas activities included within the scope of Regulation (EU) 1214/2022 had also been taken into account, would have been 84.93% (instead of 79.80%).

Below are the templates for the Key Performance Indicators (KPIs) of non-financial companies set out in Annex II of Regulation (EU) 2021/2178 and the standard templates for the public disclosure of information referred to in Article 8 paragraphs 6 and 7 set out in Annex XII.

## Proportion of turnover from products or services associated with Taxonomy-aligned economic activities - Disclosure covering the year 2022

Economic activities (1)	Code(s) (2)	Absolute turnover (3)	Criteria for substantial contribution							DNSH Criteria							Minimum safeguards (17)	Taxonomy-aligned proportion of turnover, year 2022 (18)	Taxonomy-aligned proportion of turnover, year 2021 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
			Proportion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Sustainable use and protection of water and marine resources (7)	Transition to a circular economy (8)	Pollution prevention and reduction (9)	Protection and restoration of biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Sustainable use and protection of water and marine resources (13)	Transition to a circular economy (14)	Pollution prevention and reduction (15)	Protection and restoration of biodiversity and ecosystems (16)						

### A. TAXONOMY-ELIGIBLE ACTIVITIES

#### A1. Environmentally sustainable activities (Taxonomy-aligned)

Electricity generation using solar photovoltaic technology	4.1	106,157.30	0.00%	0.00%							Y	Y		Y	Y				
Electricity generation from hydropower	4.5	223,235,229.84	6.66%	6.66%							Y	Y			Y	Y			
Transmission and distribution of electricity	4.9	83,018,016.00	2.48%	2.48%							Y		Y	Y	Y	Y			E
Storage of electricity	4.10	162,536,217.86	4.85%	4.85%							Y	Y	Y		Y	Y			E
Production of heat/cool from geothermal energy	4.22	153,494.00	0.00%	0.00%							Y	Y		Y	Y	Y			
Construction, extension and operation of water collection, treatment and supply systems	5.1	13,188,620.00	0.39%	0.39%							Y	Y			Y	Y			
Collection and transport of non-hazardous waste in source segregated fractions	5.5	31,098,189.00	0.93%	0.93%							Y		Y		Y	Y			
Installation, maintenance and repair of energy efficiency equipment	7.3	25,080,180.00	0.75%	0.75%							Y			Y		Y			E
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4	240,951.00	0.01%	0.01%							Y					Y			E
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	7.5	5,522,651.80	0.16%	0.16%							Y					Y			E
Installation, maintenance and repair of renewable energy technologies	7.6	2,644,425.00	0.08%	0.08%							Y					Y			E
Professional services related to energy performance of buildings	9.3	107,389.97	0.00%	0.00%							Y					Y			E

<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>546,931,521.77</b>	<b>16.31%</b>	<b>16.31%</b>	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>					
District heating/cooling distribution	4.15	12,006,689.38	0.36%		
Electricity generation from fossil gaseous fuels	4.29	18,463,330.40	0.55%		T
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	45,573.58	0.00%		T
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>30,515,593.36</b>	<b>0.91%</b>		
<b>TOTAL (A1+A2)</b>		<b>577,447,115.13</b>			
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>					
<b>Turnover of Taxonomy-non-eligible activities (B)</b>		<b>2,776,264,642.11</b>	<b>82.78%</b>		
<b>TOTAL TURNOVER (A+B)</b>		<b>3,353,711,757.24</b>			



High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	677,632	0.68%	T
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>1,681,412.51</b>	<b>1.68%</b>	
<b>TOTAL (A1+A2)</b>		<b>63,408,754.33</b>		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>				
<b>CapEx of Taxonomy-non-eligible activities (B)</b>		<b>36,630,996.89</b>	<b>36.62%</b>	
<b>TOTAL (A + B)</b>		<b>100,039,751.22</b>		

## Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities - Disclosure covering year 2022

Economic activities (1)	Code(s) (2)	Absolute OpEx (3)	Criteria for substantial contribution							DNSH Criteria							Minimum safeguards (17)	Taxonomy-aligned proportion of OpEx, year 2022 (18)	Taxonomy-aligned proportion of OpEx, year 2021 (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
			Proportion of OpEx (4)	Climate change mitigation (5)	Climate change adaptation (6)	Sustainable use and protection of water and marine resources (7)	Transition to a circular economy (8)	Pollution prevention and reduction (9)	Protection and restoration of biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Sustainable use and protection of water and marine resources (13)	Transition to a circular economy (14)	Pollution prevention and reduction (15)	Protection and restoration of biodiversity and ecosystems (16)						

### A. TAXONOMY-ELIGIBLE ACTIVITIES

#### A1. Environmentally sustainable activities (Taxonomy-aligned)

Electricity generation using solar photovoltaic technology	4.1	1,135.78	0.003%	0.003%						Y	Y		Y	Y				
Electricity generation from hydropower	4.5	7,020,538.64	16.03%	16.03%						Y	Y			Y	Y			
Transmission and distribution of electricity	4.9	3,422,496.67	7.82%	7.82%						Y		Y	Y	Y	Y			E
Storage of electricity	4.10	4,735,083.91	10.81%	10.81%						Y	Y	Y		Y	Y			E
Production of heat/cool from geothermal energy	4.22	5,560.00	0.01%	0.01%						Y	Y		Y	Y	Y			
Construction, extension and operation of water collection, treatment and supply systems	5.1	2,600,987.00	5.94%	5.94%						Y	Y			Y	Y			
Collection and transport of non-hazardous waste in source segregated fractions	5.5	1,488,946.00	3.40%	3.40%						Y		Y		Y	Y			
Installation, maintenance and repair of energy efficiency equipment	7.3	15,380,432.00	35.12%	35.12%						Y			Y		Y			E
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4	12,192.00	0.03%	0.03%						Y					Y			E
Installation, maintenance and repair of instruments and devices for measuring, regulating and controlling energy performance of buildings	7.5	281,032.45	0.64%	0.64%						Y					Y			E
Installation, maintenance and repair of renewable energy technologies	7.6	1,145,331.00	2.62%	2.62%						Y					Y			E

