



ESG Policy

Arpinge Energy Efficiency & Renewables Srl ("AEER") is the Arpinge Group's sub-holding dedicated to investments in the energy and energy efficiency sector. As a key player in the renewable energy generation industry, the company leverages the cross-disciplinary skills of its team every day with the ambitious goal of contributing to the Country's decarbonization.

The ESG Policy reflects the Company's commitment to operating sustainably, responsibly, and transparently, promoting the environmental, social, and economic development of the communities in which it operates and contributing to the advancement of the United Nations Sustainable Development Goals (SDGs).

The Company is committed to the following principles in the **environmental** sphere:

- **Energy** - We promote the development of renewable energy and are committed to disseminating and implementing energy efficiency solutions in all our operations and investments. We implement technologies and processes to reduce energy consumption and increase the use of sustainable energy sources.
- **Greenhouse Gas Emissions** - We work to accurately measure the greenhouse gas emissions from our direct and indirect activities, adopting technologies and management practices aimed at reducing them in line with the Paris Agreement and other international standards.
- **Net Zero Goal** - AEER is committed to achieving net zero carbon emissions by 2050, implementing mitigation and compensation strategies for the emissions generated.
- **Biodiversity and Natural Habitats** – We are committed to protecting biodiversity and natural habitats in the areas where we operate. We take measures to prevent ecosystem degradation and promote the conservation of local species.
- **Climate Risks** - We constantly analyze, evaluate, and manage physical and transition climate risks related to our activities and operations, developing adaptation and transition plans to ensure the resilience of our infrastructure and activities in the short, medium, and long term.
- **Resource efficiency** - We optimize the use of natural resources, minimizing waste and maximizing recycling and reuse wherever possible. We adopt circular economy practices in our operational processes.
- **Material sourcing** - We promote, wherever technically possible, the use of environmentally friendly materials and/or materials with high durability, recyclability, and ease of disassembly.



- **Waste Management** - We promote sustainable waste management, minimizing waste production and adopting responsible collection, recycling, and disposal practices in line with the applicable best practices.

The Company is committed to the following principles in the **social** sphere:

- **Employee Development and Engagement** - We support the development of our employees' skills, encourage their active involvement in corporate decisions and sustainability initiatives, promoting an inclusive and collaborative work environment.
- **High Labor Standards** - We ensure working conditions aligned with the best standards, respecting the human rights of all workers, protecting their fundamental freedoms, and ensuring the right to association and collective bargaining.
- **Equal Opportunity, Diversity and Inclusion** - We promote diversity, inclusion, and equal opportunities in all our operations, ensuring a fair and respectful work environment for all employees.
- **Occupational Health and Safety** - AEER promotes safe and healthy working environments for all direct and indirect personnel involved in our projects, taking appropriate measures to protect their health and ensure the safety of all other external stakeholders. We implement rigorous safety standards and provide continuous training to achieve the goal of zero accidents and incidents.
- **Employment of Local Staff and Suppliers** - Where possible, we favour the employment of local staff and suppliers to support the local economy and contribute to the development of the communities in which we operate.
- **Stakeholder Relations** - We promote open and transparent dialogue with all stakeholders, including customers, suppliers, local communities, and institutions, to build relationships of mutual trust and collaboration.
- **Local Communities Development** - AEER invests in initiatives that improve the quality of life of local communities, promoting education, health, environmental protection, cultural heritage enhancement, and socio-economic development.

The Company is committed to the following principles in the **governance** sphere:

- **Board ESG Oversight and Delegation** - AEER's Board of Directors exercises careful oversight on ESG issues, ensuring that corporate strategies and operations are based on a solid system of governance and ESG risk management. The Board may delegate specific competencies on ESG issues to one of its members or to a dedicated committee, in charge of ensuring the integration of ESG objectives into corporate strategies and monitoring progress.



- **Ethics and Integrity** - We are committed to operating transparently and fairly, fully respecting the most rigorous ethical and professional standards, protecting shareholders and all other stakeholders' rights. We adopt a zero-tolerance policy towards fraud and corruption, implementing preventive measures and ensuring full compliance with current regulations. We protect whistleblowers who report potential violations of rules and ethical principles, ensuring anonymity and their protection from any retaliation.
- **Value Chain Engagement** - We promote the integration of sustainability principles and practices into our value chain, encouraging our counterparts to respect the principles set out in this Policy and to apply them to their respective counterparts.
- **Conflict of Interest** - We adopt the most rigorous standards in managing conflicts of interest, ensuring integrity and transparency in all our operations.
- **Lobbying Activities and Political Contributions** - We manage our lobbying activities ethically and transparently, avoiding conflicts of interest and fully respecting applicable laws. In line with our Code of Ethics, we do not make contributions to political parties, movements, committees, and political and trade union organizations, nor to their representatives or candidates.
- **Privacy, Data Protection and Cybersecurity** - AEER is committed to protecting the privacy and personal data of employees, customers, and other third parties, adopting rigorous cybersecurity measures to prevent unauthorized access and data breaches.

This ESG Policy complements the principles, objectives and provisions included in the Arpinge's ESG Policy. It applies to AEER and all its subsidiaries. It is made available to all personnel and relevant counterparts. The Company is committed to monitoring its correct application and periodically reviewing its contents.

AEER's Board of Directors approved it on June 26th, 2024.