

GENERAL INTERNAL FOOTPRINT POLICY



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1. INTRODUCTION AND PURPOSES OF THE DOCUMENT

With the ratification of the UN 2030 Agenda for Sustainable Development, signed in September 2015 by Italy together with the governments of 192 other countries, the international community has expressed, more overtly than in the past, a clear judgement on the unsustainability of a development model based exclusively on economic objectives and that fails to take account of environmental and social objectives. The 2030 Agenda and its implementation through the 17 Sustainable Development Goals (SDGs) represent a major challenge for countries around the world which, through the adoption thereof, are committed to actively contributing to this development path. The transition to a sustainable economy is therefore going to be a key commitment in the coming decades on a global level, and an increasing concern for banks and financial institutions¹.

In this context, CDP recognises the importance of safeguarding the environment and intends to actively contribute through the adoption of an approach aimed at minimising its own negative impact on the external context, thanks to the responsible management of resources, as detailed in the Group Policy for a “Sustainability Framework”² and reiterated with the approval of the ESG Plan³.

Based on these considerations, in accordance with the Sustainable Development Goals and the country’s international commitments, CDP is adopting this General “Internal Footprint” Policy (hereinafter the “Policy”) in order to define its commitment to reducing its own direct environmental impact, namely the impact generated in the implementation of its operating model, with reference to all areas within the scope of application of this Policy, and to monitoring the relative performance and impacts, in order to identify any action that needs to be taken to mitigate such impacts.

This document describes:

- the reference context (section 2);
- the scope of application (section 3);
- the general principles (section 4);
- the roles and responsibilities of the Bodies and organisational structures involved (section 5);
- how transparency and accountability are ensured (section 6).

This document is subject to periodic review, partly (but not exclusively) to reflect regulatory and legislative developments, changes to the reference context and consequent revisions of the CDP strategy. In any case, this document is reviewed every three years.

¹ In this regard, see the Bank of Italy’s “Expectations for monitoring climate and environmental risks”, which contain general indications regarding the integration of climate and environmental risks into company strategies, governance and control systems, risk management frameworks and the disclosures of supervised banking and financial intermediaries.

² https://www.cdp.it/resources/cms/documents/CDP_Framework_sostenibilita.pdf

³ https://www.cdp.it/resources/cms/documents/CDP_Piano_ESG_presentazione_ITA.pdf

2. REFERENCE REGULATORY FRAMEWORK

2.1 Regulatory and legislative context

With the Paris Agreement, which entered into force in 2016, world leaders committed to limit global warming to below 2° and, if possible, to 1.5° compared to pre-industrial levels.

In this context, and in line with the commitments made under that Agreement, Europe has established the ambitious goal of becoming the first continent to achieve carbon neutrality by 2050. To that end, the European Green Deal⁴ was introduced in 2019, as a package of strategic initiatives aimed at actualising the achievement of climate neutrality.

Among the strategies adopted as part of the *Green Deal*, the *Fit for 55*⁵ package plays a fundamental role, as it establishes the objective of reducing GHG emissions by 55% by 2030, compared with the figures recorded in 1990. To ensure that this target is achieved by 2030, and that carbon neutrality is achieved by 2050, the European Union committed to updating its own legislative framework with regard to several sectors, such as energy, transport and construction.

One fundamental action for reducing emissions from energy consumption consists of increasing the use of renewable energy. In this context, the Renewable Energy Directive (RED III)⁶ was updated in 2023 to raise the share of renewable energy in the EU's overall energy consumption to 42.5% by 2030 (from the previous figure of 40% established by *Fit for 55*), with the ambition of achieving 45% by 2030.

Another scope of action defined at the community level is linked to existing buildings, responsible for around 40% of total energy consumption and 36% of greenhouse gas emissions linked to energy⁷. The legislative framework for the energy efficiency of buildings is governed by the *Energy Performance of Buildings Directive* (EPBD)⁸, introduced for the first time in 2010, and the new *2023 Energy Efficiency Directive*⁹. These directives are geared to the achievement of the European objectives, including the complete decarbonised of building stock by 2050.

The EPBD, which forms part of the *Fit for 55* package, was updated in 2021 and introduced a new definition for *Zero Emission Buildings*¹⁰ applicable to all newly constructed buildings from 2027 for buildings occupied by public entities, and from 2030 or all other buildings. For existing buildings, there are new rules for minimum energy performance which establish that public and non-residential buildings and public real estate units must be restructured and improved so that they meet at least energy performance class F by 1 January 2027 at the latest, and at least class E no later than 1 January 2030¹¹.