Professional services related to energy performance of buildings	9.3	2,050.00	0.005%	0.005%	Y	Y	E
<b>OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>36,095,785.45</b>	<b>82.43%</b>	<b>82.43%</b>			
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>							
District heating/cooling distribution	4.15	582,638.00	1.33%				
Electricity generation from fossil gaseous fuels	4.29	1,891,724.00	4.32%				T
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	4.30	110,251.00	0.25%				T
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		<b>2,584,613.00</b>	<b>5.90%</b>				
<b>TOTAL (A1+A2)</b>		<b>38,680,398.45</b>	<b>88.33%</b>				
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>							
<b>OpEx of Taxonomy-non-eligible activities (B)</b>		<b>5,108,009.59</b>	<b>12%</b>				
<b>TOTAL (A + B)</b>		<b>43,788,408.04</b>					



**Model 1 - Nuclear and fossil gas activities**

Activities related to nuclear energy		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Activities related to fossil gases		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

## Model 4 (Turnover) - Taxonomy-eligible but not taxonomy-aligned economic activities

Line	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		CCM		CCA	
		Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	18,463,330	0.551%	18,463,330	0.551%	-	-
5	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	45,574	0.001%	45,574	0.001%	-	-
6	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomyaligned economic activities in the denominator of the applicable KPI	18,508,904	0.552%	18,508,904	0.552%	-	-

## Model 4 (CapEx) - Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		CCM		CCA	
		Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	881,474	0.881%	881,474	0.881%	-	-
5	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	677,632	0.677%	677,632	0.677%	-	-
6	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomyaligned economic activities in the denominator of the applicable KPI	1,559,106	1.558%	1,559,106	1.558%	-	-

## Model 4 (OpEx) - Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		CCM		CCA	
		Amount (EUR)	%	Amount (EUR)	%	Amount (EUR)	%
1	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1,891,724	4.320%	1,891,724	4.320%	-	-
5	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	110,251	0.252%	110,251	0.252%	-	-
6	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	Amount and proportion of taxonomyeligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomyaligned economic activities in the denominator of the applicable KPI	2,001,975	4.572%	2,001,975	4.572%	-	-



# APPENDIX







# 8.1.

## METHODOLOGICAL NOTE AND GUIDE TO INTERPRETATION

GRI 2-2 |

The publication of the Consolidated Non-Financial Statement (henceforth also “Statement”) is a transparency tool which, as well as highlighting what the Dolomiti Energia Group has done during the year, also guides its future actions with the aim of fostering constant ethical, social and environmental improvements.

Now in its sixth 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.

As far as available, the recommendations of ESMA, which were also the subject of a Consob warning about the Ukraine crisis, climate-related aspects and issues, as well as the disclosure required by the European Taxonomy (Regulation (EU) 2020/852) were taken into account in preparing the Statement.

The identification and reporting of the contents of the Statement considered the following principles of the GRI Standards:

- relevance,
- inclusiveness,
- context of sustainability,
- completeness,
- balance between positive and negative aspects,
- comparability,
- accuracy,
- timeliness,
- reliability and
- clarity.

The qualitative and quantitative data and information contained in the Statement refer to the Group’s performance for the year ended 31 December 2022 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 2022 Statement. 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 2022, unless otherwise specified (see the 'Reporting Perimeter').

The data collection process was coordinated by the Group Non-Financial Controlling Department through a non-financial reporting system, which involved the use of data collection forms and a web-based information system. 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 Department.

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 2022 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 2022 Consolidated Financial Statements;
- supplements and completes the Report on Operations and other related documentation.

## 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 2022 consists of, in addition to the parent company Dolomiti Energia Holding S.p.A, the following subsidiaries: Depurazione Trentino Centrale Scarl, 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. 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.

## 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.

## MAIN ORGANISATIONAL CHANGES

The main organisational changes which took place during 2022 are outlined below:

- Acquisition by Dolomiti Energia S.p.A. of the branch of business related to marketing electricity in the Municipality of Castello Molina di Fiemme, effective as of 01/01/2022;
- Acquisition by SET Distribuzione S.p.A. of the branch of business concerning the distribution of electricity in the Municipality of Castello Molina di Fiemme, effective as of 01/01/2022;
- Exercise of option rights by 13 shareholders of 4,861,800 ordinary shares of Dolomiti Energia Holding subject to withdrawal;
- Acquisition of the shares of the Renewability Consortium by the company Dolomiti Energia Trading S.p.A. as a founding member. The Consortium represents the first Community of Renewable Energy Consumers whose objective is to invest in the construction of plants for generation from renewable sources and to supply the electricity produced by these plants to each consumer member;
- Acquisition of shares in Spreentech Ventures equal to 12.05%, a newly-established company operating mainly in the sectors of Construction 4.0, Green Building, Green Tech, Green Mobility, Smart Cities & Buildings, Circular Economy & ESG Impact, Sustainability and, in general, in all those areas belonging to the construction sector characterised by products and services with a strong green and technological content, with reference to both national and international markets;
- Adjudication by Novareti S.p.A. in the GAS sector of the tender called by ATAC Civitanova S.p.A. for the selection of a partner and aimed at the joint participation in the gas tender to be called in ATEM Macerata 2 North-east;
- Adjudication by Novareti S.p.A. in the GAS sector of the tender called by the Municipality of Canazei for the assignment in concession, by means of project financing by public initiative, of the construction and transitional management of the natural gas distribution plant in the territory of the Municipality itself.

