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Introduction

Developing and operating safe and sustainable infrastructure. With our People, ensuring access and circularity to fundamental resources for citizens, businesses and the territory"; this is the claim of the Acea Group defined in the 2024-2028 Industrial Plan "Green Diligent Growth", which traces the path of the Group's business in coming years with a strategic vision that integrates sustainability as a transversal guideline to operational and business choices.

In 2024, the Acea Group celebrated its first 115 years of operations, starting with the construction and management of the electricity network for the capital, with the activation of the first hydroelectric power stations, the management of Rome's aqueducts, and the construction of the Peschiera-Capore aqueduct, currently representing the largest aqueduct investment in Italy and among

the first in Europe, essential to securing the Capital's water supply. Water and energy, more recently joined by the environment area for waste management, to guarantee the management of these fundamental resources in a logic of efficiency and innovation, integrated with Acea's vocation of service to the territories and communities in which it operates, from the perspective of corporate responsibility towards the creation of shared value.

Attention to the environment, resources, territories and people, therefore form the basis for Acea's operations, where, in a nutshell, sustainability is a fundamental and unavoidable premise, and which the Group is committed to consistently pursuing with a strong strategic vision.

1. General information

1.1 GENERAL CRITERIA FOR SUSTAINABILITY REPORTING AND DISCLOSURES RELATING TO SPECIFIC CIRCUMSTANCES

ESRS 2 BP-1; ESRS 2 BP-2 The Acea Group's 2024 Sustainability Report is prepared in accordance with the reporting standards applied pursuant to the CSRD 2013/34/EU "Corporate Sustainability Reporting Directive" and Italian Legislative Decree 125/2024 transposing this nationally, and with the specifications adopted pursuant to Article 8 of the european Taxonomy Regulation 2020/852/EU.

The Report is prepared on a consolidated basis, approved by the Board of Directors of Acea SpA and subject to a limited review. The scope of reporting includes the Parent Company and the companies consolidated on a line-by-line basis in the annual Financial

In the last quarter of 2024, corporate changes took place that led to a change in the scope of consolidation with reference to four Group companies (Acquedotto del Fiora SpA, Agile Academy Srl, Acea Renewable Srl, Fergas Solar 2 Srl, Berg SpA). as described in the Consolidated Financial Statements.

For sustainability reporting purposes, this change was managed as follows:

- technical data (consumption, energy production, emissions, pollution, resource inflows, resource outflows): the total annual figure is shown, given that the portion for the deconsolidated months is not significant in relation to the Group total;
- personnel data: the total number of employees as at 31 December does not include the staff from the deconsolidated companies; average figures for the year include all companies.

Consistent with the ESRS standards, the Report covers the thematic content of environmental, social and governance standards. With reference to the value chain, the main information on upstream and downstream players is provided, relating to:

- the double materiality analysis process, with specific reference to identifying impacts, risks and opportunities;
- the Group's policies, actions and objectives, with a level of detail that varies according to the degree of control and influence;

 the identification of metrics, with specific reference to Scope 3 emissions reporting.

Furthermore, it is specified that in the Report:

- no information has been omitted that forms the subject of intellectual property, the result of innovation and referring to imminent developments or issues subject to negotiation;
- the phase-in provisions listed in Appendix C of ESRS 1 applicable to Acea have been adopted, with the exception of the requirements related to ESRS S1-15 Work-Life Balance Metrics, ESRS S1-12 Persons with Disabilities and ESRS S1-13 Training and Skills Development Metrics.

To avoid the duplication of data and information, the Sustainability Report refers to other sections of the Report on Operations regarding the information already contained therein, such as the business model, or for more in-depth information. The Report on Operations also describes the Group's reference context and the main risks and uncertainties from a market risk perspective, to which reference is made in the respective paragraphs. Any information referencing other corporate documentary sources is clearly specified in this document. As established by ESRS 1, Acea has defined time horizons corresponding to the Group's Enterprise Risk Management (ERM): short term (1 year), medium term (1-5 years, consistent with the coverage of the Business Plan, long term (over 5 years, namely, beyond the time frame of the Business Plan).

Regarding the use of estimates for the data published in the document, it is specified that no estimates were made for its own workforce. With reference to the value chain, it is noted that data on climate-changing emissions outlined hereunder in paragraph 2.2.4, is collected from a representative sample of Group suppliers based on a specific questionnaire. The figure is estimated by readjusting the consumption recorded relative to the total purchased during the year.

This questionnaire was also used to collect data on water consumption.

Because 2024 is the first year when ESRS standards were applied, and the Sustainability Report does not include comparative data with the previous year. Therefore, any information changes relating to previous periods or reporting errors, which could affect a comparison across several financial years, are not applicable. It is further noted that the scope for the Company's 2024 reporting

differs from last year as a result of the increased perimeter, in compliance with the new reference legislation. For 2024, the first year of reporting under the new regulations, information on the following ESRS/data points has been omitted, using the phase-in option: SBM-1 paragraph 40 (b) and (c); SBM-3 paragraph 48 (e), E1-9, E2-6, E3-5, E4-6, E5-6, S1-7, S1-11, S1-14.

1.2 GOVERNANCE ESRS GOV-1; ESRS GOV-2; ESRS GOV-3

ESRS 2 GOV-1; ESRS 2 GOV-2 The Acea SpA Board of Directors consists of 13 members: 7 men (54%) and 6 women (46%); 12 board members are Italian citizens and 1 is French; 3 board members are between 30 and 50 years old, 10 are over 50; 10 board members (77%) qualify as being independent. Only one board member, the Chief Executive Officer, holds executive positions. Board members generally have experience in the Group's business sectors, specifically in the energy, water and environmental sectors, with national and international experience, as shown in the CVs included in the Annexes.

Corporate Governance

Acea adheres to the Corporate Governance Code of Borsa Italiana, ensuring that its corporate governance system complies with the Code's principles and recommendations.

Specifically, the Board of Directors' actions are characterised by the pursuit of sustainable success, understood as the objective of creating long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the Group. The Chairperson of the Board of Directors is assigned a central role by the Board in overseeing issues related to the environmental impact and social sustainability of the Group's operations and processes.

The Board of Directors is tasked, inter alia, with defining the guidelines of the Internal Control and Risk Management System based on a proposal from the Control and Risks Committee, so that the main risks, including the risks that could become relevant from a sustainability perspective over the medium-long term, are correctly identified and adequately measured, managed and monitored.

The Board of Directors has set up three internal Committees to provide preliminary, propositional and advisory support to the administrative Body, namely: the Appointments and Remuneration Committee, the Control and Risks Committee and the Ethics, Sustainability and Inclusion Committee. The committees meet to deal with the issues falling within their remit, according to a schedule approved by each committee, based on the proposals of the respective chairpersons. This schedule is updated when deemed opportune or necessary according to developments in corporate operations. Based on the specific invitation of the respective chairperson, the meetings of each committee may be attended by other members of the Board of Directors or by representatives of company departments or third parties whose presence may be of assistance in the best performance of the committee's functions. At the meetings, committees are updated on sustainability issues relevant to the Group, ongoing actions and developments such as the adoption of policies and the implementation of operational plans.

During the year, the Ethics, Sustainability and Inclusion Committee and the Control and Risks Committee dealt with the following topics, also in terms of impacts, risks and opportunities: equality, diversity &; inclusion; occupational health and safety; business ethics; sustainability in the supply chain; corporate welfare; sustainability plan; double materiality analysis; sustainability reporting processes; integrated management systems reporting; anti-corruption; anti-trust and consumerism.

The Ethics, Sustainability and Inclusion Committee (ESIC) is a collegial body with full and autonomous powers of action and control designated with providing preliminary, propositional and advisory support to the Board of Directors within the context of corporate ethics and environmental, social and governance topics. The Committee is tasked, inter alia, with the following:

- promoting the integration of sustainability in the strategies and culture of the company and encouraging its dissemination among employees, shareholders, users, clients, the territory and all stakeholders in general;
- overseeing the sustainability topics associated with the exercising
 of business activities and interaction dynamics between the company and all stakeholders and examine the main corporate rules
 and procedures proving to be of relevance upon comparison;
- examining the guidelines of the sustainability plan and the implementation procedures;
- monitoring the implementation of the sustainability plan approved by the Board of Directors;
- expressing, on the request of the Board of Directors, opinions on other matters regarding sustainability;
- liaising with the pertinent corporate structures and bodies in relation to aspects of ethics and sustainability;
- promoting, in light of international best practices, a culture of valuing diversity, avoiding and countering all forms of discrimination, to encourage the adoption of a diverse approach to people management, spreading sensitivity and awareness of the value of differences at all levels of the organisation and monitoring overall development.

The Control and Risks Committee was established to assist the Board of Directors, ensuring adequate preliminary investigations and support in the assessments and the decisions related to the Control System, as well as the approval of the financial and non-financial reports.

The Code of Ethics sets out the general ethical principles that all company practices must be linked to, specifying the criteria of conduct towards each category of stakeholder and defining the mechanisms for implementing the principles and controlling the behaviour of the people who work in the Group's interest.

The Code is adopted by a resolution of the Acea Board of Directors and periodically updated on the basis of the suggestions and proposals received from the Ethics, Sustainability and Inclusion Committee and the Control and Risks Committee.

The Ethics, Sustainability and Inclusion Committee, in connection with the tasks assigned by the Board of Directors, monitors the adequacy of the Code of Ethics and its effective implementation, also with the support of the Ethics Officer.

The Ethics Officer prepares a periodical report on the reports, the in-depth analyses carried out and the initiatives undertaken in the field of training and communication, which is sent to the Chairperson, the CEO and the Control Bodies of Acea S.p.A. (the Control and Risk Committee, the Ethics and Sustainability Committee, the Board of Auditors and the Supervisory Body of Acea, and the Supervisory Bodies of the Group companies).

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The Board of Directors approves, reviews and updates the corporate sustainability policies, defined in line with the Code of Ethics, including: the Human Rights Policy, the Integrated Management Systems and Sustainability Policy, the Anti-Corruption Policy, and the Equality, Diversity & Inclusion Policy.

The Internal Control and Risk Management System is designed to identify, measure, manage and monitor key business risks, ensuring that the organisation operates effectively and in compliance with regulations. The SCIGR contributes to company management aimed at sustainable development, maximising the value of the company and in line with the company objectives defined by the Board of Directors of each Company, supporting Management in informed decision-making where the main risks are identified, assessed, managed and monitored, in relation to their ability to influence the achievement of the objectives and impact the value of the company.

Within the framework of the functions covered and in the achievement of the related objectives, Management ensures the SCIGR is appropriate for the activities within its remit, actively participating in its proper functioning. To this end and also depending on the risks being managed, Management establishes specific control activities and monitoring processes to ensure the effectiveness and efficiency of the SCIGR.

Within the system of controls for the governance and management of the SCIGR and sustainability issues, we note the Risk Management, Compliance &; Sustainability structure, with the mission, inter alia, of ensuring the valorisation of ESG aspects in the Acea Group, integrating sustainability principles and issues into corporate management, coordinating the planning and monitoring of sustainability objectives, and attending to ESG reporting. This structure, which reports in hierarchical terms to the Chief Executive Officer, interacts, discusses promotes and analyses the relevant sustainability issues on an ongoing basis with Group functions and companies.

Acea's Board of Directors defines the Group's strategic objectives, formalised through the Strategic Plan, in order to guide corporate management over the medium term. Management defines the company's operational, compliance and reporting objectives in line with the strategic objectives defined in the Business Plan and in accordance with the corporate mission. These objectives reflect the choices, according to which the company intends creating and preserving value for all stakeholders. This is the context for the Sustainability Plan which, defined with the contribution of the operating companies and various functions, highlights the consistency between the Group's development guidelines outlined in the Business Plan and the socio-environmental impact of business operations. The strategic planning process envisages the approval of the Plan by the Board of Directors and its subsequent monitoring, with a six-monthly review and an annual report included in the Sustainability Report, as well as a periodic review and update to maintain its consistency with business developments and strategic orientations.

Several management systems at Acea are implemented for sustainability relevant issues, from the environmental (environment, energy, etc.) to the social (diversity and inclusion, occupational safety). The functioning of these systems involves, among other activities,

identifying and evaluating the relevant aspects and impacts and continuous monitoring, including reviews by Management to assess the degree to which the systems are being applied and are effective in achieving corporate objectives.

During 2024, the Chairperson, together with the Chief Executive Officer, prepared a training programme for the Board that was also attended by the Board of Statutory Auditors, aimed at providing the Directors with a thorough knowledge of the company's activities and organisation, its sector and the regulatory framework and self-regulatory framework, the company dynamics and their evolution and the role to be performed with respect to the specific nature of Acea, from the perspective of sustainability issues. With regard to the latter, two Induction initiatives were carried out in the reporting period, with the support of external experts, focusing on the Corporate Sustainability Reporting Directive and its impact on the Acea Group. The Board of Directors also has specific competencies in the field of sustainability, with reference to management areas in the energy-utility sectors, e.g. the energy transition and climate impacts.

For its current three-year term of office, the Board resolved to carry out an evaluation of its size, composition and functioning (Board Evaluation), with the assistance of Crisci & Partners, in the role of independent external consultant. This project includes assessments of the onboarding activities and Induction needs, as well as useful recommendations on developing them over time, with reference to the methods and content, to better tailor them to the mix of skills held by individual Board of Directors members, in terms of the governance, strategy, risk and control aspects specific to Acea.

1.2.1 SUSTAINABLE REMUNERATION SYSTEMS ESRS 2 GOV-3

Acea defines its sustainability model making reference to Agenda 2030 for sustainable development, adopted by the UN Assembly since 2015. This is a globally shared action plan to foster development potential and wellbeing of individuals in harmony with the environment and its resources, making it possible to guarantee shared, long-term progress.

In a market context in which there is an increasingly widespread connection between variable remuneration mechanisms and the achievement of social and environmental results, the Acea Group has confirmed its path of increasing the integration of sustainability into business activities, adopted over the years, also by strengthening of its own commitment.

This aim is also implemented through Group incentive plans, with the importance of sustainability issues highlighted once again in 2025 – in both the short-term and long-term incentive plans – and adequately balanced with economic and financial objectives. The short-term variable incentive (MBO) scheme and the second cycle of the 2024-2026 Long-Term Incentive Plan have a composite sustainability objective, broken down into the following indicators:

2025 MBO PLAN

Composite sustainability objective



► Reduction in Accident Frequency Index (excluding commuting accidents)



▶ Organization of sewage and water treatment through measures aimed at strengthening and decommissioning/centralisation of plants



Increase in remote control of MV secondary cabins



economy in the Environment segment)

Increase in plastic sent for recovery (circular



Composite sustainability objective



► Equal representation of gender diversity in Acea structures



► Reduction in % water leaks (on volumes issued) compared to the base-year value



Reduction in production of sludge compared to the base-year value



► Increase in resilience and upgrade to LV Network

The objectives set out in the 2024-2028 Sustainability Plan were developed in close alignment with the investments envisaged by the Business Plan. This integrated approach not only ensures that the sustainability initiatives respond to environmental and social requirements, but that they are also aligned with the medium-term growth strategy. In this way the creation of sustainable value is ensured for all stakeholders, while promoting the Company's innovation and competitiveness.

A 20% percentage share is linked to the composite sustainability target for MbO 2025 and the second cycle of the 2024-2026 plan. The final figures for the 2024 MbO and the second cycle of the 2021-2023 LTIP for the composite sustainability target are shown below, with the corresponding remuneration shares.

The final results are presented at the Nomination and Remuneration Committee before being approved by the Board of Directors.

Ralance

2024 MBO Final Plan

KPIS		Weighting	Target	2024	Achieved
СОМ	POSITE SUSTAINABILITY OBJECTIVE	WEIGHTING 20%			
eos M	► PEOPLE Reduction in accident frequency index	5%	5.44	5.31	130.6%
	► WATER Optimisation of sewage and water treatment through measures aimed at strengthening and decommissioning/ centralisation of plants	5%	3	4	140%
	► NETWORKS Increase in remote control of MV secondary substations	5%	71%	76.70%	140%
	► ENVIRONMENT Increase in MWh produced from biogas (Environment area renewable source)	5%	+6%	5.76%*	98.4%

^{*} The data related to the Environmental Area objective has been adjusted to manage the effects of a critical plant issue at the Aprilia plant, an external event that could not have been foreseen by the company's management team.





2021-2023 LTI Final Plan - II cycle 2022-2024

KPIS	Weighting	Target	Balance 2024	% Achieved
SUSTAINABILITY	WEIGHTING 10%			
 Cumulative percentage change to IRI (post-intervention value/pre-intervention value) 	2%	-70.0%	-70.0%	40%
 % reduction in volume of water lost compared to the base-year value (2019) 	2%	32.0%	27.0%	30%
 % reduction in production of dewatered/dried sludge compared to the base-year value (2019) 	2%	45.7%	36.2%	0%
▶ Reduction of CO₂ emission intensity index at Acea Produzione (gCO₂/kWh produced, and reduction as a percentage compared to the 2019 figure: 89 gCO2/kWh)	2%	55	91.0	0%
Reduction in injury-related indices (Acea Group severity index on average 2022-24 ≤ 2021) (using the same scope as the 2021 NFS)	2%	-7.5%	20.0%	0%

1.2.2 THE DUTY OF CARE STATEMENT

ESRS 2 - GOV- 4 Acea is committed to implementing the duty of care to identify, prevent and mitigate the effective and potential negative impacts generated by the operations and business relations of Group companies.

Specifically, the Human Rights Policy includes Acea's commitment to adopting a due diligence process, which, based on the implementation of dedicated tools (second-level controls, risk mitigation measures, etc.), aims to integrate human rights issues into the risk assessment and management model, strengthening the Internal Control System with a specific focus on the issue.

The Management and Sustainability Systems Policy reaffirms the Group's commitment to identifying, preventing, mitigating and stopping negative impacts on human rights and the environment relating to the Group's operations.

As part of its impact analysis (Materiality Impact), Acea involves stakeholders from different categories in the assessment of impacts, including actual or potential negative impacts generated externally by its operations.

With reference to business processes that are sensitive to ethical and professional risks linked to inter-relationships with third parties (e.g. suppliers, customers, partners, etc.), reputational verification activities are carried out based mainly on searches on ad hoc databases and OSINT methodology, i.e. intelligence analysis on public sources.

Fundamental elements of the duty of care	Paragraphs of the sustainability report
Integrating the duty of care into governance, strategy and the business model	1.2 Governance; 1.5 Policies; 1.7 Double materiality process: impacts, risks and opportunities; 2.2.1 Climate change strategy, 2.2.2 Climate change
Involving stakeholders during all key duty of care stages	Paragraphs 3.1.1 and 3.1.2 of ESRS S1 Own Workforce; paragraphs 3.2.1 and 3.2.2 of ESRS S2 Workers in the value chain; paragraphs 3.3.1 and 3.3.2 of ESRS S3 Communities involved; paragraphs 3.4.1 and 3.4.2 of ESRS S4 Consumers and end users
Identifying and assessing negative impacts	1.5 Double materiality process: impacts, risks and opportunities; paragraphs 3.1.1 and 3.1.2 of ESRS section S1 Own workforce; paragraphs 3.2.1 and 3.2.2 of ESRS section S2 Workers in the value chain; paragraphs 3.3.1 and 3.3.2 of ESRS section S3 Communities involved; paragraphs 3.4.1 and 3.4.2 of ESRS section S4 Consumers and end users
Intervening to address negative impacts	paragraph 2.2.3 of ESRS Section E1 Climate Change; paragraph 2.3.2 of ESRS section E2 Pollution; paragraph 2.4.2 of ESRS section E3 Water and marine resources; paragraph 2.5.3 of ESRS section E4 Biodiversity and ecosystems; paragraph 2.6.2 of ESRS section E5 Use of resources and the circular economy; paragraphs 3.1.1 and 3.1.2 of ESRS section S1 Own Workforce; paragraphs 3.2.1 and 3.2.2 of ESRS section S2 Workers in the value chain; paragraphs 3.3.1 and 3.3.2 of ESRS section S3 Communities involved; paragraphs 3.4.1 and 3.4.2 of ESRS section S4 Consumers and end users; paragraph 4.2 of ESRS section G1 Business conduct
Monitoring the effectiveness of interventions and communicating	paragraph 2.2.4 of ESRS Section E1 Climate Change; paragraph 2.3.3 of section ESRS E2 Pollution; paragraph 2.4.3 of section ESRS E3 Water and marine resources; paragraph 2.5.4 of section ESRS E4 Biodiversity and ecosystems; paragraph 2.6.3 of section ESRS E5 Use of resources and the circular economy; paragraph 3.1.3 of ESRS section S1 Own Workforce; paragraph 3.2.3 of ESRS section S2 Workers in the value chain; paragraph 3.3.3 of ESRS section S3 Communities involved; paragraph 3.4.3 of ESRS section S4 Consumers and end-users

1.2.3 RISK MANAGEMENT AND INTERNAL CONTROLS FOR SUSTAINABILITY REPORTING

ESRS 2 GOV-5 In 2024, Acea started a process to adapt to the requirements set out in Italian Legislative Decree 125/2024, through the definition and gradual implementation of a risk management and internal controls model on sustainability reporting, aimed at ensuring the reliability of such reporting and its compliance with reporting standards.

The risk management and internal controls model on sustainability reporting also aims to support the CEO and the Financial Reporting Officer in issuing declarations to the market on the compliance of Acea's Sustainability Reporting with the reporting standards provided at European level (ESRS) and the specifications adopted pursuant to Regulation (EU) 2020/852 (the EU taxonomy).

The project launched by Acea to define the Internal Control System on Sustainability Reporting ("SCIIS"), has the following main objectives:

- define the risk management and internal controls model on Sustainability Reporting (the "SCIIS Model");
- define the methodological approach for assessing and prioritising risks and for identifying the scope of analysis of the SCIIS, and apply this methodology to draw up a roadmap for implementation for the coming years;
- analyse risks, and define and implement controls of the Sustainability Reporting process;
- conduct a pilot implementation of the SCIIS Model on certain priority indicators (KPIs), based on a benchmarking analysis and the most relevant issues for the Group, aimed at defining a methodological approach that suits the characteristics of the company;
- define the information flow towards the Chief Executive Officer

and the Financial Reporting Officer, as well as towards the administration, management and control bodies.

The defined SCIIS Model is developed on the basis of the framework prepared by the Committee of Sponsoring Organisations of the Treadway Commission (the "CoSO Report") which, in March 2023, published a specific supplementary guide dedicated to sustainability reporting, entitled "Achieving Effective Internal Control of Sustainability Reporting" (ICSR).

Consistent with the principles of the CoSo Report, the methodology adopted for assessing and prioritising risks on Sustainability Reporting is based on the following approach aimed at identifying the scope of analysis of the SCIIS:

- Identification of the analysis universe comprising the data points subject to disclosure by Acea, within the scope of Sustainability Reporting. Specifically, the data points feed into the plan of indicators (KPIs) defined by the Acea Sustainability Department following the double materiality analysis carried out pursuant to ESRS 1 "General Principles" to identify sustainability issues relevant to the Acea Group through the mapping of impacts, risks and opportunities (IRO);
- assessment and prioritisation of KPIs on the basis of a risk/relevance analysis, carried out by means of assessment drivers representing a combination of external and internal factors, in order to obtain a risk assessment that balances external expectations and the internal connotations and characteristics of the business processes from which the data disclosed in the sustainability report originates. The main drivers adopted concern consistency and relevance to sustainability policies, managerial incentives, sustainable finance instruments and rating agency assessments.

For the KPIs assessed as most at-risk/material and for the Group companies that contribute significantly to them, the approach adopted by Acea involves analysing the business processes, identifying the risks and controls aimed at ensuring that the data and in-



formation included in the Sustainability Report meet the qualitative characteristics of relevance, faithful representation, comparability, verifiability and comprehensibility. This analysis forms the basis for the procedures adopted to prepare and communicate sustainability data and information.

The development of the system included an analysis of Acea's Sustainability Reporting process, defining the activities and the roles and responsibilities of the parties involved.

In addition, the digitisation of the process was started during the year with a view to integrated reporting, by adopting the same computer application already used to prepare Acea's Consolidated Financial Statements. The digitisation of the process of collecting and consolidating sustainability data and information is an enabling factor to optimise and strengthen the control system through accountability, traceability, automated controls and monitoring dashboards.

Since the implementation phase of the SCIIS, carried out in the financial year 2024, the main risks identified, taking into account the "qualitative characteristics of information" governed by ESRS

- 1 Appendix B, concerned
- the completeness and integrity of the data;
- the accuracy of estimates;
- the accuracy and completeness of descriptions;
- · the availability and timeliness of data;
- the authorisation of data and information;
- · compliance with the relevant legislation.

The following main types of controls are provided for to safeguard against these risks:

- approval and management review controls;
- data reconciliation checks;
- automatic checks to ensure the calculation and correct imputation of data in computer systems;
- controls on logical access to the systems and traceability of operations performed on the system used for Sustainability Reporting;

- consistency checks of sustainability reporting against ESRS reference standards and further regulations;
- analysis of the deviation of the data from the available time series.

Finally, as a further risk mitigation measure within the sustainability reporting process, Acea has implemented an internal control environment consisting of a set of different elements, consistent with each other, which contribute in an integrated manner to establishing the environment Acea's people operate in, directing their activities within their assigned responsibilities and encouraging the taking of conscious decisions aimed at achieving corporate objectives. The constituent elements of the internal control environment are:

- the adoption of ethical principles and standards of conduct;
- · the adoption of regulatory instruments;
- the promotion of a risk management culture to support growth;
- system of delegations and powers and the development of skills among Acea personnel.

Given the current organisational set-up, an internal certification process was defined by the management and Delegated Administrative Bodies of the companies included within the scope of the Sustainability Reporting, concerning the correctness and authenticity of the sustainability data and information managed by them and the application of adequate internal control processes.

An internal certification on these aspects is also provided by the Head of Risk Management, Compliance & Sustainability Department of Acea to the Acea Chief Executive Officer and the Financial Reporting Officer.

During 2024, specific information flows were addressed to the Board of Directors, Management and Control Bodies and the independent auditors to illustrate the progress of Acea's programme in complying with the CSRD Directive, including the results and the development activities of internal control and risk management processes related to Sustainability Reporting.

1.3 BUSINESS MODEL AND VALUE CHAIN

ESRS 2 SBM-1 Acea's activities and business focus on the pursuit of "sustainable success" and to this end, the Group adopts appropriate policies and management systems, as well as planning and reporting tools. Of equal importance in the pursuit of continuously improving sustainability, are the initiatives of discussion, listening and sharing with the Group's various stakeholders, institutions, experts, companies, customers, suppliers, citizens, new generations, and generally, all interested parties.

The relationship between industrial strategy and sustainability is recognised in the Acea Group's Code of Ethics, which states that: "Acea intends conducting its business while respecting the principles of sustainable development and contributing to the pursuit of the UN Sustainable Development Goals (2030 Agenda) (...) Acea also operates in line with the principles issued by the United Nations Global Compact, to which Acea has formally and substantially subscribed. Acea is aware that the services it provides underpin the fundamental rights of individuals and the influence, even indirect, that its activities have on people's living conditions, on the economic and social development of the areas

in which it operates, and on the general well-being of the community. That is why it plans its investments and conducts its business to pursue sustainable success in the medium to long term (...). Acea works to integrate attention to the social and environmental aspects of operations with corporate growth strategies (...)."

At 31.12.24, the Group had 8,715 employees, of which 7,376 were in Italy and 1,339 in Latin America, as detailed in the Own Workforce paragraph.

1.3.1 THE BUSINESS MODEL

Acea is one of the leading Italian industrial groups and has been listed on the stock exchange since 1999,. It has adopted an organisational structure and operating model that support its strategic lines based on:

- growth in the water market through infrastructure developments, geographic expansion, strategic partnerships, strengthening technology and protecting water resources;
- the resilience of the electricity grid and service quality in the city of Rome:
- the development of renewable capacity for the energy transition:
- the push towards the circular economy with geographical expansion, also in synergy with other businesses.

ESRS 2 SBM-1 The organisational structure tasks the Parent Company with the role of guidance and coordination of the operating companies, to whom the Holding Company offers management support through managerial, legal, logistical, technical, financial and administrative services.

The Group, through companies where the Holding has equity investments and plays the role of industrial entity of reference, the Parent Company is involved in the following industrial chains: water, networks & public lighting, environment and energy. The business operations and objectives are broken down in the Business Plan, which defines the development guidelines for the different chains based on an assessment of the opportunities offered by the market, the regulatory and social context of reference, the governance system and a thorough identification and weighting of the risks that could impact on achieving these objectives.

Acea Group pursues corporate management that is consistent with the principles of sustainable development and pays the utmost attention to interactions with the natural environment and stakeholder relations

For a full description of the services offered and markets served, see the section "Organisational Model" in the Report on Operations. For the value relative to net revenue, reference is made to the item "Consolidated Net Revenue" in the "Notes to the Consolidated Income Statement". For the value relative to gas sales, reference is made to the relative item "Revenues from gas sales" in the "Revenues from sales and services" table of the "Notes to the Consolidated Income Statement".

1.3.2 THE VALUE CHAIN

ESRS 2 SBM-1 With reference to the value chain, as the first year of CSRD application, qualitative mapping was carried out of the main relationships and activities between the Group and the upstream and downstream parties enabling the transformation of production factors into services/products, to the benefit of customers and end users.

The mapping of the value chain was divided into business areas - Environment, Water, Networks and Public Lighting, Production, Commercial - within which the characteristic operational activities (own operations) and the main categories of parties involved upstream or downstream were mapped.

Specifically, upstream activities refer to the following procurement areas and product categories: supply of goods/materials, provision of services, execution of works.

In order to identify the main impacts, risks and opportunities connected to the Acea Group's value chain, the information made available by the relevant corporate structures was analysed, taking into account the results from the context analysis carried out as part of the double materiality process. The main impacts related to the value chain were identified and analysed, based on discussion with the internal experts who manage the processes associated with the impacts, and assessed, within the framework of the double materiality process, by representative stakeholders from the partner, supplier and customer categories or their representatives.

In the future, Acea will formulate a more granular analysis, with specific insights into the activities of the different business segments.





UPSTREAM

- Supply of raw materials and functional services for first and second tier supplier goods
- Network maintenance works (contractors and sub-contractors)
- Supply of goods and materials for water service processes (gas, chemicals, components. diesel, etc.)
- Intercompany services (e.g. waste treatment laboratory analysis etc.)
- Supply of water resources from Sub-distributors
- Logistics services (transport of materials and waste), various services (e.g. surveillance, consultancy, etc.)
- Supply of raw materials and functional services for first and second tier supplier goods
- Supplies of goods and materials for the construction of raw material processing machinery
- Logistics services (disposal, transport, brokerage, etc.)
- Supply of materials from separate collection (pulper, plastic, organic, etc.)
- Supply of sludge, liquid waste, process water, waste by Group companies
- Supply of goods and materials for industrial processes (gas, diesel, chemicals, components, etc.)
- Works for plant construction (contractors and sub-contractors)



WATER



ENVIRONMENT

- Supply of raw materials and functional services for first and second tier supplier goods
- Network maintenance works (contractors and sub-contractors)
- Supply of goods and materials for operations (electromechanical equipment, components, gas, diesel, oils, etc.).
- Plant design, installation, operations and maintenance activities
- Various services (e.g. surveillance, consultancy, logistics, etc.)



- Supply of raw materials and functional services for first and second tier supplier goods
- Network maintenance works (contractors and sub-contractors)
- Supply of goods and materials for processes (e.g. panels, turbines, fuels, etc.)
- Intercompany supply of water resources for hydroelectric production (Acea Ato 2 for Peschiera aqueduct)
- Various services (e.g. surveillance, consultancy, logistics, etc.)



- Supply of raw materials and functional services for first and second tier supplier goods
- Supply of goods and services for process management (software etc.)
- Energy supply from wholesalers, traders, GME
- Intercompany supply of electricity
- Various services (e.g. surveillance, consultancy, logistics, etc.)



Additional Group operations include:

- Engineering & Infrastructure Projects, which deal with plant design, construction management, safety coordination and inspections, research and development, etc.

UPSTREAM

- Supply of goods and materials for the management of engineering services
- \cdot Supply of goods and services for research and analysis activities (laboratory devices, chemicals, etc.)
- $\boldsymbol{\cdot}$ Provision of services for engineering activities
- Execution of works (contractors)
- · Supply of goods and services for plant operations

DOWNSTREAM

· Main Intercompany water, environment and electricity companies

0

OWN OPERATIONS DOWNSTREAM · Users of integrated water service (drinking water, sewerage and purification) • Sub-distributors to whom the water resource is supplied · Intercompany companies present in the territories served by Acea water companies (e.g. Acea SpA served POTABILISATION PURIFICATION by Acea Ato 2, Acea Ambiente served by Acea Ato 5) - Business partners and system entities SUPPLY DISTRIBUTION SEWER (ARERA, water governing bodies, etc.). - Intercompany companies in the environment, water and energy areas receiving energy and waste management and disposal services - Municipalities and public administration for the disposal of their waste - Consortia and producers of secondary raw materials COMPOSTING - End of Waste user companies BIO-WASTE RECOVERY - Nursery sector and agriculture consortia - Business partners and system entities (ARERA, GSE etc.) · Domestic e-business users for electricity distribution service provision · Production plants for grid connection · Large utilities and institutions serviced on medium voltage network • Communities in the territories where Acea operates (public lighting) TRANSMISSION DISTRIBUTION PUBLIC AND PRIVATE USERS - Business partners and system entities (ARERA, TERNA, etc.). • Intercompany company (Efficient utility systems for Acea Ato 2 (purifier) · Acea Energia as a Trader · Photovoltaic companies for operation & management services and asset management - Business partners and system entities HYDROELECTRIC COGENERATION **PHOTOVOLTAIC** (GME, TERNA, GSE, etc.).

Acea SpA which centrally administers management, coordination and administrative services (human resources management, procurement, facilities) in favour of Group's subsidiaries.

CUSTOMER CARE

UPSTREAN

 $\boldsymbol{\cdot}$ Supply of goods and materials for business process management

CUSTOMERS

- · Consultancy and specialised services
- Various services

MARKETING STRATEGY

DOWNSTREAM

• Free market customers (domestic and business)

(Environment companies, water companies, etc.)

Protected market customersIntercompany following selection

- Business partners and system entities (Sales agents, ARERA, etc.).

Subsidiaries



1.4 THE STRATEGY OF SUSTAINABILITY

ESRS 2 MDR-T In March 2024, the 2024-2028 "Green Diligent Growth" Business Plan was approved, which reaffirms Acea's leadership role as an infrastructure operator in the regulated Water, Electricity and Environment sectors, increasingly integrating ESG criteria into business decisions and reinforcing its commitment to valuing people. The Plan allocates EUR 7.6 billion in investments to support Italy's development, to make managed infrastructure increasingly sustainable and resilient with a focus on the energy transition, starting with water, decarbonisation and the development of energy from renewable sources, and the valorisation of the territory, from the perspective of a circular economy. Focusing on people, strong cost and investment discipline and optimisation of the financial structure complete the pillars of the Plan. The principles guiding the Green Diligent Growth Plan are: Developing and operating safe and sustainable infrastructure Ensuring, thanks to our people access and circularity to fundamental resources for Citizens, Businesses and the Territory.

The 2024-2028 Sustainability Plan

Consistent with the industrial development guidelines, the objectives of having a positive impact on people and the environment that Acea pursues in its operations are formalised in the 2024-2028 Sustainability Plan approved by the Board of Directors.

The Plan was defined with the involvement of the Functions of the Parent Company and operating companies, and taking into consideration the material issues and associated impacts, risks and opportunities identified by listening to external and internal stakeholders, and consistent with the objectives of the European Green Deal and the Agenda 2030 Sustainable Development Goals relevant to the businesses managed.

The Plan includes the formalisation of the Group's governance commitments, in line with policies, to ensure that business choices and execution methods are environmentally, socially and economically sustainable, and to ensure that the principles of sustainable development are progressively integrated into corporate governance.

- Promoting the ethical dimension of the business
- Definition and updating of value codes and policies code of ethics, human rights policy, anti-corruption policy, integrated quality policy, etc.
- ► Training and monitoring of policy implementation
- Alignment of organisational structure with committees and specific responsibilities on sustainability
- Inclusion of **ESG objectivesin performance management models** (Long Term, MBO)
- Integrating sustainability in business
- Monitoring and reporting on public sustainability commitments (e.g. targets validated by SBTi)
- Integration of sustainability aspects in the risks assessment process
- Increasing the use of green/blue finance instruments
 and strengthening relations with shareholders, investors and the financial community from an ESG perspective
- Dissemination of sustainability culture and involvement
- Training of employees and valorisation of "sustainability professionals"
- Involvement of internal/external stakeholders in sustainability decisions
- Development of a sustainable value chain

The Plan formalises the 6 strategic sustainability objectives divided into 20 lines of action and 87 targets associated with specific actions, with progress monitoring KPIs defined for each one.

Strategic objectives	Infrastructure resilience and security	Water protection	Environmental protection	Centrality of people	Evolution in the supply chain	Value for the community
Action lines	➤ Strategic aqueduct works ➤ Optimisation of the sewage treatment system ➤ Strengthening the power grid ➤ Digitalisation	► Reduction in losses ► Water resilience ► Water quality	►Circularity of resources ► Decarbonisation ► Biodiversity	 Employees' well-being Skills development Diversity and inclusion People Engagement Health and safety 	►Sustainable procure- ment ►Supplier health and safety	Innovation in the territory ► Stakeholder engage- ment ► Supporting local communities
Target	17 targets	6 targets	19 targets	20 targets	8 targets	17 targets

The first three strategic objectives are business-related and generate obvious environmental benefits, as well as effects on the overall improvement of the services rendered to the territory, through the upgrading and securing of water and electricity infrastructure and increasing their resilience, also for the purposes of mitigation or adaptation to climate change, in addition to the adoption of digital technologies for remote control and network demarcation, with a view to increasing their flexibility. The other three objectives focus more on people, from a perspective of creating shared value, well-being and the growth of People in the Group, suppliers, and communities.

The Plan was developed on a perimeter that includes the Group's main companies: Acea Ato 2, Acea Ato 5, Gori, AdF, Gesesa; Areti, Acea Energia, Ecogena (merged into a.cities), Acea Ambiente, Acea Infrastructure, Acea Produzione, and abroad Aguas

De San Pedro and Consorcio Agua Azul, not corresponding to the CSRD perimeter however. At the time the Plan was formalised, it is noted that these companies accounted for 96% of capex, 91% of opex and 89% of turnover (2023 figures). The Plan will be updated during 2025, which will include aligning the planning perimeter to the CSRD perimeter.

For the first time, the Sustainability Plan involved the Group's foreign companies operating in Honduras and Peru, with the provision of specific lines of action for environmental protection and the growth of the Group's people and communities involved, also considering the different geo-political situation of the areas in which Acea operates. Specifically, the objectives relating to people were defined with a view to ensuring standard treatment and working conditions for all People in the Group.





Strategic objectives	Action lines		Target @2028	company
V			<u> </u>	<u> </u>
Environmental protection	Biodiversity	Árboles para el Merendón	 Planting of 350,000 new trees, in addition to the one million already planted, with protection and safeguarding of resident species and increasing employment in the area 	Aguas de San Pedro
Centrality of people	Health and safety	Safety and prevention training	▶ 90% of employees involved in training	Aguas de San Pedro
	Skills development	Specialised training	▶ 95% sectors covered▶ 97% course attendance	Aguas de San Pedro Consorcio Agua Azul
	Diversity and inclusion	Improving the D&I culture	➤ 1 initiative per year ➤ 90% participation rate	
Evolution in the supply chain	Health and safety	Safety and prevention training	▶ 90% attendance for supplier courses	Consorcio Agua Azul
Value for the community	Supporting local communities	Training in schools	 At least 1 campaign per year 2,780 school kits distributed in poorer areas 	Consorcio Agua Azul
		Hygiene-health training	▶ 25 workshops/year for local communities	Aguas de San Pedro Consorcio Agua Azul
		Fire prevention	► Training of 1 fire-fighting team ►30 new hydrants installed	

Finally, the Plan details the investments linked to the various lines of action, consistent with the Business Plan, totalling around EUR 5.4 billion to 2028.

STRATEGIC OBJECTIVES

Strategic objectives	Infrastructure resilience and security	Water protection	Environmental protection	Capex	63% Water 20% Electrical 9% Environment 8% Production
	2,870 EURM	1,183 _{EURM}	1,277 _{EURM}		

ESRS 2 MDR-T During 2024, progress on the targets was monitored both with regard to the actions implemented in the year and the investments made in the various lines of action, which at 31.12.2024, totalled EUR 950 million. In the following section of the Report, the progress of the different lines of action is detailed with an indication of the actions completed in 2024 and the related investments with any opex recorded during the year.

It is specified that the action lines for the plan, which may contribute to more than one environmental objective, have been included in the dominant ESRS. For example, water recovery and reuse projects contributing to both ESRS E3 "Water and Marine Resources" and ESRS E5 "Use of Resources and Circular Economy' were reported in ESRS E3.

1.5 GROUP POLICIES

ESRS 2 MDR-P The Group conducts its business from the perspective of sustainable growth, taking into account the strategic, regulatory and main standards defined at international level when defining its internal rules. Specifically, Acea operates in line with the principles issued by the UN Global Compact, to which it has formally subscribed, on human rights, working standards, environmental protection and the fight against corruption.

To ensure the relevant sustainability issues are properly managed in the social, environmental and governance contexts, Acea adopts the policies and guidelines listed below, which are approved by the Parent Company's Board of Directors, implemented by the subsidiaries, and monitored regarding their application and adequacy in relation to the objectives pursued and updated periodically. Specifically, the governance system envisages a specific intra-Board committee, the Ethics, Sustainability and Inclusion Committee which, among the tasks assigned to it by the Board of Directors, oversees the correct implementation of sustainability policies, with specific reference to the Code of Ethics and the Human Rights Policy, also with the support of the Ethics Officer. All internal and external persons, working in the interest of Acea, within the context of their respective structures, functions and responsibilities are committed to implementing the principles set out in the corporate regulatory systems.

