

<p>Annex to the guarantee request from</p> <p>Sustainability Proofing Summary¹</p>	
<p>The summary² is in line with the sustainability proofing guidance and should be presented only for direct financing.</p>	
<p>Identification of the project</p>	
<p>Project total cost (exclusive of VAT):</p>	<p><input type="checkbox"/> below EUR 10 million</p> <p><input checked="" type="checkbox"/> equal to or higher than EUR 10 million</p>
<p>If the project is exempted from screening/proofing based on the threshold, please mention this together with a short confirmation of legal compliance</p>	
<p>EIA Directive</p>	
	<p><input type="checkbox"/> Annex I projects (EIA required)</p> <p><input type="checkbox"/> Annex II projects (screening)</p> <p style="padding-left: 20px;"><input type="checkbox"/> EIA required (project screened in)</p> <p style="padding-left: 20px;"><input type="checkbox"/> EIA not required (project screened out)</p> <p>2014 EIA Directive applicable</p> <p style="padding-left: 20px;"><input type="checkbox"/> Yes</p> <p style="padding-left: 20px;"><input type="checkbox"/> No</p>
<p>Sustainability proofing process</p>	<p><input checked="" type="checkbox"/> Climate</p> <p><input checked="" type="checkbox"/> Environmental</p> <p><input checked="" type="checkbox"/> Social</p>
<p>Climate Dimension</p>	
<p><i>Legal framework</i></p>	<p>Applicable legislation and compliance of the operation (e.g. if part of an EIA).</p> <p>Based on the information provided by the Final Recipient and on the requirements set by the Concession Agreement, the project shall comply, among others, with the following legislations: SWD (2020) 55 final and EN 50600.</p>
<p><i>Climate dimension (screening)</i></p>	<p>Adaptation:</p> <p>Describe the basis for not undertaking the climate risk assessment based on the results of the climate vulnerability assessment.</p> <p>Please refer to Section “Climate adaptation (proofing)” below.</p> <p>Mitigation:</p> <p>Is the project recommended to undergo Carbon footprint as per Chapter 2.2 of the sustainability proofing guidance?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

¹ In line with Article 8 (5) of the InvestEU Regulation and the sustainability proofing guidance ([C\(201\)2632 final](#)).

² In line with section 3.2 of the Investment Guidelines, the sustainability proofing summary shall be made public after the Investment Committee has approved the use of the EU Guarantee for a specific operation (with due regard to rules and practices regarding confidential and commercially sensitive information)

	<p>If “no”, justify why the Carbon footprint is not necessary. Provide any other considerations to take into account:</p> <p>In line with the technical guidance on sustainability proofing for the InvestEU Fund, a screening of the operation regarding GHG emissions has been conducted as to identify if the proposed project has to undergo a carbon footprint assessment. Indeed, the Project Promoter has undertaken a carbon footprint calculation through GHG Protocol Methodology and according to this assessment the project is below the thresholds of 20.000 tonnes CO₂e/year emissions.</p> <p>This means that it is not necessary to perform a carbon footprint assessment.</p> <p>GHG Protocol is an internationally recognized standard for accounting and reporting greenhouse gas emissions. This protocol is consistent with the International Financial Institution Framework for a Harmonised Approach to Greenhouse Gas Accounting.</p>
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<p><i>Climate adaptation (proofing), as applicable</i></p>	<p>Confirm the use of the ‘Technical guidance on climate proofing of infrastructure in the period 2021-2027’ for the infrastructure projects.</p> <p>Describe the climate vulnerability assessment and its main conclusions. Describe the basis for undertaking proofing. Describe the conclusions of the climate risk assessment. Describe the climate adaptation measures put in place. Describe the residual climate risks and justify why they are acceptable.</p> <p>Verification: Describe the independent verification of the climate proofing documentation as regards climate adaptation, if such a verification is available.</p> <p>CDP carried out a Climate Change Vulnerability and Risk Assessment (CCVRA) of the project, also through interviews filled out by counterparts.</p> <p>The PSN facilities consists of 4 data centers grouped into 2 Regions:</p> <ol style="list-style-type: none"> 1. Lombardia in the Northern region: <ul style="list-style-type: none"> ○ Site A: Santo Stefano Ticino (MI); ○ Site B: Rozzano (MI); 2. Lazio in the southern region: <ul style="list-style-type: none"> ○ Site C: Acilia (RM); ○ Site D: Pomezia (RM). <p>The CCRVA was carried out by following the guidelines released by the European Commission, i.e. “<i>Technical guidance on climate-proofing of infrastructure projects for the period 2021-2027</i>”.</p> <p>Specifically, the assessment was divided into two phases, the screening (Phase 1) and the risk assessment (Phase 2).</p> <ol style="list-style-type: none"> 1. In the Phase 1 (<i>Screening phase</i>), the key elements of the project, including data center facilities, equipment, and operation and maintenance aspects have been highlighted and climate-related hazards in the current and future climate scenarios relevant to the specific project and its geographic location have been identified. The exposure and sensitivity of the project elements have been assessed and combined with a vulnerability matrix, that allowed the identification of hazards leading to high vulnerability, namely heat waves, river floods (site C-Acilia and B-Rozzano only), and heavy precipitation, along with drought (specifically for sites located in Lazio). Hazards contributing to medium vulnerability included changing temperature patterns, while those resulting in low vulnerability were primarily changes in precipitation patterns and drought (for sites in Lombardia, site A and B).
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2. In the Phase 2 (*Risk Assessment phase*), further investigation on the climate-related hazards identified in the Phase 1 have been conducted. For each risk factor the likelihood of each and their impact on assets, environment, social, financial, and reputational aspects have been estimated. Combining the likelihood and impact analyses, the hazards with extreme risk level have been identified: heat waves, heavy precipitation and changing in temperature patterns, high risk level i.e. drought and river flood (only B and C site) and medium risk level i.e. changing in the precipitation pattern.