Regarding the transport sector, in particular the progressive electrification of the automobile sector, in 2021 the European Parliament and the Council adopted a Regulation that enhances reduction targets for CO₂ emissions for new vehicles entering the market. The Regulation establishes a 55% reduction in CO₂ emissions for new vehicles by 2030 to 2034, compared with 2021 levels, and a 100% reduction in CO₂ emissions for new vehicles by 2035.¹²

Lastly, a further action plan established by the European Union within the Green Deal concerns the transition to a circular economy.

⁴European Commission, European Green Deal

⁵European Commission, Fit for 55, 2021

⁶European Parliament, Directive (UE) 2023/2413, 2023

⁷European Commission, Commission welcomes political agreement on new rules to boost energy performance of buildings across the EU, 2023

⁸European Parliament, Energy Performance of Buildings Directive, 2010

⁹European Parliament, Energy Efficiency Directive, 2023

¹⁰A Zero Emission Building is understood to be a building with a very high energy performance which requires a low quantity of energy, entirely covered by energy originating from the building itself or from renewable sources, and has no emissions deriving from fossil sources;

¹¹European Parliament, Revised EPBD Directive, 2023

¹²European Parliament and Council, 2021/0197(COD), 2023

To that end, the Strategic Plan for a cleaner and more competitive Europe was adopted in 2020¹³, focusing on the improvement of sustainable products by identifying measures applicable to their design (greater durability, repairability and recyclability), and to raise citizenship awareness on responsible consumption. In Italy, the National Strategy for the Circular Economy was approved in June 2022, establishing a number of 2035 targets concerning the development of a new system for the digital traceability of waste, tax incentives to support recycling activity and the use of secondary raw materials, the revision of the environmental tax on waste, or the right to reuse and repair.¹⁴

The reference regulatory and legislative framework is completed by internal legislative sources, which are also inspired by the aforementioned external regulations, including but not limited to the Group Policy for a “Sustainability Framework”, the Group “Missions” Policy, the General “Responsible Procurement” Policy and the Regulation on “Property, Facility Management and Health, Safety and Environment”, which outline the principles, methodologies and operating procedures through which environmental sustainability is pursued, in the areas of buildings management, raw materials consumption, and the organisation of business travel, among others.

3. SCOPE OF APPLICATION

3.1 Corporate scope

This document applies to Cassa Depositi e Prestiti S.p.A. (“CDP”).

CDP undertakes to ensure that this Policy is progressively extended to Companies subject to its Management and Coordination¹⁵.

3.2 Scope

The perimeter of application of this Policy relates to the environmental impacts generated by the implementation of CDP S.p.A.’s operating model, or those generated by the implementation of internal processes and activities mostly pertaining to the management of:

- sites, including the related energy and resource consumptions, emissions, and waste management;
- key ICT components (datacentres, devices and networks);
- travel.

Consequently, this Policy excludes environmental impacts generated indirectly by the implementation of financing and/or investment processes and activities, and the supply chain, which are covered in specific sustainability policies including but not limited to the General Responsible Lending Policy, the General Responsible Investment Policy and the General “Responsible Procurement” Policy.

¹³ European Commission, COM(2020) 98 final, 2020

¹⁴ Ministry for Ecological Transition, National Strategy for the Circular Economy; 2022

¹⁵ Pursuant to Articles 2497 et seq. of the Italian Civil Code

4. GENERAL PRINCIPLES

In accordance with the reference legislative and statutory framework, CDP recognises the importance of protecting the environment as a resource, promotes and supports the efficient management and use of resources at its own sites, with a view to reducing the environmental impact generated in order to create shared value, including through the promotion of compatible individual conducts.

The approach adopted by CDP in the management of its own direct impact is in line with the objectives of contributing to the fight against climate change and to the transition to circular economy, which are also encouraged through its business activities and sustainability policies dedicated to such activities.

To that end, with this Policy, CDP intends to govern its internal activities in the relevant areas covered in the document, and to commit to constant improvement and increasing efficiency in the management of those activities, as well as the adoption of measures and initiatives aimed at ensuring the effective application of the principles established herein.