The Human Rights Policy and the Anti-Corruption Guideline also apply to suppliers, partners and, more generally, to all those who have contract-based relationships with or act in the name and on behalf of Acea.

Acea disseminates information of the corporate regulatory system to stakeholders, providing information in this regard on this on the institutional website.

The main contents of the regulatory instruments that apply to relevant sustainability issues are outlined below.

Code of Ethics

Acea considers as inalienable in the definition of its Code of Ethics, the UN Universal Declaration of Human Rights, the International Labour Conventions and Recommendations issued by the ILO, the Charter of Fundamental Rights of the European Union and the Italian Constitution.

The Code establishes the principles and rules of conduct that must guide the Company in its behaviour in respect of stakeholders, pursuing the optimal management of impacts, risks and opportunities, and declares Acea's commitment to:

- enhancing the value of the Group's people in improving their well-being, protecting their health and safeguarding their working conditions;
- with regard to the environment, with the prevention of pollution, the sustainable management of natural resources, the protection of ecosystems, the fight against climate change and the promotion of the circular economy;
- to the territory, by supporting cultural and socially utility initiatives and those that promote the well-being of the community;
- to customers, protecting them with correct business conduct.

 The Code of Ethios also requires suppliers to adopt helpovious pro-

The Code of Ethics also requires **suppliers** to adopt behaviour protecting the human rights of their employees, with specific regard to dignified working conditions and the protection of health and safety.

Principles and values of Stakeholder Engagement

Acea has published its statement and formulated a procedure so as to involve **stakeholders**, including representatives from the **communities involved**, with the aim of creating relationships based on listening, dialogue, and the mutual understanding of points of view and expectations, with the goal of encouraging wider stakeholder engagement in defining the Group's strategic priorities as well as its business operations.

Human Rights Policy

Acea promotes human rights in their broadest sense, with a particular focus on aspects relevant to the areas of managed operations, in the areas of community, work and customers. The protection of fundamental workers' rights (combating forced and child labour, adequate working and wage conditions, etc.) extends across the supply chain. The protection of the community and customers manifests in the commitment to accessibility to adequate services, to developments in innovation and digitisation as an evolutionary function of the different businesses managed. The commitment to promoting human rights is also emphasised through responsible behaviour in respect of customers and the fight against all forms of corruption to protect the legality and correct economic and social development of the reference context. Human rights also include $% \left(1\right) =\left(1\right) \left(1\right) \left($ the sustainable management of natural resources, in particular water, by valuing its proper use and paying attention to waste reduction, rational use and reuse. The Group's commitment is expressed in the protection of the territories in which it operates, safeguarding ecosystems, protecting biodiversity and combating deforestation, and containing the phenomenon of climate change and its effects with mitigation and adaptation measures, such as infrastructure resilience, the efficient use of energy and increased production from renewable sources. The Policy has been defined in compliance with the main references on the subject, including the International Charter of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions and the Global Compact, and with the internal regulatory assumptions already existing in Acea, including those on anti-corruption, fair competition, protection of privacy, etc.

Integrated management and sustainability systems policy

In carrying out its operations, the Acea Group has made a series of commitments with a view to the synergistic development of management systems and pursuit of strategic sustainability objectives. Acea therefore enhances its commitments to quality and customer satisfaction, offering quality services that increase satisfaction, by responsibly managing the economic, social and environmental impacts of operations; for the environment, through the sustainable management of energy, water and the other natural resources used, enhancing their uses and strengthening the processes of reuse and recovery with a view to the circular economy and rationalisation of their end uses, protecting the environment and countering climate change for workers' health and safety, maintaining safe and healthy working conditions, pursuing the protection, inclusion and enhancement of workers' diversity and well-being as an integral part of health and safety management; finally for energy management, structuring a process that allows efficient energy management, with the definition and monitoring of objectives with a view to continuous improvement. Specifically, Acea is committed to the integration of



sustainability logics in corporate structures, processes and activities to ensure the pursuit of sustainable success and to the identification, prevention, mitigation and stopping of negative impacts on **human rights and the environment** related to its operations.

Equality, Diversity & Inclusion Policy

The Acea Group promotes the principles of inclusion and the enhancement of diversity, prevention and combating all forms of discrimination and the pursuit of fair treatment among the **People of Acea** in the selection, training, development and remuneration processes. The Group's commitment to gender equity and overcoming stereotypes is also realised through policies and actions aimed at promoting a work-life balance.

Anti-Corruption guidelines

Acea has defined its commitment to preventing **corruption risks** in an organic framework of rules and principles. The Group is committed to constantly implementing sustainable business combining results and performance with compliance with rules and values, to make the Group ethically virtuous based on the supposition that "illicit" profit is not acceptable. Acea SpA has also adopted an anti-corruption policy, which resulted in the certification of the UNI ISO management system ISO37001:2016.

Antitrust and consumer protection guidelines

In order to responsibly manage its behaviour towards its customers, Acea has defined a set of rules, organisational and procedural measures aimed at ensuring that corporate activities comply with antitrust legislation, as well as preventing, managing and mitigating the risks arising from potentially anti-competitive behaviour or the **breach of consumers' rights**.

Privacy guidelines

Acea is committed to the creation and implementation of effective policies to protect the personal data of its employees, customers, suppliers, shareholders, stakeholders, partners, as well as the persons whose personal data, for various reasons, is processed by the company, with the aim of ensuring the application of the GDPR and other national and European regulations on the protection of personal data.

Policy for the management of reports

Finally, Acea has drawn up and implemented a Whistleblowing Management Policy to implement the requirements of Italian Legislative Decree No. 24 of 10 March 2023, the Code of Ethics, the Organisational, Management and Control Model pursuant to Legislative Decree no. 231/2001, the Anti-Corruption Guideline, the Antitrust and Consumer Protection Compliance Guideline and the Equality, Diversity & Inclusion Policy.

Strategy for the correct management of variable and fiscal risks

The Acea Group considers the correct management of the tax variable to be of essential value. For this reason, the Group has adopted a tax policy with the aim of reducing the tax risks to which Group companies are exposed in the achievement of its statutory objectives, ensuring compliance with tax obligations and promoting a relationship of transparency and loyal cooperation with the tax authorities and third parties.

Acea has also made use of the following instruments to better regulate relations with workers and suppliers.

Charter of the Person and Participation

The Protocol between Acea and the trade unions aims to support involvement and participation in the life of the company, focusing on the **people in their individual, social, professional dimension**, and integrated with the environment and territory. The aim is to create value for the territory, strengthen the quality of service, develop and increase company professionalism and individual and collective well-being. The common and values that bind the parties are the enhancement of a healthy working environment, both in terms of safety and the corporate climate, the protection and quality of work also in the **procurement** chain, the care of professional skills, work-life balance, the promotion of well-being and a culture of safety.

Sustainable procurement policy

Acea promotes the involvement of its **suppliers** in a partnership relationship, with the aim of identifying aspects that can reduce any negative environmental and social impacts linked to the supply chain. Acea's commitment to various issues, including labour rights, health and safety, and environmental protection, is also a requirement to be shared along the **supplier value chain itself**, involving sub-contractors and sub-suppliers.

1.6 STAKEHOLDER ENGAGEMENT

ESRS 2 SBM-2 Acea's organisational structure is based on the principles and values of stakeholder engagement and serves as a centre of specialist competence and know-how at Group level. This is also facilitated through awareness-raising actions and the development of methodological models and tools to promote the implementation and management of stakeholder engagement activities by Acea structures and Group companies, which are responsible for managing their own stakeholders, ensuring reporting at Group level.

These tools include the Stakeholder Tree, a mapping of the relevant stakeholders for Acea, developed through an in-depth analysis of the Group's relational network and the involvement of both senior figures and those with operational responsibilities. The Stakeholder Tree is divided into categories and sub-categories, which are also subdivided according to issues of relevance for the different busi-

nesses. The stakeholder macro-categories are shown on the next page.

The stakeholder engagement process is regulated by a Group procedure and adheres to the Global Reporting Initiative Standards and AA1000 SES on stakeholder engagement. Owners of a stakeholder engagement process are the figures responsible for the design, implementation, realisation and management of a stakeholder engagement programme, project or initiative within Acea structures or Group companies. Approval is always required from the Head of the structure to which the owner belongs, and in the case of initiatives of specific strategic importance and sensitivity, also from higher level managers, up to, if applicable, Acea Top Management. The process is initiated with the definition of the subject and objectives to be achieved through the engagement of the structures of Acea



Opinion

makers

New generations

representatives

Workers

Customers

Sharehold-

袻

ers and investors

Evaluation and

control bodies

Bodies and Governance

Group com panies

Institutions

Business partners and institutional

partners

and Group companies, which are responsible for the management of their stakeholders. The identification of the topic of engagement is aimed at pinpointing the specific issues that will be addressed during the stakeholder engagement process. Subsequently, the stakeholder engagement project owner carries out the identification, analysis and prioritisation of all stakeholders who are interested in or can influence the course of the project at various levels and to varying degrees.

Suppliers

The definition of forms of engagement (e.g. information, consultation, etc.) also takes into account existing stakeholder relations, the subject matter of the initiative, resources and time frame. This phase also defines the operational tools (e.g. work tables, focus groups, etc.) needed to best target the needs, opinions and expectations of stakeholders. Next, a plan is drawn up to involve the relevant stakeholders, also taking into consideration the context. In this context, operational tools are prepared with all useful information, including any correlation with relevant sustainability issues, references to objectives of the Sustainability Plan, etc., for the implementation, realisation and operational management of the stakeholder engagement plan. Once the engagement has been planned, the defined activities are operationalised. Stakeholders are then involved in the manner envisaged by the defined tools.

The engagement initiatives introduced by Holding companies and functions involve various stakeholders. Specifically, initiatives are developed by looking for common benefits for both Acea and its stakeholders. In respect of stakeholders in the communities involved, such as the younger generation and the student population, numerous activities are implemented in the area of training and civic education. In respect of the employee stakeholder, numerous ini-

tiatives are proposed, for instance, to pursue their well-being and skills development. In respect of the supplier stakeholder, initiatives are undertaken to promote compliance with the Group's strategic guidelines, while at the same time protecting working conditions. For details on the initiatives, representative of the application of stakeholder engagement practices, reference is made to the information in paragraphs 3.1.2 of ESRS S1, 3.2.2 of ESRS S2, 3.3.2 of ESRS S3 and 3.4.2 of ESRS S4.

Citizens

At the end of the process, a review of the activities is carried out involving the other company structures that may be involved, with the aim of learning from successes and mistakes, also for the benefit of future activities to be undertaken, as well as highlighting any new opportunities to be developed. Feedback is also provided to the stakeholders involved, following the principle of inclusiveness and accuracy.

To ensure the integration of stakeholder engagement within the Group's strategies, processes and business activities, also for the purpose of reporting and optimising the best practices implemented, Acea has prepared a report on the status of stakeholder engagement activities in the Group, which summarises the main projects and initiatives implemented during the previous year.



1.7 DOUBLE MATERIALITY PROCESS: IMPACTS, RISKS AND OPPORTUNITIES

ESRS 2 IRO-1 The double materiality analysis guides the Group's sustainability planning, highlighting relevant impacts, risks and opportunities related to strategic objectives along the value chain. This approach makes it possible to pro-actively adapt the company's strategy, anticipating and managing possible critical issues and strengthening the resilience of the business model against potential negative sustainability-related impacts. In 2024, the Acea Group carried out the double materiality analysis process in line with the ESRS standards and the Materiality Assessment Implementation Guidance (MAIG Guidance Line) developed by EFRAG, based on the dual perspective of impact and financial materiality.

The analysis was led by the Parent Company with the involvement of the sustainability and risk owners of the companies involved at each stage of the process.

The process involved the following main steps:

- Understanding the context;
- Identifying potentially relevant issues, impacts, risks and opportunities:
- Impact materiality assessment;
- Financial materiality assessment;
- Aggregation of results and drawing up the list of material IROs.

Understanding the context was carried out by studying external documents (regulatory developments in sustainability, sector, benchmark analysis, etc.) and internal documents (industrial and sustainability strategy, policies, etc.); the evidence that emerged was then traced back to the sub-themes and sub-sub-themes related to the thematic ESRS (governance, environmental and social) and the list of potentially relevant issues and associated impacts, risks and opportunities was drawn up. This activity takes into account the characteristics of the value chain in the geographical reference contexts and both the positive and negative impacts on people and the environment, considering current and future effects over a short, medium or long term time period. The list of impacts analysed includes those related to the company's activities or its business relations.

A multi-stakeholder focus group was organised for the impact materiality assessment, in which 32 persons representing 11 stakeholder categories (employees, peers, research organisations, innovative partners, suppliers, non-profit associations, institutions, consultancy companies, trade unions, consumer associations, new generations) participated. Stakeholders were divided into 6 work tables, coordinated by independent facilitators who guided the reflection, voting and collected the emerging evidence. The event comprised three main phases: the introductory session aimed at explaining the regulatory framework and voting methods to stakeholders, the discussion phase for voting on impacts, and the final phase for sharing results.

To ensure impacts are correctly represented, the outcomes of stakeholder assessments were reviewed based on internal knowledge, to balance any possible bias and overestimates of stakeholders, and were analysed on the basis of updated findings.

Stakeholders involved in the focus group rated the significance of impacts (magnitude, extent, and, for negative impacts, irremediable) on a scale of 1-5, subsequently re-weighted on a 1-4 scale

for consistency with ERM metrics. The probability of occurrence of potential impacts was not measured directly, but rather calculated by considering the Group's level of control over the impacts (also considering the historical data series, where present). The impact materiality threshold was defined by considering the average value of the scores obtained from the product of significance and probability.

For the financial materiality assessment, the methodology used in the Group's risk assessment process (ERM) was adopted, which refers to the parameters of impact and probability. To this end, in the ERM framework, risk scenarios (short and medium term) and opportunity scenarios related to ESG dimensions potentially able to generate a significant impact on the Company (business trend, economic-financial performance, etc.) were identified and, where already present, broken down further, starting from the ESRS analysis (ESRS 1 Application Requirement 16). These scenarios were jointly assessed by risk owners, ERM focal points and corporate sustainability contact persons and validated at senior management level. For long-term risks and opportunities, which go beyond existing strategic planning guidelines, the analysis was based on scenario analyses of climate risks and opportunities. To identify the relevant risks and opportunities, the methodology used in the Group's risk assessment process was adopted, which considers the dimensions of impact and probability (on a scale of 1-4), in the context of the risk matrix, and assesses the impact in reputational or economic-fi-

Risks and opportunities with the following gross probability and impact values were considered material: impact 2 and probability 4, impact 3 and probability greater than and equal to 3, impact 4 and any level of probability.

The double materiality process and its outcomes were shared with the Ethics, Sustainability and Inclusion Committee and the Parent Company's Control and Risk Committee and approved by the Board of Directors of Acea S.p.A. As a result of the findings of the analysis, all ESRS environmental, social and governance issues were found to be material. The remainder of the document provides the disclosures for the different topics with details of policies, strategies, objectives, actions, resources and metrics, as required by the ESRS standard.

ERS 2 SBM-3 In order to quantify the current financial effects of material risks and opportunities, the Acea Group verified the actual occurrence during the year of events corresponding to the scenarios in question and associated cost and revenue items for these scenarios. The current financial effects of these scenarios were assessed in relation to the ERM financial materiality threshold. The representation of material IROs is detailed in each pertinent thematic ESRS.

For 2024, no relevant significant ESG risks and opportunities were found. It is noted that for 2024, the first year when the regulation was adopted, information on the expected financial effects has been omitted.

2. Environmental information

In compliance with the CSRD Directive and ESRS standards, Acea is committed to providing transparent and detailed reporting on its environmental performance. This section presents key environmental information reflecting the Group's ongoing commitment to sustainability and environmental protection in all its different aspects.

Our environmental strategy is based on sound principles that aim to reduce the ecological impact of our operations, promote climate resilience and contribute to the transition to a low-carbon economy. Through the responsible management of natural resources and implementation of innovative technologies, Acea is committed to minimising greenhouse gas emissions, optimising water use, reducing waste and protecting biodiversity.

In this section we provide an overview of our environmental initiatives, projects and achievements, outlining our progress and future goals. The disclosure includes quantitative and qualitative data illustrating our performance in the areas of:

- reducing greenhouse gas emissions (Scope 1, 2 and 3);
- energy efficiency and the use of renewable energy sources;
- sustainable management of water resources;
- · waste reduction and management;
- · protection of biodiversity and ecosystems.

This reporting is crucial not only in ensuring transparency in respect of our stakeholders, but also to guide our future actions and continuously improve our environmental practices. Acea recognises that environmental sustainability is a key element for long-term success and is committed to continuously improving all its operations.

2.1 DISCLOSURE REQUIRED BY THE EUROPEAN TAXONOMY

Pursuant to Regulation 2020/852 and Regulation 2021/2178 "Disclosure Delegated Act", the European Taxonomy is a classification system for economic activities that can contribute to achieving the environmental objectives set out in the European Green Deal: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and the protection of biodiversity and ecosystem health. Currently, the Taxonomy has identified and regulated 155 economic activities within 16 production sectors.

The European Taxonomy lists and describes the economic activities that can contribute to achieving each environmental objective, if conducted in compliance with certain technical criteria, without causing significant damage to the remaining objectives and in compliance with social safeguards. These "eco-sustainable" activities are then enhanced, by representing their percentage contribution to three economic KPIs (turnover, capex and opex).

Regulation 2020/852 was applied from 2021, and supplemented with the gradual adoption of Delegated Acts. Specifically, in addition to the 'Disclosure Delegated Act', the European Commission adopted the "Climate Delegated Act" - C (2021) 2800 final, effective from 1 January 2022, in relation to the first two climate targets, supplemented by the "Complementary Delegated Act" - C (2022) 631, effective from 1 January 2023; the Commission regulated the remaining four environmental objectives, with the "Environmental Delegated Act" - C (2023) 2486, effective from 1 January 2024, which also amended the KPI reporting templates, and published Delegated Regulation 2023/2485, whereby further amendments were made to the Climate Delegated Act, both in terms of new activities and technical screening criteria.

Acea, which falls under the non-financial companies subject to the regulation since its first year of application, has regularly reported on the requirements of Regulation 2020/852 and Delegated Acts in its Consolidated Non-Financial Statement, anticipating the full application of the Environmental Delegated Act in relation to the 2023 financial year. With the entry into force of the CSRD Directive 2022/2464/EU, implemented in Italy by the Legislative

Decree 125/2024 of 6 September 2024, the information required by the European Taxonomy forms an integral part of Sustainability Reporting.

This section details the analysis carried out, in compliance with the regulations, to identify the Acea Group's activities eligible for the Taxonomy and the reporting of the three key performance indicators: turnover, capex and opex resulting from eligible and aligned activities.

Analysis of eligibility and alignment

The analysis carried out identified the Group's activities that correspond to those described in the Delegated Acts and relative Annexes (I and II of the Climate Delegated Act, dedicated to climate mitigation and adaptation objectives), and taking into account the Complementary Delegated Act and the Environmental Delegated Act, identifying eligible activities and, among these, the activities that are "environmentally sustainable", i.e. aligned with the Taxonomy criteria, specifying any activities that are partially aligned (for example, for the same activity, only some companies are aligned, or when, for different companies, the activity meets the technical screening criteria only for a portion of the facilities/structures).

The analyses carried out in 2024 considered all operating companies included in the Acea Group's line-by-line consolidation perimeter, including an additional 14 companies compared to 2023. Specifically, the analysis increased the scope of eligibility compared to the previous year, from 24 to 29 activities attributable to 6 sectors identified by the Regulation: energy, water supply, sewerage, waste treatment and decontamination; transport; construction and real estate activities; professional, scientific and technical activities; information and communication. Eligible activities can contribute to the following objectives:

- 19 activities: contribution to climate change mitigation and adaptation;
- 2 activities: contribution to climate change mitigation
- 3 activities: contribution to the sustainable use and protection of water and marine resources;
- 3 activities: contribution to the transition to a circular economy;
- 2 activities: contribution to pollution prevention and reduction.

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Alignment to the Taxonomy was assessed in respect of the eligible activities, using the three criteria set out in the regulations, checking that each activity:

- contributes substantially to the achievement of one or more of the environmental objectives set out in Art. 9, in accordance with Art. 10 to 16 (Reg. 2020/852);
- does not cause significant harm (DNSH criterion) to any of the environmental objectives, in accordance with Art. 17 (Reg. 2020/852);
- is carried out in compliance with the minimum safeguards provided in Art. 18 (Reg. 2020/852), in support of sustainable and inclusive growth, and in compliance with international labour and human rights, and social and governance standards.

The Group adopted two distinctive approaches for the DNSH analysis: for the specific criteria, an assessment of the capacity of each individual activity to meet the requirements, while for "recurring criteria" (those detailed in the Appendices), the most common best practices available for each business were considered in order to guarantee, where possible, compliance with the applicable requirements for eligible activities. To complete the analysis, Acea verified compliance with the minimum safeguards, which include the minimum requirements for the protection of human and labour rights, as described in international standards. Acea's commitments in this respect are directly referenced in the

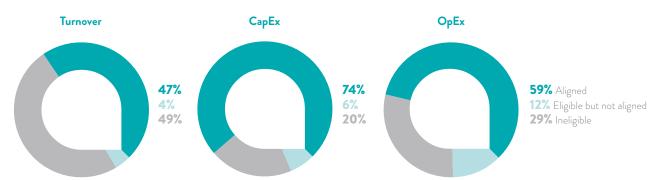
Group's policies and documents, including, primarily: the Code of Ethics, the Human Rights Policy, the Integrated Management Systems and Sustainability Policy, as well as the corporate documents governing the Company's conduct on antitrust, consumer protection, anti-corruption and privacy issues. For more details on the main policies and methods for managing these issues reference is made to paragraph 1.5 Group Policies and paragraph 4 Information on Governance.

Based on the analyses performed, Acea identified a total of 33 eligible activities for the Group. Following the rationalisation and target positioning choices by the companies, there are 29 activities that are eligible and valued in the economic and financial KPI tables, as explained above. The 4 rationalised eligible economic activities have been valorised in the complementary tables showing the overall alignment percentages for each objective. The following is noted regarding the total 29 eligible activities:

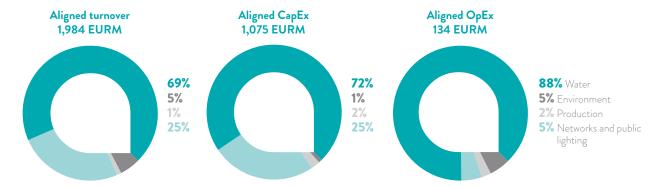
- 17 fully aligned activities;
- 8 partly aligned activities;
- 4 non-aligned activities.

Finally, performance indicators were associated with the activities: turnover, capex and opex from eligible and aligned activities, as shown below with respect to the Group total and with details of aligned activities according to business area.

KPIs attributable to eligible, aligned, and non-eligible activities



Details per business of economic KPIs for aligned activities



Turnover: of the total turnover of EUR 4,270 M, EUR 175 M is attributable to eligible activities but not aligned to the Taxonomy, EUR 1,984 M is aligned to the Taxonomy. The segments contributing the most to the aligned turnover are the Water segment, with 70% of the total (1,369 million) and the Networks segment with 25% (502 million).

Capex: out of the total capex considered for Taxonomy purposes of EUR 1,450 M (including increases during the year for Rights Of Use - IFRS 16 for about EUR 11,4 M), EUR 85 M is attributable to eligible but non-aligned activities, whereas EUR 1,075 M is considered aligned to the Taxonomy. The segments contributing the most to the aligned capex are Water (72% of the total for EUR 769 M)

and Networks (25% of the total for EUR 273 M).

Opex: out of the total operating expenses considered for the purposes of the Taxonomy, amounting to EUR 226 M, EUR 27 M is attributable to eligible but non-aligned activities, while EUR 134 M is considered aligned. Once again in this case, Water is the largest contributing sector with 88% of the total aligned opex (EUR 117 M).

The paragraphs below provide a sector breakdown of the activities that are eligible, aligned and non-aligned with the environmental goals of the Taxonomy. In accordance with the Regulation, it is noted that for the 19 eligible activities both in terms of the goals of mitigation and adaptation to climate change the mitigation goal was deemed prevalent.



14 activities are eligible for the water business:

- 8 activities with regard to climate change mitigation and adaptation goals (1 in the "Water Supply, Sewerage, Waste Treatment and Remediation" sector, 5 from the "Energy" sector and 2 from the "Construction and Real Estate" sector). After verification of the criteria for a substantial contribution and DNSH, 5 activities were found to be aligned with the target, 1 partly aligned and 2 not aligned. No activities were found to be aligned with the climate change adaptation goal;
- 3 activities for the "Sustainable use and protection of water and marine resources goal", partially aligned;
- 3 activities for the Transition to a Circular Economy goal, of which 1 aligned, 2 partly aligned.

With reference to the capex associated with the "Sorting and recovery of materials from non-hazardous waste" activity, combined with the "Transition to a Circular Economy" goal, we note the intervention carried out by Acea Ato 2 for the recovery of sand from purification processes and the cleaning of sewerage networks for a total investment of approximately EUR 5.5 million in 2024.

Regarding foreign countries, only 1 activity is eligible and aligned, contributing to the climate change mitigation objective and relates to the "Water supply, sewerage, waste treatment and decontamination" segment.



8 activities are eligible for the Production area:

- 2 activities for the climate change mitigation goal;
- 6 activities for the climate change mitigation and adaptation goals.

These activities are mainly attributable to the "Energy" (4 activities), "Construction and Real Estate" (2 activities), "Transport" (1 activity) and" Professional, Scientific and Technical Activities" (1 activity) sectors. Following the analysis, 5 activities were found to be fully aligned with the climate change mitigation target, 1 was partially aligned and 2 were not aligned. No activities were found to be aligned with the climate change adaptation goal.



10 activities are eligible with reference to the Environment segment, which is mainly active in waste treatment:

- 7 activities with regard to climate change mitigation and adaptation goals (4 from the "Water Supply, Sewerage, Waste Treatment and Remediation" sector, 2 from the "Energy"sector and 1 from the "Construction and Real Estate" sector). Following the analyses, 7 activities were found to be fully aligned with the mitigation target, and of these, 6 activities were also aligned with the adaptation goal;
- 1 activity was aligned for the "Transition to a circular economy" goal;
- 2 activities were aligned for the Pollution Prevention and Control goal.



NETWORK AND PUBLIC LIGHTING

2 activities are eligible for the area, one falling under the "Energy" sector and the other under the "Construction and Real Estate" sector. One was fully aligned with the climate change mitigation goal, and another aligned with the climate change mitigation goal and also aligned with the climate change adaptation objective.



For the area, dedicated to research, innovation, design and laboratory activities at the service of Group companies, 1 activity in the "Water supply, sewerage, waste treatment and decontamination" sector is eligible, and fully aligned with the climate change mitigation objective. It is not aligned with the adaptation target. Intercompany activities are removed from the accounting of the KPIs, in accordance with the Regulation.



For the Commercial area, 5 activities addressing climate change mitigation and adaptation objectives are eligible, 3 in "Construction and real estate activities", 1 in "Water supply, sewerage, waste treatment and decontamination", and 1 in "Transport". 4 were aligned with the climate change mitigation goal, and one was not aligned. It is not aligned with the adaptation target. It is specified that the analysis excludes the electricity sales business, which is not included in the Taxonomy, and which covers 46% of the Group's 2024 turnover.

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The table below shows the list of Acea Group's eligible activities according to environmental goal, with an indication of the degree of alignment and the sectors within which there is at least one company where the activity is eligible.

Objective	Economic activities	Description of eligibility/alignment	Area
CCM/CCA	4.1 Electricity generation using solar photovoltaic technology	 Eligibility: ASM Terni, Cavallari and the companies in the Production Area operating/installing photovoltaic plants for the production of electricity. Alignment: plants operated by ASM Terni, Cavallari and the Production Area companies. Overall compliance with DNSH criteria for applicable objectives. 	Water, Environment and Production
CCM/CCA	4.5 Electricity generation from hydropower	Eligibility: ASM Terni and Acea Produzione operate hydroelectric power plants for the production of electricity. Alignment: the Group's power generation plants are run-of-river plants and have no artificial reservoirs. Overall compliance with DNSH criteria for applicable objectives.	Water and Production
CCM/CCA	4.8 Electricity generation from bioenergy	 Eligibility: the activity is carried out by Acea Ambiente, Orvieto Ambiente, Deco and Ecologica Sangro. They operate plants for the production of electricity through biogas recovery. Alignment: bioenergy power generation activity is compliant with all criteria and complies with industry BAT. Overall compliance with DNSH criteria for applicable objectives. 	Environment
CCM/CCA	4.9 Transmission and distribution of electricity	 Eligibility: the activity is carried out by ASM Terni and areti. They operate electricity transmission and distribution networks. Alignment: the activity involves transmission and distribution infrastructure or equipment which form part of the interconnected European system. Overall compliance with DNSH criteria for applicable objectives. Non-alignment: a residual percentage of areti's transformers contain PCBs. 	Water and Network and Public Lighting
CCM/CCA	4.13 Production of biogas and biofuels for use in transport and of bioliquids	 Eligibility: the activity is carried out by Acea Ato 2, which started up the biomethane upgrading plant in the Roma Nord and Roma Est treatment plants; Non-alignment: although the plants operated by Acea Ato 2 are registered with the quality system for biomethane producers, biomethane production is not yet at full capacity. 	Water
CCM/CCA	4.15 District heating/ cooling distribution	 Eligibility: Acea Produzione and Ecogena manage district heating and cooling distribution infrastructures. Alignment: Acea Produzione manages district heating networks that reach and exceed 75% of the heat generated. Overall compliance with DNSH criteria for applicable objectives. Non-alignment: the district heating networks managed by Ecogena do not reach the threshold value of 75% of heat generated, as required by Directive 2012/27/EU. 	Production
CCM/CCA	4.20 Cogeneration of heat/cool and power from bioenergy	Admissibility and non-alignment: (SII) is completing construction work on a co- generation plant that will utilise the biogas produced by the anaerobic digester from the Terni 1 treatment plant. The activity is therefore eligible, but it is currently not possible to verify whether it passes the technical screening criteria.	Water
CCM/CCA	4.30 High- efficiency co- generation of heat/ cool and power from fossil gaseous fuels	 Eligibility: Ecogena and Acea Produzione have methane-fuelled plants. Non-alignment: greenhouse gas emissions only in the operation phase exceed the maximum permitted limit of 100gCO₂/kWh. 	Production
CCM/CCA	5.1 Construction, extension and operation of water collection, treatment and supply systems	 Eligibility: Aguas de San Pedro and Consorcio Agua Azul manage the water supply service, water collection and drinking water system. Alignment: the activity meets the consumed energy threshold of 0.5 kWh/cm and complies with the DNSH criteria for the applicable targets. 	Water Overseas

Objective	Economic activities	Description of eligibility/alignment	Area
CCM/CCA	5.3 Construction, extension and operation of waste water collection and treatment systems	 Eligibility: Acea Ambiente operates the Chiusi plant that treats wastewater through biological oxidation. Alignment: wastewater treatment and collection systems meet net energy consumption thresholds. Overall compliance with DNSH criteria for applicable objectives. 	Environment
CCM/CCA	5.5 Collection and transport of non- hazardous waste in source segregated fractions	 Eligibility: Acea Ambiente, Aquaser, Ferrocart and Tecnoservizi operate in the transport and intermediation of liquid and solid waste. Alignment: Non-hazardous waste, collected separately and transported by Acea Ambiente, Aquaser, Ferrocart and Tecnoservizi, is separated at source and assigned for preparation for reuse or recycling. Overall compliance with DNSH criteria for applicable objectives. 	Environment
CCM/CCA	5.6 Anaerobic digestion of sewage sludge	 Eligibility: Acea Ato 2, Gori and SII operate wastewater treatment plants that can be equipped with anaerobic digestion compartments to treat sewage sludge and produce biogas. Alignment: Acea Ato 2 anaerobic digestion plants are equipped with systems to detect the accidental releases of biogas, which is transformed into biomethane to be injected into the natural gas network. Overall compliance with DNSH criteria for applicable objectives. Non-alignment: Gori and SII plants do not use biogas directly for electricity production, which is therefore not injected into the natural gas network nor used as fuel. 	Water
CCM/CCA	5.7 Anaerobic digestion of bio- waste	Eligibility: Acea Ambiente and Orvieto Ambiente operate composting plants dedicated to the treatment of organic waste. Alignment: Acea Ambiente and Orvieto Ambiente plants produce biogas and digestate from the digestion process of separately collected municipal organic waste. In addition, they implement a monitoring and contingency plan to minimise methane leaks in plants. Overall compliance with DNSH criteria for applicable objectives.	Environment
CCM/CCA	5.8 Composting of bio-waste	 Eligibility: Acea Innovation and Acea Infrastructure are involved in the installation and management of composting plants. Alignment: composting plants produce compost from separately collected organic waste. The compost produced is used as fertiliser according to EU and Italian regulations. Overall compliance with DNSH criteria for applicable objectives. 	Commercial, Engineering & Infrastructure Projects
CCM/CCA	5.10 Capture and use of landfill gas	 Eligibility: Orvieto Ambiente and Deco operate plants dedicated to capturing and utilising landfill gas. Alignment: all closed landfills did not become operational after 8 July 2020. Overall compliance with DNSH criteria for applicable objectives. 	Environment
CCM	6.15 Infrastructure enabling low-carbon road transport and public transport	 Eligibility: Acea Innovation, Umbria Energy and Ecogena manage and install electric vehicle charging stations. Alignment: the Group's infrastructure is dedicated to vehicles with zero tailpipe CO₂ emissions. Overall compliance with DNSH criteria for applicable objectives. 	Commercial, Production
CCM/CCA	7.3 Installation, maintenance and repair of energy efficiency equipment	 Eligibility: Acea Innovation, Umbria Energy and Ecogena are involved in the design, execution and marketing of energy efficiency devices. Non-alignment: Group companies do not, and are unable to, carry out an appraisal of the components used in the implementation of devices, in accordance with national legislation, because they install energy efficiency devices on third-party assets. 	Commercial, Production
CCM/CCA	7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	 Eligibility: ASM Terni, Acea Innovation, Umbria Energy and Ecogena install wall-boxes and charging stations on private land. Alignment: Ecogena, Acea Innovation, Umbria Energy and ASM Terni deal with the installation, management and maintenance of electric vehicle charging stations. Overall compliance with DNSH criteria for applicable objectives. 	Water, Commercial, Production

Objective	Economic activities	Description of eligibility/alignment	Area
CCM/CCA	7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	 Eligibility: ASM Terni, Adistribuzione and areti install and replace smart meters. Alignment: ASM Terni, areti and Adistribuzione install, manage and replace smart meters for gas, heating and electricity. Overall compliance with DNSH criteria for applicable objectives. 	Water, Networks and Public Lighting
CCM/CCA	7.6 Installation, maintenance and repair of renewable energy technologies	 Eligibility: Acea Ambiente, Orvieto Ambiente, Deco, Tecnoservizi, Acea Innovation and Umbria Energy install solar photovoltaic systems. Alignment: companies carry out on-site installation, maintenance and repair of photovoltaic solar systems, solar hot water panels, heat pumps, electricity or thermal energy storage units, micro-cogeneration plants, heat recovery/heat exchanger systems. 	Environment, Commercial
CCM	9.3 Professional services related to energy performance of buildings	 Eligibility: Ecogena carries out design and technical consulting activities aimed at increasing the energy efficiency of buildings. Alignment: the activity consists of energy efficiency consulting services, energy audits, energy performance contracting and energy services. 	Production
CE	2.2 Production of alternative water resources for purposes other than human consumption	 Eligibility: Acea Ato 2, AdF and SII implement solutions for the reuse of purified wastewater for industrial/irrigation use. Alignment: AdF supplies purified wastewater from the Punta Ala plant for the irrigation of the golf course owned and operated by the Golf Punta Ala company. Overall compliance with DNSH criteria for applicable objectives. Non-alignment: SII does not have a specific authorisation to reuse water, and Acea Ato 2 activity has not yet started, so the technical screening criteria cannot be considered to have been passed. 	Water
CE	2.3 Collection and transport of non-hazardous and hazardous waste	Eligibility: ASM Terni and Umbriadue. are authorised to transport non-hazardous and hazardous special waste. Alignment: ASM Terni only allocates a proportion of waste for preparation for reuse or recycling. Source-separated waste is not mixed with other waste streams and the quality and quantity of the waste collected is continually monitored and evaluated. Non-alignment: Umbriadue does not guarantee compliance with all DNSH criteria. ASM Terni only allocates a portion of waste for reuse or recycling.	Water
CE	2.7 Sorting and recovery of materials from non-hazardous waste	 Eligibility: Acea Ato 2, Demap, Ferrocart, Cavallari, Meg, S.E.R Plast and Tecnoservizi operate plants for the sorting and processing of non-hazardous waste streams into secondary raw materials. Alignment: Acea Ato 2, Cavallari, Ferrocart, Meg, Demap, S.E.R Plast and Tecnoservizi produce secondary raw materials from separately collected and transported waste. For materials in which case separate collection is mandatory, the activity converts at least 50%, in terms of weight, of the separately collected non-hazardous waste into secondary raw materials suitable for the substitution of primary raw materials in production processes. 	Water/Environment
WTR	2.1 Water supply	 Eligibility: Acea Ato 2, AdF, SII, Acea Ato 5, Gori, Gesesa, Acea Molise manage the water service, including water supply. Alignment: Acea Ato 2, Acea Ato 5, AdF, Gori, Gesesa and Acea Molise comply with the alternative criterion related to water leaks, calculated as required by ARERA Resolution 917/17, Ref. Macro-indicator M1. Overall compliance with DNSH criteria for applicable objectives. Non-alignment: SII does not always carry out loss recovery quantitative assessments and does not have concessions for all supply sources in use. Acea Ato 5 complies with the alternative criterion on water leaks, but is aligned at 79%. 	Water

Objective	Economic activities	Description of eligibility/alignment	Area
WTR	2.2 Urban waste water treatment	 Eligibility: Acea Ato 2, AdF, SII, Acea Ato 5, Gori, Gesesa, Acea Molise and Umbriadue. manage the water service, including the treatment of wastewater. Alignment: SII and Gori carry out their operations without deteriorating the sound ecological status and potential of any water body; the plants are equipped with a collection system and a secondary treatment system. Not aligned: pollutants from discharges into receiving waters, in relation to Acea Molise, do not meet the maximum levels prescribed by national regulations, Umbriadue does not carry out assessments of direct greenhouse gas emissions from the wastewater system and Gesesa does not have sufficient information for the exceeding of criteria. Instead, AdF, Acea Ato 5 and Acea Ato 2 guarantee compliance with the criteria for only a portion of the plants. 	Water
WTR	4.1 Provision of IT/ OT (information technology/ operational technology) data- based solutions for loss reduction	 Eligibility: Acea Ato 2 and Acea Ato 5 install technological solutions to control, manage, reduce and mitigate leaks in water supply systems. Alignment: Acea Ato 5 has implemented a WMS platform to display the entire water system of the company and manage the "Out of Service" mapping processes. Non-alignment: Acea Ato 2 is not aligned, as it does not meet the DNSH criteria related to the objectives of "Transition to a Circular Economy" and Pollution Prevention and Reduction. 	Water
PPC	2.1 Transport of hazardous waste	 Eligibility: Cavallari transports hazardous waste prior to the treatment, recovery or disposal of materials. Alignment: Cavallari is authorised to transport hazardous waste as per the Environmental Operators Register, also on behalf of third parties. 	Environment
PPC	2.2 Treatment of hazardous waste	 Eligibility: Berg operates a facility for the storage, treatment, disposal of hazardous and non-hazardous waste, and in particular performs biological treatment of hazardous waste and physical-chemical treatment. Alignment: Berg carries out its activities in accordance with the best available techniques and in a dedicated waste storage area. It also meets the criteria for handling mercury-containing waste. 	Environment

Activity 5.5-Collection and transport of non-hazardous waste in fractions separated at source overlaps with 2.3-CE-Collection and transport of non-hazardous and hazardous waste for the Environment sector.

With the rationalisation of activities, activity 5.7 -CCM- Anaerobic digestion of organic waste was valorised instead of 2.5 EC.

With the rationalisation of activities, activity 2.7 - CCM- Anaerobic digestion of organic waste was valorised instead of 2.5 EC.

With the rationalisation of activities, activity 2.7 - CE - Sorting and recovery of materials from non-hazardous waste was valorised instead of 5.9 CCM.

Activity 2.1-Water Supply, overlaps with 5.1-CCM-Construction, Extension and operation of water collection, treatment and Supply Systems, Treatment and Supply Systems for the Water Division and 5.2-CCM-Renewal of Water Collection, Treatment and Supply Systems, which is being rationalised.

Activity 2.2-Urban Wastewater Treatment, overlaps with 5.3-CCM-Construction, Extension and operation of waste water collection and treatment systems, and 5.4-CCM-Renewal of Wastewater Collection and Treatment Systems for the Water Area.

newal of Wastewater Collection and Treatment Systems for the Water Area.

Activity 2.2 (PPC) is eligible and aligned only for Berg, which contributed 0% to the three economic KPIs and is therefore not included in the relevant tables.



KPI DISCLOSURE SPECIFICATIONS

Accounting policy

This section describes the process for constructing the economic KPIs associated with eligible and aligned activities, in accordance with Annex I of Delegated Regulation (EU) 2021/2178. Specifically, the indicators were reconstructed using data from general, industrial and regulatory accounting; the share of each KPI for each economic activity is calculated in relation to total turnover, investments and operating costs exclusively for the expenses provided by the European Taxonomy.