## 8.2. 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 2022
GRI 1 considered	GRI 1: Foundation 2021
Applicable GRI Sector Standard	Not available

## GRI content index 2022

GRI Standard/ other source	Disclosure	Location
<b>GENERAL DISCLOSURES</b>		
GRI 2: General Disclosures 2021	2-1 Organizational details	1.1 Company Profile
	2-2 Entities included in the organization's sustainability reporting	1.1 Company Profile 8.1 Annex
	2-3 Reporting period, frequency and contact point	
	2-4 Restatements of information	
	2-5 External assurance	9. Independent auditors' report
	2-6 Activities, value chain and other business relationships	1.1 Company Profile 3.1 Products and Services 3.2 Close to Customers with Affordable, Efficient and Reliable Services 5.2 Energy Consumption 5.3 Emissions to air 5.5 Efficient and Sustainable Use of Water 6.1 The Supply Chain
	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	2.4 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



GRI Standard/ Other source	Disclosure	Location
	2-22 Statement on sustainable development strategy	Letter to stakeholders
	2-23 Policy commitments	2.4 Business Ethics and Integrity
	2-24 Embedding policy commitments	2.4 Business Ethics and Integrity
	2-25 Processes to remediate negative impacts	2.4 Business Ethics and Integrity 4.1 Commitment Towards Employees 5.1 Managing Environmental Impacts 5.6 Safeguarding Natural Resources and Biodiversity
	2-26 Mechanisms for seeking advice and raising concerns	2.4 Business Ethics and Integrity
	2-27 Compliance with laws and regulations	7. Disclosure pursuant to Regulation (EU) 2020/852 on the taxonomy
	2-28 Membership associations	6.2 Responsible Relations with Communities
	2-29 Approach to stakeholder engagement	2.5 La sostenibilità per il Gruppo Dolomiti Energia
	2-30 Collective bargaining agreements	4.1 Commitment Towards Employees
<b>MATERIAL TOPICS</b>		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	2.5 Sustainability for the Dolomiti Energia Group
	3-2 List of material topics	2.5 Sustainability for the Dolomiti Energia Group
<b>SUSTAINABLE AND RESILIENT SUPPLY CHAIN</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	6.1 The Supply Chain
GRI 204 - Procurement Practices 2016	204-1 Proportion of spending on local suppliers	6.1 The Supply Chain
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	6.1 The Supply Chain
<b>CONSIDERATION OF ESG-RELATED RISKS AND OPPORTUNITIES IN BUSINESS DEVELOPMENT AND STRATEGY</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 Creation of Economic Value 2.1 The Governance Model 7. Disclosure pursuant to the Taxonomy Regulation (EU) 2020/852
<b>CREATION OF ECONOMIC VALUE</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 Creation of economic value
	201-1 Direct economic value generated and distributed	1.3 Creation of economic value
	201-2 Financial implications and other risks and opportunities due to climate change	1.3 Creation of economic value
GRI 201: Economic Performance 2016	201-4 Financial assistance received from government	
<b>DIALOGUE WITH LOCAL COMMUNITIES AND SUPPORT FOR LOCAL DEVELOPMENT</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	6.2 Responsible Relations with Communities
GRI 203: Indirect Economic Impacts 2016	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 6.2 Responsible Relations with Communities
<b>HUMAN RIGHTS</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees
<b>ETHICS, INTEGRITY AND TRANSPARENCY IN BUSINESS AND GOVERNANCE</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Business Ethics and Integrity
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	7. Disclosure pursuant to Regulation (EU) 2020/852 on the taxonomy



GRI Standard/ Other source	Disclosure	Location
<b>TRAINING, PROFESSIONAL DEVELOPMENT AND FAIR PAY</b>		
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
<b>EMERGENCY MANAGEMENT, BUSINESS CONTINUITY AND CYBERSECURITY</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.3 Business Continuity, Resilience and Cybersecurity
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	2.3 Business Continuity, Resilience and Cybersecurity
<b>RESPONSIBLE AND SUSTAINABLE WASTE MANAGEMENT</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	5.4 Waste
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	5.4 Waste
	306-2 Management of significant waste-related impacts	3.1 Products and Services Offered 5.4 Waste
	306-3 Waste generated	3.1 Products and Services Offered 5.4 Waste
	306-4 Waste diverted from disposal	3.1 Products and Services Offered 5.4 Waste
	306-5 Waste directed to disposal	3.1 Products and Services Offered 5.4 Waste
<b>SUSTAINABLE MANAGEMENT AND PROTECTION OF WATER QUALITY</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	5.5 Efficient and Sustainable Use of Water
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	3.1 Products and Services Offered 5.5 Uso efficiente e sostenibile dell'acqua
	303-2 Management of water discharge-related impacts	5.5 Efficient and Sustainable Use of Water
	303-3 Water withdrawal	5.5 Efficient and Sustainable Use of Water
	303-4 Water discharge	5.5 Efficient and Sustainable Use of Water
	303-5 Water consumption	5.5 Efficient and Sustainable Use of Water
<b>FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</b>		
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
<b>CLIMATE CHANGE MITIGATION AND ADAPTATION</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 Economic Value Creation 3.1 Products and Services Offered 5.2 Energy Consumption 5.3 Emissions to air
GRI 302: Energy 2016	302-1 Energy consumption within the organization	5.2 Energy Consumption
	302-3 Energy intensity	5.2 Energy Consumption
	302-4 Reduction of energy consumption	5.2 Energy Consumption
	302-5 Reductions in energy requirements of products and services	3.1 Products and Services Offered