4.1 Green Energy

The use of renewable energy is an essential component of the energy transition and the mitigation of climate change, as also recognised by European legislation. Indeed, to achieve the target of a 55% reduction in GHG emissions by 2030 compared to the values recorded in 1990 as established in the *Fit for 55* package, the European Commission revised the Renewable Energy Directive (RED III) raising the share of renewable energy in the EU's overall energy consumption to at least 42.5% by 2030, with the ambition of achieving 45% within the same timeframe.

According to Eurostat data, as regards the use of renewable energy with reference to overall energy consumption, in 2021 the share of renewables in the EU reached 21.8%, while in Italy the share of energy from renewable sources in overall energy consumption came in lower, at 19.2%¹⁶.

In line with the legislative framework and the European Union's renewable energy commitments, as well as the commitments made under the ESG Plan 2022-2024, CDP intends to contribute to the energy transition process through measures which include increasing the share of renewable energy in its consumption.

Consistently, CDP is committed to purchasing every year, where economically sustainable, 100% certified renewable energy (e.g., energy backed by *Origin Guarantee Certificates*, the *Renewable Energy Certificate System* or *European Energy Certificates*), including by conducting feasibility studies aimed at identifying solutions that ensure the long-term use of certified renewable energy through purchases and/or self-generation.

4.2 Green Building

Energy consumption deriving from buildings represents a significant share of the overall environmental impact. In the context of the European Union, buildings are responsible for approximately 40% of energy consumption, more than half of gas consumption (mainly for heating, cooling and sanitary hot water) and 36% of greenhouse gas emissions linked to energy consumption. These figures are influenced by building type: at present, around 35% of buildings in the EU are more than 50 years old and almost 75% of existing buildings are energy inefficient. At the same time, the annual average rate of energy renewal is limited to approximately 1%.¹⁷

¹⁶ Eurostat, *Shedding light on energy* - 2023 edition;

¹⁷ European Commission, *Commission welcomes political agreement on new rules to boost energy performance of buildings across the EU*, 2023;

In line with the commitments made as part of the ESG Plan 2022-2024 and the European Union's targets, to support the energy transition through building upgrades and energy efficiency initiatives. With reference to directly managed buildings – CDP is set on adopting best practices for the efficient management of buildings from an environmental point of view, with a particular focus on the following areas, as described in more detail in the following sections:

- Environmental Management System and energy diagnosis;
- *Smart Building*;
- Energy efficiency;
- Certification;
- Self-generation of energy from renewable sources;
- Awareness-raising campaigns.

4.2.1 Environmental Management System and energy diagnosis

With a view to constantly reducing the energy consumption of its own buildings, CDP has adopted a performance monitoring process in line with the frequency provided for by the Environmental Management System (EMS), in accordance with the requirements of the standard UNI EN ISO 14001:2015, which requires:

- the identification and monitoring of Key Performance Indicators (KPIs);
- the control and reporting of consumption;
- the integrated management of buildings;
- the activation of innovative and digital asset management technologies in collaboration with the Group companies involved in the aforementioned processes and present on company sites;
- periodic building energy diagnoses, where provided for by the legislation, with a commitment to assess the possibility of progressively extending them to other sites, in order to verify the efficiency of plants, the level of emissions and to identify potential improvement actions.

4.2.2 Smart Building

CDP has carried out projects aimed at optimising the building management activities, such as the implementation of an integrated platform for the supervision, management, and control of facilities (lighting, district heating and air conditioning) and the systems present in the buildings, with a view to increasing efficiency in the management of facility and site maintenance, as well as their energy efficiency.

Where possible, CDP is committed to progressively expanding these projects.

4.2.3 Energy efficiency

CDP has adopted several practices to improve the energy efficiency of its buildings, such as the installation of:

- low environmental impact lighting units, LED where possible, in all of the buildings in which it operates;
- presence detection sensors to ensure that lights turn off in offices and external service spaces;
- timers for switching off lights on the external facades of buildings;
- automatic mechanisms for turning off hot/cold air conditioning systems in corridors and shared areas, where possible and necessary.

With a view to continuous improvement and increasing efficiency, CDP is committed to adopting the following measures in the buildings in which it operates, including new buildings:

- systems for monitoring hot/cold sanitary water consumption;
- indoor air quality monitoring systems;
- mechanical heat pump systems for the production of hot sanitary water.