Specifically:

- Eligible turnover: the numerator was considered to be the portion of consolidated net turnover derived from the sale of products and services, including intangible products and services (item Revenue from sales and services and other revenue and income in the consolidated income statement), related to economic activities eligible for the Taxonomy and, as the denominator, the total net turnover recorded in the Consolidated Financial Statements (ref. IAS 1, item 82, letter a).
- Eligible CapEx: the numerator considered was the portion of capital expenditure posted to the assets of the Consolidated Financial Statements, and defined based on the criteria under point 1.1.2.2 of the Delegated Act and the denominator was the total capital expenditure quantified on the basis of the criteria under point 1.1.2.1 of the Delegated Act. The denominator includes additions to tangible and intangible assets for the year, net of depreciation, amortisation, write-downs, revaluations and changes in fair value, excluding changes in fair value. Capitalised expenses were identified using data from the Consolidated Financial Statements, taking into account increases related to the IAS 16 categories (property, plant and equipment), IAS 38 (intangible assets) and IFRS 16 (leases) and IAS 40 (investment properties).

• Eligible opex: the numerator used was the portion of operating expenses associated with the eligible activities and defined on the basis of criteria under point 1.1.3.2 of the Delegated Act and the denominator was the total operating expenses quantified on the basis of the criteria under point 1.1.3.1 of the Delegated Act. The item includes direct non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.

Acea has drawn up a Green Financing Framework and on the basis of this, in January 2023 issued a Green Bond totalling €700 million to support initiatives focused on four areas: water resource management; energy efficiency; circular economy; and green energy. With regard to the KPI relating to capital expenditure and turnover, there is a contribution from green bond issues for 2024 amounting to EUR 265 million or 18% of the eligible capex.

Detailed tables illustrating the percentages of turnover, capex, opex related to taxonomy-eligible, aligned and non-aligned activities are provided in Annexes (paragraph 5.2). The table relating only to activity on energy production from nuclear and fossil fuels (4.30 "High-efficiency cogeneration of heat/cool and electricity from gaseous fossil fuels") found to be eligible and not aligned, and the tables showing the percentages of alignment on all 6 taxonomy objectives are also provided.

It is specified that, within the templates in paragraph 5.2, only the amounts for economic KPIs with a value other than zero were reported.

2.2 CLIMATE CHANGE

ESRS E1; ESRS 2 IRO-1

2.2.1 CLIMATE CHANGE STRATEGY

Environmental protection is a fundamental premise of the Group's business strategy, with major investments in implementing actions contributing to mitigation and adaptation to the climate crisis, from reducing the emission intensity of activities to the transition to a circular economy.

The main lines of action are set out in the Sustainability Plan, which includes interventions for the resilience and digitisation of water and electricity networks to increase the climate change adaptability of infrastructure, energy efficiency, emission reduction and renewable energy production, as well as water resource protection projects that contribute to climate change mitigation and adaptation objectives. Acea also continues to offer its customers certified energy with a guarantee of origin, energy produced from renewable sources and gas with associated emission offsetting.

In 2024, Acea also updated the climate scenario analyses for the third year relating to the Group's different businesses according to the recommendations of the ISSB-TCFD system, which are now supplemented by the ESRS (E1) standards, to continue refining the ability to understand and manage physical and transition risks and

the related opportunities. This activity was also conducted in line with Article 19 of the CSRD, which requires companies to provide detailed information on how climate change could affect their activities, by analysing physical and transitional risks.

ESRS E1-1; ESRS 2 MDR-T Acea's climate strategy for climate change mitigation envisages a process to reduce climate-altering emissions with a 'Well below 2° C' target. This commitment has been validated by the Science Based Targets initiative (SBTi), and is aimed at limiting the global temperature increase to well below 2°C compared to pre-industrial levels, in line with the trajectories of the Paris Climate Agreement. Acea's targets are aligned with the EU Paris-Aligned Benchmarks, as they envisage a reduction in emission intensity of more than 50% from the baseline year and formalised targets on Scope 3 emissions. The commitment, which was not formalised through a specific "Climate Change Mitigation Transition Plan" as defined by the ESRS, was presented to the Board of Directors as part of the Business Plan, of which it is one of the basic elements. The current commitment includes targets to 2032 and will

be supplemented in 2025 with climate neutrality targets to 2050. The paragraphs below outline the emission reduction targets, the decarbonisation levers identified, the actions and resources envisaged in the Plan, and the related final figures to 2024. The decarbonisation levers underlying the achievement of the SBT targets mainly include:

- the increase in renewable energy production (Scope 1 target);
- the implementation of energy efficiency measures at facilities and premises and increased energy purchases with G.O. (Scope 2 target);
- the increase in the portion of energy sold with G.O. and the gradual reduction of gas distribution, in line with market developments that envisage an increasing electrification in consumption (Scope 3 target).

With regard to the Group's direct emissions, we note that locked-in emissions are mainly from waste-to-energy plants amounting to approximately 293,000 tonnes of CO_2 in 2024, which are included in the calculation for the purposes of SBTi targets. In the scope of the Group's decarbonisation programmes, feasibility studies are underway on CCSU (Emission capture and storage) and an initial pilot plant is planned at the new waste-to-energy plant that will be built in Santa Palomba to serve the capital. The impacts, risks and opportunities related to climate change are outlined below, with details on the transition risks. With regard to the objectives, planned actions and respective allocated resources, reference is made to Section 2.2.3 "Climate Change Targets, Actions and Resources".

ESRS 2 SBM-3 ESRS 2 IRO-1 The impacts, risks and opportunities related to climate change have been identified through a dou-

ble materiality analysis with a process that covers the entire Group value chain and actively involves internal and external stakeholders, as described in detail under General Information in paragraph 1.6 "Stakeholder engagement", and are reported in the table of IROs relevant to the topic.

Specifically, Acea periodically conducts analyses on climate risk scenarios to strengthen its resilience strategies. The results of the analysis conducted in 2024 are shown below. The analysis involved the Group's operating companies that manage strategic assets such as power generation plants, water and electricity distribution infrastructure. The infrastructure considered is located in geographical areas where they are exposed to physical hazards that may lead to periods of operational disruption. Major climatic events that could compromise business operations include heat waves, fires, floods, heavy rainfall and prolonged periods of drought. Based on these factors, a climate risk map was developed to assess Acea's vulnerability and, where possible, quantify the economic impact, in line with CSRD guidance and, in particular, ESRS E1 standard, as described below. The analysis of resilience to climate change considers a short to medium and long-term time horizon.

The climatic risk analyses to assess transition and physical risks were carried out by carefully harmonising the methodology in line with the recommendations of the ISSB-TCFD system with the Group's Enterprise Risk Management methodology, with the aim of ensuring that the analyses carried out are aligned with the Group's strategic objectives, as described in paragraph 1.7 "Double materiality process, impacts, risks and opportunities".



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Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Climate change mitigation		 impact	Innovation of industrial processes to support ecological transition	+	medium	upstreamown operationsdownstream
Climate change mitigation		 impact	Development of energy models based on electrification of consumption and production from renewable sources	+	medium	own operations downstream
Energy		 impact	Reducing energy consumption by optimising industrial processes	+	long	upstream own operations
Climate change mitigation		 impact	Production of direct greenhouse gas emissions, related to the use of fossil fuels and waste-to-energy, and indirect emissions	<u>-</u>	medium	upstreamown operationsdownstream
Climate change adaptation		 impact	Low resilience of plants, infrastructure and networks to the effects of climate change	<u>-</u>	long	• own operations
Climate change adaptation		R risk	Damage to infrastructure and production sites due to the effects of climate change (rivers flooding, storms)		long	• own operations
Climate change mitigation		R risk	Tightening/introduction of carbon pricing schemes with effects on industrial processes		medium	• own operations
Climate change mitigation		R risk	Tightening of regulations related to the marketing of products and services with a low environmental impact (Green Claims Directive)		medium	• own operations
Climate change mitigation		O opportunities	Growing push towards renewable energy, with business opportunities in the green energy production sector		long	• own operations

⁺ Positive impact; - Negative impact; O Effective; O Potential



Transition risks

Various climate scenarios developed by international organisations, including in particular the International Energy Agency (IEA) and the Intergovernmental Panel on Climate Change (IPCC), were used to forecast the evolution of transition risks. The main scenarios used include:

- STEPS Stated Policies Scenario: based on climate policies already implemented by governments; it represents a future in which only the effects of current policies are reflected without necessarily achieving emission-reduction targets;
- APS Announced Pledges Scenario: based on climate commitments announced by countries, although not yet supported by concrete policy plans. It is a scenario that reflects a future with greater ambitions compared to STEPS;
- SDS Sustainable Development Scenario: represents a "well below 2° C" scenario and is based on an increase in clean energy policies and investments to achieve the main sustainable development goals;
- IEA NET ZERO by 2050 (NZE) Scenario: envisages achieving climate neutrality by 2050. This ambition would require a radical change in the energy and industrial sectors, with a transition to renewable energy sources, massive investments in carbon capture technologies and the phasing out of fossil fuels;
- SSP Shared Socio-economic Pathways Scenarios: five scenarios describing possible global socio-economic developments up until 2100; they help to assess the impact of climate policies on greenhouse gas emissions and understand different trajectories of socio-economic development.

For the identification of transitional climate risks and opportunities, an initial screening phase was conducted to identify the specific challenges of each business sector taking into account sector characteristics, market dynamics, emerging trends and existing and emerging regulations, with specific reference to European regulations and Directives, as well as global standards such as those defined by the TCFD taskforce and the Paris Agreement. As from January 2024, the TCFD (Task-Force on Climate-Related Financial Disclosure) transferred its mandate to the ISSB (International Sustainability Standards Board), the independent sustainability reporting

standard-setting body of the IFRS Foundation. Consequently, in this document we directly quote the ISSB-TCFD system meaning those same TCFD Recommendations. The analysis also took into account best practices adopted by global organisations and recommendations from sector and scientific reports.

The preliminary screening identified the main climate risks and opportunities that could potentially affect the Group's operations and value chain. The long list of potential transition risks and the preliminary results of the analysis were submitted to the risk owners of Group companies to prioritise the risks, based on the specific characteristics and activities of each company. In this way, the most relevant risks were identified for each corporate entity, allowing for a targeted analysis of potential vulnerabilities and opportunities, in line with the operational and strategic specific characteristics of individual entities. This approach was complemented by discussions with the corporate functions involved, identified on the basis of the pertinence and relevance of the risks and opportunities identified. The process included plenary meetings and one-on-one interviews to provide a better understanding of the risks, stimulate internal dialogue, reinforce the validity of the analysis, and at the same time, promote a corporate culture geared towards proactive risk management, the adoption of sustainable practices and the identification of opportunities.

With respect to relevant transition risks, companies are working to implement emission reduction strategies by investing in innovative technologies and/or adopting offsetting measures to also mitigate the financial impact, as described in the paragraphs below.

Physical risks

For the analysis of the Group's physical risks the IPCC's Representative Concentration Pathways (RCPs) scenarios were considered. Each scenario is associated with a level of global warming and provides an overview of how greenhouse gas emissions could evolve depending on the policies and practices adopted at international level. The following scenarios were considered for the analysis:

RCP Scenario	Scenario description					
RCP 8.5	RCP scenario 8.5 is the most extreme; it predicts an increase of more than 4° C by 2100 and it is believed that this could be reached if no mitigation policy is adopted . The high economic and demographic growth rates described in the Shared Socio-economic Pathway 5 (SSP5) Scenario favour this scenario, triggering most of the so-called climate "tipping points" with consequences that are difficult to model.					
RCP 4.5	RCP scenario 4.5 is the one considered most likely considering countries' current commitments . It envisages a temperature increase of between 2 and 3° C by 2100, well beyond the limits of the 2015 Paris Agreement and the Kyoto Protocol. Considering current commitments by countries, it is considered likely that 2.5°C will be reached by 2100.					
RCP 2.6	RCP scenario 2.6 is in line with the Paris/Kyoto agreements , with a temperature increase of less than 1.5° C by 2100, and calls for a 70% reduction in emissions between 2010 and 2100 with substantial changes in energy use and greenhouse gas emission reduction programmes by also acting on carbon dioxide, in addition to other gases with a very high Global Warming Potential (GWP) (methane, nitrous oxide, sulphur hexafluoride and other fluorinated gases).					

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For the representation of Business Interruption Days (BID) we chose to focus on the RCP 4.5 climate scenario, which represents projections that are closest to the current conditions and trajectories that could materialise, and the RCP 8.5 scenario, which represents the worst-case trajectory that could occur in the absence of significant changes in climate policies.

The analysis for the identification of physical climate risks was based on a structured methodology, consistent with the main international reference standards and guidelines.

The main climate risks that could affect the Group's assets were selected according to a logic of relevance, classifying them inter alia, in line with the requirements of the European Taxonomy DNSH into:

- acute physical risks, which include extreme events such as storms, flash floods and forest fires, in which case the impact has been calculated in Business Interruption Days (BID);
- chronic physical hazards, representing gradual climate changes, such as desertification, drought or changes in rainfall.

The analysis was conducted taking into account the risk and vulnerability for economic activity related to physical climatic hazards. An analysis was also conducted in this regard on the geographical coordinates of the main assets, including altitude. For the assessment, data from the IPCC ATLAS database, the CORDEX-Copernicus project and literature data from sources such as Nature or MDPI were used, and a climate projection analysis programme from seven different climate models was used. The programme calculates the average of the climate projections and the distributions at the 25% and 75% percentiles, specific to different geographical areas, providing a simulation for the prediction of climate change in different regions in the different scenarios, with an indication of the average prediction value, the expected variability and uncertainties associated with the climate projections provided by the different models.

The results were prioritised with the cooperation of Group companies' contact persons who, on the basis of their knowledge of past risk situations, provided further specific criteria appropriate for the classification of results:

- Water area: for companies operating in the Integrated Water System sector, the prioritisation of results was carried out with different criteria for the different types of plants. For sewage treatment plants, the "population equivalent" criterion served by each plant was adopted; for sewage and water lifts, prioritisation was based on energy consumption; for springs and reservoirs, the hourly flow rate criterion was used, expressed in litres per second:
- Environment area: for companies operating in the waste management, treatment and disposal sector, the analysis focused on the most economically important assets, such as waste-to-energy plants, excluding offices;
- Production area: for electricity production assets, the prioritisation criterion was established according to the type of plant: for solar panels, hourly production was used; for hydroelectric power plants, which represent greater value both economically and in terms of production, all results were investigated without additional selection criteria;

 Networks and public lighting area: for the company areti, which manages the electricity distribution network, the criterion adopted to assess the relevance of results was based on the annual transformation capacity of each primary substation.

ESRS E1-9 In the analysis, the estimated economic impacts are defined by considering two aspects: the loss of revenue associated with BIDs (Business Interruption Days) and the damage to the asset; no detailed economic quantification is available for the current year.

2.2.2 CLIMATE CHANGE POLICIES

ESRS E1-2The issue of climate change is a priority for the Acea Group, which is committed to identifying, assessing, managing and, where possible, reducing the impacts and risks generated by its operations or those linked to players across the value chain, both in terms of mitigation and adaptation.

The Group has formalised and adopted a number of commitments in this respect over the years. Specifically, the *Code of Ethics* defines climate change commitments within the broader sense of "environmental protection and enhancement", with the aim of defining a mitigation and adaptation strategy that includes measures to make energy use more efficient, enhance and exploit renewable sources, and increase infrastructure resilience. The Group's commitment to combating climate change is also confirmed in the "Integrated Management Systems and Sustainability Policy", corresponding to the call for specific focus on this issue in all technical management regulations, expressed by the ISO standard setter. Furthermore, in being aware that the impacts of climate change could affect the protection of human rights, Acea has reaffirmed its commitments to manage its operations in a way that is appropriate to containing this phenomenon in the Human Rights Policy.

Group policies are described in Section 1.6 of this document.

2.2.3 CLIMATE CHANGE TARGETS, ACTIONS AND RESOURCES

ESRS E1-4; ESRS 2 MDR-T With a view to managing significant climate-related impacts, risks and opportunities, the Group has formalised specific strategic objectives, in line with the policies adopted, so as to contribute to mitigating and adapting to climate change, which are included in the Sustainability Plan that also outlines the actions and investments for the action lines developed by operating companies.

Action lines	Action	IRO	Description V
Strategic aqueduct works	► Peschiera and Marcio works ► Other aqueduct works	I I R	 Innovation of industrial processes to support ecological transition Low resilience of plants, infrastructure and networks to the effects of climate change Damage to infrastructure and production sites due to the effects of climate change (rivers flooding, storms)
Strengthening the power grid	 Network extension Network continuity Strengthening medium-voltage substations 	I R	 Low resilience of plants, infrastructure and networks to the effects of climate change Damage to infrastructure and production sites due to the effects of climate change (rivers flooding, storms)
Digitalisation	 Broadband connectivity Smart Grid Business continuity Water and sewerage remote control Networks remote control 	I	 Innovation of industrial processes to support ecological transition Development of energy models based on electrification of consumption and production from renewable sources
Decarbonisation	 ► Photovoltaic ► Hydroelectric ► Renewables for self-consumption ► Energy efficiency ► Biomethane ► Purchasing electricity with G.O. ► Electricity sales with G.O. ► ESCO installations 	O I I I R	 ▶ Growing push towards renewable energy, with business opportunities in the green energy production sector ▶ Development of energy models based on electrification of consumption and production from renewable sources ▶ Reducing energy consumption by optimising industrial processes ▶ Production of direct greenhouse gas emissions, related to the use of fossil fuels and waste-to-energy, and indirect emissions ▶ Tightening of regulations related to the marketing of products and services with a low environmental impact (Green Claims Directive)

With reference to the risk related to the "Tightening/introduction of Carbon Pricing schemes with effects on industrial processes", it is noted that Acea currently manages this risk by adopting a strategy of purchasing CO_2 quotas in stages throughout the year, as described in the paragraph on Climate Change Metrics below.

ESRS 2 MDR-T, ESRS E1-3 The objectives and investments envisaged in the Sustainability Plan until 2028 are shown below, with the progress in the actions and related investments at 31.12.2024, with reference to the lines of action that contribute to the management and mitigation of impacts and risks and the development of opportunities relevant to climate change. For actions related to these strategic lines, only the capex was monitored, because opex represents a non-significant portion.

Action line	Action (company)	Target (a) 2028	Target progress	Overall 2024	Baseline 2023	Capex 2028 (EUR M)	Capex 2024 (EUR M)
	► Peschiera and Marcio Works	▶ Peschiera, completion of the planning/authorisation process	- 84%			1,266	133.6
Strategic aqueduct works	(Acea Ato 2)	► Marcio, completion of 4 works	47%			,	
	► Other aqueduct works (Acea Ato 2)	► Realisation 32 works	6%	2 works completed, 5 in progress	-	129	20.5
	► Network expansion (areti)	► 600 km prepared for connection of new loads	13%	80 km	-	167	33.3
Strengthening the	► Network continuity (areti)	► Work on 240 km of LV network and 840 km of MV network	26% LV 15% MV	63 km LV 126 km MV	-	476	56.1
power grid		▶ 285,000 beneficiary users	16%	44,869 users	-		
	► Strengthening medium-voltage substations (areti)	► Work on 34 primary and 3,800 secondary substations	38% primary 77% secondary	13 primary substations 2,929 secondary substations	-	100	34



24%

83,331

el Merendón

(Aguas de San Pedro

▶ +350,000 trees

(abroad)



ESRS E1-3; ESRS 2 Below is a description of the main actions implemented by Group companies in 2024, summarised in the previous Plan monitoring table.

The strategic works envisaged by the Plan in all areas, mainly water and electricity networks, contribute to the goal of adapting to climate change as they aim to increase infrastructure resilience and safety and, consequently, their ability to react and manage extreme phenomena by minimising service disruptions.

Specifically, in 2024, Acea Ato 2 participated in the definition of the Municipality of Rome's Climate Adaptation Strategy, to which it contributes through investments to increase resilience and safety and the strengthening of the drinking water and purification systems, the creation of a network for the distribution of purified wastewater for reuse for non-drinking purposes, and specific measures to mitigate the impact of heat waves and rising temperatures, including the extension of the drinking water network in squares and public spaces.

Works in progress mainly refer to:

- the continuation of the planning and authorisation process for the construction of the second section of the Peschiera-Marcio aqueduct, one of the main aqueducts in Europe, which today guarantees water supplies to 80% of Romans with water of the highest quality and purity. The second line will increase infrastructure resilience and secure the water supply of the capital and certain areas in upper Lazio;
- the commencement of the construction of the 4 strategic works on the Marcio aqueduct: Marcio aqueduct 1st lot, Ottavia Trionfale pipeline,1st phase of the doubling of the VIII Sifone, Monte Castellone pipeline;
- the commencement of five new strategic works to increase
 the resilience and safety of the aqueduct system serving ATO
 2 Lazio Centrale and neighbouring ATOs, specifically: securing
 the Frascati Bunker, a new drinking water plant serving the Spolverino Water Centre, works in the municipality of Trevignano, a
 connection between the Villa Parodi and Altipiani di Arcinazzo
 reservoirs, and an interconnection near Civitavecchia;
- Works to strengthen the electricity grid enabling the connection of new loads and distributed generation on electricity grids, and aimed at mitigating and/or preventing the risk of user disconnections;
- the programme of digitisation and remote control of electricity grids to increase the flexibility and resilience of the network. Specifically, with reference to the smart grid, activities were completed to create the ADMS platform for managing the MV and LV network, and tools are currently been developed to manage energy flexibility on the electricity distribution network to rebalance loads in critical grid situations.

In addition, in 2024, areti drew up the Resilience Plan, in accordance with Article 77 of the Consolidated Act on the Quality of Electricity [Testo Integrato della Qualità Elettrica] (TIQE - Annex A of Resolution 646/2015/R/eel and subsequent amendments), which includes works aimed at limiting the probability of disconnection in the face of the main risk factors affecting the network. The plan contains the interventions aimed at improving the resilience index of the medium and low voltage electricity network in the metropolitan city of Rome. The main critical risk factors assessed in the Plan refer to flooding due to particularly heavy rainfall or landslides and floods caused by hydro-geological instability, and heatwaves associated with prolonged periods of drought.



NEW PHOTOVOLTAIC WINDOW AT THE VATICAN MUSEUMS

In 2024 Acea built the new photovoltaic window at the Vatican Museums' Cortile delle Corazze to produce renewable energy, with an important aesthetic and functional value. Replacing the existing glass panes with new photovoltaic glass has resulted in a roof that provides thermal insulation and a shading effect that significantly increases the liveability of the spaces. The work, completed in just six months, was carried out without interrupting museum activities and without any disruption to visitors. In addition to the Corazze Courtyard, the project also includes the photovoltaic glass roofing of the Vignaccia warehouse in the Vatican Gardens, which will be completed by early 2025. In total, the two plants will provide 350 kW of peak photovoltaic power for a total production of around 500 MWh of electricity per year. The intervention was completed with a new lighting system to improve the lighting efficiency of the site and with the installation of 20 "fast" charging points on 10 stations and 2 "ultra fast" charging points on an additional station at the side of the Aula Paolo VI entrance to encourage the spread of electric mobility.

Actions aimed at climate change mitigation encompass investments in decarbonisation by Group companies, in line with the decarbonisation levers required by SMTi targets. The 2024 actions include:

- the commissioning of new Acea Produzione photovoltaic plants mainly in Lazio (Licodia Eubea, Nepi, Bomarzo, Canino, Picinisco, Ferentino and Scurcola) with an installed capacity of 153.6 MW;
- the upgrading of biogas plants at the Roma Nord and Roma Est treatment plants managed by Acea Ato 2 for the production of biomethane, with the completion of the sustainability certification, in accordance with Decree-Law 7/8/2024 on biofuels;
- the purchase of approximately 0.34 TWh of electricity in 2024, with a guarantee of origin (30% of total Group electricity consumption) for consumption by Acea Ato 2, Ambiente, Acea Innovation, Serplast, AdF, Geal, Nuove Acque and Orvieto Ambiente:
- Acea Energia's sale to end customers of approximately 2.5 TWh
 of electricity G.O. (46% of total electricity sold), and the offsetting of CO₂ emissions related to the quantities of methane
 gas distributed and sold during the year through the purchase of
 voluntary carbon credits, as reported in paragraph below;
- the implementation of the energy efficiency measures programme at the head offices and facilities of Group Companies to reduce energy consumption and related emissions. Specifically, the company areti contributes to the objective through interventions to reduce technical energy losses for the adaptation to the standards of the nominal voltages of the HV, MV and LV networks and optimise the MV network set-up (also thanks to the use of MV/LV transformers with very low losses).

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With regard to foreign companies, mention should be made of the work carried out by Aguas de San Pedro in Honduras, where the reforestation project in the Merendón area is continuing, which will lead to approximately 1.5 million fruit trees being planted by 2028, with a consequent benefit for the local communities also linked to employment opportunities. This project aims to reduce the environmental damage caused by deforestation through agroforestry practices and environmental education. To date, 1,200,000 trees have been planted, contributing to the capture of CO_2 emissions, the conservation of biodiversity and the protection of ecosystems.

ESRS 2 MDR-T The actions included in the Plan under the Decarbonisation action line contribute to achieving the targets validated by SBTi to 2032 (compared to the base year 2020), and already described in the climate change strategy:

- Scope 1: Reduce the intensity of direct emissions per unit of energy produced by 56% compared to the base year value (i.e. 0.71 tCO_ne/MWh);
- Scope 2: reduce indirect emissions related to energy withdrawals from the grid by 32% compared to the base year value (or 301,649 tCO₂e);
- Scope 3: Reduce indirect emissions related to the sale and distribution of natural gas by 30% compared to the base year value (or 439,514tCO₃e);
- Scope 1+3: Reduce the intensity of indirect emissions related to the production and sale of electricity by 56% compared to the base year value (or 0.42 tCO₂e/MWh).

Performance monitoring for the first three years of SBTi, published on the Acea's website as required by SBTi, showed significant progress in the achievement of targets for the reduction of direct emissions and those related to the sale of electricity. Emissions related to electricity withdrawals will be reduced over the next few years thanks to energy efficiency measures and the increased use of energy purchases with Guarantees of Origin, while emissions related to methane gas will be reduced in the second half of the period, thanks also to the progressive electrification of consumption in Italy, as already envisaged when setting the targets.

Overall, the decarbonisation actions implemented by the various companies in the Group contributing to the SBTi targets, involved investments totalling EUR 33.5 million.

2.2.4 METRICS RELATED TO CLIMATE CHANGE

ESRS E1-5 Energy consumption

The Group's total energy consumption in 2024 was approximately 3.560 GWh, of which 37% was from renewable sources. Of the non-renewable portion, about 20% refers to methane consumption, mainly used for power generation processes and heating, while 36% relates to Solid Recovered Fuel (SRF) and pulper for waste-to-energy processes at the San Vittore del Lazio and Terni plants. Electricity consumption, amounting to about 1 TWh, of which about 35% was purchased from certified renewable sources with G.O., is mainly attributable to the withdrawal and distribution processes of potable and non-potable water, purification systems, and consumption by plants and premises. With reference to the Other items, it is noted that: the figure included in Renewable consumption (8 MWh) refers to biodiesel fuel for automotive use used by Acea Molise; the figure included in Purchased renewable consumption (6 MWh) refers to consumption from hydroelectric renewable sources purchased and consumed by Consorcio Agua Azul; the figure in Consumption of self-generated non-fuel renewable energy (4,927 MWh) mainly represents self-consumption by Acea Produzione hydroelectric plants.

ESRS E1-5 Measurement, calculation and/or estimation methodology

Data on the consumption of fuels used for plant operations and space heating (e.g. methane, diesel and petrol) are measured by onsite meters with uncertainties ranging from \pm 0.5% to \pm 2%. The consumption of biogas, photovoltaics and paper mill FSCs/pulper come from meters (with an uncertainty of \pm 1%). Data on electrical, thermal and cooling energy consumed at the Group's facilities and used, for example, for water lifting plants are measured by meter readings with an uncertainty of \pm 1%. The electricity consumption at company offices is measured by reading the bills provided by Acea Energia. With regard to the energy consumption of the Environment segment, for Acea Molise and Gesesa, the figures for December are estimated on the basis of historical data. The quantities of fuel used for the fleet of Group Companies comes from fuel cards that record the filling up of vehicles.

ESRS E1-5 Total energy consumption expressed in MWh

ESRS_E1-5	Type of sources		31/12/2024
			MWh
	Methane - Natural Gas		419,929
	Diesel		67,989
	LPG		447
	Petrol		11,940
	FSCs - non-renewable portion		808,180
	Electricity		675,252
	Thermal energy		71
	Refrigeration energy		35
	Technical network losses		279,070
	Non-renewable sources		2,262,913
	Fuel consumption for renewable sources, including biomass	Biogas self-consumed in landfill (including flared biogas)	78,708
		Biogas self-consumed in digestion plant (including flared biogas)	79,704
		FSCs - renewable portion	798,543
		Other	8
		Total	956,963
	Consumption of electricity, heat, steam and cooling purchased or acquired from renewable sources.	Electricity G.O.	344,996
		Thermal energy - Renewable	3,856
		Photovoltaic	2,355
		Other	6
		Total	351,213
	Consumption of self-generated non-fuel renewable energy	Photovoltaic	2,298
		Other	4,927
		Total	7,224
	Renewable sources		1,315,400

ESRS E1-5 Details of source type iro total consumption

ESRS_E1-5	31/12/2024
	Percentage
Portion of fossil sources iro total energy consumption (%)	63%
Portion of nuclear sources iro total energy consumption (%)	0%
Portion of renewables iro total energy consumption (%)	37%

ESRS E1-5 Details of fossil energy consumption in high climate impact sectors

	31/12/2024
Consumption of fuel from coal and coal products (MWh)	0
Consumption of fuel from crude oil and petroleum products (MWh)	80,301
Fuel consumption from natural gas (MWh)	419,929
Fuel consumption from other non-renewable sources (MWh)	808,180
Consumption of electricity, heat, steam and cooling from fossil sources, purchased or acquired (MWh)	888,245



ESRS E1-5 Energy intensity rate

The energy intensity rate for the Group's high-impact sectors is 0.0006 MWh/ \in . The rate represents the ratio of energy consumption expressed in MWh to consolidated net revenue of the high-impact sectors. According to the NACE classification defined in Delegated Regulation (EU) 2022/1288, the sectors considered in the calculation are: D - electricity, gas, steam and air conditioning supply, E - water supply, sewerage, waste treatment and sanitation, and F - construction.

The revenue corresponding to these segments, amounting to EUR 3,660,861,000, represent part of the Group's total net revenue in the "Notes to the Consolidated Income Statement".

Energy consumption along the supply chain

Acea constantly raises awareness and monitors its supply chain with respect to specifically, energy issues using a specific questionnaire submitted to a representative panel of suppliers. In addition, the questionnaire also includes a specific section on water withdrawals, broken down according to process and civil use, with the aim of promoting supplier awareness regarding water use.

In 2024, the questionnaire was completed by 47 suppliers (out of the 100 invited), representing 42% of the total expenditure on goods/services and works, with data on: fuel consumption, electricity, fuel and refrigerant gas.

Total energy consumption for the supply chain was then estimated by comparing the consumption indicated in the questionnaire with total purchases for the year, which amounted to 95,389 MWh.

ESRS E1-5 Energy production

The Group produces electricity, totalling about 982 Gwh through the Production and Environment areas. More than 60% (around 600 GWh) comes from renewable sources, mainly from hydroelectric plants (52% of the renewable portion) and from waste-to-energy from paper pulp and FSCs (25%) at the two plants in San

Vittore del Lazio and Terni, as well as photovoltaics (10%). Photovoltaic production includes energy used for self-consumption. Non-renewable production relates to thermoelectric plants, mainly including the high-efficiency cogeneration plant at Tor di Valle fuelled by methane gas, and the non-renewable portion related to waste-to-energy managed by Acea Ambiente.

In 2024 Acea will have the following fleet of power generation plants:

- 8 hydroelectric power stations located in the Lazio, Abruzzo and Umbria regions for a total of 124.2 MW;
- 2 thermoelectric power stations located within the Municipality of Rome area: Montemartini (78.3 MW) and Tor Di Valle (28.5 MW), for 106.8 MW in total installed capacity;
- a photovoltaic park with a total capacity of approximately 170 MW, of which 153.6 MW will become operational by 2024;
- 2 waste-to-energy plants at San Vittore del Lazio and Terni, with a total available gross electrical power of approximately 62.5 MW. In addition, the Environment area produces electricity from biogas derived from the anaerobic digestion process at the Orvieto Ambiente technology hub, the sites managed by Deco and Ecologica Sangro and the Acea Ambiente composting plants at Aprilia and Monterotondo Marittimo. The figure for "Other" under energy production from renewable sources refers to biomethane produced by Acea Ato 2.

ESRS E1-6 Measurement, calculation and/or estimation methodology

The energy generated by the plants is measured by meters installed on site, with uncertainties varying between \pm 0.5% and \pm 5% depending on the type of energy produced. As an example, the thermal energy produced in the Tor di Valle cogeneration plant is measured at the generator discharge pipes, with an uncertainty of \pm 2%.

ESRS E1-5 Energy production from renewable sources

ESRS_E1-5	31/12/2024
	MWh
Hydroelectric energy	313,735
Photovoltaic energy	59,514
Biogas	76,658
FSC/Pulper - Renewable portion	147,595
Other	1,260
Energy production from renewable sources	598,762

Including the photovoltaic energy production of the plants operated by the equity-consolidated companies, total production is at approximately 173 GWh.

ESRS E1-5 Energy production from non-renewable sources

ESRS_E1-5		31/12/2024
		MWh
Thermoelectric power - from	non-renewable sources	132,879
Thermal energy - from non-re	enewable sources	101,214
FSC/Pulper - non-renewable	portion	148,742
Energy production from non-	renewable sources	382,835

ESRS E1-6 Greenhouse gas emissions

GHG emissions are quantified according to the GHG Protocol guidelines by classifying them into direct (Scope 1) and indirect (Scope 2 and Scope 3) emissions. With reference to Scope 3, it is noted that the table below only shows the categories relevant to

the Group, i.e.: goods and services purchased, capital goods, fuel and energy related activities (not included in Scope 1 or 2), business travel, use of products sold, investments. The table below shows the emissions classified against SBTi targets and CSRD perimeter.

ESRS E1-6 Gross emissions Scope 1, Scope 2, Scope 3

			Retrosped	ctive		Goal	s and target ye	ear
	SBT 2020	SBT 2023	CSRD 2024	%N/N-1	2025	2030	2032	Annual target % / base year
Scope 1 emissions [tCO ₂ e)								
Scope 1 emissions	428,043	372,227	398,813	NA	NA	NA	NA	NA
% of Scope 1 emissions covered by regulated emissions trading systems (%) (*)	39%	14%	13.4	NA	NA	NA	NA	NA
Scope 2 emissions [tCO ₂ e)								
Location based Scope 2 emissions	396,740	343,543	410,891	NA	NA	NA	NA	NA
Market-based Scope 2 emissions (tCO ₂)	301,649	305,888	421,755	NA	NA	NA	205,121	NA
Scope 3 emissions [tCO ₂ e)								
Total indirect emissions Scope 3	3,523,006	NA	2,306,415	NA	NA	NA	NA	NA
1 Purchased goods and services	9,713	NA	20,745	NA	NA	NA	NA	NA
2 Capital goods	1,929	NA	4,517	NA	NA	NA	NA	NA
3 Fuel and energy-related activities (not included in Scope 1 or 2)	2,850,252	1,682,901	1,537,403	NA	NA	NA	NA	NA
4 Upstream transport and distribution	NA	NA	NA	NA	NA	NA	NA	NA
5 Waste generated during operations	91,108	NA	NA	NA	NA	NA	NA	NA
6 Business trips	46	NA	336	NA	NA	NA	NA	NA
7 Employee commuting	1,937	NA	NA	NA	NA	NA	NA	NA
8 Leased assets upstream	NA	NA	NA	NA	NA	NA	NA	NA
9 Downstream transport	NA	NA	NA	NA	NA	NA	NA	NA
10 Processing of products sold	NA	NA	NA	NA	NA	NA	NA	NA
11 Use of products sold	439,514	680,241	697,006	NA	NA	NA	307,660	NA
12 End-of-life treatment of products sold	NA	NA	NA	NA	NA	NA	NA	NA
13 Leased assets downstream	NA	NA	NA	NA	NA	NA	NA	NA
14 Franchising	NA	NA	NA	NA	NA	NA	NA	NA
15 Investments	129,047	NA	46,408	NA	NA	NA	NA	NA

Scope 1 direct emissions mainly originate from the two waste-to-energy plants operated by the Environment area and the thermal power plants. Scope 1 emissions are calculated starting from energy consumption multiplied by specific emission factors (Defra 2024 coefficients) and also include contributions from certain processes in the Environment area (composting, treatment and disposal of liquid waste), sludge drying at treatment plants, consumption of petrol

and diesel vehicles, sulphur hexafluoride (SF $_6$) leaks that may occur at the areti and Acea Produzione plants, heating of premises and freon gas leaks/top-ups from air conditioners. In 2024 biogenic emissions, calculated from consumption for the Defra 2024 coefficients, amounted to approximately 290,000 tonnes of CO $_2$ e and derive mainly from energy production plants in the Environment area.



Only the thermoelectric power plants (Montemartini and Tor di Valle) operated by Acea Produzione are subject to the Emission Trading Scheme (ETS). In 2024 53,450 tonnes of emission volumes were entered into the EU-ETS, 13% of the Scope 1 total.

Indirect Scope 2 emissions are caused by electricity withdrawals related to covering the needs of the Group's plants and sites, consumption for public lighting and technical losses in the electricity grid, which amount to $83,721\,\mathrm{tCO_2}$ e (calculated using the location-based factor). For the location-based calculation, the Ispra 2024 coefficient of $0.3\mathrm{tCO_2}/\mathrm{MWh}$ was used, for the market-based calculation, the AIB-residual mix coefficient of $0.5\mathrm{tCO_2}/\mathrm{MWh}$ was used.

Scope 3 emissions are calculated on the CSRD perimeter, and relate mainly to the sale of electricity (67%) and the distribution and sale of natural gas (31%), referring to the following activities in 2024:

- the companies active in the commercial sector that sell energy and gas Acea Energia and Umbria Energy placed 5,573 GWh of electricity on the market (both on the free market and the protected market), with a 46% share sold with a Guarantee of Origin, and therefore not responsible for climate-changing emissions;
- the methane gas sold by the same companies in the commercial segment amounts to 217,963,737 scm;
- the Adistribuzione and Notaresco companies distributed 96,382,124 scm of methane gas (97% distributed by Adistribuzione).

In the investment category, the emissions by investee and non-consolidated companies are shown.

Each entry is calculated according to a specific methodology, according to the GHG Protocol:

- the emissions for the Capital Goods and Purchased Goods and Services categories are calculated using the estimated consumption data for the supplier fleet, by normalising data from the collected questionnaires (Hybrid method);
- emissions from Fuel and Energy activities are calculated by considering the electricity sold for the market-based coefficient (AIB-residual mix 2024) (Average data method);
- emissions from Business Trips were provided by the independent travel agency, which calculated them from the distance data for the relevant emission coefficients (distance-based method);
- emissions from the Use of Products Sold were calculated considering the gas sold and distributed by the Group, multiplied by the Defra emission coefficient (Average data method);
- emissions from Investments were calculated considering Group companies' Scope 1 and Scope 2 emissions that were not included in the CSRD reporting scope or in the value chain (Investment method).

Emission intensity

Emission intensity is calculated as the ratio of the Group's total emissions to consolidated revenues, in which regard reference is made to the relevant item in the notes to the Group's consolidated income statement.

ESRS E1-6 Emission intensity

ESRS_E1-6		31/12/2024
	Intensity of GHG emissions, location based (total GHG emissions vs net revenue)	0.00073 t CO₂/€
	Intensity of GHG emissions, market based (total GHG emissions vs net revenue)	0.00073 t CO₂/€

ESRS E1-7 Emission offsetting

Acea's commitment to combating climate change is also realised by participating in voluntary offsetting projects, specifically by purchasing certified carbon credits to offset the amount of methane gas sold on the market.

The carbon credits purchased for 2024 contributed to funding mitigation projects in Cambodia and Vietnam with tangible benefits for the local communities, totalling EUR 407 thousand credits:

- Southern Cardamom REDD+ in Cambodia will protect a key area in the Cardamom Mountains rainforest ecosystem, one of the 200 most important places for biodiversity conservation on the planet; the project will support around 30 villages by providing new and sustainable livelihood opportunities for more than 17,000 people, with additional activities related to food security, health education and environmental awareness.
- Dak Psi 3 and 4 Hydropower Project in Vietnam, construction and operation of a run-of-river hydroelectric project with total

installed capacity of 45 MW from two waterfalls in one of the poorest areas of Vietnam. The project will impact positively on the environment and local communities and will help reduce Vietnam's dependence on electricity imports.

The total amount of carbon credits verified, recognised and cancelled by the two projects are as follows:

- Southern Cardamom REDD+ Cambodia 10,000 credits;
- Dak Psi 3 and 4 Hydropower Project Vietnam 397,000 credits. In summary, credits amounting to 407,000 tCO2eq were cancelled during the year, through certified reduction Verified Carbon Standard (VCS) projects and developed outside the European Union. No Absorption project was used, and no information is currently available on any credits that are expected to be cancelled in the future.

ESRS E1-8 Internal carbon pricing

The internal carbon price is used to assign an economic value to carbon dioxide emissions. This internal price helps the company to integrate emission costs into investment and management decisions, incentivising the reduction of emission and supporting the transition to a low-carbon economy.

Acea Produzione, the only company in the Acea Group obligated by the EU-ETS market, buys CO_2 quotas from Acea Energia, which in turn procures them during the year from external counterparties, so as to diversify the purchase price, while at the same time buying and

selling electricity, with a strategy that allows it to decrease the price risk and not compromise margins from the managed business. The price is estimated during the budget definition phase on the basis of market scenarios acquired from leading rating companies that deal with market forecasting and modelling, and is also used in climate risk analyses according to the ISSB - TCFD system, in which Acea Produzione participates together with other Group companies, to assess the Carbon Pricing (EU-ETS) transition risk. In 2024, the estimated price used in forecasts and scenarios was EUR 80/tonne, compared to the final average price of EUR 63.7/tonne.