GRI Standard/ other Framework	Disclosure	Location
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	5.3 Emissions to air
	305-2 Energy indirect (Scope 2) GHG emissions	5.3 Emissions to air
	305-3 Other indirect (Scope 3) GHG emissions	5.3 Emissions to air
	305-4 GHG emissions intensity	5.3 Emissions to air
	305-5 Reduction of GHG emissions	5.3 Emissions to air
	305-6 Emissions of ozone-depleting substances (ODS)	5.3 Emissions to air
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	5.3 Emissions to air
G4: General standard disclosure for the electric utility sector	EU 5 Allocation of emission quotas and compliance with Kyoto Protocol	5.3 Emissions to air
<b>OFFERING ENERGY EFFICIENCY AND RENEWABLE ENERGY SOLUTIONS</b>		
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 Products and Services Offered
	EU 2 Net energy produced	3.1 Products and Services Offered 5.2 Energy Consumption
	EU 3 Number of customers, divided by type	3.1 Products and Services Offered
	EU 4 Length of the distribution network	3.1 Products and Services Offered
<b>TRANSPARENT, CLEAR AND HONEST COMMUNICATION AND MARKETING PRACTICES</b>		
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
<b>QUALITY, SAFETY, CONTINUITY AND AFFORDABILITY OF SERVICES PROVIDED TO CUSTOMERS</b>		
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 Products and Services Offered
	EU 26 Percentage of population not served in the electrical energy distribution area	3.1 Products and Services Offered
	EU 27 Number of service disconnections for non-payment	3.1 Products and Services Offered
	EU 28 Service interruption frequency index	3.1 Products and Services Offered
	EU 29 Service interruption average duration index	3.1 Products and Services Offered
<b>HEALTH, SAFETY AND WELL-BEING</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.2 Attention Paid to Occupational Health and Safety



GRI Standard/ other Framework	Disclosure	Reference Section
GRI 403: Occupational health and safety 2018	403-1 Occupational health and safety management system	4.2 Attention Paid to Occupational Health and Safety
	403-2 Hazard identification, risk assessment and incident investigation	4.2 Attention Paid to Occupational Health and Safety
	403-3 Occupational health services	4.2 Attention Paid to Occupational Health and Safety
	403-4 Worker participation, consultation, and communication on occupational health and safety communication	4.2 Attention Paid to Occupational Health and Safety
	403-5 Worker training on occupational health and safety	4.2 Attention Paid to Occupational Health and Safety
	403-6 Promotion of worker health	4.2 Attention Paid to Occupational Health and Safety
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	4.2 Attention Paid to Occupational Health and Safety
	403-8 Workers covered by an occupational health and safety management system	4.2 Attention Paid to Occupational Health and Safety
	403-9 Work-related injuries	4.2 Attention Paid to Occupational Health and Safety
	403-10 Work-related ill health	4.2 Attention Paid to Occupational Health and Safety
<b>AWARENESS-RAISING REGARDING CONSUMPTION EFFICIENCY, THE USE OF RENEWABLE ENERGY AND RESPONSIBLE WASTE MANAGEMENT</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.1 Products and Services Offered
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 Products and Services Offered
<b>TALENT ATTRACTION, RETENTION AND CORPORATE WELFARE</b>		
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 Towards Employees
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.1 Commitment Towards Employees
<b>PROTECTION OF WATER, SOIL AND ECOSYSTEM QUALITY AND CONSERVATION AND RESTORATION OF BIODIVERSITY</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	3.1 Products and Services Offered 5.6 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	5.6 Preservation of Natural Resources and Biodiversity
	304-2 Significant impacts of activities, products and services on biodiversity	5.6 Preservation of Natural Resources and Biodiversity
	304-3 Habitats protected or restored	5.5 Efficient and Sustainable Use of Water 5.6 Preservation of Natural Resources and Biodiversity
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	5.5 Uso efficiente e sostenibile dell'acqua 5.6 Preservation of Natural Resources and Biodiversity
<b>REPORTED NON-MATERIAL TOPICS</b>		
<b>DIVERSITY, INCLUSION, AND EQUAL OPPORTUNITY</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	4.1 Commitment Towards Employees



GRI Standard/ other Framework	Disclosure	Reference Section	
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	
<b>ANTI-CORRUPTION</b>			
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4 Business Ethics and Integrity	
GRI 205: Anti-Corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	2.4 Business Ethics and Integrity	
	205-3 Confirmed incidents of corruption and actions taken	2.4 Business Ethics and Integrity	



## 8.3.

## RECONCILIATION STATEMENT ON MATERIAL TOPICS, THE AREAS COVERED BY ITALIAN LEGISLATIVE DECREE 254/2016 AND THE GRI STANDARDS

Material Topic	Reference GRI Standards	Applications of Italian Legislative Decree 254/2016	Reporting Perimeter	
			Internal impacts to the Group	External impacts to the Group
Sustainable and resilient supply chain	Procurement Practices (204) Supplier Environmental Assessment (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 (201)	Supply Chain Human Rights Environment	Group	Suppliers Environment Community
Creation of economic value	Economic Performance (GRI 201)	Society	Group	Customers Community
Dialogue with local communities and support for local development	Indirect Economic Impacts (GRI 203) Local Communities (GRI 413)	Society Environment	Group	All Stakeholders
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
Emergency management, business continuity and cybersecurity	Customer Privacy (418)	Society Environment Staff	Group	Community Customers 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



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 Competitors Investors Institutions
Climate change mitigation and adaptation	General Disclosure (GRI 2) 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
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
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

## 8.4. ANNEXES

### WASTE (GRI 306)

Waste produced internally by composition

2021	UoM	Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>269.4</b>	<b>250.8</b>	<b>18.6</b>
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
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>4,462.9</b>	<b>2,890.6</b>	<b>1,572.3</b>
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
<b>TOTAL WASTE</b>	<b>t</b>	<b>4,732.3</b>	<b>3,141.4</b>	<b>1,590.9</b>