Moreover, CDP is committed to applying the Minimum Environmental Criteria (MEC)¹⁸ in the required areas (e.g. energy services for buildings, with reference to lighting and heating/cooling services) and, where possible, to promoting solutions for improving the efficiency of the buildings (such as thermal insulation and high-performance closures, eco-efficient lighting systems and other low-consumption electrical/electronic apparatus, supplied with certificates attesting their low environmental impact, such as Ecolabel, EPD) both in the restructuring of buildings used as corporate offices and in the construction of new buildings, in line with the provisions of Directive 2018/884/EU.

4.2.4 Certification

All CDP sites with over 20 employees are certified in accordance with the international standard UNI ISO 14001¹⁹. Moreover, with regard to LEED²⁰, WELL and WELL H&S²¹ certifications, where possible, CDP is also committed to expanding these to other offices, apart from regional premises and offices, downstream of its restructuring activities.

4.2.5 Self-generation of energy from renewable sources

In pursuit of the objective of continually improving its own environmental performance, CDP is committed to using an increasing amount of self-generated energy, through the installation of photovoltaic plants, for example, where technically and regulatorily possible. For this reason, CDP is dedicated to continually monitoring the evolution of local legislation on the matter, in order to identify potential new opportunities for the installation of plants for the production of renewable energy.

4.2.6 Awareness-raising campaigns

CDP internally promotes awareness-raising campaigns aimed at raising environmental awareness and consciousness among its employees and consequently reducing energy consumption. From this perspective, CDP is committed to maintaining and, where possible, increasing the development of such initiatives.

4.3 Travel / Green Mobility

The transport sector is responsible for approximately 25% of the EU's overall GHG emissions. Of this amount, 71% derives from road transport and 12% is attributable to cars only²². The decarbonisation of the transport sector is one of the EU's objectives, which aims at the gradual electrification of vehicles. In this context, the share of electric vehicles in the European market is growing every year, representing 21.6% of new registrations in 2022. However, despite the constant growth, electric vehicles still only represent 1.2% of the European car fleet.²³

Notwithstanding the fact that CDP's direct environmental impact resulting from its company fleet represents a lower share of the total impact, given the low number of vehicles that comprise the fleet and the fact that it is exclusively made up of hybrid cars, a significant portion of CDP's emission comes from the Scope 3 emissions associated with employee business travel.

¹⁸ The MEC are adopted by Decree of the Ministry of Ecological Transition. For more information see the website <https://gpp.mite.gov.it/CAM-vigenti>

¹⁹ Environmental management system that an organisation can use to manage its own environmental performance.

²⁰ Certification related to the building's entire life cycle, from planning to construction, which promotes an approach oriented towards sustainability, recognising the performance of buildings in significant aspects, such as energy and water saving, the reduction of CO₂ emissions, improvement in the ecological quality of interior spaces and the materials and resources used, and the design and choice of site.

²¹ Certification related to the comfort level of buildings, with a particular focus on the wellbeing and health of occupants. Specifically, there are seven aspects that the WELL protocol seeks to assess and therefore certify: Mental and physical wellbeing, Comfort, Movement; Light; Food; Water; Air.

²² European Council; Clean and sustainable mobility for a climate-neutral EU; 2023

²³ EEA, (europa.eu), 2023

In line with the commitments made as part of the ESG Plan 2022-2024 and the European Union's targets, CDP intends to contribute to the development of sustainable mobility, promoting an increasingly widespread use of vehicles with a lower environmental impact and encouraging the adoption of virtuous conduct aimed at reducing the emissions generated by employee travel. This commitment includes training on sustainable travel practices, the promotion of eco-compatible alternatives for travel, including the definition and implementation of people caring initiatives based on the earmarking of contributions aimed at incentivising sustainable travel.

4.3.1 Company fleet

To pursue a constant reduction in the impact generated by the use of its own car fleet, CDP is committed to maintaining, where possible, a fleet comprising 100% hybrid and/or electric vehicles.

4.3.2 Business travel

The objectives of CDP's "Missioni" Policy include the mitigation of the environmental impacts deriving from employee travel for business reasons, which CDP intends to achieve through a few measures and guidelines, such as:

- the obligatory use of train for distances of less than 3 hours' travel time;
- the use of a single private vehicle when more than one employee is travelling to the same destination;
- the use of public transport and eco-sustainable structures, where compatible with employee needs;
- awareness-raising measures aimed at the use of "green" taxis, by using operators which offer electric vehicles.