2.3 POLLUTION ESRS E2

ESRS E2; ESRS 2 IRO-1 The Acea Group's main operations that could generate pollution-related impacts include waste management, power generation, water management and energy distribution, all of which, if not managed properly, could affect the environment and surrounding ecosystems.

Pollution-related impacts, risks and opportunities have been identified through a double materiality analysis with a process that covers

the entire Group value chain and actively involves internal and external stakeholders, as described in detail under General Information in paragraph 1.5. As proof of the Group's commitment to pollution issues, Acea is also in constant communication with local institutions and municipalities. Specifically, the analysis assessed the effects of Group company operations on air, soil and water pollution, including microplastics and hazardous substances.

Pollution Impact Risks and Opportunities

Subtopic Sub-subtopic		IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Water pollution		 impact	Damage to human health and ecosystems due to the presence of pollutants in the water (emerging pollutants, microplastics, etc.)	<u>-</u>	short	• own operations
Substances of concern		 impact	Environmental impacts from the use of chemicals in the Group's industrial processes	<u>-</u>	long	• own operations
Air pollution		 impact	Damage to human health due to harmful atmospheric emissions from sites and installations	<u>-</u>	short	• own operations
Soil pollution		R risk	Risk related to environmental offence charges by the relevant authorities for non-compliance with the Consolidated Environmental Act		medium	• own operations
Water pollution		O opportunities	Development of process control technologies to contain pollutants		medium	• own operations

⁺ Positive impact; - Negative impact; O Effective; O Potential



2.3.1 POLLUTION POLICIES

ESRS E2-1; ESRS 2 MDR-T To strengthen its commitment to pollution prevention and control, the Acea Group has defined specific strategic objectives and over the years, implemented a series of policies aimed at identifying, assessing, managing and, if possible, mitigating its significant impacts and the risks related to this issue. In this regard, in its Code of Ethics, the Group emphasises its commitment to environmental protection through the prevention of pollution and minimisation of environmental risks and impacts. This commitment is also reflected in the Integrated Management and Sustainability Systems Policy in which the Group defines the protection of the natural environment as a priority. With a view to constant improvement, Acea also undertakes to define, pursue and monitor specific environmental objectives, taking into account the reference context, and identify actions and lines of action to increase its environmental performance. The Emergency Management Plans of companies operating in the water, energy and environmental sectors define the conditions that could prejudice the

continuity and quality of the services provided, classify emergency levels, describe preventive and remedial measures for types of unforeseen events, including pollution and environmental protection, and identify actions to limit the contamination of environmental matrices (air, water, soil).

Finally, Acea asks its suppliers to share its commitment to environmental protection, also with reference to minimising waste produced and implementing strategies to optimise the use of resources and reduce any direct and indirect negative impacts on the environment. Group policies are described in Section 1.5 of this document.

2.3.2 POLLUTION-RELATED OBJECTIVES, ACTIONS AND RESOURCES

ESRS 2 MDR-T; ESRS E2-3 The Group has formalised specific strategic objectives in the Sustainability Plan with a view to managing the relevant impacts, risks and opportunities related to pollution.

Action lines	Action	IRO	Description
Water quality	 ▶ Quality of purified water ▶ Quality of drinking water ▶ PFAS monitoring, MOE, microplastics in water 		 ▶ Damage to human health and ecosystems due to the presence of pollutants in the water (emerging pollutants, microplastics, etc.) ▶ Environmental impacts from the use of chemicals in the Group's industrial processes ▶ Development of process control technologies to contain pollutants
Innovation in the territory	► Reducing odour emissions	R	 Risk related to environmental offence charges by the relevant authorities for non-compliance with the Consolidated Environmental Act

With reference to the impact of "Damage to human health due to harmful atmospheric emissions from sites and plants, it is noted that Group Companies, particularly the Environment Area, work constantly to reduce polluting emissions from their plants and have continuous emission monitoring systems in place, also with the aim of managing and minimising the "Risk associated with environmental offence charges by the relevant authorities for non-compliance

with the Consolidated Environmental Act".

The objectives and investments envisaged in the Plan are shown below, with the progress in the actions and related investments at 31.12.2024, with reference to the lines of action that contribute to the management of impacts, risks and opportunities relevant to pollution. For actions related to these strategic lines, only the capex was monitored, because opex represents a non-significant portion.

Action line	Action (company)	Target @ 2028	Target progress	Overall 2024	Baseline 2023	Capex 2028 (EUR M)	Capex 2024 (EUR M)
	► Improving quality of purified water (Acea Ato 2)	► Reduction of non- compliant samples/ total samples analysed (ind. ARERA M6)	-	7.77%	9.6%	165	54.3
	► Improving quality of purified water (AdF)	➤ Reduction of non- compliant samples/ total samples analysed (ind. ARERA M6)	-	5.26%	11.28%	12.3	2.2
	► Quality of purified water (Gori)	► Reduction of total suspended solids to 91%	-	93%	-	50	0.02
Quality water	► Quality of drinking water (AdF)	► Improved quality of water provided (ind. ARERA M3)	-	4.68%	5.94%	3	0.6
		Extension of the Water Safety Plan to the total area covered (265 zones)	44%	5 zones	112 zones	-	-
	Water monitoring (Acea Infrastructure)	► 55 parameters of perfluoroalkyl substances (PFAS) and emerging organic micropollutants (MOE) in water	69%	8 parameters	30 parameters	-	-
		► 50 monitorings/year of microplastics in water	40%	20 monitorings	10 monitorings		
Innovation in the territory	Reduction of odour emissions (Acea Infrastructure)	► Strengthening of controls: 7 control technologies, 30 odorous species, 12 receptors	57%	1 technology 12 species 6 receptors	2 tech- nologies 5 species 2 receptors	0.5	0.2



ESRS E2-2 ESRS 2 MDR-T; ESRS 2 MDR-A In general, all Group Companies in the various businesses pursue the continuous improvement in the processes and resources used to reduce the environmental impact, including water, air and soil pollution. All plants have the main environmental certifications (in line with ISO 9001, 14001, 45001, 50001) and the plants in the Environment area are EMAS certified, attesting to the ongoing commitment to sustainability and reduction of the environmental impact, mainly in terms of optimising energy efficiency and minimising harmful emissions.

Water quality improvement measures are among the main actions implemented by Group Companies in 2024:

- Gl interventions by Acea Ato 2 and AdF to improve purified water, measured according to the M6 indicator of the Regulatory Authority for Energy Networks and Environment (ARERA). Indicator M6 measures the quality of purified water, defined as the rate overshooting the limits in discharged wastewater samples.
- Gl interventions to AdFs to improve purified water, as measured by ARERA's M3 indicator, which measures the quality of the water supplied. This indicator assesses the adequacy of water quality intended for human consumption by taking into account various parameters, such as the incidence of non-potability orders and the rate of non-compliant internal samples. AdF, for example, has an ongoing programme to extend Water Safety Plans to all supplied areas (Water Safety Zones -WSZ) to improve the quality of the drinking water supplied. The other companies in the area have already established Water Safety Plans in advance of the deadlines set by the relevant regulations;
- activities to extend the spectrum of analyses conducted to improve monitoring capacity for perfluoroalkyl substances (PFAS),
 Emerging Organic Micropollutants (MOE) and Microplastics
 (MP) in water. In 2024, eight additional test methods were validated by Acea Infrastructure for pharmaceutical components to be detected in wastewater, with specific focus on antibiotics, and monitoring campaigns were conducted on the Tiber River;
- the development of activities by Acea Infrastructure to expand odour monitoring capacity through the adoption of control technologies for a greater number of odorous species and receptors, with a significant impact on communities in the areas surrounding the Group's plants.

It is also noted that the Environment area sites have implemented a series ofinterventions on plants to reduce pollution: completion of the revamping of the flue gas treatment line at the Terni waste-to-energy plant; interventions to control and reduce accidental leaks for composting sites and the installation of containment basins to limit spills; the construction of roofing and waterproofing to reduce odorous emissions; and the efficiency of the company fleet vehicles, with the reduction of emissions and pollution into the atmosphere.

Finally, in 2024, Areti continued its experimentation with the use of vegetable dielectric oil in transformers, replacing traditional oil, to reduce environmentally harmful spills.

2.3.3 POLLUTION METRICS

ESRS E2-4; ESRS E2-5 Without prejudice to the policies on pollution and the actions that the Group's companies put in place, particularly at the plants, with the aim of reducing any emissions of pollutants, the quantities measured in 2024 for each pollutant covered by the standard, are shown below, broken down according to air, water and soil.

In 2024, air emissions wee only reported by companies in the Environment and Production area, as the water business has no emissions above the threshold to report. Emissions into water are mainly reported by companies operating integrated water systems, in cases where values are above the threshold. In this sense, Acea Ato 2 took into consideration the 4 plants with more than 100,000 population equivalent (Roma Nord, Roma Est, Roma Sud, Ostia), and Gori considering 7 (Angri, Area Nolana, Nocera Superiore, Scafati, Mercato San Severino, Foce Sarno, Punta Gradelle). In 2024, ground pollutant emissions were at zero, no spills were detected and no microplastics were used or generated.

ESRS E2-4 Measurement and calculation methodology

The water emissions reported for the Water area refer to the already existing and consolidated information flow to the supervising Ministry relative to the E-PRTR (European Pollutant Release and Transfer Register), because the thresholds envisaged by the CSRD are congruent with those of the E-PRTR itself (Italian Presidential Decree 157/2011). The values given for each plant derive from an average concentration value (mg/l) multiplied by the average flow rate for the year 2024.

Atmospheric emissions are monitored in a planned and consistent manner. The plants are managed according to UNI EN ISO 14001 and UNI EN ISO 45001 management standards. Acea Ambiente also applies the UNI EN ISO 50001 management system, while the waste-to-energy plants, the Orvieto Ambiente plant and the Deco and Ecologica Sangro sites also hold certification under the European EMAS III scheme. The main macro-pollutants of Acea Ambiente and Acea Produzione plants are monitored through Continuous Emission Monitoring Systems (CMMS). With reference to the Environment area, it is further specified that the monitoring of air pollutant emissions takes place both continuously and discontinuously, in accordance with sector regulations and the Integrated Environmental Authorisation of the sites, as specified in the site monitoring and control plan. For energy production sites, pollutant masses were calculated using the monthly average pollutant concentration for the flow rate of the flue gas for the fuel hours.

ESRS E2-4 Pollutant quantities of air, water, soil

ESRS E2_4	Pollutant	31/12/2024
		Kilograms
	Carbon monoxide (CO)	47,327
	Ammonium (NH ₃)	14,711
	Nitrogen oxides (NO _x /NO ₂)	206,181
	Sulphur oxides (SO $_{\rm x}$ /SO $_{\rm 2}$)	6,104
	Chromium and compounds (expressed as Cr) (9)	1
	Mercury and compounds (expressed as Hg) (9)	0
	Nickel and compounds (expressed as Ni) (9)	0
	Lead and compounds (expressed as Pb) (9)	1
	PCDD + PCDF (dioxins + furans) (expressed as TEQ) (11)	0
	Polycyclic aromatic hydrocarbons (PAHs) (15)	0
	Chlorine and inorganic compounds (expressed as HCl)	12,685
	Fluorine and inorganic compounds (expressed as HF)	310
	Particulate (PM ₁₀)	1,937
	Other	35,126
	Emissions broken down by pollutant - Air	324,383
	Total nitrogen	6,062,602
	Total phosphorus	859,861
	Total Organic Carbon (TOC) (expressed as total C or COD/3)	4,694,435
	Other	12,087,814
	Emissions broken down by pollutant - Water	23,704,713
	Emissions broken down by pollutant - Soil	0

Pollutants in the air

Among the pollutants in the air resulting from combustion processes are carbon monoxide (CO), nitrogen oxides (NO $_{\rm x}$) and sulphur oxides (SO $_{\rm x}$), which come from energy production activities at the thermal power plants, the two waste-to-energy plants and biogas production. Specifically, nitrogen oxides (NO $_{\rm x}$) are produced by the waste-to-energy plants of San Vittore del Lazio and Terni (46%), the Aprilia composting site (22%) and the Tor di Valle and Montemartini power plants (10%). The item "Other" includes certain compounds that the plants monitor as a whole in accordance with regulatory requirements and consists mainly of 28,000 tonnes of heavy metals (Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V) emitted from the Deco site.

Pollutants in water

Pollutants in water, including nitrogen, phosphorous and organic carbon, are mainly emitted by the water companies. Specifically, Acea Ato 2 is responsible for 88% of total nitrogen and phosphorus emissions through its 4 purification plants with more than 100,000 AE, and contributes 82% of total organic carbon emissions, with Gori contributing 15%.

The item "Other" consists of 98% of the chlorides emitted into water by the company Gori through its 7 plants serving more than 100,000 AE.



ESRS E2-5 The table below shows the substances of concern and substances of very high concern generated or used during the pro-

duction processes, subdivided according to hazard classes.

ESRS E2-5 Substances of concern and very high concern

ESRS E2_5	Risk class	31/12/2024
		Tonnes
	Germ cell mutagenicity	0
	Reproduction toxicity	0
	Endocrine system disruption to human health	0
	Endocrine system disruption to the environment	0
	Persistent, mobile and toxic or very persistent and very mobile properties	0
	Persistent, bioaccumulative and toxic or very persistent and very bioaccumulative properties	0
	Respiratory sensitisation	0
	Skin sensitisation	51
	Chronic danger for the aquatic environment	77
	Danger for the ozone layer	0
	Specific target organ toxicity (repeated exposure)	1
	Total amount of substances of concern generated or used during production or acquired	129
	Total amount of substances of very high concern generated or used during production or acquired	0

Substances of concern are reported by the company Simam and are used mainly for carpentry activities. The chemicals used are dosed online, with no direct human contact with these substances, including iron chloride (which impacts the skin), sodium sulphide and sodium hypochlorite (which can affect the aquatic environment). The quantities of chemical compounds are extrapolated us-

ing management software that records the quantities purchased for each order placed. Also of note is the presence of ammonia (NH $_3$) used for the flue gas treatment at the Terni waste-to-energy plant.

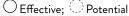
2.4 WATER AND MARINE RESOURCES ESRS E3

ESRS E3; ESRS 2 IRO-1 Impacts, risks and opportunities related to waters and marine resources have been identified through a double materiality analysis with a process that covers the entire Group value chain and actively involves internal and external stakeholders, as described in detail under General Information in paragraph 1.7.

Specifically, the analysis focused on companies that manage and process water resources to ensure a thorough understanding of the environmental impacts and informed management of water-related risks, which is fundamental to the Group's operations. With reference to these issues, Acea is also in constant contact with the municipalities where it operates and the relative territorial entities.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Acque	Water consumption	 impact	Reducing water consumption based on industrial process optimisation	+	long	upstream own operations
Acque	Water withdrawals	 impact	Increased reliability and resilience of water infrastructure and improved quality of service with the adoption of innovative technologies	+	long	own operations downstream
Acque	Water discharges	 impact	Alteration of the chemical composition of reservoirs	<u>-</u>	medium	• own operations
Acque	Water withdrawals	 impact	Reduced availability of quality water due to system inefficiencies (ageing networks, water losses, etc.).	-	short	own operations downstream
Acque	Water withdrawals	R risk	Scarcity of water resources due to climate change, affecting water service management		medium	• own operations
Acque	Water discharges	O opportunities	Development of solutions for wastewater treatment and reuse		medium	• own operations

⁺ Positive impact; - Negative impact;



2.4.1 POLICIES ON WATER AND MARINE **RESOURCES**

ESRS E3-1; ESRS 2 - MDR-P Water represents one of the key elements of Acea's business.

In confirming the importance it attributes to the sustainable management of water resources, the Group adopts a structured approach, also defining specific strategic objectives, aimed at identifying, assessing, managing and, where possible, reducing the impacts and risks associated with the issue, and seeking opportunities associated with the protection of water and marine resources. In this respect, as stated in the Acea Group's Code of Ethics and Integrated Management and Sustainability Systems Policy, the company has set as its main objective the sustainable management of the water and other natural resources used, maximising their uses, optimising reuse and recovery processes and promoting the efficient management of their end uses. The Group's commitment to the protection of water resources is also implemented through single policies and guidelines implemented by the companies operating in the Integrated Water Service, which include specific commitments to ensure high standards of purification quality, for example through the constant monitoring of discharged water with the aim of limiting pollution to surface water bodies, preventing environmental damage and promoting the protection of ecosystems and natural habitats. Group policies are described in Section 1.5 of this document.

2.4.2 OBJECTIVES, ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

ESRS E3-3; ESRS 2 MDR-T The management of the Integrated Water Service is one of the fundamental businesses of the Acea Group, which therefore pays special attention to the protection of water resources in all their forms. Furthermore, the objectives of protecting and conserving water resources are particularly relevant because the areas where Acea operates and/or impacts are all in areas of high water stress, as defined by the Aqueduct Water Risk Atlas map drawn up by the World Resources Institute (WRI).

ESRS 3-2 The Group has formalised strategic objectives linked to the impacts, risks and opportunities related to the issue and highlighted as relevant as a result of the double materiality analysis, fo-

- the management of the relevant impacts, risks and opportunities related to water risk-prone areas, including the improvement of water quality;
- responsibly managing impacts, risks and opportunities in terms of marine resources, including the nature and quantity of marine resource products (such as gravels, deep-sea minerals, fish products) used by the company; and
- reducing water consumption, including an explanation of how these targets apply to water risk-prone areas, including those with high water stress.

3

The plan lines of action with reference to the IROs relevant to the issue are shown below.

Action lines	Action	IRO	Description
Optimisation of the sewage treatment system	➤ District metering of the sewerage network ➤ Upgrading purification	I	▶ Alteration of the chemical composition of reservoirs
Digitalisation	▶ Water and sewerage remote control	I	► Increased reliability and resilience of water infrastructure and improved quality of service with the adoption of innovative technologies
Water quality	 ▶ Quality of purified water ▶ Quality of drinking water ▶ Monitoring perfluoroalkyl substances (PFAS), microorganic pollutants (MOE), microplastics (MP) 	I	▶ Alteration of the chemical composition of reservoirs
Reduction in losses	▶ Reduction in lost volumes	I I R	 Reducing water consumption based on industrial process optimisation Reduced availability of quality water due to system inefficiencies (ageing networks, water losses, etc.). Scarcity of water resources due to climate change, affecting water service management
Circularity of resources	▶ Wastewater reuse	0	▶ Development of solutions for wastewater treatment and reuse
Water resilience	► Modelling water needs ►Aquifer modelling	R	► Scarcity of water resources due to climate change, affecting water service management

The objectives and investments envisaged in the Sustainability Plan until 2028 are shown below, with the progress in the actions and related investments at 31.12.2024, with reference to the lines of action that contribute to the management and mitigation of impacts and

risks and the development of opportunities relevant to water, water consumption, water withdrawals and water discharges. For actions related to these strategic lines, only the capex was monitored, because opex represents a non-significant portion.

Action line	Action (company)	Target (a) 2028	Target progress	Overall 2024	Baseline 2023	Capex 2028 (EUR M)	Capex 2024 (EUR M)
Optimisation of the source	► District metering of the sewerage network (Acea Ato 2, Acea Ato 5)	▶1,930 km of network	16%	371 km	-	96	25.0
of the sewage treatment system Upgrading purification (Acea Ato 2, Acea Ato 5, AdF, Gori, Gesesa)	► Work on 46 treatment plants	20%	9		335	41.2	
Reduction in	► Reduction in lost volumes (Acea Ato 2, Acea Ato	► Reduction in the volume of water lost of 93 Mcm (vs 2023)	34%	457 Mcm lost	489 Mcm lost	952	267.3
losses	5, AdF, Gori, Gesesa)	► Losses 41.1% (-5.6 p.p. vs 2023)	-	44.7% (-2 p.p. vs 2023)	46.7%	, , ,	207.0
Circularity of resources	► Wastewater reuse (Acea Ato 2, AdF, Gori)	▶7 Mcm/year for reuse	41%	2.9 Mcm (3.4 Mmc on CSRD perimeter)	-	12	0.02

ESRS E3-2; ESRS 2 MDR-A; ESRS 2 - MDR-T In accordance with the policies adopted by Acea, aimed at managing the impacts, risks and opportunities associated with issues related to water and marine resources, the Group implemented measures during 2024 to achieve its water and environmental protection goals.

Specifically, in view of various internal assessments conducted and recent studies by ISPRA and CMCC (Euro-Mediterranean Centre on Climate Change), an action strategy was developed along a number of main lines, such as: the containment of losses, both physical and commercial, efficiency gains in networks and interconnection of aqueduct systems, safeguarding of supply sources, with a view to preventing risks and protecting current and future needs, digitalisation of water networks and measurement methods. In terms of of reducing both physical and commercial water losses, day-to-day water management is implemented in a responsible and efficient manner through several specific lines of action such as the district metering of water networks, combating misuse and optimising metering and monitoring.

In 2024, all companies in the Water area continued to carry out interventions aimed at reducing losses, mainly related to the digitisation and district metering of networks, but also water reclamation, meter replacements and work on pipelines, which reduced losses to about 45% as a calculated average figure across all Group Companies. Metrics include the Group water balance.

The companies in the area also constantly strive to improve the quality of the water distributed. This objective, reported in the environmental goals, includes constant monitoring of the resource with analytical controls, in addition to those carried out by the local health authorities, both on drinking water intended for users, which is of fundamental importance given its health repercussions, and on wastewater returned to the environment after purification treatment, which is functional in guaranteeing the regeneration of aquatic ecosystems and water bodies, and generally, the environmental quality of the territory. With regard to the optimisation of the sewage treatment system, we note specifically:

- the implementation of interventions to optimise the treatment sections of the Acea Ato 2 and AdF purification plants, with the aim of minimising going over the BOD, COD, SST, total phosphorus and nitrogen parameters;
- upgrading of purification, through centralisation, efficiency and decommissioning of plants aimed at increasing overall purification efficiency. Specifically, Acea Ato 2 extended two treatment plants and decommissioned four inefficient plants with an investment of EUR 28 million;

Compliance with drinking water analyses for all companies within the scope of reporting is between 96% and 100%. The ARERA indicator (M3b) requires compliance with percentage threshold values of samples (for the non-compliant) on drinking water analyses. Acea carries out extensive analyses, exceeding those stipulated by regulatory requirements. Some parameter overruns may occur, but the values of compliance certifications recorded by the Group meet ARERA requirements to ensure full service delivery.

With regard to strengthening resource circularity processes, we note the implementation of measures for the recovery and reuse of purified waste water to reduce the consumption of drinking. For example, wastewater is used for cleaning the forecourts at the Chiusi wastewater treatment plant, used as technical water for washing equipment, sand and screenings at Gori sites, or used as industrial water at Acea Ato 2 sites. AdF also provides reclaimed wastewater to a third party for the irrigation of a golf course as part of the circular economy.

With a view to the circularity of resources, we also note the adoption at Acea Ambiente sites of innovative systems for the recovery and treatment of the first rain water for reuse as industrial water (Terni, Orvieto Ambiente, Aprilia, and Monterotondo Marittimo sites) or for fire-fighting and dust abatement (Orvieto Ambiente), as part of programmes for the continuous monitoring and reduction of water consumption. In addition, demineralised water is produced from rainwater at the waste-to-energy plant in San Vittore del Lazio and reused entirely in the process with zero discharge into the environment.

2.4.3 WATER AND MARINE RESOURCES METRICS

ESRS E3-4 At Acea, water resources are used in various industrial processes, such as electricity production, the compost generation process, the cleaning of water treatment and anaerobic digestion plant compartments, as well as for hygienic and sanitary uses and, in lesser quantities, for laboratory activities.

All Group companies are committed to reducing the consumption of drinking water. Specifically, programmes to reuse the recycled portion, including by reusing purified water in the plants, as outlined in the previous section. Specifically, in 2024 all Acea Ato 2's industrial water plants became fully operational, allowing for the recovery and reuse of approximately $2.8\ \mathrm{million}\ \mathrm{cubic}\ \mathrm{metres}\ \mathrm{of}\ \mathrm{purified}$ water for industrial purposes. Out of the approximately 3.4 million total cubic metres of recycled and reused water shown in the table, 83% refers to Acea Ato 2. Companies in the Environment area limit their use of drinking water, mainly utilising water from wells and adopting rainwater recovery systems, as described in the previous paragraph. The reuse of treated waste water is an effective response to water stress in Acea's areas of operation, but specific regulatory interventions are required to further expand its potential. In this sense, European Regulation 2020/741 on the reuse of treated water in agriculture, besides introducing important requirements, facilitates the option of increasing this reuse.

2024 data on water withdrawals, quantities of water recovered and reused, and total water consumption, is shown below for all from high water stress areas, as recorded by the World Resource Institute's Aqueduct Water Risk Atlas tool.



ESRS E3-4 Water withdrawals

ESRS_E3-4	ESRS_E3-4 Water use	
		m ³
	Water for industrial purposes	1,169,225
	Water for civil purposes	2,833,045
	Water withdrawals	4,002,270

ESRS E3-4 Volumes of recycled and reused water and stored water stored

ESRS_E3-4	31/12/2024
	m ³
Total volume of recycled and reused water	3,377,247
Total volume of stored water	15,252
Changes in the volume of stored water	80

ESRS E3-4 Water consumption

ESRS_E3-4	Water use	31/12/2024	
		m ³	
	Water for industrial purposes	4,434,302	
	Water for civil purposes	1,850,638	
	Water consumption	6,284,940	

ESRS E3-4 In the case of water for industrial purposes, this mainly refers to water recovered from purification and treated by Group companies themselves; regarding the volumes of reuse of purified water recorded, for example, by Acea Ato 2 (62% of the total consumed for industrial purposes), these refer to uses within the wastewater treatment process, for the maintenance and cleaning of compartments such as the sludge lines and initial pre-treatment. This reduces the use of water resources according to a circular economy logic. Other industrial uses include recovered rainwater. The Monterotondo Marittimo composting plant has a rainfall recovery system that, after phytodepuration, enables the collection of water into special aerated reservoirs both as a reserve for fire-fighting and as a reserve of industrial water for reuse in processes.

The water consumed for civil purposes, i.e. sanitary use at the company's premises, is mainly supplied from public waterworks (99%). The quality of the same water is regulated in Italy by Legislative Decree No. 18 of 23 February 2023, which implements Directive (EU) 2020/2184 on the quality of water intended for human consumption.

Water consumption is measured for 68% by direct measurement, 32% by best estimates, and a very small portion (0.1%) by sampling and extrapolation.

ESRS E3-4 Water intensity rate

ESRS_E3-4	31/12/2024
	m³/MIn€
Water intensity rate	1,472

The water intensity rate is calculated as total water consumption in m³ compared to net revenues from own operations in millions of euro; Regarding the value of consolidated net revenue, reference is made to the relevant item in the notes to the Acea Group consolidated income statement

Group Water Balance and Loss Reduction

The issue of containing leaks in water distribution networks, which all Group Companies are committed to, is at the heart of sustainable water resource management, and requires constant monitoring of networks to identify leaks or intercept other anomalies and intervene promptly. The Business Plan envisages major investments for the district metering of networks aimed at optimising operating pressures and reducing lost volumes, focusing on field losses starting in the most critical districts. The adoption of georeferencing systems enables constant improvements to the monitoring process, based on the verification and calibration of the meters installed on the sources and in the drinking water plants, and the expansion of the census and georeferencing of networks to detect leaks.

The water balance of the Water area Group company is shown below, with the evaluation of losses carried out in line with ARERA Resolution 917/17 R/IDR, which requires water losses to be calculated across the entire perimeter of the aqueduct system (and not only the distribution network) and include apparent losses. The consolidated Group figure is the total of the amounts from the different companies in the perimeter.

Acea Group Water Balance	u.m.	2024
drinking water collected from the environment or from other systems and fed into the aqueduct systems	Mm³	1,137.6
surface water	Mm³	30.1
from wells	Mm ³	310.7
from springs	Mm ³	707.5
water collected from other aqueduct systems	Mm ³	89.4
total drinking water leaving the aqueduct system	Mm ³	638.5
total drinking water dispensed and billed in the network	Mm^3	540.9
total drinking water authorised and not billed in the network	Mm ³	50.6
total drinking water exported to other systems	Mm ³	43.3
total metered drinking water losses	Mm ³	3.7
Loss assessment according to ARERA Resolution 917/17 R/IDR		
total Group water losses	Mm³	499.1
water loss percentages	%	43.9
Treated water Acea Group		
water treated at the treatment plants	Mm^3	817.7
treatment plants	no.	632

It is noted that withdrawals for the water balances of the companies in the Water business, as well as withdrawals for the Group's civil and industrial water consumption, illustrated above, are made in areas at potential risk of water stress, as analysed using the World Resource Institute's Aqueduct Water Risk Atlas tool.

2.5 BIODIVERSITY AND ECOSYSTEMS ESRS E4

ESRS E4; ESRS 2 IRO-1 Based on their typical activities such as water supply, energy production and distribution, and waste management, Acea Group Companies could impact on biodiversity. On this basis, Acea focuses closely on protecting ecosystems, as defined in the procedures of the Environmental Management Systems, which pursue continuous improvements in reducing impacts, in the assessments for the planning and creation of plants, as well as in managing operational areas.

Biodiversity-related impacts have been identified through a double

materiality analysis with a process that covered the entire Group value chain and actively involved internal and external stakeholders, as described in detail under General Information in paragraph 1.7.

Specifically, the analysis focused on activities that interact with the natural environment, to provide an in-depth understanding of ecological impacts and informed management of the activities with a potential impact. As a result of this analysis, no relevant opportunities or risks were identified with regard to biodiversity.

ESRS 2 SBM-3

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Impacts and dependencies in terms of services / ecosystems		 impact	Restoration of ecosystems through renaturation (planting, etc.)	+	long	• own operations
Impacts on the extension and condition of ecosystems		 impact	Alterations in the environmental balance of ecosystems caused by the presence of Group sites and plants on the territory	<u>-</u>	long	• upstream • own operations

+ Positive impact; - Negative impact; O Effective; O Potential

ESRS 2 IRO-1 As part of its dual materiality process, Acea identified and assessed dependencies on biodiversity, ecosystems and related services at its operating sites and upstream and downstream along the value chain. An analysis of the physical, transitional and systemic risks with regard to biodiversity is not available. A new integrated transition plan is being developed, which will include climate, resources and nature and for the first time in 2025, will consider opportunities, physical, transition and systemic risks in terms of biodiversity.

ESRS E4 SBM-3 For the purpose of identifying and assessing the relevant impacts, risks and opportunities relating to biodiversity and ecosystems, Acea has identified its sites/plants located in high biodiversity areas, i.e. nationally-derived Protected Natural Areas (EUAPs) and Natura 2000 Network Sites (Sites of Community Interest, Special Areas of Conservation and Special Protection Areas), mapping the infrastructure of the Group's main companies. The analysis conducted on over 23,000 sites/plants, including pylons but excluding underground electricity grids and pipelines, showed that less than 5%, could have significant impacts on biodiversity whereas around 10% represent potential interference in biodiversity-rich areas. The analyses conducted on the electricity distribution network showed interference with protected areas over approximately 400 km of network. No plants from the Environment Segment, carrying out waste-processing activity, are located in the aforesaid areas.

In the analysis, Acea also identified high biodiversity priority areas by calculating the relative Environmental Fragility Index (IFA) to assess the different habitats included and the portion of land occupied, the fragility of the habitat and the type of sites/installations present for each of the protected areas intersected.

The IFA definition is based on the information provided by the Nature Map, calculating the ratio between the area of each habitat and the protected area containing it, and multiplying this value by the habitat's own ISPRA-defined environmental fragility. For each protected area, the IFA was defined by totalling the environmental fragility values for the habitats, and an association was created with the Group's highest impact facilities in the area. The product between the IFA and the area intersected by the plants made it possible to identify twelve "priority" zones, the first eight with potential impacts related to sites/facilities, the last four with potential interference with electricity distribution networks.

An awareness of the potential interference enables the optimisation of operations and companies have planned and/or implemented various actions to safeguard biodiversity, some in "priority" areas with a high level of biodiversity.

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Group companies with plants in the area	Natural area	Type of protected site	
Gori	Monti Lattari Regional Park	EUAP	
Gori	Dorsale dei Monti Lattari	SCIs-SCZs	
Acea Ato 2	Piana di S. Vittorino - Sorgenti del Peschiera	SCIs-SCZs	
Acea Ato 2, areti	Riserva naturale Valle dell'Aniene	EUAP	
Gori	Parco regionale bacino fiume Sarno	EUAP	
Gori	Monte Mai and Monte Monna	SCIs-SCZs	
Acea Ato 2	Farfa River (medium-high course)	SCI-SAC/SPA	
cea Ato 2, areti Riserva naturale Litorale romano		EUAP	
areti	Parco regionale urbano Pineto		
areti	Castel Porziano - coastal strip	SCIs-SCZs	
areti	Castel Porziano - presidential estate	SPAs	
areti Riserva naturale dell'Insugherata		EUAP	

Acea sites/plants analysed, with potential impacts on biodiversity and protected areas intersected





(aqueduct, sewers, purification)



· WTE and waste treatment plants



Production of electricity



Electricity transmission and distribution primary substations, pylons and grids

2,290 sites/plants in protected areas (10%) and 404 km of electricity grid (27%)



1,145 sites in protected areas with potential impact (5%) for a total surface area of 223.4 hectares

404 km of electricity grid with potential impact (27%)

type of areas: land and marine

130 protected areas intersected







NOTE: where SCIs/SCZs and SPAs coincide, they are only considered once under SCIs/SCZs.

2.5.1 BIODIVERSITY AND ECOSYSTEM PROTECTION STRATEGY

ESRS E4-1 A new integrated transition plan is being developed that will include climate, resources and nature, and will be completed by 2025.

The preservation and enhancement of biodiversity are among the environmental priorities of Group's companies, which are committed when carrying out their activities to contain the factors responsible for the loss of biodiversity - avoiding the overexploitation of natural resources, the introduction of invasive species and the pollution of air, water and soil - and implementing measures to restore ecosystems, wherever possible.

To this end, Group Companies manage their processes in compliance with the environmental authorisations which each plant is subject to, striving to safeguard the flora and fauna present and protect the natural environment, including by adopting the best available technologies and the best environmental management practices. Specifically, the activities involved in the Integrated Water Service are aimed at the maintenance of optimal environmental conditions and sites where water is drawn, near to springs, are managed with attention to the conservation of existing ecosystems and, more generally, the preservation of the water flow. Likewise, with treatment activities,

the primary goal is that discharges, after appropriate treatment at Acea plants, comply with the limits established by regulations in the sector and do not damage but rather protect the natural habitats of the receiving bodies of water. Targets for improving the purification efficiency of some water companies form part of this commitment.

As far as hydroelectric power stations are concerned, Acea Produzione manages water withdrawals and releases in compliance with the concessions issued by the relevant authorities and with current legislation; for all reservoirs, management projects are defined with the relative impact studies for protected areas, to ensure the maintenance of the reservoir capacity and safeguarding of the quality of the stored water and the recipient water body, as well as guaranteeing the functioning of the discharging and intake bodies (Italian Legislative Decree no. 152/2006, Ministerial Decree 30/06/2004 and subsequent amendments). The company also provides for the protection of the habitats of all species present in order to mitigate the effect of the artificial barrier of the dams, which interferes with the natural migration of fish and the gradual sedimentation of the riverbed, with consequent changes in the native flora of the banks. Protection of the aforementioned basins ensures the living conditions of the "resident" and "migratory" birds, which use these sites for reproduction and feeding even during migration.

2.5.2 BIODIVERSITY AND ECOSYSTEM POLICIES

ESRS E4-2 The Acea Group recognises the priority importance of protecting the environment and is committed to managing environmental risks through policies to ensure the integrity of ecosystems and the protection of biodiversity, and assessing and managing relevant impacts, risks, dependencies and opportunities in this area. Specifically, the Code of Ethics defines the objective of protecting the territories in which Group companies operate, also with specific attention to combating deforestation. This commitment extends to the value chain based on adherence to the Code of Ethics, which requires that suppliers also share, inter alia, the principles of biodiversity and ecosystem protection, thus contributing to responsible and sustainable environmental management. The protection of the natural environment, biodiversity and ecosystems is a commitment confirmed in the Integrated Management and Sustainability Systems Policy, which aims to guide the operations of various management systems on the subject, as well as in the Human Rights Policy, where the company's focus on this issue is highlighted. This document formalises Acea's commitment to safeguarding the integrity

of ecosystems while respecting the community and the intergenerational pact, including through the implementation of environmental and energy management systems, which define objectives, improvement programmes and monitoring tools to prevent and reduce the environmental impacts related to Group company operations. Group policies are described in Section 1.5 of this document.

2.5.3 OBJECTIVES, ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

ESRS 2-MDR-T; ESRS E4-4; ESRS 2 MDR-A With a view to managing the relevant impacts, risks and opportunities related to biodiversity and the protection of ecosystems, the Group has formalised specific strategic objectives, in line with the policies adopted, included in the Sustainability Plan, which also outlines the actions and investments planned up to 2028.

Action lines	Action	IRO	Description V
Biodiversity	 Removal of high-voltage pylons Sarno basin reclamation Ecosystem Protection Plan 	l I	► Alterations in the environmental balance of ecosystems caused by the presence of Group sites and plants on the territory ► Restoration of ecosystems through renaturation (planting etc.)

Below are the objectives and investments foreseen in the Sustainability Plan to 2028 and the progress of the actions and related investments as of 31.12.2024, with reference to the lines of action that contribute to the management and mitigation of the relevant impacts on the subject identified as a result of the double mate-

riality analysis: impacts and dependencies in terms of ecosystem services and impacts on the extent and condition of ecosystems. For actions related to these strategic lines, only the capex was monitored, because opex represents a non-significant portion.

Action lines	Action (company)	Target @ 2028	Target progress	Overall 2024	Capex 2028 (EUR M)	Capex 2024 (EUR M)
Biodiversity	► Removal of high-voltage pylons (areti)	▶ 115 pylons removed	43%	49 pylons		
		► 620 m² of reclaimed land in high biodiversity areas	32%	200 m2 reclaimed land	3	1.4
	► Sarno basin reclamation (Gori)	► Elimination of 69 unlawful discharges	6%	4 discharges eliminated	143	55

0

ESRS E4-3 With reference to the management of biodiversity-related impacts, risks and opportunities, the company plans to implement several projects in 2024 that will contribute to the protection of ecosystems. The main actions implemented by operating companies in different businesses are outlined below, specifying, where applicable, the priority areas with a high biodiversity value, where the intervention is focused.



The Sarno basin reclamation programme continued, aimed at resolving the pollution of the river hydrographic basin with the completion of the sewerage system and consequent collection and treatment. Thanks to the project, swimming in the sea at the Gulf of Castellammare has once again become possible after 50 years. (Parco regionale bacino fiume Sarno). In 2024, two discharges were eliminated in the municipality of Gragnano and two in the municipality of Castellammare di Stabia.

We remind you in addition of the different ongoing interventions by Acea Ato 2 to ascertain and prevent possible critical events in neighbouring habitats, where it constantly monitors the areas affected by water service management and purification activities:

- in the areas of the Peschiera-Capore aqueduct system, where the
 doubling of the upper section is being carried out, a study was conducted by the Federico II University of Naples, which showed how
 the release of water from the spring positively impacts the Farfa
 River ecosystem, promoting biodiversity. (Piana di S. Vittorino,
 Sorgenti del Peschiera Fiume Farfa medium-upper course);
- at the major purification plants (Roma Nord, Roma Sud, Cobis, Ostia, Roma Est, Fregene), monitoring programmes have been carried out, which have shown that the analysed plants play a positive role for the ecosystem by providing synanthropic biodiversity hotspots, favouring the presence of an extremely characteristic fauna community (Valle dell'Aniene Nature Reserve, Litorale Romano Nature Reserve).

Monitoring of the peregrine falcon also continued (included under the category of "Least Concern" in the Red List) at the Villa Borghese and Villa Pamphili sites, in an area around the Acqua Vergine springs.

Adistribuzionegas, which operates the methane gas distribution network, minimised the impact on biodiversity in the Abruzzo Region's National Park by restoring conditions at the site after the pipelines were laid.



None of the plants in the Environment area fall under high biodiversity areas. The Acea Ambiente UrBees project aimed at environmental monitoring by observing the behaviour of bees as bio-indicator insects at the waste-to-energy plant in San Vittore del Lazio continues. It confirms the overall good health of the bees and absence of cases of unforeseen diseases or depopulation, as well as the absence of dust from the plant on the bees' wings.

Activities also continued to create and manage green areas at Acea Ambiente sites, including the Terni and Orvieto Ambiente plants, where native tree species were planted to reduce the visual impact of the plants and increase the presence of plant and animal species in the surrounding areas. In addition, beehives were installed in the perimeter of the Orvieto Ambiente plant in 2023, while a zoning project is being developed within the plant complex to create a natural garden.



NETWORK AND PUBLIC LIGHTING

Areto is continuing with the decommissioning and demolition programme for the overhead power lines and pylons within important areas subject to protection, including Parco di Veio, Riserva Naturale della Marcigliana and, south of Rome, Riserva Naturale Decima Malafede and Riserva Naturale del Litorale romano. In 2024, 49 pylons were removed in the Decima Malafede Nature Reserve and the Litorale Romano Nature Reserve. The activity contributed to the restoration of 200 m2 of soil in a high biodiversity area, in line with the European Nature Restoration Directive that came into force in 2024, which aims to restore at least 20% of land and marine areas in the European Union by 2030.

ESRS 2 MDR-A;, ESRS E4-3 It is noted that Acea did not undertake any biodiversity offsets in 2024.

2.5.4 BIODIVERSITY AND ECOSYSTEM METRICS

ESRS E4-5 As mentioned above, Acea has identified its sites/ plants located in high biodiversity areas, i.e. nationally-derived protected natural areas (EUAPs) and Natura 2000 network sites (Sites of community interest, Special areas of conservation and special protection areas), mapping the infrastructure of the Group's main companies.