The assessment was carried out thorough analysis of the technical documents provided by the Final Recipient, including interviews with the technical team of the Final Recipient about the adaptation measures introduced in the project. The key takeaways are summarised here below:

- *All Datacenter are classified in a range of Rating Level 3 (Rozzano, Pomezia) and Rating Level 4 (S. Stefano, Acilia) according to ANSI/TIA 942; based on the Rating Level “Protection against most physical events” (Tier III) and “Protection against almost all physical events” (Tier IV) have been identified and implemented. A specific environmental risk assessment was performed and seismic and hydrogeologic risk addressed;*
- *All data centers are in different geographic zones in order to have different risk conditions; the requirement of a distance between different Regions of at least 500 km allows areas to be considered completely unrelated from the point of view of risks of all kinds;*
- *All Sites are certified according to ISO14001, Environmental Management System Standard, that includes among requirements an environmental risk review, control operation of the environmental aspects and emergency environmental procedure; currently only the DC located in Santo Stefano has received LEED certification (Gold Level), while the process is still ongoing for all others;*
- *To mitigate temperature-related risks, such as heat waves, the site includes specialized cooling units designed for extreme climatic conditions based on ASHRAE HANDBOOK guidelines for a 20-year period and tropicalized refrigeration units are installed in all PSN data centers.*
- *For sites with Rating 4 and TIER IV certification, the site is supplied by no less than two electrical transformer substations that are independent of each other and segregated by REI120 fire compartments; each cabin is designed to guarantee the power supply of the entire settlement in the event of down of the other cabin (2N configuration);*
- *Power energy supply unit are installed at each datacenter; The units are equipped with an on-board daily fuel tank and with USTs (Underground Storage Tank) to guarantee an operating autonomy at rated power*

without topping up of fuel not less than 48 hours in the conditions of emergency;