4.3.3 Work-home travel

Thanks to the support of the Mobility Manager, which coordinates the activities for the survey conducted among employees each year, revealing their mobility practices in order to prepare the Home-Work Travel Plan (HWTP)²⁴ and identify strategies and improvement measures for sustainable mobility, at the main sites in which CDP operates, CDP offers its employees infrastructure and tools that seek to incentivise virtuous practices and behaviours and to reduce the environmental impact resulting from home-work travel. By way of example, the following are noted:

- the installation of electric vehicle charging points, with a further commitment to consider the expansion of this practice to future sites;
- the preparation of parking areas, maintenance stations and charging points for electric motorcycles;
- access to showers and changing rooms in order to encourage the use of bicycles and scooters.

Moreover, CDP is committed to continuously raising awareness and encouraging its employees to make virtuous choices from an environmental point of view. To this end, several forms of incentive are on offer, such as agreements for the use of bike/scooter sharing platforms, contributions for annual season tickets for public transport and for the purchase and/or rental of electric vehicles.

The Smart Working agreement, through which CDP governs the use of this practice, also contributes to generating positive environmental impacts, making it possible to reduce home-work travel and therefore the relative emissions.

Lastly, in line with its own institutional role, CDP is committed to strengthening its awareness-raising activities, including through external stakeholders, by means of participation in national and international events related to sustainable mobility (such as the European Mobility Week).

²⁴ As required by Decree-Law 34/2020 which, for companies with more than 100 employees located in certain geographical contexts, it is obligatory to submit the "Home-Work Travel Plan" or "HWTP" by 31 December every year, with the objective of supporting sustainable mobility.

4.4 Emission offsetting

The offsetting of greenhouse gas emissions is an action that is subsequent and complementary to reduction activities which, in relation to “non-attributable emissions”, contributes to a business’s climate mitigation strategy.

Notwithstanding CDP’s commitment to reducing its own direct environmental impact and the numerous initiatives undertaken, a certain portion of emissions is naturally unavoidable and is not, and cannot be, fully eliminated.

In line with the commitments made under the ESG Plan 2022-2024 and the targets established by the European Union, which is defining a framework for the certification of projects aimed at carbon absorption and capture, CDP intends to incrementally make use of offsetting initiatives. In particular, CDP is committed to continue the offsetting of its own emissions, launched with pilot initiatives dedicated to specific categories of emissions (e.g. emissions related to paper and toner consumption and the organisation of events), incrementally offsetting the portion of its own emissions that cannot be further reduced, in addition to selecting tools, offsetting initiatives and projects (e.g. considering the adoption of an Internal Carbon Price tool aimed at determining an internal price for emissions) through a process requiring a due diligence on the compliance of said plans with CDP’s strategic priorities/ambitions and sustainability policies.

4.5 Waste / Circular Economy

In 2020, the European Commission adopted an Action Plan for the circular economy²⁵ which focusses on the enhancement of sustainable products through measures for their design and measures for raising consumer awareness for responsible consumption. The Plan envisages the implementation of 35 actions, primarily with reference to products with a high environmental impact, such as electronics, batteries, packaging, plastic, construction and building and food products.

In Italy, the National Strategy for the Circular Economy was approved in June 2022, establishing targets for 2035 concerning the development of a new system for the digital traceability of waste, tax incentives to support recycling activity and the use of secondary raw materials, the revision of the environmental tax on waste, or the right to reuse and repair²⁶.

Within the European Union, rates of waste recycling (urban, packaging and electronics waste) are slowly growing, which represents progress towards the use of a greater quantity of waste as a resource and the achievement of a circular economy. In 2020, the overall recycling rate, or the ratio between total waste generated (excluding principal mineral waste) and the quantities managed through recycling, came to 46%. With reference to 2021, the detailed data show packaging recycling in first place with 64%, followed by urban waste with 49% and electronic waste with 39%²⁷.

In line with the legislative framework and the commitments made by the European Union, as well as the commitments made in its own ESG Plan 2022-2024, CDP promotes greater use of products/services with a lower environmental impact and encourages internal circular economy practices, as described in more detail in the following sections.

4.5.1 Responsible consumption of raw materials

CDP is working to reduce, to the extent possible, the consumption of resources through measures that include the use of new technologies. For example, procurement processes are 100% paper- free both regarding the supplier qualification process via the Procurement Portal, and the process of selecting and contracting suppliers right through to the payment of goods and services provided²⁸. Moreover, in order to reduce paper consumption, CDP is committed to providing all its staff with a laptop computer and monitor for their workstations, to allow double displays, thus reducing the need for paper document and, where possible, promoting the use of electronic filing, the dematerialisation of documentation and the digitisation of signatures in day-to-day operations.