ESRS E4-5 Sites located in or in the vicinity of biodiversity-sensitive areas

ESRS E4-5		31/12/2024
		Hectares
Sites in or nearby protected areas or major biodiversity areas negatively affected by the business	Owned	439
	Leased	0
	Managed	278
		Number
Sites in or nearby protected areas or major biodiversity areas negatively affected by the business	Owned	543
	Leased	21
	Managed	2,131

ESRS E4-5 The hectares corresponding to Group sites within or near protected areas or major biodiversity areas refer for 41% (about 300 hectares), to areas under the Casoli dam and related ancillary works, related to the Sant'Angelo hydroelectric power plant, owned by Acea Produzione, for a total of 5 sites; for 19% (about 140 hectares) this refers to sensitive areas managed

by the water company Gori, corresponding to more than 500 sites, including water and sewage; for 18% (about 130 hectares) refer to areas managed by Acea Ato 2 and corresponding to almost 550 sites, including water and sewage. Finally, almost 1,500 sites corresponding to 2% of the areas (about 13 hectares) include areti secondary substations and high-voltage substations.

2.6 USE OF RESOURCES AND THE CIRCULAR ECONOMY ESRS ES

ESRS E5; ESRS 2 IRO-1 Impacts, risks and opportunities related to the use of resources and the circular economy were identified based on an assessment carried out with the support of internal and external experts. This assessment involved the entire Acea Group value chain, carefully analysing its assets and activities so as to identify potentially relevant impacts, risks and opportunities. Furthermore, stakeholders were actively involved in the assessment process, participating in the voting of impacts, to foster a shared approach and responsible management of the risks related to the use of resources and promotion of circular economy practices.

In addition, risks related to the use of use and the circular economy were assessed by the company's internal experts, integrating the methodologies used for risk assessment (ERM), already in use in the Acea Group. Opportunity, on the other hand, was identified as being long-term, going beyond the existing strategic planning guidelines, consequently the assessment was carried out according to ISSB - TCFD principles, referring to internationally recognised scenarios and metrics.



Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Waste		 impact	Contribution to the resolution of critical issues related to mass waste production using waste-to-energy processes	(+)	long	• own operations
Outflows of resources related to products and services		 impact	Reduction of pressures on the natural environment by processing to reuse civil and industrial waste (plastic, paper, sludge, wastewater, etc.)	+	long	upstream own operations
Resources inflow, including use of resources		 impact	Reducing pressures on the natural environment by sourcing environmentally sustainable goods and products (reusable, recycled, etc.)	(long	• upstream • own operations
Waste		 impact	Environmental impacts related to waste generated by business processes	<u>-</u>	medium	• own operations
Waste		R risk	Non-compliance of suppliers with the current legislation, with reference to operational waste management		medium	• own operations
Waste		O opportunities	Development of production solutions/technologies with low environmental impact (advanced systems for waste treatment, etc.).		medium	• own operations
			.cs.			

O Effective; O Potential

+ Positive impact; - Negative impact;

2.6.1 POLICIES FOR THE USE OF RESOURCES AND THE CIRCULAR ECONOMY

ESRS E5-1 The use of resources and the circular economy are a priority issue for the Group, which is committed to assessing, managing and, where possible, reducing the related impacts and risks, as well as identifying and developing opportunities related to the issue, focusing on resource circularity.

Specifically, the integrated management and sustainability systems policy includes the objective of sustainably managing energy, water and other natural resources, focusing on enhancing their uses, reuse and recovery processes with a view to the circular economy, while paying particular attention to rationalisation of their end uses. Furthermore, Acea is committed to implementing and promoting a business model based on the circularity of resources, focusing especially on the Environment area, with waste recovery programmes, and the Water area, with commitments related to the conservation and protection of water, with measures to reduce leakages and waste, water recovery and reuse projects, and by training consumers and citizens on the correct use of the resource. Group policies are described in Section 1.5 of this document.

With reference to the impact "Reducing pressures on the natural environment by sourcing environmentally sustainable goods and products (reusable, recycled, etc.)", we note the principles set out in the Group's Sustainable Procurement Policy, which promotes the creation of a virtuous ecosystem with its suppliers by promot-

ing initiatives aimed at reusing resources, minimising waste, and protecting social aspects. Specifically, Acea recognises the value of companies that have chosen to gain certification in the quality, safety, environment and energy schemes and enhances the value of companies that demonstrate that they apply sustainability criteria, also by supporting the adoption of sustainability performance monitoring systems (e.g. Ecovadis), as described in section 4.2 Management of relations with suppliers. The correct adoption of the Policy, as well as the principles set out in the Group Code of Ethics that is submitted to suppliers, helps to mitigate the risk associated with "non-compliance of suppliers with the current legislation, with reference to operational waste management". The obligation for suppliers to properly manage waste in compliance with current regulations is also specified in the procurement contracts of Group companies.

2.6.2 OBJECTIVES, ACTIONS AND RESOURCES RELATED TO THE USE OF RESOURCES AND THE CIRCULAR ECONOMY

ESRS 2 MDR-T; ESRS E5-3; ESRS 2 MDR-A The issue of the circular economy is of priority importance to the Group and in line with the policies adopted, includes a dedicated strategic objective in the Sustainability Plan, with specific lines of action for the various businesses, with specific focus on the Environment area.

Attention to the circularity of resources is a common goal of all Group companies, which contribute to the recovery and reuse of every possible resource and to the overall effort to reduce the amount of waste produced.

With a view to managing the relevant impacts, risks and opportunities related to this issue, the Group has formalised specific strategic objectives included in the Sustainability Plan, which also outlines the measures and investments for the lines of action developed by operating companies.

Action lines	Action	IRO ▼	Description V
Circularity of resources	 ▶ Increased volume of processed waste ▶ End-of-Waste Recovery (recycling) ▶ Sludge recovery for biolignite ▶ Purification sand recovery ▶ Reduction of sewage sludge 	 	 Contribution to the resolution of critical issues related to mass waste production using waste-to-energy processes Reduction of pressures on the natural environment by processing to reuse civil and industrial waste (plastic, paper, sludge, wastewater, etc.) Development of production solutions/technologies with low environmental impact (advanced systems for waste treatment, etc.). Reducing pressures on the natural environment by sourcing environmentally sustainable goods and products (reusable, recycled, etc.) Environmental impacts related to waste generated by business processes

The objectives and investments envisaged in the Plan are shown below, with the progress in the actions and related investments at 31.12.2024, with reference to the lines of action that contribute to the management of impacts, risks and opportunities relevant to the issue.

For actions related to these strategic lines, only the capex was monitored, because opex represents a non-significant portion.

Action line	Action (company)	Target @ 2028	Target progress	Balance 2024	Baseline 2023	Capex 2028 (EUR M)	Capex 2024 (EUR M)
Circularity of resources	► Increased volume of processed waste (Acea Ambiente)	▶1.9 Mt/year	-	1.7 Mt	-	433	94.7
	► End of Waste Recovery (AS Recycling)	► Material recovery > 85% of input volumes	-	83%		33	5.5
	► Recovery of purification sand "soil washing" (Acea Ato 2)	▶ 65% recovered material	Plant to launch	-	-	6	5.5
	► Reduction of sewage sludge	► -40% (vs 2023)	-18%	123.419 t	149.770 t	51	8.9

Interventions that contribute to the circular economy of resources relate mainly to the Environment and Water areas:

- increased volume of processed waste: in the Environment area, for example, the recovery of plastic and metal materials from separate urban waste collection (Demap), the recycling of plastic and paper waste for the production of secondary raw materials; in addition, the plan includes a target toincrease waste-to-energy treatments with the aim of reducing waste treated in landfills, with a reduction in emissions from the supply chain and benefits for the territory. In the Water area, the recovery of sludge for the production of biolignite to be used as fuel or fertiliser;
- End of Waste (AS Recycling) recovery: the upgrading of waste input sorting and recycling plants for the recovery of secondary raw materials (recycling);
- sand recovery from soil washing (Acea Ato 2): recovery of sand from purification processes and sewer cleaning
- reduction of sewage sludge: refer to interventions mainly in Acea Ato 2 plants.





ESRS E5-2; ESRS 2 MDR-A; ESRS 2 MDR-T In accordance with the policies adopted by the Acea Group, aimed at managing the impacts, risks and opportunities associated with issues related to the use of resources and the circular economy, the Group implemented a series of and measures and interventions during 2024 that contribute to the objectives of protecting the environment and natural resources, with particular reference to the circular economy.

The efficient use of resources and maximisation of circularity processes are a common commitment of the Group companies, specifically the Environment Area.

A description of the main actions implemented by Group Companies in 2024 that contributed to the objectives of efficient use and circularity of resources are provided below, and summarised in the Plan monitoring table above:



- measures to reduce sewage sludge, amounting to EUR 8.9 million. Specifically, the measures implemented by Acea Ato 2 included: the commissioning of the Roma Sud treatment plant, the revamping of the sludge silos at the Cobis and Montagnano treatment plants, and the construction of the dewatered sludge treatment plant at the Roma Est purifier;
- the completion of the "soil washing" plant built by Acea Ato 2 for the recovery of sand from purification processes and sewer cleaning.



Interventions that contribute to the circular economy of resources relate mainly to the Environment and Water areas:

- increased volume of waste processed through the waste-to-energy plants in San Vittore del Lazio and Terni that integrate circular economy and resource efficiency. San Vittore del Lazio, the only plant in the region, processes special non-hazardous waste; Terni processes pulper waste from paper mills. Both plants recover energy from waste combustion and reduce waste treated in landfills, benefiting local communities and with an overall reduction in supply chain emissions linked to the waste chain;
- the recovery of plastic and metal materials from separate urban waste collection (Demap), the recycling of plastic and paper waste for the production of secondary raw materials (Ferrocart, Meg, Tecnoservizi), including mainly: the recovery and treatment of organic waste for the production of compost and electricity, also used for self-consumption, at sites in the Environment area;
- interventions for the recovery of secondary raw materials with the upgrading/construction of waste sorting and recycling plants, with a recovery rate of 83% of the total waste entering the recycling area;
- energy valorisation of landfilled waste, with the production of electricity from the biogas produced at the plant and in the landfill (Orvieto hub);
- the recovery of whey, a by-product of dairy processing, for reuse as a food product (Iseco);

the construction and operation of community-based composting plants (so-called Smart Comp), which have resulted in the production of more than 100,000 tonnes of quality compost, also reducing emissions locally by avoiding the transportation and disposal of waste that is now composted on site.



Simam aims to reduce the impact on the environment right from
the design phase: treatment services are provided with mobile
plants designed to favour modularity, thus avoiding oversizing
and the waste of resources and offering versatile solutions in
the event of process modifications and reusable options in the
event of treatment decommissioning. Simam is also committed
to finding innovative solutions for the recovery and reuse of resources, starting with the treatment of wastewater and waste,
and the optimisation of treatment plants both in terms of management methods and the adoption of new technologies.

Finally, all the Group's sites and offices implement separate waste collection, in accordance with the specifications of the municipalities where they are located, also with a view to constantly educating and improving the sensitivity of the people in the offices.

2.6.3 METRICS FOR THE USE OF RESOURCES AND THE CIRCULAR ECONOMY

ESRS E5-4; ESRS E5-5 Over the last year, Acea generally increased its capacity to intervene in the management of the final part of the waste cycle, with the aim of recovering, recycling, reusing and, where possible, recovering energy. Specifically, the Group manages the treatment of municipal solid waste (MSW) and other types of waste (such as green waste from separated waste collection, industrial waste, etc.) for the recovery of material and disposal of residual materials in landfill, the storage, selection, sorting and separation of multi-material waste originating from separated waste collection, such as plastic and metal packaging, for subsequent recovery, the treatment of liquid waste such as leachates and liquid sludge, waste-to-energy the volumes for disposal, the land needed for the disposaland recovery of the waste energy portion, and the production of high quality compost-for agricultural use.

ESRS E5-4 Resource inflows

Incoming flows mainly include various types of materials and waste arriving at Environment Area plants, and the chemical resources used for process management, from the treatment of wastewater from water companies to the operation of production plants and the Environment Area.

Of the incoming materials, 47% refer to biological resources, mainly biomass arriving at the Aprilia and Monterotondo Marittimo composting sites (approximately 160,000 t) and at the Orvieto Ambiente composting line (112,00 t) and the biological component arriving at the waste-to-energy plants in San Vittore del Lazio and Terni (174,000 t). Other incoming liquid waste involves Simam and the Chiusi site for a total of 380,000 t. Non-organic materials used during the year are also calculated (approximately 986,000 t); these include the portion of waste-to-energy FSCs and pulper,

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amounting to approximately 150,200 and 40,000 t, respectively. Deco's Municipal Solid Waste (MSW) Mechanical Biological Treatment (MBT) plant received more than 245,000 t of municipal solid waste (MSW), from which it recovers material and FSCs. The company Cavallari receives waste at its sites mainly from separate urban waste collection or special non-hazardous waste from production activities, totalling about 110,000 t.Tecnoservizi, a company operating in the mechanical treatment and recovery of sorted municipal waste, receives more than 95,300 t, including quantities of used

hydraulic oil and motor oil. Another important facility is the Ecologica Sangro landfill site, which treated approximately 62,000 t before being sent to landfill. Regarding the Networks & Public Lighting area, Areti accounts for approximately 4,100 t of electromechanical materials installed in works on substations and networks, as well as oil and sulphur hexafluoride (SF₆) top-ups. Technical materials include approximately 41,500 t of chemicals used for process management, from water company wastewater treatment to production plants, to the Environment area.

ESRS E5-4 Resource inflows

ESRS E5-4	Incoming flows	31/12/2024
		Tonnes
	Overall total weight of products used during the reporting period	1,911,281
	Total secondary components	0
		Percentage
	Biological materials	46.5%
	Secondary components	0%

ESRS E5-4 Measurement, calculation and/or estimation methodology

Data for the different types of waste is taken from management software, and can therefore be considered as direct measurements derived from certified weighing systems on entry and exit from the plant. For biological materials (organic waste), the input streams to the sites also come from extractions from management software used to register incoming weighed biomass forms. Data on purchased chemicals, which constitute a part of the total weight of the products used during the reporting period, is taken from the purchase invoices of the supplier companies verified by a certified proprietary weighing system.

ESRS E5-5 Resource outflows

Resource outflows mainly relate to the activities of plants in the Environment area. Specifically, they include the quality compost produced at the Monterotondo Marittimo and Aprilia sites and at the Orvieto Ambiente site and used in agriculture, and the Solid Secondary Fuel (CSS), produced mainly by Deco and Cavallari, used

by cement works or waste-to-energy plants, which will respectively valorise its material or energy component. "Other" includes other products placed on the market, mainly the result of material recovery and waste from the environment chain. Ferrocart, for example, produces about 20,500 tonnes of secondary raw materials (MpS)/ EoW from the processing and paper waste, Cavallari produces and sells paper, cardboard and secondary raw materials and pallets (about 16,500 t), Meg, whose plants receive waste from sorting centres accredited by the Consortia (Corepla, Conip, Ecolight) or from private producers who sort and select plastic waste, obtains different types of plastics from its production processes, defined as MpS/EoW and all conforming to UNI standards. Compared to incoming waste quantities, Meg converts at least 70% in terms of weight, of the recovered plastic waste into secondary raw materials (about 9,600 t released on the market). Tecnoservizi also produces and markets around 7,400 t of EoW paper. Wastewater accounted for in outflows are the quantities recovered and sold to third parties, mainly related to water sold by AdF for non-agricultural irrigation. The company Iseco produces milk powder from dairy derivatives.

ESRS E5-5 Outflows

Compost	31/12/2024
Compact	Tonnes
Composi	43,047
SRF	102,285
Milk powder	1,384
Waste water	72,100
Other	56,597
Weight of products released on the market	275,414
Weight of recycled content (including packaging)	NA

ESRS E5-5 Product durability is not an applicable figure, given the Group's business.



ESRS E5-5 Waste produced

The principles of the circular economy drive the shared goal pursued by all Group companies in their overall commitment to reduce waste. The main categories of waste produced are outlined below, including sludge or sand and screenings for the companies in the Water area, leachate for the landfill sites in the Environment area, and fly and bottom ash for the waste-to-energy plants in the Environment area. 58% of the total waste produced (898,000 tonnes)

is recovered, whereas the remainder is destined for disposal. Companies in the Environment area that sent significant amounts of waste for recovery include: Deco (22% of total waste to recovery), Tecnoservizi (15%) and Acea Ambiente's two waste-to-energy plants (10%). Companies in the Water area, on the other hand, send more than 120,000 tonnes of waste for recovery (23% of the

ESRS E5-5 Waste not intended for disposal

ESRS_E5-5	Types of waste	Preparation for re-use	Recycling	Other recovery operations
		Tonnes		
Waste not intended for disposal	Hazardous	52,045	3	844
	Non-hazardous	287,129	68,291	118,997

ESRS E5-5 Waste intended for disposal

ESRS_E5-5	Types of waste	Incineration	Landfill disposal	operations
		Tonnes		
Waste intended for disposal	Hazardous	1,212	573	15,916
	Non-hazardous	891	167,962	184,148

ESRS E5-5 Total waste produced

ESRS_E5-5	Materials in waste	31/12/2024
		Tonnes
Total waste produced	Buffer tank water	10,756
	Lead batteries	37
	Paper and cardboard	7,536
	Hazardous fly ash	9,179
	Hazardous bottom ash	50,584
	FSCs (combustible waste)	124,648
	Sewage sludge	157,476
	Iron and steel	15,156
	Oils, mineral oils and concentrates produced by separation processes	386
	Leachate	57,308
	Sands and screens	22,311
	Surplus	74,613
	Excavated earth and rocks	24,163
	Transformers and capacitors containing PCBs	16
	Plastic	106,359
	Other materials	237,484
	Total	898,010

ESRS E5-5 Among the waste produced, the most significant category is sludge from water companies. Specifically, Gori produced about 65,500 t of sludge (42% of total sludge), Acea Ato 2 almost 45,000 (29%). It is noted that water companies aim to reduce the volume of sludge produced by implementing new drying lines, latest-generation centrifuges and other specific systems every year. These initiatives have a major impact in terms of the circular economy: reducing the water content of the sludge optimises opportunities to use it in material and/or energy processes and reduces disposal costs.

14% of waste consists of Solid Secondary Fuels produced mainly by Deco (79%) and Cavallari (10%), which are sent for energy recovery in cement works or waste-to-energy plants. Plastics are mainly produced by Cavallari (59%) and Meg (20%) and everything is sent for recovery. Hazardous bottom ash is produced by the waste-to-energy plant San Vittore del Lazio (93%) and the remaining amount by Terni. Most bottom ash and fly ash is recovered. The surplus, consisting of various scraps from the treatment of different types of waste, is mainly produced by the Orvieto Ambiente (26%) and Cavallari (26%), Demap (21%) and Ferrocart (14%) landfills and is sent to various disposal operations.

The item "Other materials" includes very different types of waste and scrap from the different business areas. For example, 38% is produced by Deco's plants, mainly waste from mechanical biological treatment, sent for disposal as well as heavy inert materials and aqueous waste solutions sent for disposal; 32% is produced by Tecnoservizi and includes inert waste from demolition and construction, insulation waste, bituminous mixtures and other waste from various processes, mainly sent for disposal.

The distribution of the main types of waste, in particular hazardous waste and non-recycled waste, is described below. Hazardous waste, as defined by the European Waste Codes (EWC), is classified according to specific hazard characteristics. The waste-to-energy plant at San Vittore del Lazio produces about 86% of the total hazardous waste, including slag and bottom ash from the combustion process, fly ash and residual sodium products from the flue gas treatment process. The category of non-recycled waste comprises most of the waste generated (91%), including all waste sent for disposal and recovered waste, except for recycled waste in the strictest sense (9%).

ESRS E5-5 Details of non-recycled, hazardous and radioactive waste

ESRS_E5-5	31/12/2024		
	Tonnes		
Non-recycled waste	819,071		
Hazardous waste	70,591		
Radioactive waste	0		

ESRS E5-5 Recyclable content of products and non-recycled waste

ESRS_E5-5	31/12/2024
	Percentage
Recyclable content in products	1%
Recyclable content in product packaging	0%
Non-recycled waste	91.2%

ESRS E5-5 Product durability is not an applicable figure, given the Group's business.

ESRS E5-5 Measurement, calculation and/or estimation methodology

The waste produced is accounted for using specific management software that records data from the forms, following operations on the loading and unloading registers. Quantitative data on waste disposed of derives from direct measurements taken using weighing systems, which are periodically calibrated and certified. In addition, environmental legislative compliance checks are systematically carried out on suppliers handling and transporting waste. Specifically, sewage sludge is mechanically removed from sedimentation tanks and placed on drying beds, after centrifugation in larger plants.



3. Company information

3.1 OWN WORK FORCE ESRS S1

ESRS S1 The information and data presented in this section refers to employees who have a direct contract with Acea Group companies.

ESRS 2 SBM-2 The personnel of Group companies represent a key stakeholder, whose contribution is central to the pursuit of industrial objectives. To give due consideration to the interests, opinions and rights of employees, the Company has set up a procedure for consulting trade unions representing the interests and demands of workers

ESRS 2 SBM-3 The definition of the relevant impacts, risks and opportunities (IROs) with reference to its own workforce involved the direct involvement of employees and trade unions, who participated in the multi-stakeholder focus group to assess the impacts, and ERM managers and focal points of the Human Resources and Organisation function who participated in the risk assessment process. IROs have been defined in line with the corporate strategy that reaffirms the Group's commitment to valuing people and protecting human rights, a strategy outlined in the Sustainability Plan, which includes the "Centrality of People" objective with lines of action relating to: employee welfare, skills development, people engagement, diversity and inclusion, and employee health and safety. Relevant negative impacts on the issue refer to specific events that may occur in Group companies (e.g. accidents at work, incidents of discrimination, etc.). With regard to the relevant positive impacts, the Group is committed to adequate remuneration, operates in compliance with labour regulations and has performance management systems in place.

Acea also promotes the development of professional skills through a structured training process that starts with a needs analysis to define targeted training courses (in technical, managerial, governance, digital and occupational safety); Acea promotes the application of the principles of inclusion and enhancement of diversity in all human resources management processes (selection, training, development, welfare, etc.), including through dedicated initiatives. Included among these is the Group's Welfare Plan, identifying six fundamental pillars relating to health, work-life balance, emotional and physical well-being, supplementary pensions, income support measures and family, with special attention paid to social solidarity.

Significant risks related to employees, which emerged from the risk assessment process, relate to the difficulties the Group may encounter in finding key competencies for business processes and the climate of potential conflict with the trade union partners representing the world of work.

To give due consideration to the needs of all Group employees, the risk assessment also covered the companies operating in Latin America, with specific reference to the protection of working conditions and equity, diversity and inclusion issues. The relevant IROs that emerged from the dual materiality process, therefore, concern all Group employees.

In 2024, the Acea Group was not involved in activities that exposed its employees to the risk of child, forced or compulsory labour.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Working conditions	Appropriate salaries	 impact	Appropriate salaries to ensure safe and decent living conditions	+	medium	• own operations
Equal treatment and equal opportunities for all	Training and skills development	 impact	Professional fulfilment/ satisfaction and enhancement of individual skills	(+)	medium	• own operations
Working conditions	Work-life balance	 impact	Improving corporate well- being through welfare and work-life balance initiatives	+	medium	• own operations
Working conditions	Health and safety	 impact	Occupational accidents with health consequences for Group personnel	<u>-</u>	long	• own operations
Working conditions	Secure employment	 impact	Critical issues related to working conditions and the work environment impacting the internal climate	()	medium	• own operations
Equal treatment and equal opportunities for all	Gender equality and equal pay for work of equal value	 impact	Deterioration in the psycho- physical well-being of staff as a result of any episodes of discrimination and incidents affecting the dignity of persons	(3)	short	• own operations
Working conditions	Freedom of association, existence of works councils and workers' rights to information, consultation and participation	R risk	Climate of potential conflict with trade union partners representing the world of work		medium	• own operations
Equal treatment and equal opportunities for all	Training and skills development	R risk	Difficulties in sourcing and attracting resources with key competencies to ensure the continuity of business processes		medium	• own operations

+ Positive impact; - Negative impact;



3.1.1 POLICIES AND PROCESSES RELATED TO THE OWN WORKFORCE

ESRS S1-1 The Charter of the Person and Participation signed by Acea with the trade unions is the reference protocol for managing relations with employees and defines common values and commitments to ensure adequate working environments, the enhancement of skills, well-being and work-life balance, and a culture of safety at work. The protocol promotes the participation of trade union representatives in company labour relations system on issues related to training, health and safety, professional retraining, welfare, inclusion and equal opportunities.

The Acea Group's commitment to the protection of human rights is formalised in the applicable value documents, specifically, the Code of Ethics and the Human Rights Policy described in the General Information in the paragraph on Group policies, and is supported by a collegiate body - the Ethics Officer - who manages the reporting system and monitors compliance with the values. The Human Rights Policy sets out principles for the protection of workers'

fundamental rights, such as the rejection of child and forced labour, the guarantee of adequate working conditions and remuneration, non-discrimination on the basis of gender, age, ethnicity, sexual orientation and identity, disability, religious faith or other individual characteristics, the fight against physical and psychological violence, sexual harassment and bullying in the workplace - further reiterated in the Equality, Diversity & Inclusion Policy - health, safety and psycho-physical well-being in the workplace. The Policy has been defined according to the main references on the subject, including the International Charter of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions and the Global Compact, and on the internal regulatory assumptions already existing in Acea, including those on anti-corruptionfair competition, privacy protection, etc. With specific reference to the issues of diversity and inclusion, Group policies are implemented through specific procedures, including the Diversity & Inclusion Plan and the Diversity & Inclusion Protocol, with a system defined by the Holding company that has obtained

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gender equality certification. For a description of the Group policies, reference is made to paragraph 1.5 of the document.

In 2024, Acea Ambiente, areti, Acea Ato 2, Acea Infrastructure and Acea Energia also obtained gender equality certification in accordance with UNI PdR 125:2022. During the year, and in line with the process started with the adoption of the Charter of the Person and Participation, Acea signed the Code for responsible companies in favour of maternity, promoted by the Ministry for Family, Natality and Equal Opportunities, which provides for various areas of intervention, including: career continuity for mothers, prevention and care of health needs, balancing work time and methods with private life, and support for child care and education expenses.

In 2024, the Acea Group obtained Top Employers Italia Certification for the third consecutive year, serving as recognition of corporate excellence in HR policies and strategies and their implementation, with the aim of contributing to the well-being of people, improving the environment and the world of work.

With regard to occupational safety, most Group companies have implemented an Occupational Safety and Health Management System certified in accordance with UNI ISO 45001:2023.

ESRS S1-2 Aware of the role that dialogue with workers' representatives plays in the correct management of industrial relations, Acea has adopted a high-profile model managed by the Parent Company's Human Resources and Organisation department, which has operational responsibility for ensuring that the involvement of workers' representatives takes place and that the results guide the company's approach. The model is based on systematic discussion and participation and provides for bilateralism that take the form of the establishment of Committees, Bodies, Commissions and Work groups, made up of members of the company and representatives identified by the trade unions. These joint bodies, which meet in response to specific needs, are responsible for training, retraining, welfare, inclusion and equal opportunities. During the year, social partners were involved in meetings aimed at providing them with information or initiating discussions on the following specific issues: valuing people, adapting workspaces, revising working hours to meet the new needs of the production context, smart working and desk sharing, and training financed by inter-professional bodies for continuous training, to which Acea belongs. Trade unions at national, regional, territorial and company level were also involved in a specific event to present the 2024-2028 Business Plan.

In line with regulatory requirements, workers representatives are regularly involved in matters relating to occupational health and safety management through the Unitary Trade Union Representatives (RSU) and the Workers' Safety and Environmental Representatives (RLSA).

Specifically, in 2024, Acea launched the internal communication campaign "Every gesture can make a difference" aimed at raising staff awareness on work safety issues. The campaign also included an internal survey, carried out in cooperation with INAIL, the workers' safety representatives and the company doctor, aimed at understanding workers' perceptions of the risks they are exposed to in the workplace and identifying possible improvement measures.

ESRS S1-3 In order to adequately address the impacts, particularly any negative ones that it may generate with staff, Acea has adopted structured employee relations management processes. Specifically, the Human Resources and Organisation function, in coordination with the Group companies, is responsible for:

- the in service management on behalf of the subsidiaries, of the administration of the personnel employed by them;
- defining the remuneration policy, which includes performance appraisal processes and meritocratic plans;
- managing industrial relations;
- defining the lines for developing training plans, starting from a survey of the training needs of Group personnel;
- Setting commitments and plans for promoting inclusion and valuing diversity.

With regard to safety in the workplace, the Health, Quality, Safety and Environment department of the Parent Company provides coordination and guidance on the subject, monitoring Group companies on the application of regulations, guidelines and corporate policies, and draws up the Group's accident report on a central and annual basis. Each company has direct responsibility for the operational management of safety and takes care of training staff, monitoring accidents and assessing the risks to the workers, preparing the Risk Assessment Document (RAD).

With reference to employees' reports on alleged breaches of the principles set out in the Code of Ethics and in the Policy on Human Rights at Work, Acea has activated the "Comunica Whistleblowing" platform, which guarantees the highest degree of confidentiality and privacy in the processing of communications. Reports are forwarded to the Ethics Officer, who takes charge of them and carries out the appropriate investigations. Employees may also send communications to the Human Resources and Organisation department that are acknowledged by the relevant departments.

The Group has also set up specific communication channels, including dedicated e-mail addresses available on the company intranet, to allow workers to express concerns about injuries and accident rates. The issues raised are examined and addressed through structured processes, which include analysing the reports, identifying appropriate solutions and verifying the effectiveness of the actions taken. The results of the analyses are monitored and reported to management to ensure continuous improvement.

To ensure that workers are aware of the existence of these tools, Acea informs staff through the corporate intranet portal and specific awareness and training campaigns. With reference to these communication channels, regular surveys are conducted to assess the perception of their use and collect feedback on their effectiveness.

3.1.2 OBJECTIVES, ACTIONS AND RESOURCES RELATED TO THE OWN WORKFORCE

ESRS S1-4; ESRS S1-5; ESRS 2 MDR-T; ESRS 2 MDR-A

With a view to managing the relevant impacts, risks and opportuni-

ties related to the issue, the Group has formalised specific strategic objectives included in the Sustainability Plan, in line with the policies adopted, which also outlines the actions for the lines of action developed by operating companies. Opex of approximately EUR 2.4 million was realised in 2024 for these strategic lines.

Action lines	Action	IRO	Description V
Employee well-being	▶ Welfare enhancement	I	 Improving corporate well-being through welfare and work-life balance initiatives Critical issues related to working conditions and the work environment impacting the internal climate
Skills development	► Corporate Academy ► Training	R	 Difficulties in sourcing and attracting resources with key competencies to ensure the continuity of business processes ▶ Professional fulfilment/satisfaction and skills enhancement
People Engagement	► People Survey ► Involvement of operational staff	I	▶ Professional fulfilment/satisfaction and skills enhancement
Diversity and inclusion	► Gender equality ► Improving the D&I culture	I I	 Appropriate salaries to ensure safe and decent living conditions Critical issues related to working conditions and the work environment impacting the internal climate Deterioration in the psycho-physical well-being of staff subjected to any episodes of discrimination and incidents affecting the dignity of persons
Health and Safety	➤ Culture of safety (for accident reduction) ➤ HSE process optimisation ➤ Innovative safety equipment (Youcare kit, man-down device)	ı	▶ Damage to health caused by occupational accidents occurring to Group personnel

The Sustainability Plan defines the objectives that the Group intends pursuing to manage the positive and negative impacts and any relevant risks and opportunities related to personnel management, also taking into consideration the workers' requests noted by the Parent Company's Human Resources and Organisation function in the performance of its personnel relations management activities and in its periodic discussions with trade union representatives.

Specifically, the Centrality of People objective has been defined in the Plan, which includes the objectives and actions for managing the relevant impacts and risks on the topic identified as a result of the double materiality analysis: appropriate salaries, training and skills development, work-life balance, health and safety, secure employment, gender equality and equal pay for work of equal value, freedom of association.





Action line	Action (company)	Target @ 2028	Target progress		
Employee well-being	▶ Welfare enhancement	► Increase in service users vs. previous year	✓ Target reached (from 3,954 to 5,942 people)		
	▶ Corporate Academy	► 6,500 people/year trained	5,045 people trained		
		▶140 internal faculties involved	31 internal lecturers		
Skills development		▶15 digital training courses, 5,000 total participants	14 courses 3,184 participants		
, , , , , , , , , , , , , , , , , , , ,	► Training	▶22h of training per capita/year (excluding foreign countries)	100% (27h)		
		►100 people certified as "Sustainability Professionals"	22%		
	► Gender equality	► 32.6 % women managers (executives and middle managers)	30.17%		
	► Improving the D&I culture	▶1 campaign and 1 initiative per year	4 initiatives		
Diversity and	▶Culture of safety	► Accident frequency and severity indices < average over the last three years	IFI > average IGI < average		
inclusion		> 90% Near Misses resolved			
	► HSE process optimisation	► Process digitisation for 100% of Group Companies	In progress		
	►Innovative safety equipment	▶Testing Youcare kit and man-down device for areti and Acea Ato 2	9 people areti 20 Acea Ato 2		
Health and safety (foreign countries)	► Safety and prevention training (Aguas de San Pedro)	▶ 90% of employees involved in training	100%		
Skills development (foreign countries)	► Specialised training (Aguas de San Pedro, Consorcio Agua Azul)	▶97% course attendance	86%		
Diversity and inclusion (foreign countries)	► Improving D&I culture (Aguas de San Pedro, Consorcio Agua Azul)	▶1 initiative per year ▶Participation rate 90%	100%		

With reference to the risk connected to the climate of potential conflict with representative trade union partners, the Group has set up a structure dedicated to dialogue with the trade unions in the company and has established bilateral bodies with trade unions, including the Bilateral Inclusion and Equal Opportunities Committee, the Bilateral Welfare Committee and the Technical Working Groups on tenders and the optimisation of working hours, the Training, Health and Safety Observatory and the Observatory on professional retraining. The Group also organises information and consultation meetings with trade unions on important negotiation issues that may lead to trade union agreements, which are also concluded by means of specialist legal assessments.

With reference to the risk connected to the possible difficulties in

sourcing and attracting resources with key competencies to ensure the continuity of business processes, Acea has reorganised the selection process, adopting a Group procedure that regulates the methods and actions to be implemented in the selection processes, enhanced the search for personnel through specific digital platforms, and extended the search for personnel to new territorial areas.

In order to counter the occurrence of negative impacts related to the protection of safety at work, with particular reference to accident prevention and the reduction of accident rates, Acea implements safety training programmes and customised protocols for workers with specific physical or health conditions, ensuring adjustments to equipment and work processes.

Occupational health and safety

During the year, training activities were carried out to promote safety at the workplace in the operational contexts most exposed to the risk of accidents, involving the correct use of personal protective equipment and knowledge of safety procedures in the field. Risk monitoring was also enhanced through targeted inspections and audits for the most sensitive operational areas, integrating innovative technologies for the early detection of hazardous situations, and awareness-raising campaigns were launched for workers engaged in high-risk activities, such as working at heights, confined spaces, electrical work or work in areas with exposure to biological and chemical agents. Awareness-raising events on safety in the workplace were also held during the year, where topics related to risk prevention, continuous monitoring and the correct use of personal protective equipment were analysed. These included the "Team Building Operations", the "Safetycomedy" and the "Safety Day Acea Ambiente - Insieme per crescere in sicurezza" (Acea Environment - Together to grow in safety), aimed at operational staff in the electricity distribution and environment sectors. Health promotion and health education plans are also in place for foreign companies.

Diversity & Inclusion

With the aim of fostering a serene working climate and countering possible episodes of discrimination, promoting inclusion and valuing diversity, Acea adopted the annual Equality & Care Plan and the Equality, Diversity & Inclusion Policy, appointed an Equality, Diversity & Inclusion Manager and set up the Equality, Diversity & Inclusion Committee. A space dedicated to ED&I issues is also available on My Intranet. In 2024 the UNI/PdR 125:2022 certification on gender equality was confirmed for Acea SpA and extended to Acea Ambiente, areti, Acea Ato 2, Acea Energia and Acea Infrastructure; additionally Acea joined Valore D, an association of companies that promotes gender balance and the dissemination of the values of inclusion in organisations. Specific initiatives were also organised during the year, including: the webinar "Beyond Words. From inclusive language to broad language", on the occasion of the World Day of Cultural Diversity for Dialogue and Development, the event "The Dialogue of Diversity: Let's Build the Road to Inclusion", dedicated to the Equality Diversity & Inclusion Champions who are part of the Equality Community and the Talks Academy on Disability. The companies operating abroad also organised initiatives during the year to raise employee awareness on diversity management and gender equality.

Remuneration and benefits

The Group's commitment to producing positive impacts on personnel, with particular reference to adequate working conditions and remuneration, the enhancement of skills and the promotion of well-being, is embodied in specific activities. The remuneration that Acea pays its employees is determined by applying the National Collective Bargaining Agreements (CCNL) of reference, which ensure the minimum salary levels according to professional categories. The company also applies a remuneration policy that includes merit-based principles, in line with the Performance Management Model adopted, with effects on the fixed and variable components of the remuneration, determining remuneration that is above the minimum salaries set by the National Collective Bargaining Agreements (CCNL). Employees are eligible for the performance bonus every year. This is a variable payment, linked to qualitative and quantitative results achieved in the realisation of business objectives, in line with the industrial and sustainability planning, which

aims for workers to participate in company processes and projects to increase profitability and improve competitiveness, productivity, quality and efficiency. There are also benefits for employees, including those with part-time or fixed-term contracts, such as meal vouchers (tickets), supplementary health insurance and benefits granted through the Circolo Ricreativo Aziendale (CRA).

Training and skills development

To develop people's skills, the Group is committed to setting up a high-level training centre, called the "Acea Academy", which is also open to external stakeholders, and has adopted the "Pianetacea" e-learning platform, offering staff the opportunity to choose online training courses. In 2024, Acea also implemented training courses of excellence in the field of leadership, including:

- the Manager programme, dedicated to those responsible for managing people and complex processes, which involved 150 participants;
- the Growth Programme dedicated to talents, young people or high-potential individuals on growth paths, involving 350 people;
- the course "Future Connections: the Role of Artificial Intelligence and the Evolution of Leadership", designed with the aim of exploring the main aspects of the application of Al in work contexts and analysing how the role of leadership is transforming within organisations.

Each training course includes an entrance test, an exit test and an assessment test to verify the effectiveness of the course in relation to the skills acquired and assessment of the course teaching and organisation. Appropriate actions are also planned for the training of staff with disabilities, through the provision of sign language.

Corporate welfare and well-being

The Acea Group is active in promoting corporate welfare, starting with listening to staff on a periodic basis through surveys referring to needs and assessments of welfare initiatives. During the year, the Welfare Plan was consolidated, which is divided into six pillars relating to health, work-life balance measures, psycho-physical well-being, supplementary welfare, economic benefits, and family, and specific initiatives were implemented, including:

- "Previeni con Acea", a five-day campaign dedicated to cancer prevention with 625 breast, dermatological and endocrinology screenings free of charge for employees at the Group's offices, in collaboration with Susan G. Komen Italia;
- corporate wellness programmes to promote physical well-being by adopting healthy lifestyles, participating in sports and customising one's diet plan with a nutritionist;
- self-defence courses dedicated to all Group employees;
- mental well-being programmes and the introduction of an online psychology service for all employees;
- a permanent advice channel aimed at employee mothers and fathers, whereby the company interacts with them and collects information about their needs with a view to promoting corporate well-being and reducing the gender gap;
- digital platform dedicated entirely to in-home parental support.



3.1.3 OWN WORKFORCE METRICS

ESRS S1-6; ESRS S1-8 Employee characteristics

The effective workforce at 31.12.2024 numbered 8,715 employees, of which 78% were men and 22% women; this figure refers to the number of persons operational at the end of the reporting period and corresponds to a personnel cost of EUR 328,524,000 as per

the Group's Consolidated Financial Statements.

The composition of the workforce confirms the prevalence of the male component, which refers mainly to technical activities. 90% of employees are employed under open-ended contracts, confirming employment stability within the Group; all employees from the operating companies in Italy are covered by National Collective Labour Agreements (CCNL).

ESRS S1-6 Employees per country

ESRS_S1-6	Employees broken down by country	31/12/2024
		Number
	ltaly	7,376
	Peru	891
	Honduras	419
	Dominican Republic	29
	Total	8,715

ESRS S1-6 Contract type

ESRS_S1-6	Type of employment contract	Male	Female	Other	Not reported
	Employees with open-ended contracts	5,988	1,823	-	-
	Employees with fixed-term contracts	829	75	-	-
	Employees with variable hours	-	-	-	-
	Total	6,817	1,898	0	0

ESRS S1-8 Collective bargaining coverage

ESRS_S1-8 31/12/2024

	Geographi- cal Area	Percentage
Total number of employees covered by collective labour agreements		89%
Employees registered as trade union members within the European Economic System		50%
Employees covered by collective labour agreements (in companies within the European Economic System) in relation to the total workforce	Italy	85%
Employees covered by collective labour agreements (in companies outside the European Economic System) in relation to the total workforce	Peru	0%
Employees covered by collective labour agreements (in companies outside the European Economic System) in relation to the total workforce	Honduras	5%
Employees covered by collective labour agreements (in companies outside the European Economic System) in relation to the total workforce	Dominican Republic	0%

ESRS S1-6 Output turnover rate

The exit turnover rate, given by the ratio of exits to numbers for the year, was 11% for companies operating in Italy, mainly due to the exit of the water company Acquedotto del Fiora from the scope

of full consolidation. For the foreign companies operating in Latin America, which recorded a total of 782 staff departures, the rate was 58%, mainly due to the termination of the existing contract with Consorcio Acea.