2020	UoM	2020		
		Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>101.92</b>	<b>92.35</b>	<b>9.57</b>
Waste from electrical and electronic appliances	t	15.07	15.07	-
Batteries and accumulators	t	7.8	7.8	-
Cables	t	1.99	1.99	-
Fluorescent lighting	t	0.18	0.18	-
Packaging that contained hazardous substances	t	1.31	1.31	-
Absorbents and filtering materials	t	1.1	1.1	-
Mineral/synthetic oils	t	4.26	4.26	-
Chemicals	t	2.91	2.91	-
Other	t	67.3	57.73	9.57
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>1,916.59</b>	<b>444.45</b>	<b>1,472.14</b>
Plastics	t	79.84	79.84	-
Wood	t	49.01	49.01	-
Mixed packaging	t	11.27	11.27	-
Metal	t	116.28	116.28	-
Organic waste	t	13.53	13.53	-
Sewage sludge	t	22.16	-	22.16
End-use electrical and electronic equipment	t	52.89	52.89	-
Other	t	1,571.61	121.64	1,449.98
<b>TOTAL WASTE</b>	<b>t</b>	<b>2,018.53</b>	<b>536.82</b>	<b>1,481.71</b>

## Waste intended for disposal by disposal method

2021	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>21.2</b>	<b>21.2</b>
Incineration (including energy recovery)	t	-	-	-
Incineration (without energy recovery)	t	-	-	-
Disposal at landfills	t	-	-	-
Other disposal operations <sup>47</sup>	t	-	21.2	21.2
-Waste from electrical and electronic appliances	t	-	-	-
-Batteries and accumulators	t	-	-	-
-Cables	t	-	-	-
-Fluorescent lighting	t	-	-	-
-Packaging that contained hazardous substances	t	-	-	-
-Absorbents and filtering materials	t	-	-	-
-Mineral/synthetic oils	t	-	0.1	0.1
-Other	t	-	21.1	21.1
-Chemicals	t	-	-	-
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>1,572.8</b>	<b>1,572.8</b>
Disposal at landfills	t	-	22.9	22.9
-Other	t	-	22.9	22.9
Other disposal operations <sup>47</sup>	t	-	1,549.9	1,549.9
-Plastics	t	-	-	-
-Wood	t	-	-	-
-Mixed packaging	t	-	-	-
-Metal	t	-	-	-
-Organic waste	t	-	-	-
-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
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>1,594</b>	<b>1,594</b>

<sup>47</sup> This includes, for example, submission to biological or physical-chemical treatment.

2020	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>9.57</b>	<b>9.57</b>
Incineration (including energy recovery)	t	-	-	-
Incineration (without energy recovery)	t	-	-	-
Disposal at landfills	t	-	-	-
Other disposal operations <sup>47</sup>	t	-	9.57	9.57
-Waste from electrical and electronic appliances	t	-	-	-
-Batteries and accumulators	t	-	-	-
-Cables	t	-	-	-
-Fluorescent lighting	t	-	-	-
-Packaging that contained hazardous substances	t	-	-	-
-Absorbents and filtering materials	t	-	-	-
-Mineral/synthetic oils	t	-	-	-
-Other	t	-	9.57	9.57
-Chemicals	t	-	-	-
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>2,233.51</b>	<b>2,233.51</b>
Disposal at landfills	t	-	31.42	31.42
-Other	t	-	31.42	31.42
Other disposal operations <sup>47</sup>	t	-	2,202.09	2,202.09
-Plastics	t	-	-	-
-Wood	t	-	-	-
-Mixed packaging	t	-	-	-
-Metal	t	-	-	-
-Organic waste	t	-	-	-
-Sewage sludge	t	-	44.32	44.32
-End-use electrical and electronic equipment	t	-	-	-
-Other	t	-	2,157.77	2,157.77
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>2,243.08</b>	<b>2,243.08</b>

## Self-produced waste not destined for disposal by type of recovery operation

2021	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>183.8</b>	<b>183.8</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	-	-
-Metal	t	-	-	-
Other recovery operations <sup>48</sup>	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
-Other	t	-	29.8	29.8
-Chemicals	t	-	1.4	1.4
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>2,682.6</b>	<b>2,682.6</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	-	-
Other recovery operations <sup>48</sup>	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
-Sewage sludge	t	-	-	-
-End-use electrical and electronic equipment	t	-	56.1	56.1
-Other	t	-	180.8	180.8
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>2,866.4</b>	<b>2,866.4</b>

<sup>48</sup> Includes, for example, handover to suppliers accredited with the recycling chain

2020	UoM	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>92.37</b>	<b>92.37</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	0.01	0.01
-Metal	t	-	0.01	0.01
Other recovery operations <sup>48</sup>	t	-	92.36	92.36
-Waste from electrical and electronic appliances	t	-	16.02	16.02
-Batteries and accumulators	t	-	6.86	6.86
-Cables	t	-	1.99	1.99
-Fluorescent lighting	t	-	0.18	0.18
-Packaging that contained hazardous substances	t	-	1.31	1.31
-Absorbents and filtering materials	t	-	1.10	1.10
-Mineral/synthetic oils	t	-	4.26	4.26
-Other	t	-	57.73	57.73
-Chemicals	t	-	2.91	2.91
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>-</b>	<b>444.44</b>	<b>444.44</b>
Recovery/Preparation for reuse	t	-	-	-
Recycling	t	-	-	-
Other recovery operations <sup>48</sup>	t	-	444.44	444.44
-Plastics	t	-	95.65	95.65
-Wood	t	-	33.2	33.2
-Mixed packaging	t	-	11.27	11.27
-Metal	t	-	116.27	116.27
-Organic waste	t	-	13.53	13.53
-Sewage sludge	t	-	-	-
-End-use electrical and electronic equipment	t	-	52.84	52.84
-Other	t	-	121.68	121.68
<b>TOTAL WASTE</b>	<b>t</b>	<b>-</b>	<b>536.81</b>	<b>536.81</b>