- To fight the increasing average temperatures, the systems are designed to withstand temperatures up to 35 °C in the technical rooms, with atmosphere controlled by HVAC system designed to ensure the thermo-hygrometric values within the ranges recommended by ASHRAE Thermal Guidelines for Data Processing Environments (18÷27°C, 20÷80% H.R.); The HVAC serving the Data Centre is realized in order to achieve the objectives of the TIER III/3 minimum certification rating. The infrastructure will guarantee the possibility of carrying out any ordinary or extraordinary maintenance work, guaranteeing extraordinary maintenance, guaranteeing the continuity of the site's operation. Monitoring and management system for Indoor environmental condition (temperature, humidity) is installed at all the PSN datacenter (BMS); free cooling is adopted across all sites to harness natural cool air and reduce energy consumption.*
- To address heavy precipitation, the sites depend on green external areas and planted trees. Green external area, with high permeable capacity, is within a range of 50-70% of the entire surface and the planted trees area ranging from 15% to 30% of the total area; those environmental condition contribute positively to on-site rainwater management. Only Santo Stefano a Ticino (site A) uses, in addition to permeable green area, five rainwater collection basins (according to LEED prerequisites) to handle heavy precipitation. However, it is recommended to create a site-specific stormwater management plan for all locations, meeting at least the LEED requirements;*
- River flooding poses no risk to sites A and D while it can be assumed B and C at high risk in future scenario that climate change's increased rainfall and extreme weather events increases the severity of flooding. The adaptation measure involves connecting the Data Center's drainage system to municipal networks, preventing backflow during extreme events affecting stormwater and wastewater disposal networks, and high permeable capacity of 50 -70% of the entire surface (green and planted area). In addition, at any DC are installed power units supply equipped with a dedicated storage fuel tank to ensure operational autonomy without refueling for a minimum of 48 hours in the event of the loss of an energy source; given the low probability and impact of this climate hazard, the adopted measures can be deemed sufficient;*
- The DC water supply is generally satisfactory, relying on the aqueduct for 70-100% of needs, reducing drought-related risks. Currently, only the S. Stefano data center collects rainwater. It is recommended to implement adaptation measures for future droughts, such as rainwater collection, water-saving fixtures, and fittings, to mitigate potential impacts on the data center;*
- Regarding the changing in precipitation pattern (decrease of average precipitation) the datacenters are considered with low vulnerability of which is associated insignificant level of impact.*

	<p>The implemented measures, combined with certifications such as LEED, Tier III or IV, and ISO14001, are deemed sufficient, and residual climate-related risks are considered acceptable and the adaptation measures in the project are adequate and in line with the climate risk identified.</p> <p>In conclusion, the PSN data centres are affected by only residual climate-related risks, which are considered acceptable.</p>
<p><i>Climate mitigation (proofing), as applicable</i></p>	<p>Confirm the use of the ‘Technical guidance on climate proofing of infrastructure in the period 2021-2027’ for the infrastructure projects.</p> <p>Provide a comparison of the project type with table 1 in chapter 2.2.5.1 of the sustainability proofing guidance.</p> <p>Describe the basis for undertaking the proofing.</p> <p>Describe the quantification of GHG emissions.</p> <p>Indicate absolute and relative emissions, and compare with the thresholds in chapter 2.2.5.1 of the sustainability proofing guidance.</p> <p>Describe the basis for undertaking (or not) the monetisation of GHG emissions and identification of low-carbon options.</p> <p>Indicate expected lifespan of the infrastructure.</p> <p>For infrastructure with lifespan beyond 2050, describe its compatibility with conditions of climate neutrality as regards O&M and decommissioning.</p> <p>Verification:</p> <p>Describe the independent verification of the climate proofing documentation as regards climate mitigation, if such a verification is available.</p> <p>Not applicable, since the findings of the climate screening process did not reveal the need to continue with the proofing phase.</p>
<p><i>Voluntary measures (Positive agenda checklist)</i></p>	<p>Present the voluntary measures taken to improve the climate performance of the operation, if applicable.</p> <p>PSN, under the Convention signed with Department for Digital Transformation of the Presidency of the Council of Ministers, has undertaken the following climate-related commitments:</p> <ul style="list-style-type: none"> - Achieving Carbon Neutrality (Scope 1 and 2) by 2030 - Becoming Net Zero (Scope 1, 2, 3) by the end of the Convention period - Filing in an Annual Sustainability Report to disclose the status of indicators related to ESG impacts (e.g., energy savings, use of renewable energy, ...). <p>In order to be compliant with the “EU Green Public Procurement criteria for data centers, server rooms and cloud services” Directive, PSN is committed to establish internal policies to identify sustainability risks and impacts of purchased products and services, and to minimize the use of energy and natural resources and maximize the use of energy sources renewables.</p>