ESRS S1-6 Number of employees leaving operating companies in Italy

ESRS_S1-6	31/12/2024
	Number
Voluntarily	148
Due to dismissal	19
Due to retirement	115
Due to death in the line of duty	12
Other (to be specified)	487
Employees who left the company	781

ESRS S1-9 Diversity metrics

The personnel of the Group companies with senior management roles, consisting of managers in positions n-1 from top management, are 74% male and 26% female; 8% of the workforce is under

30 years old, 51% are between 30 and 50 years old and 42% are over 50.

ESRS S1-9 Employees with senior management roles according to gender

ESRS_S1-9	Employees with senior management roles according to gender	Male	Female	Other	Not reported
	Number	42%	15%	-	-
	Percentage	74%	26%	-	-

ESRS S1-9 Staff age brackets

ESRS_S1-9	Personnel age brackets	Under 30 years old	30-50 years old	Over 50 years old
	Employees	660	4,435	3,620

ESRS S1-10 Adequate wages

All Group employees receive an appropriate salary in line with applicable benchmarks (National Collective Labour Agreements, in

Italy, and the Labour Code and collective and industry agreements, abroad).

ESRS S1-12 Persons with disabilities

ESRS_S1-12	Gender	
		Percentage
Disabled persons among employees, subject to legal restrictions on data collection	Male	5%
	Female	11%
	Other	0%
	Not reported	0%

ESRS S1-13 Training and skills development metrics

A total of 226,195 training hours were provided to Group personnel during the year, of which 24% was provided to female staff and 76% to male staff. Per capita training hours were 29 for women and 25 for men. The figure for training hours per capita broken down ac-

cording to gender is calculated as the ratio of male/female training hours provided to the number of males/females. A total of 85% of the Group's personnel were involved in performance and competence appraisal systems during the year.

C



ESRS S1-13 Hours of training provided according to gender

Gender	31/12/2024
	Number
Male	171,972
Female	54,223
Other	0
Not reported	0
Male	25
Female	29
Other	0
Not reported	0
	Male Female Other Not reported Male Female Other

ESRS S1-13 Number of employees who participated in regular performance and career development reviews

ESRS_S1-13	Gender	31/12/2024
		Number
Employees who participated in regular performance and career development reviews	Male	5,617
	Female	1,760
	Other	0
	Not reported	0
		Percentage
Employees who participated in periodic performance and career development reviews	Male	82%
	Female	93%
	Other	0%
	Not reported	0%

ESRS S1-14 Health and safety metrics

Safety management in the Acea Group is structured at an organisational level: the Parent Company manages coordination and guidance activities on the subject, and each Group company has direct responsibility for the operational management of safety.

All Group companies operating in Italy have adopted certified occupational safety management systems that cover all the employees they employ.

In 2024, no Group company in Italy or abroad recorded deaths among its staff due to work-related injuries and illnesses or fatal accidents.

The work-related injury rate is calculated as the ratio of the number of recordable work-related injuries to the total number of hours worked by own workers and multiplied by 1,000,000.

ESRS S1-14 Employees covered by the health and safety management system

ESRS_S1-14	Geographical area	31/12/2024
Employees covered by the		
health and safety manage-	Italy	7,376
ment system		
	Honduras	0
	Peru	860
	Dominican Republic	0
	Total	8,236
Employees covered		
by management system		95%
for health and safety		

ESRS S1-14 Number of of occupational accidents

ESRS_S1-14	Geographical area	31/12/2024
		Number
Number of occupational accidents	Italy	86
	Honduras	31
	Peru	18
	Dominican Republic	0
	Total	135

ESRS S1-14 Rate of work-related injuries

ESRS_S1-14	Geographical area	Number
Injury rate related to work	Italy	6
	Honduras	34
	Peru	10
	Dominican Republic	0

ESRS S1-15 Work-life balance metrics

Acea operates in compliance with the legislation referring to leave for family reasons, which governs days off and economic support for female and male workers connected with maternity, paternity of children, adopted children and fostered children. 100% of employees are entitled to this leave in Italy.

In the Dominican Republic, where Acea Dominicana operates, this type of leave is not covered by local legislation. Consequently, the percentage of employees entitled to family leave drops to 99.7% at Group level.

ESRS S1-15 Number of employees entitled to family leave

ESRS_S1-15	31/12/2024
	Percentage
Employees entitled to leave for family reasons	99.7%

ESRS S1-15 Number of eligible employees who took family leave

ESRS_S1-15	Gender	31/12/2024
		Percentage
Eligible employees who have taken leave for family reasons	Male	5%
	Female	4%
	Other	0%
	Not reported	0%
	· · · · · · · · · · · · · · · · · · ·	

ESRS S1-16 Remuneration metrics (pay gap and total remuneration)

Information on remuneration metrics is reported with details of the countries where the companies operate: Italy, Peru, Honduras, Dominican Republic.

The gender pay gap is calculated by comparing the difference between the average male gross hourly remuneration and the average female gross hourly remuneration with the average male gross hourly remuneration. The annual total remuneration rate is the ratio of the annual total remuneration of the highest paid person to the median remuneration of the employees (excluding the highest paid person).

In Italy, the gender pay gap is 1% in favour of men and the total annual salary of the highest paid person is 24 times higher than the median employee salary. In Honduras, women are paid 9 % more than men, and the ratio of the highest paid person's total annual salary to the median employee salary is 12. In Peru, the gender pay gap is 25% in favour of women and the highest paid person receives an annual salary 8 times higher than the median employee. In the Dominican Republic, men earn 39% more than women, and the total annual salary of the highest paid person and the median employee is 8.

ESRS S1-16 Pay gap and total remuneration in Italy

ESRS_S1-16	31/12/2024
Gender pay gap	1%
Remuneration rate annual total	24

ESRS S1-16 Pay gap and total remuneration in Honduras

ESRS_S1-16	31/12/2024
Gender pay gap	-9%
Annual total rate of remuneration	12

ESRS S1-16 Pay gap and total remuneration in Peru

ESRS_S1-16	31/12/2024
Gender pay gap	-25%
Annual total rate of remuneration	8

ESRS S1-16 Pay gap and total remuneration in the Dominican Republic

ESRS_S1-16	31/12/2024
Gender pay gap	39%
Annual total rate of	0
remuneration	O

ESRS S1-17 Serious human rights incidents, complaints and impacts

In 2024, three reports were submitted by company employees through the dedicated channels relating to human rights issues, one of which related to an alleged case of harassment, which was closed after further investigation, and two relating to human resources management.

ESRS S1-17 No human rights related sanctions or fines were imposed on the Group.

ESRS S1-17 Number of incidents of discrimination

ESRS_S1-17	Form of Discrimination	31/12/2024
		Number
Incidents of dis- crimination	Gender	0
	Race or ethnic origin	0
	Nationality	0
	Religion or personal beliefs	0
	Disability	0
	Age	0
	Sexual orientation	0
	Harassment	1
	Other forms of discrimination	0
	Total	1



ESRS S1-17 Number of complaints

ESRS_S1-17 Number Complaints submitted through the channels provided for their own workers to raise concerns Complaints submitted through the channels provided for their own workers to raise concerns Serious labour-related human rights problems and incidents of non-compliance with the UN Guiding Principles, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises

ESRS S1-17 Amount of fines and penalties

ESRS_S1-17	31/12/2024
	EUR
Fines, sanctions and compensation for damages following incidents of discrimination, including harassment and complaints filed	0
Fines, sanctions and compensation for significant damages for serious human rights problems and incidents related to their own workforce	0

3.2 WORKERS IN THE VALUE CHAIN ESRS S2

ESRS 2 SBM-3 The information illustrated in the following section refers to the main categories of suppliers, and describes the characteristics of the Acea Group's value chain in qualitative terms, taken as a whole:

- non-employee personnel working at the company's premises, including consultants, contract staff, personnel of service providers (cleaning, maintenance, etc.);
- · personnel of contractors carrying out activities at Group work

sites

· sales agents and workers in logistics companies.

Impacts, risks and opportunities related to workers in the value chain have been identified through a double materiality analysis with a process that covers the entire Group value chain and actively involves internal and external stakeholders, as described in detail under General Information in paragraph 1.5.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Other work-related rights	Child labour	 impact	Any incidents of human rights infringements along the supply chain related to child labour	\odot	long	• upstream
Other work-related rights	Forced labour	 impact	Any incidents of human rights infringements along the supply chain related to forced labour	\odot	long	• upstream
Working conditions	Secure employment	 impact	Lack of respect for workers' rights along the supply chain (stable and regular employment, appropriate contracts, decent working hours, etc.)	Θ	medium	• upstream
Working conditions	Health and safety	 impact	Damage to health caused by occupational accidents occurring to contractor company's personnel	-	long	• upstream
		_				

+ Positive impact; - Negative impact;

O Effective; O Potential

In supply contracts with suppliers located in at-risk countries, defined as such by recognised organizations, contractual clauses have been introduced that involve compliance of the supplier with specific social obligations; e.g. measures that guarantee employees respect for their fundamental rights, the principles of equal treatment and non-discrimination, protection against child labour, the fight against forced labour, guaranteed minimum wage, limited work hours.

3.2.1 WORKER-RELATED POLICIES AND PROCESSES IN THE VALUE CHAIN

ESRS S2-1 The Acea Group is aware that along the supply chain, characterised by extensive and often delocalised production chains, negative impacts may be generated relating to the violation of the fundamental rights of workers employed by supplier companies, such as child labour, forced labour, workplace safety. Acea has therefore adopted value codes and policies dedicated to the proper management of the supply chain.

Specifically, the Code of Ethics reaffirms the reference principles that should guide relations between Acea, as a contracting authority, and its suppliers (contractors and subcontractors), "on the basis of the principle of mutual benefit and cooperation that underlies such relations", including:

- compliance with rules and procedures, including verification processes to identify potential risks to reputation and/or corruption:
- the protection, by the supplier or sub-supplier, of the human rights of their employees (decent working conditions, protection of health and safety) and safeguarding of the environment (protection of ecosystems and biodiversity, rational use of natural resources, minimisation of waste, energy saving);
- respect for privacy and guarantee of the quality of goods, services and performance.

Suppliers issue a declaration of acceptance and commitment to comply with the prescriptions contained in the Code of Ethics, which constitutes an element of the contractual relationship with Acea, who is entitled to take appropriate measures in the event of the specified principles and criteria of conduct being breached.

During the year, Acea adopted the Sustainable Procurement Policy to confirm its commitment to sustainable supply chain management and the increasing integration of ESG criteria into procurement processes.

Finally, the Human Rights Policy, which is inspired by the main relevant international references (International Bill of Human Rights, International Labour Organisation Declaration on Fundamental Principles and Rights at Work, ILO conventions, etc.), includes the principle of "Responsible Management of Supplier Relations", which states that: "Behaviour aimed at protecting the human rights of staff is expected from the supplier and sub-supplier (...), with particular attention to dignified working conditions (equal treatment and non-discrimination, fight against child labour and forced labour, guarantee of minimum wages, wages in line with the relevant national labour contracts and in any case proportionate to the quantity and quality of the work performed, compliance with the limits linked to the duration of working hours, etc.) and to the protection of health and safety in the workplace (...).

ESRS S2-2 In the definition of trade union agreements and protocols that also include supply chain issues, through the structures in charge of managing industrial relations of the Human Resources and Organisation Department of the Parent Company, Acea interacts with the main trade union representatives of the workers of the supplier companies and with trade associations in the definition and signing of specific agreements that refer to supply chain issues (health and safety in the workplace, employment protection, combating unlawful forms of work, compliance with contractual regulations, etc.).

ESRS S2-3 For several years now, Acea has signed a "Water Contracts Protocol", which includes aspects such as employment protection (proper application of the trade union clause with reference to contract changes), combating unlawful work or work not complying with the relevant national labour contracts, workplace health and safety and compliance with contractual regulations.

In addition, a Contracts Protocol was signed between Acea and the trade unions to ensure the highest levels of legality and efficiency in the handling of contracts, strengthen the protection of occu-

pational health and safety and support stable, quality employment. The Protocol also defines rewarding criteria for the assignment of tenders, to continue the objective of quality work throughout the cycle, including: lowest total number of sub-contractors; the commitment of ensuring minimum percentages of women and young people, the use of workers primarily employed under permanent employment contracts, the application of gender parity policies, the application of the trade union clause, to promote stable employment, with a commitment by the incoming contractor to absorb staff leaving the outgoing contractor within their own staff component. The Protocol references the principles and aims of the National Framework Protocol to support legality, signed by Acea and the Ministry of the Interior, with the aim of strengthening the joint commitment to combat the potential for corruption and the risks of organised crime infiltrating sectors of national strategic importance.

Acea has activated the "Comunica Whistleblowing" platform, also accessible to external stakeholders, to collect reports on alleged breaches of the principles in the Code of Ethics and the Human Rights Policy, including those relating to "work", guaranteeing the highest degree of confidentiality and privacy. Reports are forwarded to the Ethics Office, which takes charge of them and carries out the appropriate investigations. The reporting channel is available on the institutional website, where there is a dedicated section explaining its purpose and promoting its use.

3.2.2 OBJECTIVES, ACTIONS AND RESOURCES RELATING TO WORKERS IN THE VALUE CHAIN

ESRS S2-4; ESRS S2-5; ESRS 2 MDR-T; ESRS 2 MDR-A

With a view to managing the relevant impacts, risks and opportunities related to the issue, the Group has formalised specific strategic objectives included in the Sustainability Plan, in line with the policies adopted, which also outlines the actions and investments for the lines of action developed by operating companies. The Plan defines the objectives the Group intends pursuing to manage the value chain-related impacts identified as relevant following the double materiality analysis, with specific reference to labour-related rights, working conditions, safe employment and health and safety.

These actions form part of the "Supply Chain Evolution" objective, which includes one line of action for the strengthening of the sustainable procurement process and another on workers' health and safety.





Action lines	Action	IRO	Description V
Sustainable procurement	►ESG criteria in tenders ►Responsible Procurement Policy ► Supplier qualification (Ecovadis)	I I	 Lack of respect for workers' rights along the supply chain (stable and regular employment, appropriate contracts, decent working hours, etc.) Any incidents of human rights infringements along the supply chain related to child labour Any incidents of human rights infringements along the supply chain related to forced labour
Supplier health and safety	 ▶ Security training ▶ Verification of technical and professional qualifications ▶ Construction site supplier inspections 	I	➤ Damage to health caused by occupational accidents occurring to contractor company's personnel

As described in the policies section above, the Code of Ethics, the Human Rights Policy and the Sustainable Sourcing Policy, which suppliers are required to accept, allow the Group to intervene, including on a contract basis, in the event of any incidents of human rights infringements along the supply chain related to forced or child labour, and in general, for any failure to respect workers' rights

along the supply chain.

The objectives envisaged in the Plan up to 2028 and progress in the actions at 31.12.2024 are shown below. Economic commitments are envisaged to implement these actions, with the relative amounts not significant in terms of capex/opex.

Action line	Action (company)	Target @ 2028	Target progress
Sustainable procurement	▶ESG criteria in tenders	► Application of sustainability rewarding criteria for 90% of tendering procedures	60% application of procedures
	► Supplier qualification (Ecovadis)	▶ 80% Ecovadis accredited suppliers	71%
	► Security training	► Accident incidence rate < average over the last three years	Incidence rate > average over the last three years
Supplier health and safety	► Verification of technical and professional qualifications (ITP)	 Digitisation of ITP verification process for all Group Companies 	12%
	► Construction site supplier inspections	► +5% number of inspections/year vs 2023	+5.3% (approx. 15,000 inspections)
Suppliers health and safety (foreign countries)	► Safety and prevention training (Consorcio Agua Azul)	▶90% attendance for supplier courses	67%

During the year, several activities were carried out to manage the negative impacts related to workers in the value chain that emerged from the double materiality analysis.

To protect the rights of workers along the supply chain and to counter possible episodes of child and forced labour, in 2024, Acea strengthened the commitment it had already made with the Code of Ethics and the Human Rights Policy, by adopting the Sustainable Procurement Policy that includes the principle of Work and People, calling on suppliers to comply with current labour regulations, refraining from any form of illegal, forced or child labour. The Policy also promotes best practices in environmental, social and good governance sustainability along the supply chain and is submitted to suppliers at the qualification stage. Reference is made to paragraph 1.5 for more information on the policies.

Again with the aim of promoting ethical and sustainable behaviour along the supply chain, in 2024, monitoring continued in respect of suppliers' performance with regard to environment, labour and human rights, ethics and sustainability in procurements through the Ecovadis platform, with 783 suppliers assessed at 31.12.2024. In 2024, Acea organised the first "Vendor Day Acea. Together for Growth", during which it shared the vision and objectives set out in the 2024-2028 Business Plan with its partners and suppliers, so as to engage the supply chain in business challenges and opportunities. With reference to the issue of occupational health and safety along the supply chain, Acea conducted about 15,000 work site safety audits during the year, relating both to major maintenance contracts for networks and services in the water and electricity sectors, and to smaller contracts, and organised the "Safety Walk & Talk" and the "Contractor Safety Day" to disseminate a culture of safety at work sites.

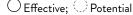
3.3 COMMUNITIES INVOLVED ESRS S3

ESRS 2 SBM-3 Aware of the role it plays in the socio-economic system in which it operates, integrates its commitment to contribute to the sustainable development of the territories and the welfare of its people and all its stakeholder into the efficient and effective management of its businesses. The Group recognises its stakeholders not only as parties that have a key role in enabling the company's objectives but also, and above all, as the main direct or indirect recipients of its activities. The Group promotes the development of trusting relationships with stakeholders and adopts an inclusive and proactive approach in their regard.

Acea identifies stakeholder categories and sub-categories within the Stakeholder Tree, also subdividing them according to issues relevant to the business. Within these categories, the different communities, which are impacted by the Group's activities because they live near the production sites (waste-to-energy plants, purifiers, primary substations, etc.), are represented, including by neighbourhood committees, territorial committees, and environmental and social protection associations. Reference is made to paragraph 1.6 of the document for more details on the stakeholder engagement process.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Economic, social and cultural rights of the community	Territory-related impacts	 impact	Creation of community awareness and sensitivity and skills in new generations regarding the responsible use of natural resources	(+)	medium	downstream
Civil and political rights of the community	Freedom of expression	 impact	Constructive dialogue with the territory and community	+	medium	• downstream
Civil and political rights of the community	Freedom of expression	 impact	Failure to take community and territorial demands into account in company choices and planning	Θ	short	• downstream
Economic, social and cultural rights of the community	Territory-related impacts	R risk	Possible impacts on the development of company plants due to territory's lack of acceptance		medium	• own operations

⁺ Positive impact; - Negative impact;



3.3.1 THE POLICIES AND PROCESSES RELATING TO THE COMMUNITIES INVOLVED

ESRS S3-1 The Group is committed to managing relations with its stakeholders according to the principles of integrity, transparency, fairness, impartiality and inclusiveness according to the provisions of the Code of Ethics, the Human Rights Policy and the Integrated Management Systems and Sustainability Policy. The aim is to create relationships based on listening, dialogue, and the mutual understanding of points of view and expectations, with the goal of encouraging wider stakeholder engagement in defining the Group's strategic priorities as well as its business operations, by also dealing with any critical and/or conflict situations as soon as possible. Any significant negative impacts are not systemic in nature but, where applicable, relate to individual projects linked to infrastructure developments. The Acea Group respects the rights of local communities and contributes to their advancement, promoting the socio-economic development of the contexts in which it operates. The Acea Group is attentive to the protection of the natural environment and ecosystems, working to preserve their integrity, respecting the community and the intergenerational pact. The Group also contributes to the enhancement of the territory by supporting socially useful initiatives with a cultural purpose or that promote the well-being of the community. In this regard, projects and initiatives promoted by organizations, associations, institutions, etc., that concern social, environmental, cultural, sporting, recreational and charitable issues, aimed at the inclusion of people in particularly

disadvantaged social contexts, are supported, including financially.

As set out in the specific Policy, respecting human rights, understood in the broadest sense and with particular focus on the aspects relevant to the areas of operations managed, is an indispensable value for Acea. It therefore undertakes to ensure that no form of infringement occurs in this regard, developing and implementing processes that are appropriate to identifying the potential or current risks and impacts of its activities in the context of human rights, to prevent breaches and to remedy these should they occur. For a details on Group Policies, reference is made to paragraph 1.5. In 2024, there were no reported cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises.

ESRS S3-2 Participation by the communities involved takes place at different stages and with different stakeholders depending on the specific initiative and instance. The stakeholder engagement process requires the owner of the initiative to identify the stakeholders that need to be engaged through stakeholder mapping, so as to assign relevance and define priorities in terms of engagement. Having identified the stakeholders to be involved, the owner, in agreement with any relevant corporate structures, defines the forms of engagement and the operational tools that will be used, taking into account the subject and objectives of the activity. Stakeholders are therefore involved in the manner envisaged by the tools used (e.g.

0

Through an invitation to work tables or other specific communications, etc.) by the owner of the engagement process.

With reference to communities, initiatives frequently take place involving educational institutions, local administrations, consumer associations and environmental associations. These parties represent the needs and expectations of the territory, making an essential contribution to directing the actions of companies towards greater sustainability and responding to the needs of the population.

In the water sector specifically, direct involvement is pursued through regular meetings with local administrations, e.g. at the Conference of Mayors, which is entrusted with decisions on guiding, planning, scheduling and controlling the service, and is therefore an essential element in ensuring constructive dialogue with the territory and communities.

In the energy grids sector, given the growing importance of the electrification of consumption and distributed generation scenario, discussions were developed with a number of local community stakeholders (e.g. citizens, energy communities, universities), to share plans for the development of flexibility services on the electricity grid and acquire the knowledge and propensity of stakeholders to participate in the new paradigm for the grid's operation. Participants in these initiatives were involved at different stages, in goal setting, monitoring operations and assessing results.

In both the environmental and water sectors, there are significant initiatives involving schools, which are particularly sensitive to the issues of environmental and water education and the skills required by emerging professions for the younger generations. Group companies are constantly responding to these demands with a range of proposals, from initiatives at plants, to school training projects for primary and secondary schools, to curricular training courses for high school students.

The operational responsibility for ensuring that community involvement takes place and that the results guide the company's approach lies with top management and management, according to Acea's organisational structures and the level of engagement activated. The stakeholder engagement process envisages that the planning of activities is approved by the organisational structure owner of the project/initiative, and also by higher-level managers, up to the level of Acea's top management if necessary, in the case of especially significant initiatives for the Group. Acea monitors the effectiveness of involvement through direct and indirect feedback with stakeholders on shared projects and the level of participation in initiatives launched by the Group. As part of the stakeholder engagement process, the feedback phase to stakeholders and any follow-up activities to stakeholders are regulated.

ESRS S3-3 Acea ensures that communities are heard in instances involving the Group's activities and that may be of concern to stakeholders. To do this, various channels are in place, ranging from commercial channels or for emergency and breakdown reporting, from physical contact to social channels and apps, whereby real-time updates and interaction with companies can be maintained. The use of these tools is promoted via corporate websites, communication campaigns and social channels. According to their organisation, operating companies have structures to oversee the territories, which manage the process of collecting, analysing and responding to requests from municipalities and the other main territorial stakeholders.

Reports, enquiries and complaints received through official channels are recorded, analysed and managed by the relevant corporate structures according to their type and priority, monitoring the entire process until resolution, ensuring updates to reporting stakeholders and using the data collected to improve processes and prevent future critical issues.

With regard to possible reports on episodes that may represent breaches of internal and external regulations, the Group has adopted a whistleblowing system that safeguards the whistleblower against possible retaliation. This system can be used by all stakeholders via a digital platform that complies with regulatory requirements. Reports received are analysed and processed according to a specific procedure, ensuring the appropriate checks and providing feedback to the whistleblower. Group companies have implemented Environmental and Energy Management Systems (ISO 14001, ISO 50001), defining environmental objectives, the relative improvement programmes and tools to control and monitor potential and actual risks and impacts, to prevent and minimise impacts on local communities.

3.3.2 OBJECTIVES, ACTIONS AND RESOURCES RELATED TO THE COMMUNITIES INVOLVED

ESRS S3-4; ESRS S3-5; ESRS 2 MDR-T; ESRS 2 MDR-A

In accordance with the policies adopted, the Sustainability Plan defines the objectives that the Group intends pursuing to manage the positive and negative impacts and any relevant risks and opportunities on the topic: land-related impacts, freedom of expression, community rights. The objectives and actions related to the issue for the communities involved fall under the plan objective "Value for the Territory", which includes an action line regarding innovation in the territory and a line for listening and supporting communities.

Action lines	Action	IRO	Description V
Innovation in the territory	►Water kiosks► Electric mobility infrastructure► Reducing odour emissions	R I	 ▶ Creation of community awareness and sensitivity and skills in new generations regarding the responsible use of natural resources ▶ Possible impacts on the development of company plants due to territory's lack of acceptance ▶ Creation of community awareness and sensitivity and skills in new generations regarding the responsible use of natural resources
Stakeholder engagement	 ▶ Dialogue on the territory ▶ Training in schools ▶ Artistic lighting ▶ Sponsorships ▶ Raising awareness on environmental issues 	I I R	 Constructive dialogue with the territory and community Failure to take community and territorial demands into account in company choices and planning Possible impacts on the development of company plants due to territory's lack of acceptance

The objectives and investments envisaged in the Plan up to 2028 and progress in the actions and related investments at 31.12.2024 are shown below. Opex of approximately EUR 0.7 million was realised in 2024 for actions referring to stakeholder engagement.

Action line	Action (company)	Target (a) 2028	Target progress	Capex 2028 (EUR M)	Capex 2024 (EUR M)
Innovation in the	► Water houses (Acea Ato 2, AdF)	▶102 new installations	30 kiosks installed	2	0.7
territory	► Electric mobility infra- structure (Acea Energia)	▶ 229 new stations	50 stations installed	11	1.7
	▶Raising awareness on environmental issues	▶1-2 communication campaigns per year	7 campaigns	-	-
	▶Dialogue on the territory	▶1 territorial project per year	1 territorial project	_	_
Stakeholder engagement	▶Training in schools	▶1 primary and secondary school programme per year	1 educational programme	-	-
	► Artistic lighting	▶8 interventions/year	24 events	-	_
	▶Sponsorships	▶20 projects/year	50 projects	-	_
Supporting local communities (foreign countries)	► Training in schools (Consorcio Agua Azul)	▶at least 1 campaign per year and 2,780 school kits distributed in Annual target reached poorer areas		-	-
	► Hygiene-sanitation training (Aguas de San Pedro)	▶25 workshops/year for local communities	Annual target reached		-
	▶ Fire Prevention (Aguas de San Pedro)	► Training of 1 fire-fighting team and 30 new hydrants installed	Annual target reached	_	-

All Group companies are committed to preventing negative impacts, enhancing positive impacts, generating value in the territories where they operate, and mitigating the risks relating to interaction with communities. Specifically, to promote the creation of constructive dialogue with the territory, take into due consideration the requests of communities and reduce the risk that its presence is not accepted in the territory, the Group's companies envisage processes and tools for managing relations with stakeholders and receiving the requests from the community, to activate projects and solutions that can maximise the level of the services rendered and infrastructure projects.

For example, the companies operating in the environment chain are committed to building trust with the communities involved; to this end, the main waste treatment plants were opened for stakeholder visits during the year. To promote transparent communication with the citizens of the Municipality of Rome, a new WhatsApp channel was activated in 2024 to receive information on breakdowns, maintenance activities and planned interventions on the water and electricity networks. To make energy infrastructures more sustainable and resilient and generate positive impacts on the quality of life in communities, the Group's electricity distribution company has carried out interventions, including designing

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analytics processes to perform predictive maintenance of plants, aimed at adapting infrastructure to the increasing electrification of consumption and distributed generation, such as connecting to large infrastructure works.

In relation to any significant negative impacts on the communities that may emerge as a result of the need to acquire land, for the installation of plants and networks needed to provide services, Acea undertakes a cost-benefit analysis to assess the solutions that could reduce the potential negative impacts on stakeholders.

Acea has also launched several initiatives to create greater awareness in the community and the younger generations on the issue of the responsible use of natural resources and train students in green skills. For example, in the water sector, in response to the requests in the area that highlight an increased awareness towards a more sustainable and responsible way of consuming natural resources, awareness-raising initiatives on the sustainable management of the integrated water cycle, including the purification chain, have been implemented, targeting citizens as a whole and the new generations, with training and school-to-work alternation activities. Specifically, in 2024, as part of the three-year Memorandum of Understanding with the Ministry of Education and Merit, a new "Water Education" project was created for primary and secondary schools in Lazio, Campania, Umbria, Tuscany, Molise and Valle d'Aosta, which includes a dedicated digital platform and the opportunity to participate in guided tours at the operational sites in the regions involved. In addition, the Group offered a free training course to young people up to 35 years of age or unemployed and out-of-work adults in Lazio to acquire technical skills in the water and electricity business sectors, offering them the opportunity of a placement in the Acea

The objectives and activities carried out by Acea abroad are very relevant considering the economic and social context in which Group Companies operate. To this end, the plan includes training and awareness-raising activities, particularly on hygiene and health issues and respect for natural resources, as well as specific practical measures to support local communities.

In particular, efforts continued during the year to increase attention and awareness on the importance of preserving the quality of water resources from a health and hygiene perspective, including through the organisation of workshops dedicated to the local community and training at schools.

MIM-ACEA MEMORANDUM OF UNDER-STANDING TO PROMOTE THE CONSCIOUS USE OF WATER RESOURCES

Acea signed a three-year Memorandum of Understanding with the Ministry of Education and Merit to promote education on the correct use of water resources in primary and middle schools. The educational project, in which Acea will make its know-how and expertise available to schools nationwide, aims to provide training and information on the value of safeguarding and consciously using water. Topics related to the water cycle (water collection, distribution and quality); uses in industry, agriculture and households; supply and reuse; infrastructure, such as aqueducts and dams; and the application of technological innovation and Artificial Intelligence in the optimal management of the water system will be explored. The Protocol includes interactive formats and quizzes, videos and photographic material for students to illustrate all the operational phases in the water cycle, and also specific training sessions for

teachers.
"The agreement is a novelty in the European context as it sees a company like Acea, the leading national water operator, put its expertise at the service of the Ministry of Education and Merit's education measures. Today's initiative also confirms Acea's commitment to introducing the Charter of the Person, which puts the citizen at the centre as the recipient of essential public services. Greater involvement by young people is needed to establish a culture of sustainable water use so that, by adopt-

ing respectful lifestyles, we can have an impact on climate change,

shaping the citizens of tomorrow." Fabrizio Palermo, CEO of Acea.

3.4 CONSUMERS AND END-USERS ESRS S4

ESRS 2 SBM-3 Acea is a major infrastructure operator in water, environmental (waste treatment and composting, energy valorisation, material recovery) and energy (production, distribution and sale of energy, public lighting) services).

The services provided by water companies cover the water, sewerage and purification segments, ensuring environmental protection and public health. Customers of the water sector are the inhabitants of the municipalities where the water companies are located.

In the environmental sector of waste management, companies

provide services to public and private customers, in the treatment and recovery of materials, from the perspective of a circular economy, energy valorisation (electricity and biogas) and disposal. The energy sector includes the generation, distribution and sale of energy. Production is mainly from renewable sources, with a growing commitment in the photovoltaic sector. Distribution covers the needs of households and businesses in the Rome and Formello

metropolitan area, whereas the sale of electricity and gas is aimed

at customers in the free market and, residually, in the protected

market.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Information- related impacts for customers	Access to (quality) information	 impact	Increased customer awareness in the choice of products and services via appropriate corporate communications	+	short	• downstream
Social inclusion of consumers and/or end-users	Access to products and services	 impact	Development of innovative, digital and value-added solutions and services (e-mobility, green product sales) in response to emerging needs	+	medium	• downstream
Personal safety of consumers and/or end users	Health and safety	 impact	Possible damage to human health related to the inadequate control and monitoring of the quality of services provided (drinking water quality, etc.)	Θ	short	• downstream
Social inclusion of consumers and/or end-users	Access to products and services	 impact	Deterioration in the quality of life and socio-economic context due to the possible lack of access to adequate services	9	short	• downstream
Information- related impacts for consumers and/or end-users	Confidentiality	 impact	Loss of customer data due to privacy breaches	<u>-</u>	long	• downstream
Information- related impacts for consumers and/or end-users	Freedom of expression	 impact	Deterioration of the customer experience and increase in complaints and litigation	<u>-</u>	medium	• downstream
Social inclusion of consumers and/or end-users	Responsible business practices	 impact	Economic damage to customers for unfair, deceptive and aggressive business practices	<u>-</u>	short	• downstream
Social inclusion of consumers and/or end-users	Access to products and services	 impact	Difficulties in using online services (digital counter, website, etc.) by those less accustomed to using technology (elderly, etc.)	<u>-</u>	short	• downstream

O Effective; O Potential

3.4.1 CONSUMER AND END-USER POLICIES

+ Positive impact; - Negative impact;

AND PROCESSES

ESRS S4-1 Acea is committed to implementing correct, transparent and non-discriminatory behaviour towards customers, corresponding to the universal nature of the service characterising its activities, and consistent with the principles in the Code of Ethics and the Integrated Management Systems and Sustainability Policy. Contracts and communications with customers are based on clarity, simplicity and completeness of information to enable an informed choice by the customer. Acea is mindful of understanding

customers' needs, translating them into performance requirements, and pursuing their satisfaction by guaranteeing excellent quality standards in the services/products offered. Acea's suppliers are also required to share their commitment to customers by guaranteeing high quality standards, the accessibility of services, safety and efficiency. Suppliers undertake to minimise non-conformities and potential complaints arising from their own activities and those of their suppliers and pursue initiatives that contribute to the continuous improvement of production processes and quality performance, also for the benefit of customers and end-users.

Acea treats customer data confidentially and in accordance with competition, privacy, and personal data protection legislation. To this end, a Group Privacy Governance Model has been established, in compliance with the EU Regulation 2016/679 on data protection (GDPR), in which roles, responsibilities and implementation methods of the basic principles of privacy protection regulations are identified, using a preventive risk-based approach supported by continuous monitoring and periodic reviews.

Acea has an Antitrust Compliance Programme in place, consisting of a set of regulatory tools and organisational safeguards, methodologies and processes aimed at preventing the potential risks of infringing competition and consumer protection laws, including the Antitrust Compliance and Consumer Protection Manual as the main tool. In addition to reporting the main elements of the reference legislation, the Manual sets out the relevant cases and conducts and the main rules of conduct to be observed by all recipients, including specific guaranteed protection for vulnerable consumer groups (e.g. minors, the disabled), and reaffirms and applies the principles in the Code of Ethics, which enshrines the protection of competition and consumers as founding values of Acea and the Group's Companies' business.

Any significant negative impacts for customers that are not systemic in nature but related to individual incidents, may involve the areas of privacy and business practices.

As stated in the Human Rights Policy defined on the basis of the main relevant international references (International Charter of Human Rights, OECD Guidelines, Global Compact, etc.), the Acea Group is aware that it provides public utility services, underpinning the fundamental rights of individuals, and generating significant impacts on people. Based on this assumption, it plans investments and conducts its activities with the aim of developing accessible and functional services to improve the quality of life. Acea is committed to ensuring that no form of human rights' infringements occur, developing and implementing processes that are appropriate to identify the potential or current risks and impacts of its activities in the sphere of human rights, preventing violations and remedying them if they do occur. Furthermore, Acea has made the whistleblowing platform for reporting possible violations of these rights also by parties in the downstream value chain available to all stakeholders, including external parties.

Acea is committed to designing infrastructure and delivering products and services in such a way as to protect the health and physical integrity of its customers, adopting appropriate measures to prevent and protect health and safety from any type of potential direct or indirect impact, with specific regard to the activities managed. For example, the Group pays careful attention to the quality controls for drinking water intended for human consumption.

ESRS S4-2 Through the Institutional Affairs & Business Development Function of the Parent Company, the Acea Group interacts, in a structured manner, with consumer associations operating in the territory, in particular those recognised by the National Council of Consumers and Users (CNCU), which represent the demands of consumers and end-users. Specifically, the

Association Relations Unit is responsible for overseeing the relationship with consumer representatives and receiving requests from the territories in the context of ongoing relations with them. The Unit, in turn, forwards these to the Acea SpA functions and to the relevant operating companies for the necessary analyses and possible related actions. In addition, it organises regular meetings with consumer representatives and, in relation to specific needs, dedicated meetings with the individual sector representatives. The ADR Acea SpA - Consumer Associations body also falls under the Unit. In the framework of the conciliation protocol signed between some Group companies (6 for the Water Sector and 2 for the Energy Sector) and consumer associations registered with the CNCU, this body deals with the out-of-court management of disputes that may arise between consumers and companies.

Acea has a corporate procedure in which the stages of activities relating to measuring the customer experience and verifying their internal application are formalised, and carries out periodic surveys of customer and citizen satisfaction with respect to the services provided. The customer satisfaction surveys ("quality perceived") are carried out with support from a market research company. Most of the surveys are distributed evenly throughout the year so as to generate frequent results that allow the Group companies to intervene promptly, where necessary, on the provision of the services and communication. Additionally, the new continuous survey method for customers who contact Acea (call back) makes it possible to minimise the impact of any seasonal peaks on the results. In 2024, Acea was among the first Italian listed companies to receive a certificate from RINA Services Spa confirming its processes comply with the ISO 10004 guidelines for the design, development and delivery of customer satisfaction monitoring and measurement services.

In accordance with the provisions of the law and the relevant institutions (ARERA, Area Management Authorities), water companies adopt the Service Charter, which is an annex to the supply contract. Among other commitments, the Service Charter recognises the users' right of access to information and an opinion on the actions of operators as an essential element of conscious participation by all users in the service; it outlines the modalities for the submission of complaints and requests for information and the related answers by operators; it states the modalities for proposing conciliatory methods and alternative dispute resolution procedures; it provides for concessions for certain categories of more needy customers, such as the elderly, handicapped or persons with illnesses.

Within the different companies, the sales and communication units ensure the proper functioning of the customer care and management procedures at the different stages of the relationship with the organisation. The development of innovative digital channels, the counter booking system and the video call service are designed to ensure easy and inclusive access to services. These tools make it possible even the most vulnerable consumers to communicate their needs quickly and directly.

ESRS S4-3 The Acea Group is mindful in adopting responsible marketing styles, focusing, in the promotion of its products and services, on methods and forms of communication that are suited to making the message authentic, clear, transparent and exhaustive, and guiding consumer choices without manipulative or deceptive intent

Acea operates the ADR (Alternative Dispute Resolution) Body, Acea SpA - Consumer Associations which, under the Conciliation Protocol signed between certain Group Companies (6 for the Water Sector and 2 for the Energy Sector) and the Consumer Associations registered with the CNCU, deals with the out-of-court management of disputes that may arise between consumers and the Company.

In the commercial sector, the marketing processes implemented by business partners are constantly monitored and any resulting complaints about disputed contracts are followed up with corrective measures. For customers experiencing hardship conditions, support instruments are provided by legislation to ensure water and energy services are affordable. These instruments take the form of social bonuses and are paid to household utility owners against specific requirements.

Most Group companies have ISO 9001-certified quality management systems in the pursuit of continuous performance improvement and resulting customer satisfaction. These systems are based on fundamental principles such as customer focus, management involvement and a process approach. Any aspects of the service that may lead to negative impacts, in terms of dissatisfaction with the quality of customer service, are reported as non-conformities and actions are initiated to correct the phenomenon and prevent its recurrence.

In the drinking water sector, through the implementation of Water Safety Plans, it is possible to prevent and reduce the risks of water pollution or shortages by analysing hazardous events along the entire supply chain and defining their mitigation interventions, monitoring systems, operating procedures in both ordinary and emergency conditions, the water quality control plan, and the methods for informing the public and the competent authorities.

Customers in the electricity distribution service include users of electro-medical equipment, to whom special attention is paid in the event of breakdowns or planned supply interruptions, providing solutions to ensure their safety.

The electricity distribution network management activities include the Electricity System Safety Emergency Plan (PESSE), which is designed to prevent uncontrolled blackouts in the event of an imbalance between energy demand on the national grid and electricity

production. The aim of the Plan is to bring about a predefined and targeted reduction in electricity consumption, through a selective and planned shutdown of certain utilities, to avoid the occurrence of widespread power cuts with consequent inconvenience to the entire community. Major utilities such as hospitals, railways, airports, etc. are excluded from the plan.

Acea ensures that consumers are heard when they have concerns about the Group's activities and that may be a cause for concern for stakeholders. To do this, various channels are in place, ranging from commercial channels or for emergency and breakdown reporting, from physical contact to social channels and apps, whereby real-time updates and interaction with companies can be maintained. The use of these tools is promoted via corporate websites, communication campaigns and social channels. Reports, enquiries and complaints received through official channels are recorded, analysed and managed by the relevant corporate structures according to their type and priority, monitoring the entire process until resolution, ensuring updates to reporting stakeholders and using the data collected to improve processes and prevent future critical issues. With regard to possible reports on episodes that may represent breaches of internal and external regulations, the Group has adopted a whistleblowing system that safeguards the whistleblower against possible retaliation. This system can be used by all stakeholders via a digital platform that complies with regulatory requirements. Reports received are analysed and processed according to a specific procedure, ensuring the appropriate checks and providing feedback to the whistleblower.

3.4.2 ACTIONS AND OBJECTIVES RELATING TO CONSUMERS AND END USERS

ESRS S4-4; ESRS S4-5; ESRS 2 MDR-T; ESRS 2 MDR-A

The Sustainability Plan defines the objectives that the Group intends pursuing in line with the adopted policies, to manage the relevant impacts on the topic highlighted following the double materiality analysis, including: information-related impacts for customers and consumers/end users, social inclusion for consumers/users, personal safety of consumers/users.

It is specified that certain sustainability objectives are common and already reported in the "Communities involved" section because, for Acea, most of the services offered to consumers and end-users correspond with services rendered to the community. Furthermore, the impact related to possible harm to human health associated with the inadequate control and monitoring of the quality of services provided is already addressed in the Water and Marine Resources section with the objectives referring to water quality.