Residual waste<sup>49</sup> produced sites

2021	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	kg	-	-	-	-	-	-
Residual	kg	-	-	-	-	-	-
<b>NON-HAZARDOUS WASTE</b>	kg	125,550	-	125,550	200,140	-	200,140
Residual	kg	125,550	-	125,550	200,140	-	200,140
<b>TOTAL WASTE</b>	kg	125,550	-	125,550	200,140	-	200,140

2020	UoM	ROVERETO			TRENTO		
		Waste generated	Waste diverted from disposal	Waste directed to disposal	Waste generated	Waste diverted from disposal	Waste directed to disposal
<b>HAZARDOUS WASTE</b>	kg	-	-	-	-	-	-
Residual	kg	-	-	-	-	-	-
<b>NON-HAZARDOUS WASTE</b>	kg	95,254	-	95,254	265,240	-	265,240
Residual	kg	95,254	-	95,254	265,240	-	265,240
<b>TOTAL WASTE</b>	t	95,254	0	95,254	265,240	0	265,240

49 The tables consider the residual waste produced at the two main sites at Via Manzoni in Rovereto and at Via Fersina in Trento.



## Distribution of Waste produced in Trento and Rovereto

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
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>128</b>	<b>128</b>	<b>0.05</b>	<b>383</b>	<b>382</b>	<b>0.8</b>
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
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>17,890.2</b>	<b>15,141.1</b>	<b>2,749.2</b>	<b>53,379.3</b>	<b>49,284.3</b>	<b>4,095</b>
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
<b>TOTAL WASTE</b>	<b>t</b>	<b>18,018.6</b>	<b>15,269.5</b>	<b>2,749.3</b>	<b>53,762.4</b>	<b>49,666.6</b>	<b>4,095.8</b>

2020	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
<b>HAZARDOUS WASTE</b>	<b>t</b>	<b>146.6</b>	<b>145.0</b>	<b>1.6</b>	<b>375.9</b>	<b>372.5</b>	<b>3.3</b>
WEEE	t	90.2	90.2	-	224.6	224.6	-
Other (Batteries, medicines, etc.)	t	56.4	54.8	1.6	151.3	148.0	3.3
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	<b>17,513.1</b>	<b>14,850.1</b>	<b>2,663.0</b>	<b>52,345.5</b>	<b>45,948.7</b>	<b>6,396.8</b>
Paper and cardboard	t	2,630.3	2,630.3	-	8,341.1	8,341.1	-
Glass	t	1,418.1	1,418.1	-	4,886.9	4,886.9	-
Lawn cuttings	t	1,220.5	1,220.5	-	3,069.6	3,069.6	-
Organic waste	t	4,151.2	4,151.2	-	13,394.8	13,394.8	-
metal packaging	t	-	-	-	19.3	19.3	-
Multi-material	t	1,549.9	1,549.9	-	4,936.0	4,936.0	-
Bulky objects	t	588.8	344.4	244.4	1,249.2	1,249.2	-
Wood	t	862.8	862.8	-	2,335.8	2,335.8	-
Inert	t	1,059.1	1,059.1	-	2,695.3	2,695.3	-
WEEE	t	216.1	216.1	-	610.7	610.7	-
Metal	t	252.9	252.9	-	725.8	725.8	-
Other (Batteries, medicines, etc.)	t	77.8	77.3	0.4	258.6	225.6	33.0
Used clothing	t	144.9	144.9	-	461.3	461.3	-
Residual	t	3,000.6	648.9	2,351.7	8,617.3	2,399.1	6,218.3
Sweeping	t	340.1	273.6	66.5	743.8	598.3	145.5
<b>TOTAL WASTE</b>	<b>t</b>	<b>17,659.8</b>	<b>14,995.1</b>	<b>2,664.7</b>	<b>52,721.4</b>	<b>46,321.3</b>	<b>6,400.1</b>

## Waste destined for disposal by disposal method

2021	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	-	0.1	0.1	-	0.8	0.8
Incineration (with energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	-	-	-	-	-
Other disposal operations <sup>50</sup>	t	-	0.1	0.1	-	0.8	0.8
-Other (Batteries, medicines, etc.)	t	-	0.1	0.1	-	0.8	0.8
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	-	2,749.2	2,749.2	2,153.7	1,939.4	4,095.0
Incineration (with energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	53.4	53.4	530.9	1,703.6	2,234.5
-Bulky objects	t	-	-	-	2	-	2
-Other (Batteries, medicines, etc.)	t	-	-	-	-	21.9	21.9
-Used clothing	t	-	-	-	-	-	-
-Residual	t	-	-	-	346.6	1,681.7	2,028.3
-Sweeping	t	-	53.4	53.4	182.3	-	182.3
Other disposal operations <sup>50</sup>	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
-Other (Batteries, medicines, etc.)	t	-	-	-	-	-	-
-Residual	t	-	2,688.1	2,688.1	1,579.9	10.6	1,590.4
-Sweeping	t	-	-	-	-	-	-
<b>TOTAL WASTE</b>	<b>t</b>	-	2,749.3	2,749.3	2,153.7	1,940.2	4,095.8

<sup>50</sup> This includes, for example, delivery to mechanical biological treatment plants