²⁵ European Commission, COM(2020) 98 final, 2020

²⁶ Ministry for Ecological Transition, National Strategy for the Circular Economy; 2022

²⁷ European Environment Agency, Waste recycling in Europe (europa.eu) 2023

²⁸ For more information on the principles and operating procedures for constantly promoting best practices for ESG sustainability in the supply chain, see the General Responsible Procurement Policy

In any case, in its use of resources, CDP promotes the responsible consumption of raw materials through the use of renewable materials. In order to support the responsible management of forests, the safeguarding of biodiversity and the integrity of ecosystems, CDP is committed to:

- purchasing, in line with the Minimum Environmental Criteria (MEC) and where possible, 100% recycled paper, for the most part post-consumption, as it already does for all of its office printers at the sites in which it operates, for which it also has a plan for double-sided printing and limiting the use of colour to centralised services;
- progressively eliminating single-use plastics in vending machines, using water bottles produced exclusively with sustainable packaging;
- replacing single-use plastic products (cups, bottles, and palettes) with items made of paper, wood or other recyclable materials;
- paying particular attention to the packaging of purchased products, favouring products with compostable packaging.

4.5.2 Circular economy and waste management

CDP is committed to reducing its production of urban waste, including through activities to raise awareness of these issues and the sharing of good practices for waste separation, with the aim of increasing year-on-year the percentage of waste that is subject to separate collection within its own offices.

From this perspective, CDP promotes numerous initiatives at the sites in which it operates, to incentivise the separate collection of waste within its offices, such as the provision of dedicated recycling areas. Moreover, to incentivise the correct management of special waste (other than urban waste and the like), CDP requires that its waste management contracts include a special clause that obliges the contractor to dispose of a higher percentage of waste with recovery codes R1 to R12²⁹ compared with the previous year.

About the development and promotion of good circular economy practices, CDP is committed to repairing, where possible, non-functioning electronic devices (PCs and accessories) and to recycling, reusing, or donating those which are no longer usable due to functional demands linked to CDP's business or which have been placed out of service³⁰. In particular, in order to generate positive impacts for the local area and its communities, CDP promotes online announcements for the donation of not only computer equipment, but also stationary, furniture and fittings to schools, organisations and associations³¹.

In addition, with the aim of improving efficiency in its own patterns of consumption, reducing the production of waste and encouraging a circular mode, CDP is also committed to returning used printer ink cartridges to suppliers or specialist operators, to allow them to be generated with a view to circularity.

Moreover, CDP offers its employees a "Marketplace" platform on which it is possible to exchange, sell or gift items that are no longer being used and, at the same time, is committed to developing employee awareness-raising initiatives (e.g., to combat food waste, encourage recycling, etc.).

Regarding the organisation and management of events, both those held at its own sites and those managed at external sites, CDP includes strict ESG requirements for suppliers in its tender specifications. In fact, all catering services must obligatorily be plastic free and, where possible, must respect the principles of sustainability (e.g. seasonal and locally produced food). Preference is also given to "ethical and solidarity-based" catering services which have implemented agreements for the recovery of surplus food.

²⁹ R1: Use as a fuel or other means to generate energy; R2: Solvent reclamation/regeneration; R3: Recycling/reclamation of organic substances which are not used as solvents (including composting operations and other biological transformations); R4: Recycling/reclamation of metals and metal compounds; R5: Recycling/reclamation of other inorganic materials; R6: Regeneration of acids or bases; R7: Recovery of components used for pollution abatement; R8: Recovery of components from catalysts; R9: Used oil refining or other reuses of previously used oil; R10: Land treatment resulting in benefit to agriculture or ecological improvement; R11: Uses of residual materials obtained from any of the operations numbered R1-R10; R12: Exchange of wastes for submission to any of the operations numbered R1-R11.

³⁰ As governed in the "Waste Management and Asset Inventory" Procedure, which requires the annual updating of the inventory, with the objective of identifying those assets which are in perfect working order but are no longer functional to its own activities.

³¹ As governed in the Regulation on the Donation of Out-of-Service Assets.