Action lines	Action	IRO	Description V
Innovation in the territory	 ►Water kiosks ► Electric mobility infrastructure ► RomeFlex flexibility activation ► Smart lighting ► Reducing odour emissions ► Management of electricity grid customers 	 	 Increased customer awareness in the choice of products and services via appropriate corporate communications Development of innovative, digital and value-added solutions and services (e-mobility, green product sales) in response to emerging needs Deterioration of the customer experience and increase in complaints and litigation
Stakeholder engagement Raising awareness on environmental issues Dialogue on the territory Training in schools Artistic lighting Sponsorships		I I	 Increased customer awareness in the choice of products and services via appropriate corporate communications Difficulties in using online services (digital counter, website, etc.) by those less accustomed to using technology (elderly, etc.)
Water quality	► Quality of purified water ► Quality of drinking water ► PFAS monitoring	I	➤ Possible damage to human health related to the inadequate control and monitoring of the quality of services provided (drinking water quality, etc.)

With reference to the potential negative impact "Deterioration in the quality of life and socio-economic context due to the possible lack of access to adequate services", it is noted that the Group's operating companies sign an Integrated Water Service Charter that defines the quality levels of water services for drinking water, public sewage and purification that operators are obliged to observe.

The management of impacts related to the "Loss of customer data due to privacy breaches" and "Economic damage to customers for unfair, deceptive and aggressive business practices" is done through the Group's policies on the subject, described in the section on Business Conduct.

Action line	Action (company)	Target (a) 2028	Target progress	Baseline 2023	Capex 2028 (EUR M)	Capex 2024 (EUR M)
Innovation in the	► Electricity grid custom- er management (areti)	▶-20% non-recurrent complaints	-12% non-recur- rent complaints		4	0.1
territory	► Romeflex flexibility activation (areti)	▶890 interruptions avoided	904 interruptions avoided	-		
Digitalisation	► 2G meters (areti)	► 770,000 installed meters (for a total of over 1,750,000 by 2028)	58% (446,351 meters installed)	986,291	91	36.1

To mitigate any negative impacts and enhance the positive impacts on customers and end-users from the various business activities, companies pay attention to the demands being made and implement projects and solutions to maximise the effectiveness of the services rendered.

In addition, in response to evolving customer demands, the Group has developed new tools (e.g. chatbots, artificial intelligence, interactive fault map, etc.) to improve the services provided. In the electricity distribution service, the campaign to replace electricity meters with new-generation equipment will enable users to increase their awareness of consumption using the real-time communication possibilities offered by the new devices.

To protect customers, Acea Energia is committed to preventing unfair, deceptive and aggressive commercial practices in respect of customers. To this end, it has continued to verify that its sales agents conduct themselves correctly, that the presentation of contracts is clear, and, above all, that customers are fully aware of the choice they have made, that they receives specific communications on the pro-

gress of the case by email or telephone to limit the risks of misunder-standings and late exercising of their right of withdrawal. Communication actions were promoted to increase customer awareness in the choice of innovative products and services. Acea Energia's sustainable offers fall into this context, with the Luce 100% Green and 0% CO_2 tariffs, which are consistent with the Acea Group's environmental protection and regional commitment targets.

In 2024, so as to better manage the customer satisfaction monitoring process with the aim of improving the customer experience, Acea obtained certification confirming its processes comply with the ISO 10004 guidelines for the design, development and delivery of customer satisfaction monitoring and measurement services. The protection of personal data is an issue of fundamental interest to customers, and in this regard, Acea is committed to continuously improving the relevant corporate processes; in this respect, during the year, the Register of Processing Activities was updated, specifying the types of data subjects, personal data processed, the systems used and the relevant security measures.

4. Governance information

ESRS 2 IRO-1 Acea is mindful of managing the impacts, risks and opportunities related to business conduct, particularly in the areas of business ethics, anti-corruption, whistleblowing, the appropriate management of relations with suppliers, identified with the involvement of key external and internal stakeholders as part of the process of double materiality, and is aware that these aspects affect the sustainability of business operations and are central to ensuring compliance with environmental and social regulations.

Specifically, external stakeholders were involved in the dedicated multi-stakeholder focus group, when the potentially relevant impacts, identified by Acea were discussed.

Sustainability risks and opportunities were assessed by corporate risk owners, as part of the risk assessment process (ERM) already in use by the Group.

Reference is made to paragraph 1.2 Governance, for information on the role of the administrative, management and supervisory bodies.

Subtopic	Sub-subtopic	IRO	Description	Positive/Negative/ Current/Potential	Time frame	Value chain
Protection of whistleblowers		 impact	Promoting a work environment that guarantees the freedom and safety to report unlawful or fraudulent activities (whistleblowing)	(+)	medium	• own operations
Management of relations with suppliers including payment practices		 impact	Promotion of sustainability logic along the supply chain, resulting in an improved production environment	+	long	•upstream •own operations
Management of relations with suppliers including payment practices		 impact	Difficulties experienced by smaller companies to comply with sustainability requirements required by the Group	<u>-</u>	medium	• upstream
Active and passive corruption	Prevention and detection, including training/ incidents	 impact	Negative repercussions on the social environment and the production system due to incidents of corruption and misconduct	\odot	short	upstreamownoperationsdownstream
Management of relations with suppliers including payment practices		 impact	Delays in payment deadlines that can generate liquidity crises and difficulties in business continuity for suppliers	©	short	•upstream •own operations
Management of relations with suppliers including payment practices		R risk	Potential sanctions for misconduct (privacy, antitrust, etc.) by third parties (e.g. sales agents)		medium	• own operations

⁺ Positive impact; - Negative impact; - Effective; - Potential



4.1 POLICIES ON CORPORATE CULTURE AND CONDUCT ESRS G1-1

ESRS G1-1 Acea expresses its value orientation through the Code of Ethics, which sets out the principles and rules of conduct that guide the behaviour of all persons who, in any capacity, work in the interest of Acea and the companies of the Group in respect of stakeholders, i.e. those on whom Acea may exert a direct or indirect influence and who may, in turn, influence its actions (employees and contractors, customers, local communities, suppliers, financial community, institutions, natural environment, etc.). Each employee, collaborator, or top manager in the interests of Acea is required to know, formally accept, and comply with the provisions of the Code of Ethics. Acea ensures continuous information and training activities at all levels and monitors their uptake and effectiveness. Suppliers and partners are expressly requested

to conduct themselves in line with the general Acea principles and

Subsidiaries adopt the Code of Ethics based on a resolution taken by their Board of Directors, while subsidiaries and joint ventures promote its principles and content within their corporate entities. The Group implements the values expressed in the Code of Ethics through policies inherent to the key sustainability issues, including the relevant impacts, risks and opportunities, which include:

· Integrated Management Systems and Sustainability Policy, whereby the Group formalises its commitment to pursue the development of management systems (quality, environment, safety and energy) and strategic sustainability objectives in a synergistic manner;

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- Human Rights Policy, which constitutes the reference basis for the protection of human rights in Acea's activities and is based on documents issued by competent bodies recognised at international, European and national level;
- Equality, Diversity & Inclusion Policy, which promotes the principles of inclusion and valuing diversity, as well as preventing and countering all forms of discrimination within the corporate community;
- Acea Group Whistleblowing Management Policy, which defines the process for receiving, analysing and processing reports of alleged violations of Italian Legislative Decree no. 24/2023, the Code of Ethics, Legislative Decree no. 231/01 or its Management Model, the Anti-Corruption Guidelines, the Antitrust and Consumer Protection Guidelines, the Equality, Diversity & Inclusion Policy.

The Group is committed to the implementation and active maintenance of these policies, taking the necessary measures for their implementation, including training and awareness-raising of target audiences, and ensuring they are regularly monitored. The policies are made known to stakeholders through dissemination on the institutional website. As part of the Group's Regulatory System, consisting of the set of rules governing processes, responsibilities, information flows and control points, there are specific Guidelines that identify the principles of conduct and control and the best practices that need to be adopted for each macro-process and regarding the issue of compliance and governance. The guidelines on antitrust and consumer protection, privacy, ERM, and anti-corruption are noted for their relevance to the issue of business conduct. Acea SpA has an anti-corruption policy (UNI ISO 37001:2016) aimed at countering and preventing the phenomena of corruption.

In implementing the principles of the Code of Ethics, and in compliance with Legislative Decree 24 of 10 March 2023, Acea has adopted a procedure so as to easily, independently and objectively receive, analyse and process notifications of presumed violations (whistleblowing) of the Code of Ethics, the Organisation and Management Model pursuant to Legislative Decree No. 231/01, the Anti-Corruption Guidelines, the Antitrust and Consumer Protection Guidelines, the Equality, Diversity & Inclusion Policy and the Human Rights Policy, whilst guaranteeing the confidentiality and protection from retaliation of bona fide whistleblowers and also the protection of the reported party and other persons involved.

In compliance with regulatory provisions and guidelines issued by ANAC, Acea has adopted a dedicated IT platform, for reporting by internal and external entities of suspicious phenomena or behaviour, of irregularities in business actions, events or facts which could constitute a violation of internal or external regulations, with the maximum guarantee of confidentiality. Acea carries out information and training campaigns aimed at the entities managing reporting and staff on the model for receiving and handling reports.

Responsibility for managing notifications and for monitoring compliance with the values of transparency, legality, equity and ethical integrity in relations with employees, suppliers, clients and all stakeholders is entrusted to the Ethics Officer. Pursuant to the Code of Ethics and implementing Legislative Decree no. 24 of 10 March 2023, the Ethics Officer is the collegial body with the responsibility for managing the system of reporting alleged violations for non-compliance with

the law, internal regulations and the Code of Ethics (Whistleblowing System), as well as monitoring compliance with the values of transparency, legality, fairness and ethical integrity in relations with employees, suppliers, customers and all stakeholders. Its responsibilities also include promoting communication programmes and activities intended to further disseminate the principles of the Code of Ethics within the companies of the Group, as well as any updates made to the Code of Ethics, and issuing guidelines and operating procedures to reduce the risk of violations of the Code. The Ethics Officer is supported by a technical secretariat, set up within the Internal Audit function of Acea, to fulfil his/her duties. The Ethics Officer periodically reports in an anonymous and aggregate manner, in accordance with the methods defined by the relevant control models, on the issues subject to reporting, to the Financial Reporting Officer, the Antitrust Officer, the Anti-Corruption Officer, the Equality, Diversity & Inclusion Committee and the structures responsible for sustainability reporting.

Finally, the Ethics Officer publishes an annual report detailing the numbers and content of the reports received on the website's whistleblowing page. With reference to reports concerning alleged breaches of Italian Legislative Decree no. 231/01 or the organisation and management model adopted by the companies, the Reporting Management Policy stipulates that the managing entities, pursuant to Legislative Decree no. 24/23, are the Corporate Supervisory Bodies.

With regard to training on business conduct, compulsory e-learning courses are constantly held for all Group employees, including managers and top management, from the time that they join Acea. Of note are the training courses on the Code of Ethics, anti-corruption and the whistleblowing reporting system.

Specific training is provided to company personnel involved in the whistleblowing process on an operational level. The course content extensively covers various topics, including example cases on the implementation of the illustrated concepts. Participation in the courses is monitored to ascertain the actual take-up by recipients and effectiveness of the training itself based on the entry and exit tests that are conducted. Periodic in-depth courses are scheduled for specific representatives of the Holding and Group companies, based on risk-based assessments that take into account the areas of activity, updates to working methods and regulatory changes (Italian Legislative Decree no. 231/01, antitrust and data protection, etc.).

Furthermore, Acea conduct its business while respecting the European directives and guidelines on sustainability, the principles of sustainable development and contributing to the pursuit of the UN Sustainable Development Goals (2030 Agenda). Acea also operates in compliance with the principles issued by the United Nations Global Compact, which is actively promotes. Acea also supports third-party initiatives to promote sustainability in business management: in this regard, in 2024, it subscribed to the "Companies for People and Society" manifesto promoted by the UN Global Compact Network Italy. Finally, again in 2024, Acea signed a partnership protocol with the Prefecture of Rome for the protection of legality and fight against crime to be applied to the works it will be carrying out in the future in the Rome area in the water, electricity and environment sectors. The three-year agreement follows and implements the "National Framework Protocol" already signed with the Ministry of the Interior.

4.2 MANAGEMENT OF RELATIONS WITH SUPPLIERS ESRS G1-2

ESRS G1-2 Acea promotes the creation of a virtuous ecosystem with the objective of involving its suppliers in a partnership relationship, contributing to defining the sustainability characteristics of the products or services offered and promoting the introduction of initiatives aimed at reusing resources, minimising waste, and protecting social aspects.

Acea recognises the value of the companies in its supply chain that have chosen to be certified in the quality, safety, environment and energy, corruption prevention, social responsibility and gender equality areas and has undertaken initiatives to recognise companies that apply sustainability criteria, invest in safety training for their people and adopt energy efficiency practices to carry out their activities.

The Parent Company Procurement Function defines policies and guidelines and manages as a service the procurement of goods, services and works required by the Holding Functions and the main Group Companies, developing transparent relationships with suppliers.

The Code of Ethics, reaffirms the reference principles that should guide relations between Acea, as a contracting authority, and its suppliers (contractors and subcontractors), on the basis of the principle of mutual benefit and cooperation. The selection and purchasing processes are based on pre-contractual and contractual ${\tt conduct\ geared\ towards\ indispensable\ mutual\ loyalty, transparency,}$ and cooperation and pursue the recognition of equal opportunities for each supplier. Specific internal procedures, which include verification processes aimed at identifying potential reputational and corruption risks, govern relations with suppliers. Suppliers need to issue a declaration of unconditional acceptance of the prescriptions contained in the Code of Ethics and commitment to comply with them, which constitutes an element of the contract relationship, and Acea can carry out control actions at the supplier's production units or premises to verify compliance and is entitled to take appropriate measures in the event of any infringements of the principles and criteria of conduct.

The commitment to sustainable procurement is also reaffirmed in the Human Rights Policy, which prescribes the following: "Behaviours aimed at protecting the human rights of staff are expected from the supplier and sub-supplier, with particular attention to dignified working conditions (equal treatment and non-discrimination, fight against child labour and forced labour, guarantee of minimum wages, wages in line with the relevant national labour contracts and in any case proportionate to the quantity and quality of the work performed, compliance with the limits linked to the duration of working hours, etc.) and to the protection of health and safety at work, to safeguard the environment (protection of ecosystems and biodiversity, rational use of natural resources, waste minimisation, energy saving, etc.), to guarantee the quality of goods, services and performances and to respect privacy."

To register on the suppliers' list relating to the Single Regulations for Goods and Services and Works, suppliers must complete a self-assessment questionnaire on the Quality, Environment, Safety, Energy and Social Responsibility management systems (QASER), found on the Vendor Management platform. The QASER Questionnaire makes it possible to map the qualification level achieved by suppliers with regard to the certifications they hold and how these affect processes and procedures. Various systems for qualifying suppliers of works, goods and services are active in Acea in observance of principles of competition and equal treatment, which set out "general" re-

quirements - including the moral requirements provided for by sector legislation, including the acceptance of the Code of Ethics and the Organisational, Management and Control Model of Acea Group - and "specific" requirements, referring to the groups of goods covered by the individual Lists of Suppliers, which may include holding specific authorisations and certifications, such as:

- UNI EN ISO 9001 certification (binding requirement for all the "works" product groups and for almost all the "goods and services" suppliers);
- UNI EN ISO 14001 certification (for inclusion in the lists of suppliers for special non-hazardous waste, cleaning services, armed surveillance service and concierge/reception);
- Registration with the National Environmental Operators' Register or authorisation to manage a plant for the recovery/disposal of waste (for inclusion in suppliers' lists for Waste Management Systems):
- UNI EN ISO 45001 certification (for inclusion in the suppliers' list for the electro-mechanical maintenance of industrial plants and cleaning services);
- UNI EN 15838:2010 certification (for inclusion in the call center and back office supplier list);
- SA 8000 certification (for inclusion in the cleaning services suppliers' list).

In 2024, Acea adopted a Sustainable Procurement Policy that defines the guiding principles and operating methods to continuously promote best practices in environmental and social sustainability and good governance in the supply chain. The Policy applies to all suppliers, including subcontractors, sub-suppliers, partners and third party collaborators operating at Acea Group plants, sites and work sites. Signing the Policy is a mandatory condition for establishing and maintaining a business relationship with Acea, who is entitled to precautionary suspension and early termination with immediate effect of any existing business relationship in the case of breaches. A special channel of communication is provided for suppliers, where they can discuss the Policy with Acea.

The Group encourages its suppliers to implement sustainability-oriented practices and has therefore adopted the sustainability assessment model developed by EcoVadis, which monitors the ethical, social and environmental footprint of business partners. Acea invites its suppliers and business partners to register on the platform and undergo the evaluation process, following which the supplier is assigned a score, specifying the areas of strength, improvement and related action plan. To reward the most virtuous companies, the evaluation is included in Acea's tenders as one of the awarding criteria based on the assignment of a specific technical score. When submitting the bid, the supplier must declare that it holds a valid scorecard and share this with Acea or, alternatively, declare that is has completed the questionnaire.

The Acea Group with banking institutions, promotes the enhancement of the Ecovadis rating for its suppliers who intend exercising the option of assigning credit without recourse. In this context, suppliers will be able to receive a benefit linked to the achievement and improvement over time of the Ecovadis rating, from the banks with whom they have assigned their credit. This initiative is part of the measures to support the supplier stakeholder which, as specified in the current tender specifications, following the awarding of contracts, provides for the reimbursement of related charges in the event of its voluntary adherence to the commercial deferment proposal.



In addition to the rewarding elements applied when awarding tenders to entities with a sustainability rating, the Acea Group provides additional opportunities to suppliers who intend exercising the option for non-recourse in the assignment of credit. In this way, a

benefit linked to the achievement and improvement of sustainability ratings will be recognised by the Acea Group contracting authority/contracting party, in addition to a commercial deferral charge, as already provided for in the current tender specifications.

4.3 MANAGING CORRUPTION ESRS G1-3

ESRS G1-3;ESRS G1-4 Over time, Acea has developed and implemented a series of compliance measures designed to prevent the risks of unlawful conduct in the performance of business activities, particularly those most exposed to the risk of corruption.

The Parent Company implemented a Management System for the prevention of corruption, achieving UNI ISO 37001:2016 certification in 2023. The ACEA Group Anti-Corruption Guidelines identify the anti-corruption framework, i.e. the pillars for preventing and monitoring the risk of corruption, the need for information flows and reporting on the implementation and monitoring of the framework (implemented in detailed procedures), the principles of conduct to be observed in the sensitive areas potentially most exposed to the risk of corruption, and certain applicable controls and control measures that need to be adopted in managing these processes. Through the compliance clauses found in standard contracts, the Guidelines apply to Group Companies and to suppliers, partners, business associates and more generally, all parties who act in the name and on behalf of the Group or the parties they come into contact while conducting their business. With reference to the types of activity performed by Acea and to the assessment of the inherent risks and to the best practices of reference the following main sensitive macro-areas have been identified:

- purchases of goods, work, services, professional appointments and advice;
- selection, recruitment and management of personnel;
- management of donations;
- management of sponsorships and contributions to associations / entities of the Public Administration;
- · management of gifts, hospitality and entertainment expenses;
- merger & acquisition operations;
- relationships with the Public Administration;
- participation in tender procedures.

In the context of its risk assessment, to be carried out periodically, every company identifies additional activities potentially at risk of corruption on the basis of its reference business. Any investigations into corruption allegations that also lead to potential breaches of the 231 Model (e.g. assumption of active corruption) are handled by the respective Supervisory Bodies. Corruption offences that may not constitute infringements of the 231 Model are managed by the Ethics Officer (a collegial body appointed by a resolution/determination of the Company's Administrative Body as an internal subject of Acea SpA and as an external subject for the subsidiaries of the Acea Group).

To internally and externally disseminate and promote their values and rules, companies in the Acea Group activate communication/information/training campaigns on anti-corruption issues addressed to Group staff and also to external stakeholders (especially with reference to communication/information campaigns, e.g. compliance pills). Each company must initiate and at regular intervals (at least every 24 months) hold refresher mandatory training courses on corruption prevention issues, and, in any case, conduct

these promptly in the event of significant events (e.g. significant regulatory changes, substantial business changes, reports received, etc.).

An Anti-Corruption Officer is appointed for each Group company to ensure compliance for the prevention of corruption. In line with the principles of the Group's SCIGR, Anti-Corruption Officers prepare specific information flows to their respective top management and supervisory bodies, aimed at highlighting the implementation, updating and monitoring of the key elements of the anti-corruption framework, as well as the main measures to manage the relevant risk.

The adoption and updating of the Anti-Corruption Policy adopted by the Group Companies, which have implemented a Management System for the Prevention of Corruption, and of the Acea Group Anti-corruption Guidelines are disseminated via dedicated communications to staff, publication on the Company websites and intranet.

These documents are also referred to in the compliance clauses in the contract standards adopted by the Group and published on the website. The dissemination of an anti-corruption culture and training to the members of the Board of Directors is ensured on several occasions, such as, for example, the approval or updating of the Anti-Corruption Policy and Guidelines, as part of the information flows and periodic reports provided for by the Guideline itself and by the SCIGR - where the processes at risk and the mitigation measures adopted are also analysed in line with the anti-corruption framework, during the periodic reports on the Management System for the Prevention of Corruption carried out by the Anti-Corruption Manager (RAC) and Senior Management of the System and the related Review by the Management Body, and finally during any updates to the Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001 (especially with reference to predicate offences of a "corrupt" nature). With reference to the Holding Company, Board of Directors members periodically sign a declaration that they are cognisant and compliant with the main compliance documents adopted, including the Anti-Corruption Policy and Guidelines and Model 231, and the principles of conduct and control measures defined therein.

The Parent Company Internal Audit function carries out the controls envisaged in the Audit Plan, approved by the Board of Directors and subject to the opinion of the Control and Risk Committee. The Plan is drawn up on the basis of the analysis and prioritisation of the main risks for Acea and its subsidiaries, carried out during the Risk Assessment, also thanks to the monitoring carried out by the corporate Functions responsible for second-level controls. In 2024, around 88% of the Plan activities concerned corporate processes deemed as exposed to the risks as per Legislative Decree no. 231/2001, amongst which the crimes regarding corruption, the environment, and in violation of injury prevention laws and the laws safeguarding occupational health. With regard to audits of pro-

cesses related to corruption risks, there are, in particular, periodic audits of sponsorships, consulting, personnel selection, purchasing and payments, and out-of-court settlements for all subsidi-

aries that adopted the Model pursuant to Legislative Decree no. 231/2001.

4.4 BUSINESS CONDUCT METRICS AND OBJECTIVES

ESRS G1-3; ESRS G1-4; ESRS G1-6

ESRS 2 MDR-T At a governance level, for the management of sustainability issues and in line with the policies adopted, Acea has defined commitments on the promotion of the ethical dimension in business operations, on the integration of sustainability in business and on the dissemination of a culture of sustainability.

Anti-Corruption training

ESRS G1-3 Holding company functions receive training following changes to sensitive offences for anti-corruption purposes; some of these functions perform centralised services (purchasing, legal, etc.) for Group companies.

	Functions at risk	Senior executives	Administrative, management and control bodies	Other own workers
Training coverage				
Total employees to be trained	727 (in 18 Holding Functions)	78	0	6,295
Total trained employees	55 (in 8 Holding Functions)	39	0	4,703
Training procedures and duration				
Classroom training hours	83	0	0	0
Computer-based training hours	0	39	0	4,703
Frequency				
Frequency with which training must be provided	- the course is mandatory - half-yearly reminders are		o have not yet done the course	
Topics covered				
The course covered ISO 37001 on the Pr	evention of Corruption and th	e Management Syster	m for the Prevention of Corruption in	n Acea

Active and passive corruption

ESRS G1-4 In 2024, there were no cases of convictions for violations of anti-corruption laws.

Average payment times

ESRS G1-6 Considering the Group's corporate perimeter, which, net of foreign companies, covers 94% of consolidated external costs, payments made on time account for 45% of the total. With reference to the Group companies whose payments are handled by the Parent Company, representing 91% of the consolidated

dled by the Parent Company, representing 91% of the consolidated perimeter, the average payment time is 39 days, weighted on the amounts. This figure is compiled by taking into account the date when the invoice was registered and the overall main classes of pay-

ment stipulated in the contracts (30, 60, 90, 120 days). During the year, thirty proceedings were pending for late payment by suppliers. Suppliers of the main Group companies operating in Italy, considering the value of the order for the year as a whole, accounted for 50.9% of the suppliers of works, 35.3% of the suppliers of services and 13.8% of the suppliers of goods.

On the other hand, as far as the main foreign operations are concerned, the standard payment terms included in contracts include different types of time categories (on receipt of invoice, 60 days after receipt of invoice, etc.). Except in certain minor cases, payments of invoices are made, within the prescribed time limits.



5. Annex

5.1 REPORTING OBLIGATIONS

ESRS 2-IRO-2 A list of indicators subject to reporting for 2024 is provided below. This was defined on the basis of the double materiality analysis, with the involvement of the operating companies and Holding company managements/functions, to provide a meaningful representation of all Group businesses.

Below is the list of indicators subject to reporting:

ESRS 2

ESRS 2 BP-1	76
ESRS 2 BP-2	76
ESRS 2 GOV-1	77
ESRS 2 GOV-2	77
ESRS 2 GOV-3;	78
ESRS 2 GOV-4	80
ESRS 2 GOV-5;	81
ESRS 2 IRO-1	92; 101; 113; 118; 123; 127; 155
ESRS 2 IRO-2;	160
ESRS 2 MDR-A	116; 121; 125; 126; 128;
	130; 137; 145; 148; 153
ESRS 2 MDR-P;	88; 89; 119
ESRS 2 MDR-T	86; 100; 104; 105; 108; 114; 116; 119;
	121; 125; 128; 130; 137; 145; 148; 153; 159
ESRS 2 SBM-1	82; 83
ESRS 2 SBM-2	90; 134; 137
ESRS 2 SBM-3	92; 101; 123; 134; 144; 147; 150

ESRS E1

ESRS E1-1	100
ESRS E1-2	104
ESRS E1-3	105; 107
ESRS E1-4	104
ESRS E1-5	108; 110
ESRS E1-6	110; 111
ESRS E1-7	112
ESRS E1-8	113
ESRS E1-9	104

ESRS E2

ESRS E2-1	114
ESRS E2-2	116
ESRS E2-3	11∠
ESRS E2-4	116
ESRS E2-5	116; 118
ESRS E3	
ESRS E3-1	119
ESRS E3-2	119; 12°
ESRS E3-3	119
ESRS E3-4	121: 122

ESRS E4

ESRS E4 SBM-3	123
ESRS E4-1	124
ESRS E4-2	125
ESRS E4-3	126
ESRS E4-4	125
ESRS E4-5	126; 127

ESRS E5

ESRS E5-1	128
ESRS E5-2	130
ESRS E5-3	128
ESRS E5-4	130; 131
ESRS E5-5	130; 131; 132; 133

ESRS G1

ESRS G1-1	155
ESRS G1-2	157
ESRS G1-3	158; 159
ESRS G1-4	158; 159
ESRS G1-6	159

ESRS S1	
ESRS S1-1	135
ESRS S1-2	136
ESRS S1-3	136
ESRS S1-4	137
ESRS S1-5	137
ESRS S1-6	140
ESRS S1-8	140
ESRS S1-9	141
ESRS S1-10	141
ESRS S1-12	141
ESRS S1-13	141
ESRS S1-14	142
ESRS S1-15	142
ESRS S1-16	143
ESRS S1-17	143
ESRS S2	
ESRS S2-1	144
ESRS S2-2	145
ESRS S2-3	145
ESRS S2-4	145
ESRS S2-5	145
ESRS S3	
ESRS S3-1	147
ESRS S3-2	147
ESRS S3-3	148
ESRS S3-4	148
ESRS S3-5	148
ESRS S4	
ESRS S4-1	15′
ESRS S4-2	152
ESRS S4-3	153
ESRS S4-4	153
ESRS S4-5	153

The entity-specific indicators are shown below:

water treated at the treatment plants	122
treatment plants	122
total Group water losses	122
total drinking water leaving the aqueduct system	122



5.2 ECONOMIC KPI DETAILS TAXONOMY

TURNOVER 2024 FROM PRODUCTS OR SERVICES ASSOCIATED WITH ACTIVITIES ALIGNED WITH THE TAXONOMY

Financial year 2024		Year		
Economic activities	Code	Turnover	Turnover percentage of OpEx year 2024	
		(€000)	%	
A. TAXONOMY ELIGIBLE ACTIVITIES A.1 Environmentally sustainable activities (Taxonomy-aligned)				
	CCM 4.1	2 612	0.1%	
Electricity generation using solar photovoltaic technology	CCM 4.1	2,613	0.1%	
Electricity generation from hydropower		8,128		
Electricity generation from bioenergy	CCM 4.8	1,704	0.0%	
Transmission and distribution of electricity	CCM 4.9	497,759	11.7%	
District heating/cooling distribution	CCM 4.15	6,870	0.2%	
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	65,988	1.5%	
Construction, extension and operation of waste water collection and treatment systems	CCM 5.3	3,020	0.1%	
Collection and transport of non-hazardous waste in source segregated fractions	CCM 5.5	15,600	0.4%	
Anaerobic digestion of bio-waste	CCM 5.7	11,440	0.3%	
Composting of bio-waste	CCM 5.8	76	0.0%	
Capture and use of landfill gas	CCM 5.10	104	0.0%	
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	2,158	0.1%	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	149	0.0%	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	16,276	0.4%	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	602	0.0%	
Professional services related to energy performance of buildings	CCM 9.3	3	0.0%	
Supply of fresh water	WTR 2.1	781,551	18.3%	
Urban waste water treatment	WTR 2.2	491,100	11.5%	
Production of alternative water resources for purposes other than human consumption	CE 2.2	335	0.0%	
Sorting and recovery of materials from non-hazardous waste	CE 2.7	59,968	1.4%	
Collection and transport of non-hazardous and hazardous waste	CE 2.3	17,725	0.4%	
Collection and transport of hazardous waste	PPC 2.1	1,297	0.0%	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		1,984,465	46.5%	
of which enabling		516,948	9.70%	
of which transitional		-	0.00	
A.2 Activities that are Taxonomy-eligible but not environmentally sustainable (not taxonomy-aligned activities)				
Transmission and distribution of electricity	CCM 4.9	29	0.0%	
District heating/cooling distribution	CCM 4.15	6,051	0.1%	
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	4,657	0.1%	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	7,576	0.2%	
Supply of fresh water	WTR 2.1	35,034	0.8%	
Urban waste water treatment	WTR 2.2	109,000	2.6%	
Collection and transport of non-hazardous and hazardous waste	CE 2.3	12,835	0.3%	
Turnover of activities that are taxonomy-eligible but not environmentally sustainable (not taxonomy-aligned activities) (A.2)		175,181	4.1%	
A. Turnover of activities eligible for the taxonomy (A.1+A.2)		2,159,647	50.6%	
B. TAXONOMY NON-ELIGIBLE ACTIVITIES				
Turnover of activities not eligible for the taxonomy		2,110,208	49.4%	
Total (A+B)		4,269,855	100.0%	
		7		

		tial contribu	tion criteria	a		DN									
Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safe- guards	Turnover percentage aligned (A.1.) or eligible (A.2.) to the taxonomy, year 2023	Enabling activity category	Transition activity category
Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	∢	⊢
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes		Yes		Yes	Yes	0.0%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes			Yes	Yes	0.1%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes		Yes	Yes	Yes	0.1%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes		Yes	Yes		Yes	9.3%	А	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes		Yes	Yes	Yes	0.2%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes			Yes	Yes	NA		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes		Yes	Yes	Yes	NA		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes		Yes			Yes	0.3%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes		Yes	Yes	Yes	0.3%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes			Yes	Yes	Yes	0.0%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes			Yes	Yes	Yes	0.0%		
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	Yes	Yes	Yes	Yes	Yes	0.1%	А	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes					Yes	0.0%	А	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes					Yes	0.3%	А	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes					Yes	0.0%	Α	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes					Yes	0.0%	Α	
N/EL	N/EL	Yes	N/EL	N/EL	N/EL		Yes				Yes	Yes	15.9%		
N/EL	N/EL	Yes	N/EL	N/EL	N/EL	Yes	Yes			Yes	Yes	Yes	10.6%		
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes		Yes	Yes	Yes	NA		
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes		Yes	Yes	Yes	NA		
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes		Yes	Yes	Yes	NA		
N/EL	N/EL	N/EL	Yes	N/EL	N/EL		Yes	Yes		Yes	Yes		NA		
14.8%	0.0%	29.8%	0.0%	1.8%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	37%	12.1%	0%
														А	
															T
	N1/E1	N1/E1	NI/EI	N1/E1	N1/51								0.00		
EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%		
N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%		
N/EL	N/EL	N/M	N/EL	N/EL	N/EL								3.7%		
N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								NA 4 49/		
N/EL	N/EL	EL	N/EL	N/EL	N/EL								4.4%		
N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								NA 0.45%		
0.4%	0.0%	3.4%	0.0%	0.3%	0.0%								8.15%		
15.2%	0.0%	33.2%	0.0%	2.1%	0.0%								45%		

3



CAPEX 2024 FROM PRODUCTS OR SERVICES ASSOCIATED WITH ECONOMIC ACTIVITIES ALIGNED WITH THE TAXO

Financial year 2024	Year							
Economic activities	Code	CapEx	Portion of CapEx year 2024					
A. TAXONOMY ELIGIBLE ACTIVITIES		(€000)	%					
A.1 Environmentally sustainable activities (Taxonomy-aligned)								
Electricity generation using solar photovoltaic technology	CCM/CCA 4.1	15,695	1%					
Electricity generation from hydropower	CCM 4.5	3,275	0%					
Electricity generation from bioenergy	CCM/CCA 4.8	582	0%					
Transmission and distribution of electricity	CCM/CCA 4.9	232,686	16%					
District heating/cooling distribution	CCM 4.15	2,334	0%					
Construction, extension and operation of water collection, treatment and supply systems	CCM/CCA 5.1	6,426	0%					
Construction, extension and operation of waste water collection and treatment systems	CCM/CCA 5.3	403	0%					
Collection and transport of non-hazardous waste in source segregated fractions	CCM/CCA 5.5	1,013	0%					
Anaerobic digestion of sewage sludge	CCM 5.6	1,361	0%					
Anaerobic digestion of bio-waste	CCM/CCA 5.7	4,103	0%					
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1,387	0%					
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	49,950	3%					
Installation, maintenance and repair of renewable energy technologies	CCM/CCA 7.6	859	0%					
Supply of fresh water	WTR 2.1	505,687	35%					
Urban waste water treatment	WTR 2.2	241,361	17%					
Production of alternative water resources for purposes other than human consumption	CE 2.2	33	0%					
Sorting and recovery of materials from non-hazardous waste	CE 2.7	7,951	1%					
Collection and transport of hazardous waste	PPC 2.1	1.18	0%					
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		1,075,107	74.1					
of which enabling		284,882						
of which transitional		-						
A.2 Activities that are Taxonomy-eligible but not environmentally sustainable (not taxonomy-aligned activities)								
Cogeneration of heat/cool and power from bioenergy	CCM 4.20	373	0.0%					
District heating/cooling distribution	CCM /CCA 4.15	286	0.0%					
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM /CCA 4.30	2,643	0.2%					
Anaerobic digestion of sewage sludge	CCM 5.6	87	0.0%					
Supply of fresh water	WTR 2.1	18,482	1.3%					
Urban waste water treatment	WTR 2.2	62,204	4.3%					
Provision of IT/OT (information technology/operational technology) data-based solutions for loss reduction	WTR 4.1	598	0%					
Production of alternative water resources for purposes other than human consumption	CE 2.2	116	0%					
Collection and transport of non-hazardous and hazardous waste	CE 2.3	367	0%					
CAPEX of Taxonomy-eligible but non-environmentally sustainable activities (non-Taxonomy-aligned activities) (A.2)		85,156	5.9%					
A. Head of Taxonomy eligible activities (A.1+A.2)		1,160,263	80%					
B. TAXONOMY NON-ELIGIBLE ACTIVITIES								
CAPEX of activities not eligible for taxonomy		290,560	20%					
Total (A+B)		1,450,823	100%					

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Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safe- guards	Portion of CapEx aligned (A.1.) or eligible (A.2.) with the taxonomy, year the taxonomy year	Enabling activity category	Transition activity category
Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	∢	-
V	V	NI/EI	NI/EI	NI/EI	NI/EI		V		V		V	V	2.0%		
Yes Yes	Yes Yes	N/EL N/EL	N/EL N/EL	N/EL N/EL	N/EL N/EL		Yes Yes	Yes	Yes		Yes	Yes Yes	0.3%		
 Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	Yes	•	Yes	Yes	Yes	0.03%		
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	,	Yes	Yes	,	Yes	20.3%	A	
Yes	Yes	N/EL	N/EL	N/EL	N/EL	•	Yes	Yes		Yes	Yes	Yes	0.3%		
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	Yes	` `		Yes	Yes	N/EL		
Yes	Yes	N/EL	N/EL	N/EL	N/EL	`	Yes	Yes	` `	Yes	Yes	Yes	N/EL	`	
Yes	Yes	N/EL	N/EL	N/EL	N/EL	`	Yes	*	Yes	,	` `	Yes	0.0%	`	
Yes	`	N/EL	N/EL	N/EL	N/EL		`	`	`	`	`	Yes	0.4%		`
Yes	Yes	N/EL	N/EL	N/EL	N/EL	`	Yes	Yes	`	Yes	Yes	Yes	0.3%	`	`
Yes	N/EL	N/EL	N/EL	N/EL	N/EL	`	Yes	Yes	Yes	Yes	Yes	Yes	0.2%	А	`
	NI/EI	NI/EI	NI/EI	N 1 /E1	N1/51						_		2.20/		
 Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes					Yes	3.3%	A	
 Yes N/EL	Yes N/EL	N/EL Yes	N/EL N/EL	N/EL N/EL	N/EL N/EL		Yes Yes				Yes	Yes	0.0%	A .	
N/EL	N/EL	Yes	N/EL	N/EL	N/EL	Yes	Yes		•	Yes	Yes	Yes	15.5%		
N/EL	N/EL	N/EL	N/EL	Yes	N/EL	ies ,	Yes	Yes		Yes	Yes	Yes	0.01%	_	
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes		Yes	Yes	Yes	NA		
N/EL	N/EL	N/EL	Yes	N/EL	N/EL	•	Yes	Yes		Yes	Yes	Yes	NA NA		
22.1%	0.0%	51.5%	0.0%	0.6%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	75%	19.6%	0.0%
														A	
															1
EL	N/EL	N/EL	N/EL	N/EL	N/EL								N/EL		
EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
 EL	EL	N/EL	N/EL	N/EL	N/EL								0.15%		
 EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.05%		
 N/EL	N/EL	EL	N/EL	N/EL	N/EL								N/EL		
 N/EL	N/EL	EL	N/EL	N/EL	N/EL								7.46%		
 N/EL	N/EL	EL	N/EL	N/EL	N/EL								0.09%		
 N/EL	N/EL	N/EL	N/EL	EL	N/EL								0%		
N/EL	N/EL	N/EL	N/EL	EL	N/EL								N/EL		
 0.2%	0.0%	5.6%	0.0%	0.0%	0.0%								8%		
 22.3%	0%	57.1%	0.0%	0.6%	0%								83%		



OPEX 2024 FROM PRODUCTS OR SERVICES ASSOCIATED WITH ECONOMIC ACTIVITIES ALIGNED WITH THE TAXONOMY

Financial year 2024	Year						
Economic activities	Code	OpEx	Share of OpEx year 2024				
A. TAXONOMY ELIGIBLE ACTIVITIES		(€000)	%				
A.1 Environmentally sustainable activities (Taxonomy-aligned)							
Electricity generation using solar photovoltaic technology	CCM/CCA 4.1	978	0.4%				
Electricity generation from hydropower	CCM 4.5	908	0.4%				
Electricity generation from bioenergy	CCM/CCA 4.8	446	0.1970%				
Transmission and distribution of electricity	CCM/CCA 4.9	6,321	2.793%				
District heating/cooling distribution	CCM 4.15	973	0.4%				
Construction, extension and operation of water collection, treatment and supply systems	CCM/CCA 5.1	6,001	2.7%				
Construction, extension and operation of waste water collection and treatment systems	CCM/CCA 5.3	120	0.1%				
Collection and transport of non-hazardous waste in source segregated fractions	CCM/CCA 5.5	502	0.2%				
Anaerobic digestion of bio-waste	CCM/CCA 5.7	2,714	1.2%				
Composting of bio-waste	CCM 5.8	10	0.0%				
Capture and use of landfill gas	CCM /CCA 5.10	238	0.1%				
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	233	0.1%				
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	1,801	0.8%				
Installation, maintenance and repair of renewable energy technologies	CCM /CCA 7.6	10	0.0%				
Supply of fresh water	WTR 2.1	69,187	30.6%				
Urban waste water treatment	WTR 2.2	32,977	14.6%				
Provision of IT/OT (information technology/operational technology) data-based solutions for loss reduction	WTR 4.1	24	0.0%				
Sorting and recovery of materials from non-hazardous waste	CE 2.7	2,521	1.1%				
Collection and transport of non-hazardous and hazardous waste	CE 2.3	8,196	3.6%				
Production of alternative water resources for purposes other than human consumption	CE 2.2	41	0.0%				
Collection and transport of hazardous waste	PPC 2.1	192	0.1%				
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		134,394	59.4%				
of which enabling		8,365	8.97				
of which transitional		-	0.00				
A.2 Activities that are Taxonomy-eligible but not environmentally sustainable (not taxonomy-aligned activities)							
Transmission and distribution of electricity	CCM/CCA 4.9	14	0.0%				
District heating/cooling distribution	CCM /CCA 4.15	419	0.2%				
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM/CCA 4.30	2,251	1.0%				
Installation, maintenance and repair of energy efficiency equipment	CCM/CCA 7.3	101	0.0%				
Supply of fresh water	WTR 2.1	3,158	1.4%				
Urban waste water treatment	WTR 2.2	15,338	6.8%				
Collection and transport of non-hazardous and hazardous waste	CE 2.3	5,935	2.6%				
OpEx of activities that are Taxonomy-aligned but not environmentally sustainable (not taxonomy-aligned activities)		27,216	12.0%				
A. Operating expenses of Taxonomy-eligible activities (A.1+A.2)		161,610	71.4%				
B. TAXONOMY NON-ELIGIBLE ACTIVITIES							
OpEx of Taxonomy non-eligible activities		64,684	29%				
Total (A+B)		226,294	100%				

Substantial contribution criteria						ISH criteria	("Do no s	significa	int harm")						
Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safe- guards	Aligned OpEx dimension (A.1.) O eligible (A.2.) to taxonomy, year 2023	Enabling activity category	Transition activity category
Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No N/EL	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	∢	⊢
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes		Yes	`	Yes	Yes	1.6%		
Yes	Yes	N/EL	N/EL	N/EL	N/EL	`	Yes	Yes	` _	`	Yes	Yes	1.6%	` `	
Yes	Yes	N/EL	N/EL	N/EL	N/EL	`	Yes	Yes	` `	Yes	Yes	Yes	0.1%	` `	
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	`	Yes	Yes	` `	Yes	8%	А	
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	Yes	` `	Yes	Yes	Yes	0.4%	`	
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	Yes	` `	`	Yes	Yes	N/EL	`	
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	Yes	`	Yes	Yes	Yes	N/EL	`	
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	`	Yes	*	`	Yes	0.05%	*	
Yes	Yes	N/EL	N/EL	N/EL	N/EL	*	Yes	Yes	` `	Yes	Yes	Yes	4.16%	`	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL	`	Yes	`	` `	Yes	Yes	Yes	0.01%	`	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	`	`	Yes	Yes	Yes	0.12%	`	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL	*	Yes	Yes	Yes	Yes	Yes	Yes	0.21%	А	
														А	
Yes	N/EL	N/EL	N/EL	N/EL	N/EL		Yes	`				Yes	0.33%		
Yes	Yes	N/EL	N/EL	N/EL	N/EL		Yes	`	`		`	Yes	0%	А	
N/EL	N/EL	Yes	N/EL	N/EL	N/EL		Yes	`		`	Yes	Yes	32.25%	`	
N/EL	N/EL	Yes	N/EL	N/EL	N/EL	Yes	Yes	`		Yes	Yes	Yes	26.09%	`	
N/EL	N/EL	Yes	N/EL	N/EL	N/EL		Yes	`	Yes	Yes	`	Yes	N/EL	`	
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes	` _	Yes	Yes	Yes	N/EL	`	
N/EL	N/EL	N/EL	N/EL	Yes	N/EL		Yes	Yes		Yes	Yes	Yes	N/EL	`	
N/EL	N/EL	N/EL	N/EL	Yes	N/EL	`	Yes	Yes	` `	Yes	Yes	Yes	0.02%	`	
N/EL	N/EL	N/EL	Yes	N/EL	N/EL	*	Yes	Yes	` _	Yes	Yes	Yes	N/EL	` `	
9.4%	0.0%	45.2%	0.0%	4.7%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	75%		
														A	
EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.23%		
N/EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.35%		
EL	EL	N/EL	N/EL	N/EL	N/EL								0.18%		
N/EL	N/EL	EL	N/EL	N/EL	N/EL								N/EL		
N/EL	N/EL	EL	N/EL	N/EL	N/EL								5.60%		
N/EL	N/EL	N/EL	N/EL	EL	N/EL								N/EL		
1.2%	0.0%	8.2%	0.0%	2.6%	0.0%								7%		
10.6%	0.0%	53.3%	0.0%	7.4%	0.0%								83%		



The eligibility and alignment percentages for each environmental objective, consistent with the amendments made by the Environmental Delegated Act are provided below.