2020	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	-	1.6	1.6	2.0	1.3	3.3
Incineration (with energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	-	-	-	-	-
Other disposal operations <sup>50</sup>	t	-	1.6	1.6	2.0	1.3	3.3
-Other (Batteries, medicines, etc.)	t	-	1.6	1.6	2.0	1.3	3.3
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	-	2,663.0	2,663.0	3,373.0	3,194.6	6,567.6
Incineration (with energy recovery)	t	-	-	-	-	-	-
Incineration (without energy recovery)	t	-	-	-	-	-	-
Disposal at landfills	t	-	66.5	66.5	2,333.8	3,194.6	5,528.4
-Bulky objects	t	-	-	-	31.3	139.6	170.8
-Other (Batteries, medicines, etc.)	t	-	-	-	-	33.0	33.0
-Used clothing	t	-	-	-	-	-	-
-Residual	t	-	-	-	2,157.1	3,022.0	5,179.1
-Sweeping	t	-	66.5	66.5	145.5	-	145.5
Other disposal operations <sup>50</sup>	t	-	2,596.5	2,596.5	-	-	1,039.2
-Bulky objects	t	-	244.4	244.4	-	-	-
-Other (Batteries, medicines, etc.)	t	-	0.4	0.4	-	-	-
-Residual	t	-	2,351.7	2,351.7	1,039.2	10.6	1,039.2
-Sweeping	t	-	-	-	-	-	-
<b>TOTAL WASTE</b>	<b>t</b>	-	2,664.7	2,664.7	3,375.0	3,195.9	6,570.9

## Waste non destined for disposal by type of recovery operation

2021	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	-	<b>128.4</b>	<b>128.4</b>	<b>70.8</b>	<b>311.5</b>	<b>382.3</b>
Recovery/Preparation for reuse	t	-	-	-	-	-	-
Recycling	t	-	-	-	-	-	-
Other recovery operations <sup>51</sup>	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
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	-	<b>15,142.6</b>	<b>15,142.6</b>	<b>33,460.2</b>	<b>15,826.1</b>	<b>49,286.3</b>
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
-Organic waste	t	-	-	-	-	-	-
Other recovery operations <sup>51</sup>	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
<b>TOTAL WASTE</b>	<b>t</b>	-	<b>15,271.0</b>	<b>15,271.0</b>	<b>33,531.0</b>	<b>16,137.6</b>	<b>49,668.6</b>

<sup>51</sup> Includes, for example, waste delivered to suppliers that have agreements with the recycling chain

2020	UoM	COLLECTED IN ROVERETO			COLLECTED IN TRENTO		
		In situ	At an external site	Total	In situ	At an external site	Total
<b>HAZARDOUS WASTE</b>	<b>t</b>	-	<b>145.0</b>	<b>145.0</b>	<b>69.6</b>	<b>303.0</b>	<b>372.5</b>
Recovery/Preparation for reuse	t	-	-	-	-	-	-
Recycling	t	-	-	-	-	-	-
Other recovery operations <sup>51</sup>	t	-	145.0	145.0	69.6	303.0	372.5
-WEEE	t	-	90.2	90.2	41.7	182.8	224.6
-Other (Batteries, medicines, etc.)	t	-	54.8	54.8	27.8	120.2	148.0
<b>NON-HAZARDOUS WASTE</b>	<b>t</b>	-	<b>14,850.1</b>	<b>14,850.1</b>	<b>30,412.9</b>	<b>15,365.2</b>	<b>45,778.1</b>
Recovery/Preparation for reuse	t	-	-	-	2,395.6	0	2,395.6
-Residual	t	-	-	-	2,395.6	0	2,395.6
Recycling	t	-	-	-	1,036.4	175.6	1,212.1
-Organic waste	t	-	-	-	1,036.4	175.6	1,212.1
Other recovery operations <sup>51</sup>	t	-	14,850.1	14,850.1	26,980.8	15,189.6	42,170.4
-Paper and cardboard	t	-	2,630.3	2,630.3	4,914.7	3,426.4	8,341.1
-Glass	t	-	1,418.1	1,418.1	3,995.5	891.4	4,886.9
-Lawn cuttings	t	-	1,220.5	1,220.5	830.2	2,239.4	3,069.6
-Organic waste	t	-	4,151.2	4,151.2	12,007.0	175.6	12,182.7
-Metal packaging	t	-	-	-	19.5	-	19.5
-Multi-material	t	-	1,549.9	1,549.9	3,463.1	1,472.8	4,936.0
-Bulky objects	t	-	344.4	344.4	206.8	871.5	1,078.4
-Wood	t	-	862.8	862.8	328.9	2,006.9	2,335.8
-Inert	t	-	1,059.1	1,059.1	318.5	2,376.8	2,695.3
-WEEE	t	-	216.1	216.1	86.5	524.2	610.7
-Metal	t	-	252.9	252.9	80.8	645.0	725.8
-Other (Batteries, medicines, etc.)	t	-	77.3	77.3	61.1	164.5	225.6
-Used clothing	t	-	144.9	144.9	69.8	391.5	461.3
-Residual	t	-	648.9	648.9	-	3.4	3.4
-Sweeping	t	-	273.6	273.6	598.3	-	598.3
<b>TOTAL WASTE</b>	<b>t</b>	-	<b>14,995.1</b>	<b>14,995.1</b>	<b>30,482.5</b>	<b>15,668.2</b>	<b>46,150.7</b>

## Kg of waste collected per capita in Trento and Rovereto

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
<b>HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>3.1</b>	<b>3.1</b>	<b>-</b>	<b>3.1</b>	<b>3.1</b>	<b>-</b>
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	-
<b>NON-HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>440.8</b>	<b>373</b>	<b>67.8</b>	<b>441.9</b>	<b>408</b>	<b>33.9</b>
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
<b>TOTAL WASTE</b>	<b>Kg per capita</b>	<b>443.9</b>	<b>376.1</b>	<b>67.8</b>	<b>445</b>	<b>411.1</b>	<b>33.9</b>