4.6 Green IT

The information and communication technologies (ICT) ecosystem contributes in an increasingly significant manner to overall greenhouse gas emissions, for reasons including the growing use of data centres, which are now indispensable to the continuous flow of data and information. However, their nature and high energy intensiveness has raised concerns as to their environmental impact, sustainability and energy supply security. At the European level, annual energy consumption deriving from the use of data centres is in constant growth, having reached a value of around 45 TWh of energy per year, equivalent to 1.6% of the European Union's total energy consumption in 2021. To achieve the net zero emissions target by 2050, as defined at the European level, it is necessary to halve greenhouse gas emissions deriving from the use of data centres by 2030³². To that end, the European Commission has adopted measures aimed at improving the energy efficiency and circularity in cloud computing and data centres, such as the Regulation on the Eco-compatible design of servers and data storage products³³ and the European Code of Conduct for Data Centres (EU DC CoC)³⁴.

Following the European legislative effort aimed at improving energy efficiency and performance in cloud computing³⁵ and data centres, CDP favours the use of low energy consumption office equipment and machines (desktop computers, personal computers, displays, printers and multi- function devices (photocopy, fax, scan, and print). Moreover, when purchasing IT equipment CDP requires that the products comply with the main environmental requirements, such as safety (e.g., IMQ) and electromagnetic emissions (e.g., FCC) requirements certified by recognised bodies at European level, i.e., the Minimum Environmental Criteria (MEC).

With the commitment of minimising its environmental impact, CDP has defined a framework for measuring the carbon footprint of its principal ICT components (Information and Communication Technology: datacentres, devices and networks) and has identified several mitigating actions, such as the supply of renewable energy to datacentres, with a commitment to guaranteeing a fixed quota of at least 45% of total energy used, in addition to the Energy Star³⁶ certification of company laptops.

In addition, to engage the entire company population in the correct use of electronic apparatus, CDP is committed to continuing to develop awareness-raising initiatives aimed at the mindful and responsible use of ICT devices (such as turning off PCs overnight, turning monitors to 'sleep' mode during breaks, etc.).

5. ROLES AND RESPONSIBILITIES

In the light of the context outlined, the roles and responsibilities of the various parties involved – in compliance with the regulatory and organisational system and with company powers and internal delegations – are defined below:

Board of Directors

- Approves this document, as well as any material revision and the possible repeal thereof, on an exclusive and non-delegable basis.

³² European Commission, The EU Code of Conduct for Data Centres, 2023.

³³ European Commission, Regulation 2019/424, 2019 – Regulation seeking to limit the environmental impact of servers and storage products with a number of rules on energy efficiency.

³⁴ Joint Research Center, Data Centres Code of Conduct, 2016 - Voluntary initiative established by the Joint Research Center which wants to encourage and guide data centre operators and owners to reduce energy consumption in an economically advantageous manner.

³⁵ Model for allowing access to the on-demand network, a shared pool of configurable calculation resources (e.g. networks, servers, storage, applications and services) that can be provided and released quickly with minimal management efforts or interaction from the service provider. Eurostat, statistics-explained.

³⁶ Voluntary programme, conceived to identify and promote low energy consumption products, in order to reduce greenhouse gas emissions.

Risk and Sustainability Committee

- Provides the Board of Directors with an opinion on this document and on any material revision thereof.

Chief Executive Officer

- Proposes that the Board of Directors should approve this document, as well as any material revisions thereof.
- Continuously supervises, receiving information flows for this purpose, the application of this Policy, thus ensuring an organisational structure appropriate for the objective.

Administration, Finance, Control and Sustainability Department

- Monitors the evolution of the issue as part of a broader ESG strategy, liaising closely with all the competent structures, to verify the consistency of internal objectives with market developments, also with the aim of fostering their improvement.
- Ensures the definition of proposals to update this document, in coordination with other competent structures, also on the basis of significant issues identified, including those emerging from dialogue with the relevant ESG ratings agencies.
- Ensures, in collaboration with the structures involved, the correct implementation of this Policy and ongoing advisory support regarding its interpretation.
- Ensures the monitoring and reporting of ESG objectives and sustainability indicators.

Innovation, Transformation and Operations Department

- Ensures compliance with the principles contained in this document, in the areas for which it is responsible, such as property management, procurement and IT services.
- Promotes, in the areas for which it is responsible, the adoption of new practices, technological solutions and tools (e.g., software, applications, platforms) aimed at reducing the environmental footprint.

People and Organisation Department

- Ensures the promotion of virtuous practices and compliance with the principles contained in this document, in the areas for which it is responsible, such as business travel.
- Promotes, in the areas for which it is responsible, the adoption of new initiatives and tools aimed at reducing the environmental footprint.