Turnover percentage/total turnover

	Aligned to taxonomy by goal	Eligible for taxonomy by goal
ССМ	14.8%	15.2%
CCA WTR		
WTR	29.8%	33.2%
CE	1.8%	2.1%
PPC	0.0%	0.0%
BIO		

Total CapEx/CapEx share

	Aligned to taxonomy by goal	Eligible for taxonomy by goal
CCM	22.0%	22.3%
CCA	18.0%	18.2%
WTR	51.5%	57.1%
CE	0.6%	0.6%
PPC	0.0%	0.0%
BIO		

Portion of OpEx/OpEx totals

	Aligned to taxonomy by goal	Eligible for taxonomy by goal
CCM	9.4%	10.6%
CCA	7.7%	8.9%
WTR	45.2%	53.3%
CE	4.8%	7.4%
PPC	0.1%	0.1%
BIO		

TAXONOMY-ELIGIBLE BUT NOT ALIGNED NUCLEAR AND FOSSIL GAS RELATED ECONOMIC ACTIVITIES

Eco	onomic activities	CCM +	CCM + CCA		change n (CCM)	Climate chan adaptation (CC			
		Amount (€k)	%	Amount (€k)	%		%		
Tur	nover								
()									
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of turnover	4,657	0.1	4,657	0.1	-	0.00		
()				-					
	Amount and proportion of other taxonomy-aligned economic activities								
7	not referred to in rows 1 to 6 above in the denominator of turnover	13,656	0.3%	13,656	0.3%	-	0.00		
8	Total amount and proportion of taxonomy-aligned economic activities in the denominator of turnover	175,181	4.1%	175,181	4.1%	-	0.00		
Ca	pEx								
()									
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of CapEx	2,643	0.2%	2,643	0.2%	-	0.00		
()									
	Amount and proportion of other taxonomy-aligned economic activities								
7	not referred to in rows 1 to 6 above in the denominator of CapEx	746	0.1	746	0.1	-	0.00		
8	Total amount and proportion of taxonomy-aligned economic activities in the denominator of CapEx	85,156	5.9%	85,156	5.9%	-	0.00		
Op	Ex								
()									
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of OpEx	2,251	1.0	2,251	1.0	-	0.00		
()									
	Amount and proportion of other taxonomy-aligned economic activities								
7	not referred to in rows 1 to 6 above in the denominator of OpEx	535	0.2%	535	0.2%	=	0.00		
8	Total amount and proportion of taxonomy-aligned economic activities in the denominator of OpEx	27,216	12.0%	27,216	12.0%	-	0.00		

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5.3 LIST OF INFORMATION REQUIREMENTS REFERRED TO IN CROSS-CUTTING AND THEMATIC PRINCIPLES OF OTHER EU LEGISLATION

Disclosure requirements and related data	SFDR Reference	Reference to Pillar 3	Benchmark Regulation reference	Disclosure
ESRS 2 GOV-1	Annex I, Table 1, Indicator No. 13	N/EL	Commission Delegated Regulation (EU) 2020/1816 (5), Annex II	1.General Information 1.2 Governance
Gender diversity on the board, paragraph 21(d)			2020/1610 (3), Affilex II	
ESRS 2 GOV-1 Percentage of independent	N/EL	N/EL	Commission Delegated Regulation (EU) 2020/1816, Annex II	1.General Information 1.2 Governance
board members, paragraph 21 (e)				
ESRS 2 GOV-4	Annex I, Table 3, Indicator No. 10	N/EL	N/EL	1.General Information 1.2 Governance
Duty of Care statement, paragraph 30				1.2.2 Duty of Care Statement
ESRS 2 SBM-1	Annex I, Table 1, Indicator No. 4	Article 449 of Regulation (EU) 575/2013.	Commission Delegated Regulation (EU) 2020/1816, Annex II	1.General Information 1.3 Business Model and Value Chain 1.3.1 The
Involvement in activities related to fossil fuel activities, paragraph 40(d)(i)		Commission Implementing Regulation (EU) 2022/2453 (6), Table 1 - Qualitative Information on Environmental Risk and Table 2 - Qualitative Information on Social Risk	2020/1010, 7 11110211	Business Model
ESRS 2 SBM-1	Annex I, Table 2, Indicator No. 9	N/EL	Commission Delegated Regulation (EU)	The Acea Group is not involved in the
Involvement in activities related to the production of chemicals, paragraph 40(d) (ii)			2020/1816, Annex II	production of chemicals
ESRS 2 SBM-1 Participation in activities related to controversial	Annex I, Table 1, Indicator No. 14	N/EL	Article 12(1) of Delegated Regulation (EU) 2020/1818(7) and Annex II of Delegated Regulation	The Acea Group is not involved in the production of controversial weapons
weapons, paragraph 40(d) (iii)			(EU) 2020/1816	
ESRS 2 SBM-1 Involvement in activities	N/EL	N/EL	Article 12(1) of Delegated Regulation (EU) 2020/1818 and Annex II	The Acea Group is not involved in the production of tobacco
related to tobacco cultivation and production, paragraph 40(d)(iv)			of Delegated Regulation (EU) 2020/1816	
ESRS E1-1	N/EL	N/EL	N/EL	General Information
Transition Plan to achieve climate neutrality by 2050, paragraph 14				Strategy
ESRS E1-1	N/EL	Article 449 bis	Article 12(1)(d) to (g) and (2) of Delegated	General Information
Enterprises excluded from benchmarks aligned with the Paris Agreement, paragraph 16(g)		of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Model 1: Banking portfolio - Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and residual maturity	Regulation (EU) 2020/1818	Strategy

ESRS E1-4 GHG emission reduction targets, paragraph 34	Annex I, Table 2, Indicator No. 4	Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Model 3: Banking portfolio - Indicators of potential transition risk related to climate change: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818	2. Environmental Information 2.2 Climate Change 2.2.3 Climate Change Targets, Actions and Resources
ESRS E1-5 Energy consumption from fossil fuels, according to source (high climate impact sectors only), paragraph 38	Annex I, Table 1, Indicator No. 5 and Annex I, Table 2, Indicator No. 5	N/EL	N/EL	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics
ESRS E1-5 Energy consumption and mix, paragraph 37	Annex I, Table 1, Indicator No. 5	N/EL	N/EL	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Annex I, Table 1, Indicator No. 6	N/EL	N/EL	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics
Gross Scope 1, 2, 3 and total GHG emissions, paragraph 44	Annex I, Table 1, Indicators 1 and 2	Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Model 1: Banking portfolio - Indicators of potential transition risk related to climate change: Credit quality of exposures by sector, emissions and residual maturity	Articles 5(1), 6 and 8(1) of Delegated Regulation (EU) 2020/1818	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics
ESRS E1-6 Intensity of gross GHG emissions, paragraphs 53 to 55	Annex I, Table 1, Indicator No. 3	Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Model 3: Banking portfolio - Indicators of potential transition risk related to climate change: alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics
ESRS E1-7 GHG absorptions and carbon credits, paragraph 56	N/EL	N/EL	N/EL	2. Environmental Information 2.2 Climate Change 2.2.4 Climate Change Metrics





EXPOSURE of the benchmark index portfolio to physical	N/EL	N/EL	Annex II of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation	For the tax year 2024, which corresponds to the first year of sustainability reporting
climate-related risks,			(EU) 2020/1816	in accordance with ESRS, Acea Group
paragraph 66 ESRS E1-9	N/EL	Article 440 his of Dogulation (ELI)	N/EL	has decided to make
Breakdown of monetary amounts according to acute and chronic physical risk, paragraph 66(a)	N/LL	Article 449 bis of Regulation (EU) No 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Model 5: Banking portfolio - Indicators of potential physical risk related to climate change: exposures subject to physical risk	TV/LL	use of the phase-in option relating to the disclosure of the expected financial effects of physical and material transition risks
ESRS E1-9				
Location of significant assets at physical risk, paragraph 66(c)				_
ESRS E1-9 Breakdown of the book value of its real estate assets according to energy efficiency classes, paragraph 67(c)	N/EL	Article 449 bis of Regulation (EU) No 575/2013; paragraph 34 of Commission Implementing Regulation (EU) 2022/2453; Model 2: Banking portfolio - Indicators of potential climate change-related transition risk: loans secured by real estate - Energy efficiency of collateral	N/EL	
ESRS E1-9	N/EL	N/EL	Annex II to Delegated Regulation (EU)	_
Degree of portfolio exposure to climate-related opportunities, para. 69			2020/1818	
Quantities of each pollutant listed in Annex II of E-PRTR (European Pollutant Release and Transfer Register) emitted into the air, water and soil, paragraph 28	Annex I, Table 1, indicator No 8; Annex I, Table 2, indicator No 2; Annex 1, Table 2, indicator No 1; Annex I, Table 2, indicator No 3	N/EL	N/EL	2. Environmental Information 2.3 Pollution 2.3.3 Pollution Metrics
ESRS E3-1 Waters and marine resources, paragraph 9	Annex I, Table 2, Indicator No. 7	N/EL	N/EL	2. Environmental Information 2.4 Water and Marine Resources 2.4.1 Policies on water
ESRS E3-1	Annex I, Table 2, Indicator No. 8	N/EL	N/EL	and marine resources 2. Environmental Information 2.4 Water
Dedicated policy, paragraph 13				and Marine Resources 2.4.1 Policies on water and marine resources
ESRS E3-1	Annex I, Table 2, Indicator No. 12	N/EL	N/EL	Not relevant for the Group
Sustainability of the oceans and seas paragraph 14				
ESRS E3-4	Annex I, Table 2, Indicator No. 6.2	N/EL	N/EL	2. Environmental Information 2.4 Water
Total recycled and reused water, paragraph 28(c)				and Marine Resources 2.4.3 Metrics on water and marine resources
ESRS E3-4	Annex I, Table 2, Indicator No. 6.1	N/EL	N/EL	2. Environmental Information 2.4 Water
Total water consumption in m3 in relation to net revenue from own operations, paragraph 29				and Marine Resources 2.4.3 Metrics on water and marine resources

ESRS 2 IRO-1 - E4 paragraph 16(a)(i)	Annex I, Table 1, Indicator No. 7	N/EL	N/EL	2. Environmental information 2.5 Biodiversity and ecosystems
ESRS 2 IRO-1 - E4 paragraph 16 (b)	Annex I, Table 2, Indicator No. 10	N/EL	N/EL	2. Environmental information 2.5 Biodiversity and ecosystems
ESRS 2 IRO-1 - E4 paragraph 16 (c)	Annex I, Table 2, Indicator No. 14	N/EL	N/EL	2. Environmental information 2.5 Biodiversity and ecosystems
ESRS E4-2 Sustainable agricultural/ land-use policies or practices, paragraph 24(b)	Annex I, Table 2, Indicator No. 11	N/EL	N/EL	2. Environmental Information 2.5 Biodiversity and Ecosystems 2.5.2 Biodiversity and Ecosystem Policies
ESRS E4-2 Sustainable sea/ocean use practices or policies, paragraph 24(c)	Annex I, Table 2, Indicator No. 12	N/EL	N/EL	2. Environmental Information 2.5 Biodiversity and Ecosystems 2.5.2 Biodiversity and Ecosystem Policies
ESRS E4-2 Policies to address deforestation, paragraph 24(d)	Annex I, Table 2, Indicator No. 15	N/EL	N/EL	2. Environmental Information 2.5 Biodiversity and Ecosystems 2.5.2 Biodiversity and Ecosystem Policies
ESRS E5-5 Non-recycled waste, paragraph 37(d)	Annex I, Table 2, Indicator No. 13	N/EL	N/EL	2. Environmental information 2.6 Use of resources and the circular economy 2.6.2 Metrics for the use of resources and the circular economy
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Annex I, Table 1, Indicator No. 9	N/EL	N/EL	2. Environmental information 2.6 Use of resources and the circular economy 2.6.2 Metrics for the use of resources and the circular economy
ESRS 2 - SBM3 - S1 Risk of forced labour,	Annex I, Table 3, Indicator No. 13	N/EL	N/EL	3. Company Information 3.1 Own Workforce
paragraph 14 (f) ESRS 2 - SBM3 - S1	Annex I, Table 3, Indicator No. 12	N/EL	N/EL	3. Company Information 3.1 Own
Risk of child labour, paragraph 14(g)				Workforce '
ESRS S1-1 Policy commitments to human rights, paragraph 20	Annex I, Table 3, Indicator No 9 and Annex I, Table 1, Indicator No 11	N/EL	N/EL	3. Company Information 3.1 Own Workforce 3.1.1 Policies and processes related to the own workforce
Due diligence policies on matters covered by Core Conventions 1 to 8 of the International Labour Organisation, paragraph 21	N/EL	N/EL	Commission Delegated Regulation (EU) 2020/1816, Annex II	3. Company Information 3.1 Own Workforce 3.1.1 Policies and processes related to the own workforce



ESRS S1-1 Procedures and measures to prevent human trafficking, paragraph 22	Annex I, Table 3, Indicator No. 11	N/EL	N/EL	3. Company Information 3.1 Own Workforce 3.1.1 Policies and processes related to the own workforce
ESRS S1-1	Annex I, Table 3, Indicator No. 1	N/EL	N/EL	3. Company Information 3.1 Own
Occupational accident prevention policy or management system, paragraph 23				Workforce 3.1.1 Policies and processes related to the own workforce
ESRS S1-3	Annex I, Table 3, Indicator No. 5	N/EL	N/EL	3. Company Information 3.1 Own
Mechanisms for handling complaints/complaints, paragraph 32(c)				Workforce 3.1.1 Policies and processes related to the own workforce
ESRS S1-14	Annex I, Table 3, Indicator No. 2	N/EL	Commission Delegated Regulation (EU) 2020/1816, Annex II	3. Company Information 3.1 Own Workforce 3.1.3
Number of deaths and number and rate of work- related injuries, paragraph 88 (b) and (c)			2020/1010, Alliex II	Metrics related to the own workforce
ESRS S1-14	Annex I, Table 3, Indicator No. 3	N/EL	N/EL	3. Company Information 3.1 Own
Number of days lost due to injuries, accidents, fatalities or illnesses, paragraph 88 (e)				Workforce 3.1.3 Metrics related to the own workforce
ESRS S1-16 Unadjusted gender pay gap,	Annex I, Table 1, Indicator No. 12	N/EL	Commission Delegated Regulation (EU) 2020/1816, Annex II	3. Company Information 3.1 Own Workforce 3.1.3
paragraph 97(a)				Metrics related to the own workforce
Excessive pay gap in favour of the CEO, paragraph 97 (b)	Annex I, Table 3, Indicator No. 8	N/EL	N/EL	3. Company Information 3.1 Own Workforce 3.1.3 Metrics related to the
ESRS S1-17	Annex I, Table 3, Indicator No. 7	N/EL	N/EL	own workforce 3. Company Information 3.1 Own
Discrimination-related incidents, paragraph 103(a)				Workforce 3.1.3 Metrics related to the own workforce
ESR S1-17 Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD paragraph 104(a)	Annex I, Table 1, Indicator No 10 and Annex I, Table 3, Indicator No 14	N/EL	Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818	3. Company Information 3.1 Own Workforce 3.1.3 Metrics related to the own workforce
ESRS 2 SBM-3 - S2	Annex I, Table 3, Indicators 12 and 13	N/EL	N/EL	3. Company Information 3.2
Serious risk of child labour or forced labour in the labour chain, paragraph 11(b)				Workers in the value chain
ESRS S2-1 Policy commitments to human rights, paragraph 17	Annex I, Table 3, Indicator No 9 and Annex I, Table 1, Indicator No 11	N/EL	N/EL	3. Company Information 3.2 Workers in the value chain 3.2.1 Worker- related policies and processes in the value chain

ESRS S2-1 Worker-related policies in the value chain, para. 18	Annex I, Table 3, Indicators 11 and 4	N/EL	N/EL	3. Company Information 3.2 Workers in the value chain 3.2.1 Worker- related policies and processes in the value chain
ESRS S2-1 Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Annex I, Table 1, Indicator No. 10	N/EL	Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818	3. Company Information 3.2 Workers in the value chain 3.2.1 Worker- related policies and processes in the value chain
Due diligence policies on matters covered by Core Conventions 1 to 8 of the International Labour Organisation, paragraph 19	N/EL	N/EL	Commission Delegated Regulation (EU) 2020/1816, Annex II	3. Company Information 3.2 Workers in the value chain 3.2.1 Worker- related policies and processes in the value chain
ESRS S2-4 Human rights issues and incidents in its upstream and downstream value chain, paragraph 36	Annex I, Table 3, Indicator No. 14	N/EL	N/EL	3. Company Information 3.2 Workers in the value chain 3.2.4 Worker- related objectives, actions and resources relating to workers in the value chain
ESRS S3-1 Policy commitments to human rights, paragraph 16	Annex I, Table 3, Indicator No 9 and Annex I, Table 1, Indicator No 11	N/EL	N/EL	3. Company Information 3.3 Communities involved 3.3.1 Policies and processes relating to the communities involved
ESRS S3-1 Non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Principles or the OECD Guidelines, paragraph 17	Annex I, Table 1, Indicator No. 10	N/EL	Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818	3. Company Information 3.3 Communities involved 3.3.1 Policies and processes relating to the communities involved
ESRS S3-4 Human Rights Issues and Incidents, paragraph 36	Annex I, Table 3, Indicator No. 14	N/EL	N/EL	3. Company Information 3.3 Communities involved 3.3.2 Objectives, actions and resources related to the communities involved
ESRS S4-1 Consumer and End-User Related Policies, paragraph 16	In Annex I, Table 3, Indicator No 9 and Annex I, Table 1, Indicator No 11	N/EL	N/EL	3. Company Information 3.4 Consumers and endusers 3.4.1 Consumer and end-user policies and processes
Non-compliance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 17	Annex I, Table 1, Indicator No. 10	N/EL	Annex II of Delegated Regulation (EU) 2020/1816 and Article 12(1) of Delegated Regulation (EU) 2020/1818	3. Company Information 3.4 Consumers and endusers 3.4.1 Consumer and end-user policies and processes



ESRS S4-4	Annex I, Table 3, Indicator No. 14	N/EL	N/EL	3. Company Information 3.4
Human Rights Issues and Incidents, paragraph 35				Consumers and end- users 3.4.2 Actions and objectives relating to consumers and end users
ESRS G1-1	Annex I, Table 3, Indicator No. 15	N/EL	N/EL	4. Governance information 4.1 Policies
United Nations Convention against Corruption, paragraph 10(b)				on Corporate Culture and Conduct
ESRS G1-1	Annex I, Table 3, Indicator No. 6	N/EL	N/EL	4. Governance information 4.1 Policies
Protection of whistleblowers, paragraph 10(d)				on corporate culture and conduct
ESRS G1-4	Annex I, Table 3, Indicator No. 17	N/EL	Annex II to Delegated Regulation (EU)	4. Governance Information 4.3
Fines imposed for infringements of the laws against active and passive corruption, paragraph 24 (a)			2020/1816	Management of corruption
ESRS G1-4	Annex I, Table 3, Indicator No. 16	N/EL	N/EL	4. Governance Information 4.3
Rules for countering active and passive corruption, paragraph 24(b)				Management of corruption

5.4 RESPONSIBILITIES OF THE BOARD OF DIRECTORS

BARBARA MARINALI

CHAIRMAN - NON-EXECUTIVE - INDEPENDENT

Vice-Chair of UTILITALIA and Chair of the Quotate Committee of the same Federation since July 2024.

In February 2023 she was appointed Chair of the Board of Directors of Acea SpA. She has also held the position of Vice-Chair of the Steering Committee of the Fondazione Teatro dell'Opera di Roma since April 2023.

From December 2021 to April 2023, she was chair of the Board of Directors of Open Fiber S.p.A.

From April 2021 to April 2024, she served as an independent director on the Board of Directors of Webuild S.p.A (Chair of the Related Party Transactions Committee, member of the Strategy Committee and of the Remuneration and Appointments Committee).

From September 2020 to March 2022 she was Senior Advisor to the CEO of Snam, where she also served as team leader for a major water infrastructure project in South Italy.

From 2013 to 2020 she was a member of the first Transport Regulation Authority Board. From 2009 to 2013 she was the General Manager for road infrastructure for the Ministry of Infrastructure and Transport.

From 2006 to 2008 she was Director of the Interministerial Committee for Economic Planning (CIPE) and headed the Department for Economic Policy Planning and Coordination at the Prime Minister's Office.

She also has significant experience with: the Antitrust Authority, the Ministry of Economy and Finance and the Ministry of Productive Activity (now, the Ministry of Enterprises and Made in Italy - MIMIT).

She graduated with honours in Economics and Business from Sapienza University of Rome and is a chartered accountant and auditor.

She was appointed on the basis of list no. 1 presented by the aforementioned Roma Capitale.

FABRIZIO PALERMO

MANAGING DIRECTOR - EXECUTIVE

Graduated with honours in economics and business from the University of Rome "La Sapienza".

From July 2018 to May 2021, he served as Chief Executive Officer and General Manager of Cassa Depositi e Prestiti, where, since 2014, he had already held the position of Chief Financial Officer.

From 2005 to 2014 he worked for the Fincantieri Group, where he held senior positions of increasing responsibility, initially as Director of Business Development and Corporate Finance, then as Chief Financial Officer (2006-2014), and lastly as Deputy General Manager (2011-2014).

Fabrizio Palermo began his career in the London offices of Morgan Stanley, in the Investment Banking Division.

In 1998, he continued at McKinsey & Company, specialising in the restructuring, transformation and turnaround of large industrial and financial groups.

Over the course of his career, he was Chairperson of CDP Equity S.p.A., Chief Executive Officer of CDP Reti S.p.A., and Director on the Boards of Open Fiber S.p.A., Fincantieri S.p.A. and Fincantieri USA Inc., Vard Group AS and Vard Holdings Limited. Fabrizio Palermo has been a Board member of both Assonime and the Centre for American Studies, co-chair of the Italy-China Business Forum, a member of the Investors' Committee of the Italian Recovery Fund and of the Atlante Fund, and a member of the Advisory Board of the Italian B20 Presidency. From 2007 to 2010 he was Assistant Professor for the "Planning and Control" course at Libera Università Internazionale degli Studi Sociali Guido Carli (from 2007 to 2010) and subsequently was MBA Adjunct Professor for the "Corporate Finance" course in 2018 and 2022. Appointed on the basis of list no. 1 presented by the aforementioned Roma Capitale.

ELISABETTA MAGGINI

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

She has a degree in Law from LUMSA (Libera Università Maria Santissima Assunta) in Rome, as well as a Master in Finance Real Estate from LUISS Business School.

Since July 2021 she has been the Chairperson of ANCE Roma Giovani, the young builders group with the Rome Association of Building Contractors (ACER). Additionally, since 2016 she has been Chairperson of the Consultation Group for Young Entrepreneurs and Professionals in Rome and the Region of Lazio.

Since July 2020 she has been a director of the Lazio Region's ASP Asilo Savoia - Regional Personal Care Services Company.

She was a member of the Acea S.p.A. Board of Directors from 2014 to 2017.

Among her other significant experience, she served as a member of the Board of Directors of Istituto Poligrafico Zecca dello Stato S.p.A from 2017 to 2020.

From December 2020 to June 2023 she served as a Director on the Consap S.p.A. Board of Directors (the Public Insurance Services Concessionaire, an investee of the Ministry of Economy and Finance, established after the demerger from the National Insurance Institute - INA). She also served as a Director on the Sorgente Group Srl Board of Directors from 2014-2023, a holding company in the finance, real estate, construction and infrastructure sectors and, from January 2022 to July 2023 was a member of the Sorgente SGR S.p.A. Board of Directors, an asset management company in the Sorgente Group.

In addition, she was a board member of Quorum SGR S.p.A. (2021-2022) and Nova RE SIIQ S.p.A (2017-2021) a listed real estate investment company (2017-2021).





From 2013-2014 she a secretariat staff member for the President of the Region of Lazio. From 2009-2012 she a secretariat staff member for the President of the Province of Rome.

During the period 2014-2017, she was a member of the Rome Chamber of Commerce Women's Entrepreneurship Committee and from 2010 to 2016 was Chairperson of "Vocazione Roma", the association of Roman professionals, entrepreneurs and creators under 40. She was appointed from list no.1, presented by Roma Capitale.

LUISA MELARA

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

She holds a law degree from LUISS with specialisation in the legal administrative field.

A lawyer, registered with the special list of attorneys admitted to practice before the Italian Supreme Court, she is a freelance professional, specialised in company law, business crisis law, commercial and banking law and goods and services procurement contracts. She heads the Luisa Melara & Partners Law Firm in Rome.

She provides managerial activities, as well as judicial and extrajudicial consultancy and assistance for public companies, corporations and investment funds.

In 2019 she served as the Chairperson of the AMA S.p.A. Board of Directors.

Among her current engagements, she is business crisis legal consultant for ANCE (National Association of Private Construction Contractors), a member of the Advisory Committee for the FOF Private Equity Italia fund and a partner of the "Pinelli Avvocati" Law Firm in Padua. She has been "Of Counsel" in the "Business Crisis" Department at Carnelutti, Associated Law Firm in Milan.

She carries out teaching activities, specifically for the Advanced Training course for Business Law Consultants organised by the LUISS Business School, and regularly participates as speaker at conferences on corporate and business crisis issues.

She is a member of the Institute for Corporate Governance (IGS) Scientific Committee and since 2019 is a member of the Company Law Committee and the Business Crisis, Company and Market Law Committee set up by the Rome Bar Association.

She is a member of the Guarantees and Legality Olympics Committee created to oversee the 2026 Winter Olympic and Paralympic Games. Since 2021, she has been Acting Vice President of ANPIB - National Association of Private & Investment Bankers.

She was appointed from list no.1, presented by Roma Capitale.

ANGELO PIAZZA

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

He holds a degree in law from the University of Bologna and has written a number of scientific publications and essays on civil and administrative law.

A professor at the "Foro Italico" University of Rome 4, he is also a practising lawyer, and was previously a state attorney and administrative magistrate.

In the academic and professional field, he has gained experience and expertise in matters concerning public companies, local public services, public contracts and concessions, and with regard to urban planning, construction and energy and environmental law.

He has served as member and Chair of the Board of Directors and Board of Statutory Auditors of several companies.

As part of his academic experience, from 2002 to 2012 he was a tenured professor at the University of Bologna.

He was appointed from list no.1, presented by Roma Capitale.

ALESSANDRO PICARDI

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

He is currently Executive Chair of VL Capital and Nexting, Vice Chair of Confindustria Assolombarda, and a board member of the Centro Studi Americani.

More recently he served four years within the TIM Group, where he was Executive Vice President and Chief Public Affairs Officer, as well as a member of the Sparkle S.p.A. Board of Directors and subsequently Executive Chairman with operational powers at Olivetti S.p.A. He was also the Chairman of Finlombarda Gestioni SGR and has many years of experience in the telecommunication, radio and television sectors. From 2013 to 2019 he was employed by Rai, firstly as Manager of Institutional, International and Regulatory Relations and then as Director of Strategic Platform Development. At the same time, from 2014 to 2019 he was Executive Chairman of Tivù Srl - Tivusat, a company operating in free-to-air satellite television owned by Rai, Mediaset and Telecom Italia.

During the period 2012-2013 he was Deputy Chairman Corporate Affairs of Alitalia, and from 2006 to 2012 was Head of Institutional Affairs at Wind. From 2004 to 2006 he was employed by Sky Italy (satellite television) as advisor for Institutional Affairs and Relations with the Vatican. He has served on the Boards of Directors of several companies and foundations, in particular Fondazione TIM (2019-2022) and Tivu' S.r.l. - Tivusat (2019-2022). During the same period, he was a director of ISPI, the Italian Institute for International Political Studies, and the COTEC Foundation for technological innovation. From 2015 to 2018 he was a Director at Auditel.

He has previously served as Deputy Chairman of Confindustria Digitale, Deputy Chairman of Asstel (Confindustria association of telecommunications operators) from 2020 to 2022, member of the Presidency Council and General Council of Confindustria Radio Televisioni, member of the Eurovisioni Governing Council.

He was appointed from list no.1, presented by Roma Capitale.

NATHALIE TOCCI

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

She has been Director of the Istituto Affari Internazionali (IAI) since 2017, honorary professor at the University of Tübingen since 2015 and is Europe's Futures Fellow at the Institut für die Wissenschaften vom Menschen (Iwm) in Vienna. Since 2023 she has been Professor at the Transnational School of Government of the European University Institute in Florence and from 2021 to 2022 was Pierre Keller Visiting Professor at the Harvard Kennedy School.

From 2020 to 2023 she was an independent board member for Eni and from 2013 to 2020 served on the Edison Board of Directors. She has been Special Advisor to the European Union High Representative for Foreign Affairs and Security Policy and Vice President of the European Commission, first with Federica Mogherini (2015-2019) and then with Josep Borrell (2020-2021). In that capacity she worked on the drafting and implementation of the EU global strategy. In 2014, she was director of international strategies for Italy's Minister for Foreign Affairs, Federica Mogherini.

In 2006 she joined the IAI, where she is now Director, as Research Manager, in 2010 becoming Programme Manager for European foreign policy and, in 2011, Deputy Director and Editor of The International Spectator.

She has also been Senior Fellow at Washington's Transatlantic Academy (2009-2010), Associate Fellow for European foreign policy at the Centre for European Policy Studies in Brussels (2007-2009), Marie Curie Fellow at the Robert Schuman Centre for Advanced Studies – European University Institute (2005-2007), Jean Monnet Fellow for the Mediterranean Programme of the Robert Schuman Centre for Advanced Studies (2003-2004), Research Fellow at the Centre for European Policy Studies in Brussels (1999-2003).

She has written a number of scientific publications. Her current scientific interests concern European integration and European foreign policy, the Middle East, Eastern Europe, transatlantic relations, multilateralism, conflict resolution, energy, climate and defence.

Her present engagements include participation on the Boards of various institutions, such as the Centre for European Reform, the Jacques Delors Centre, the European Leadership Network. She is on the Europe for Middle East Peace Advisory Board and council member of the European Council for Foreign Relations.

She holds a PhD in International Relations from the London School of Economics.

She was appointed from list no.1, presented by Roma Capitale.

PATRIZIA RUTIGLIANO

DIRECTOR - NON-EXECUTIVE

She holds a degree in Languages and contemporary history from the Università Cattolica of Milan, with a specialisation diploma in Social Sciences and Journalism. She has gained significant managerial experience working with public and private companies in strategic sectors such as energy, telecommunications, service concessions, as well as the Public Administration. She has in-depth knowledge of ESG issues and has developed engagement models and environmental and social policies that are often innovative for the reference businesses. She has been Country Manager of the Italian Branch of SUEZ International since October 2024.

At Snam from 2009 to October 2022, in positions of increasing responsibility, she held the role of Executive Vice President Institutional Affairs, ESG, Communication & Marketing and was the first woman to become a member of the leadership team. She managed major profiles in the processes concerning functional and proprietary separation from Eni, integration of the gas markets, supply diversification and security, development of energy transition activities, gas and hydrogen market and taxonomy reform. She was responsible for the ESG policies on which the business plan was based, defining the environmental objectives (Scopes 1, 2 and 3) and the carbon offsetting mechanisms. From 2004 to 2009 she was Head of External Relations for Autogrill, during the period in which the main motorway and airport concessions were renewed.

From 2001 to 2004, she was initially e.Biscom press office manager and was then also appointed as Head of Fastweb External Relations. From 1997 to 2001 she was Spokesperson for the Municipality of Milan, during the privatisation phase of the main municipalised companies. She began her career in 1992 as a professional journalist, covering politics and economics for Mondo Economico, Fininvest and Euronews. She served on the Boards of companies and non-profits, including Tiscali and Fiera Milano, Teréga Holding, a regulated French gas utility, Toscana Energia, the SNAM Foundation, World Wellbeing Movement, the MIP-Politecnico di Milano School of Management and the publishing company II Cittadino.

She was Deputy Chairperson of Anigas (National Association of Gas Industrialists) and member of the Assolombarda governing council and the Valore D Board of Directors. She was also Chairperson of the Italian Federation for Public Relations (FERPI) from 2011 to 2016. She was appointed from list no.2, presented by Suez International SAS.

YVES RANNOU

DIRECTOR - NON-EXECUTIVE

A business manager, he has a proven track record in managing global businesses (between 800 million and 2 billion in revenues), leading the growth, turnaround and restructuring of international private listed companies in the renewable energy sector. A specialist in EPC and infrastructure projects, he also has expertise in refinancing and M&A.

Since 2023, he has been Chief Operating Officer of the Suez Group and a member of the Group Executive Committee.

From 2020 to 2023, he was Senior Advisor and a member of the Board of Directors of Kentel Associates, a consulting company in Paris. In 2019-2020, he was CEO and board member of Senvion, a German wind power O&M company.

He was also a board member of IHA (International Hydropower Association) from 2017 to 2019.





He spent the first part of his career (1997-2018) with the Alstom Group, assuming the role of CEO of the Global Business in Renewable Energies, with operations in Europe and China.

He is a board member of several companies, a Senior Advisor, as well as an investor in the Green Economy.

He graduated in Electromechanics from Pierre and Marie Curie University in Paris, before earning an Engineering Degree, also in Electromechanics, from the National Superior School of Public Works (ESTP). He then followed an Executive Programme at INSEAD in Fontainebleau.

ALESSANDRO CALTAGIRONE

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

He holds a degree in Economics and Business from Sapienza University of Rome (1994) and has held prestigious positions in several companies, including listed ones. He was also a lecturer in Business Economics and Administration at Sapienza University of Rome and at the Faculty of Economics and Business at Luiss University of Rome (Technical/Professional programme).

He was appointed on the basis of list no. 3 presented by Fincal S.p.A.

MASSIMILIANO CAPECE MINUTOLO DEL SASSO

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

Member of the Order of Engineers of Rome since 1992. Vast experience in the real estate and infrastructure sector with competencies in design, development and management of large urban and construction projects. In the course of his professional career he has developed experience in the cement, banking, renewable energy and publishing sectors. He is currently Chairman of the Board of Directors of "IL MATTINO S.p.A.".

He is also a director of Vianini Lavori S.p.A. and a director/member of the Board of Directors of various companies operating in the real estate development and management sector.

He was appointed on the basis of list no. 3 presented by Fincal S.p.A.

ANTONELLA ROSA BIANCHESSI

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

She holds a degree in Business Administration from Bocconi University. Currently an independent consultant, she has proven experience in the fields of financial analysis, corporate finance and business valuation, with in-depth knowledge of the utilities sector.

From 2011 to 2022 she was in charge of the Global Utilities Team and Managing Director at Citigroup, responsible for leading the global team in the production of comprehensive sector studies, focused on the energy transition. She headed European Utilities research and was charged with developing investment strategies in the sector and thematic analyses, for example with regard to European Taxonomy, European energy policies and investments in renewables. In this role she published a number of sector and ESG studies and analyses of corporate securities, developing dialogue with the international financial community and taking part in several financial transactions on capital markets. From 2002 to 2011, she worked for Morgan Stanley in the capacity of Southern European Utilities analyst, Executive Director. From 2000 to 2002 she was Italian utilities analyst for Goldman Sachs in London. From 1995 to 2000, she was a utilities analyst firstly at Banca IMI and then at Caboto.

She was appointed on the basis of list no. 4, presented by a group of asset management companies and institutional investors.

ANTONINO CUSIMANO

DIRECTOR - NON-EXECUTIVE - INDEPENDENT

He has a degree in Law from Università degli Studi in Palermo and has worked with a number of law firms in the United States. As an attorney, he has experience serving as General Counsel for multinational groups, handling legal affairs, international law, corporate governance, resolving global disputes, compliance and anti-bribery and risk management. He has worked and lived in London, Paris and Pittsburgh.

Since 2018 he has served as Corporate Vice President, General Counsel and Secretary of the Board of Directors of Nexans SA, the second largest producer of cables in the world. The Group, listed on the Paris Euronext stock market, works in various sectors and supplies a vast array of cables and solutions for energy transmission and distribution, including undersea cables for interconnections, for offshore wind parks, high voltage cables for power grids and cables for renewable energy sources such as solar and wind.

From 2016-2017, Antonino Cusimano served as Vice President and Group General Counsel for CMA-CGM SA, the third largest freight group in the world, headquartered in France.

From 2008 to 2016 he worked for Telecom Italia as Group General Counsel, Executive Vice President Legal Affairs and Secretary of the Board of Directors.

From 2006 to 2008 he worked for General Electric Oil & Gas in Florence, as Senior Counsel Global Services and Transactions / Senior Counsel M&A.

From 1994 to 2006 he worked for the PPG Industries International Group in Paris, where he held various positions, rising to become the General Legal Counsel for Europe, Middle East and Africa in 2000.

He was appointed on the basis of list no. 4, presented by a group of asset management companies and institutional investors.

Business outlook

In an uncertain global context, due to geopolitical tensions in Eastern Europe and the Middle East and US trade policies, Acea Group's results for 2024 show an acceleration in growth compared to previous years, with improved economic results in terms of both EBITDA and net profit, and a lower NFP/EBITDA ratio compared to 2023.

With regard to interest rates, the Acea Group optimised its financing mix by capitalising on the broad range of instruments offered on the market, which can be utilised at both fixed and floating rates. Through continuous monitoring of rate and market trends, the most cost- and risk-efficient solutions are identified.

Increasing attention continues to be paid to expenditure management, by continuously improving procurement procedures and business processes, and containing credit risk based on prevention and customer portfolio management.

The Group will continue to implement its strategy focussing on the development of sustainable infrastructure in regulated contexts, with the aim of maintaining a solid financial structure and continuing to generate positive impacts on operating and economic performance.

Resolutions regarding the result for the year and the distribution to shareholders

Dear Shareholders,

In inviting you to approve the financial statements we are submitting to you, we propose to allocate the profit for the year ended December 31, equal to € 208,492,190.09, as follows:

- € 10,424,609.50, equal to 5% of profit, to the legal reserve;
- distribution of a total dividend of € 201,920,511.65 to shareholders, corresponding to a dividend of € 0.95 per share, drawing partially from the distribution of available reserves for € 3,852,931.06.

The total dividend (coupon no. 26) of $\ ^\circ$ 201,920,511.65, equal to $\ ^\circ$ 0.95 per share, will be paid starting from 25 June 2025 with coupon detachment on 23 June 2025 and record date 24 June 2025

On the date of approval of the financial statements, treasury shares amounted to no. 416,993.

Acea SpA

The Board of Directors