2020	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
<b>HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>3.6</b>	<b>3.5</b>	<b>-</b>	<b>3</b>	<b>3</b>	<b>-</b>
WEEE	Kg per capita	2.2	2.2	-	1.8	1.8	-
Other (Batteries, medicines, etc.)	Kg per capita	1.4	1.3	-	1.2	1.2	-
<b>NON-HAZARDOUS WASTE</b>	<b>Kg per capita</b>	<b>427.4</b>	<b>362.4</b>	<b>65.0</b>	<b>429.5</b>	<b>377.1</b>	<b>52.5</b>
Paper and cardboard	Kg per capita	64.2	64.2	-	68.4	68.4	-
Glass	Kg per capita	34.6	34.6	-	40.1	40.1	-
Lawn cuttings	Kg per capita	29.8	29.8	-	25.2	25.2	-
Organic waste	Kg per capita	101.3	101.3	-	109.9	109.9	-
Metal packaging	Kg per capita	-	-	-	0.2	0.2	-
Multi-material	Kg per capita	37.8	37.8	-	40.5	40.5	-
Bulky objects	Kg per capita	14.4	8.4	6.0	10.2	10.2	-
Wood	Kg per capita	21.1	21.1	-	19.2	19.2	-
Inert	Kg per capita	25.8	25.8	-	22.1	22.1	-
WEEE	Kg per capita	5.3	5.3	-	5.0	5.0	-
Metal	Kg per capita	6.2	6.2	-	6.0	6.0	-
Other (Batteries, medicines, etc.)	Kg per capita	1.9	1.9	-	2.1	1.9	0.3
Used clothing	Kg per capita	3.5	3.5	-	3.8	3.8	-
Residual	Kg per capita	73.2	15.8	57.4	70.7	19.7	51.0
Sweeping	Kg per capita	8.3	6.7	1.6	6.1	4.9	1.2
<b>TOTAL WASTE</b>	<b>Kg per capita</b>	<b>431.0</b>	<b>366.0</b>	<b>65.0</b>	<b>432.5</b>	<b>380.1</b>	<b>52.5</b>



## HEALTH AND SAFETY (GRI 403)

### Accidents

	UoM	MEN		WOMEN		TOTAL	
		2021	2020	2021	2020	2021	2020
<b>TOTAL ACCIDENTS</b>	No.	<b>23</b>	<b>13</b>	<b>1</b>	<b>1</b>	<b>24</b>	<b>14</b>
<b>AT WORK</b>	No.	<b>22</b>	<b>12</b>	<b>-</b>	<b>1</b>	<b>22</b>	<b>13</b>
Trento	No.	18	10	-	1	18	11
Rovereto	No.	4	2	-	-	4	2
Other locations (Verona + Vimercate)	No.	-	-	-	-	-	-
<b>COMMUTING</b>	No.	<b>1</b>	<b>1</b>	<b>1</b>	<b>-</b>	<b>2</b>	<b>1</b>
Trento	no.	1	1	-	-	1	1
Rovereto	No.	-	-	1	-	1	-
Other locations (Verona + Vimercate)	No.	-	-	-	-	-	-
<b>ABSENCES DUE TO ACCIDENTS</b>	days	<b>614</b>	<b>400</b>	<b>39</b>	<b>12</b>	<b>653</b>	<b>412</b>
At work	days	612	376	-	12	612	388
Commuting	days	2	24	39	-	41	25

### Hours worked

	UoM	2021	2020
Trento	hours	1,379,857.5	1,670,619
Rovereto	hours	419,772.4	475,090
Other locations (Verona + Vimercate)	hours	42,105.7	58,972
<b>TOTAL (ESTIMATED)</b>	hours	<b>1,841,735.6</b>	<b>2,204,681</b>

### Accident rates – excluding commuting accidents<sup>52</sup>

	2021	2020
Severity index	0.26	0.18
Frequency index	9.61	5.90

<sup>52</sup> 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

2021	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	-	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	UoM	MEN			WOMEN			Total
		Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	Plant sites Rovereto / Trento	Territorial sites	Verona and Vimercate	
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

## GRI G4 EU

### Installed capacity – Cogeneration (2021)

Electric power MW	Thermal power in MWt	Cooling MWt
8.76	71.51	7.30





# INDEPENDENT AUDITORS REPORT







KPMG S.p.A.  
 Revisione e organizzazione contabile  
 Via Pancaldo, 70  
 37138 VERONA VR  
 Telefono +39 045 8115111  
 Email [it-fmauditaly@kpmg.it](mailto:it-fmauditaly@kpmg.it)  
 PEC [kpmgspa@pec.kpmg.it](mailto:kpmgspa@pec.kpmg.it)

(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 2022 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 2023 (the "NFS").

Our procedures did not cover the information set out in the "7. 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 in accordance with 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.



**Dolomiti Energia Holding S.p.A.**  
 Independent auditors' report  
 31 December 2022

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 for the identification and management of the risks generated or borne.

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. Our company applies International Standard on Quality Control 1 (ISQC Italia 1) and, accordingly, maintains 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 carried out 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;



**Dolomiti Energia Holding S.p.A.**  
 Independent auditors' report  
 31 December 2022

- 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 a).

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 Novareti 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 the correct aggregation of data in the quantitative information;
- with regard to 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, we inquired their management and obtained 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 2022 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 "7. 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, 11 April 2023

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

**Dolomiti Energia Holding SpA**  
Via Manzoni 24  
38068 Rovereto (TN)  
[www.gruppodolomitienergia.it](http://www.gruppodolomitienergia.it)

The document is published on the website  
[www.gruppodolomitienergia.it](http://www.gruppodolomitienergia.it)