Communication, External Relations, Art and Culture Department

- Oversees, in unison with the other competent Business Units, dialogue with the civil society and any other relevant stakeholders to acquire, monitor and guide policy on issues relevant to the definition of the contents of this document.
- Ensures compliance with the principles contained in this document, in the areas for which it is responsible, such as awareness-raising and training initiatives directed at internal and external stakeholders, as well as marketing and communications initiatives (e.g., events).
- Promotes, in the areas for which it is responsible, the adoption of new initiatives aimed at reducing the environmental footprint.
- Handles the promotion of this Policy and the related initiatives among external and internal stakeholders, strengthening their positioning, including through the management of engagement and communications activities, both within and outside the organisation.

Structures reporting to the “Risk Department” and “Internal Audit Department” can, in their capacities as the second and third level control functions, respectively, according to a risk-based approach and for the areas for which they are responsible, carry out checks on processes related to the activities detailed in this document, making suggestions – where necessary or in any case deemed appropriate – and periodically monitoring their correct implementation, in order to continuously strengthen measures to mitigate the potential risks identified.

6. TRANSPARENCY AND ACCOUNTABILITY

CDP recognises the value of transparency and continuous dialogue with its customers, investors, suppliers, rating agencies and civil society organisations in order to value their legitimate expectations. CDP is committed to ensuring continuous and transparent reporting on its own internal operations and the impacts generated by them.

To that end, CDP publishes annually on its website a non-financial report – which includes the Consolidated Non-Financial Statement (NFS) pursuant to Legislative Decree 254/2016 – prepared in accordance with recognised standards (i.e. the standards of the Global Reporting Initiative (GRI), the International Integrated Reporting Council (IIRC), the Sustainability Accounting Standards Board (SASB) and the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD)).

Transparency is ensured through the publication of this Policy and information on the areas connected to it, on CDP’s institutional website, as well as through ad hoc initiatives.

7. ANNEXES

7.1 Glossary

- **Paris Agreement:** the Paris Agreement is a legally binding international treaty on climate change, which came into effect in 2016. Its goal is to limit global warming to below 2°C, preferably to 1.5°C, compared to pre-industrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by mid-century.
- **UN 2030 Agenda³⁷:** plan of action for people, the planet and prosperity signed in September 2015 by the governments of the 193 UN Member Countries. It incorporates 17 Sustainable Development Goals (SDGs) in a major agenda for action with a total of 169 targets.
- **Emission offsetting:** the promotion of projects to mitigate climate change implemented outside of the company’s value chain (e.g., reforestation and ecosystem restoration activities), to offset generated emissions that it has not been able to reduce.
- **Corporate Sustainability Reporting Directive:** European Union (EU) directive that seeks to strengthen and harmonise sustainability reporting requirements for businesses within the European Union with the goal of improving the transparency and comparability of information on sustainability provided by businesses.
- **GHG emissions:** emissions of gases which generate the so-called “greenhouse effect” (Greenhouse gases) that leads to climate change. The six main greenhouse gases are: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrochlorofluorocarbons (HCFC), perfluorocarbons (PFC) and sulphur hexafluoride (SF₆).
- **Environmental, Social and Governance (ESG):** the environmental, social and corporate governance factors which qualify a financial activity as sustainable.
- **Internal footprint:** environmental impacts (e.g., greenhouse gas emissions, natural resource consumption, waste production) generated by the implementation of CDP S.p.A.’s operating model, i.e., generated by the implementation of internal processes and activities pertaining, in particular, to site management, main ICT components and travel.

³⁷ <https://unric.org/it/agenda-2030/>

- **CDP Group:** Cassa Depositi e Prestiti S.p.A. and Companies subject to management and coordination by CDP S.p.A. pursuant to Articles 2497 et seq. of the Italian Civil Code.
- **Internal Carbon Price:** planning tool adopted by companies to reduce greenhouse gas (GHG) emissions by using market mechanisms to transfer the cost of emissions onto the emitter, usually by fixing a price for carbon dioxide equivalent (CO_{2e}) emitted, in order to incentivise organisations to pursue a low carbon emissions economy.
- **Sustainable Development Goals (SDGs):** 17 goals agreed by the United Nations that aim to achieve a total of 169 targets relating to economic and social development, including poverty, hunger, health, education, climate change, gender equality, water, sanitation, energy, urbanisation, environment, and social equality.