	Indeed, the project uses 100% renewable energy from Guarantees of Origin (electronic certificates that attest to the renewable origin of the sources used).
Environmental Dimension	
<i>Legal framework</i>	<p>Applicable environmental legislation and compliance of the operation, such as:</p> <ul style="list-style-type: none"> - EIA procedures results (e.g. EIA required, EIA screening decision with or without mitigation measures) or any other relevant assessment/s. - other relevant procedures in the context of the legal compliance process described in chapter 2.3.2 of the sustainability proofing guidance, as applicable to the project. - permits in place or in progress. - short information whether a project is consistent with a planning framework (i.e. whether it results from a plan/programme that was subject to a strategic environmental assessment). <p>Based on the information provided by the Final Recipient and on the requirements set by the Concession Agreement, the project shall comply, among others, with the following legislations: SWD (2020) 55 final and EN 50600.</p>
<i>Environment dimension (screening)</i>	<p>Describe the conclusions of the InvestEU screening performed based on Checklist 1 in Annex 3 of the sustainability proofing guidance. (For example, provide a short justification for why: (i) it is considered that the project has no impact/s or only low impact/s on the elements of the natural capital and the two crosscutting themes; (ii) the project requires an EIA, but no significant residual impacts were identified).</p> <p>The project was screened against the criteria detailed in the Checklist in Appendix 3 of the Sustainability Proofing Guidance. What emerged is that the project is unlikely to generate negative impacts on any of the environmental elements (air, water, land and soil, biodiversity, noise and odour).</p> <p>The Project Promoter has reported that they have initiated the process for obtaining the EIA for one of the data centers, with a total thermal power that will over time exceed 50MW, as required by Italian legislation (Legislative Decree 152/06).</p>
<i>Environment dimension (proofing), as applicable</i>	<p>Describe the basis for undertaking the proofing (results of the screening). Describe the identified impacts. Describe proposed mitigation and/or compensation measures (and their costs). Quantification and monetisation of the residual risks, where applicable Justify why residual risks are acceptable.</p> <p>Not applicable, since the findings of the environmental screening process did not reveal the need to continue with the proofing phase.</p>
<i>Voluntary measures (Positive agenda checklist)</i>	Present the voluntary measures taken to improve the environmental performance of the operation, if applicable.

	<p>The implementation of the proposed project is capable of generating several positive environmental project impacts. Indeed, among the major aims of the PSN Project there is to:</p> <ul style="list-style-type: none"> - minimize the use of water thanks to the use of systems for collecting rainwater and the use of low-water consumption systems - achieve maximum efficiency and improve environmental performance thanks to the adoption of BAT (Best Available Technologies) considering the Guidelines of the European Code of Conduct for Energy Efficiency in Data Centers - follow a circular economy process as outlined in the Convention in accordance with the Directive 2009/125/EC.
Social Dimension	
<i>Legal framework</i>	<p>Applicable labour and social legislation and compliance of the operation. Based on the information provided by the Final Recipient and on the requirements set by the Concession Agreement, the project shall comply, among others, with the following legislations: SWD (2020) 55 final and EN 50600.</p>
<i>Social dimension (screening)</i>	<p>Describe the results of the InvestEU screening performed based on the Checklist in Annex 3 of the sustainability proofing guidance. <i>(For example, provide a short justification why it is considered that the project has no impact/s or only low impact/s on the dimension of criteria of the social dimension described in Chapter 2.4 of the sustainability proofing guidance).</i></p> <p>The project was screened against the criteria detailed in the Checklist in Appendix 3 of the Sustainability Proofing Guidance. What emerged is that the project is unlikely to generate negative impacts on the various issues outlined in the social dimension.</p>
<i>Social dimension (proofing), as applicable</i>	<p>Describe the basis for undertaking the proofing (screening results). Describe the identified impacts. Describe proposed mitigation and compensation measures. Describe residual risks and justify why they are acceptable.</p> <p>Not applicable, since the findings of the social screening process did not reveal the need to continue with the proofing phase.</p>
<i>Voluntary measures (Positive agenda checklist)</i>	<p>Present the voluntary measures taken to improve the social performance of the operation, if applicable. Explain any other positive social impact expected from the operation, regarding, in particular: i. Gender equality and women’s empowerment; ii. Social inclusion and, iii. Resilience building.</p> <p>The implementation of the proposed project is capable of generating several positive social project impacts contributing to support vulnerable groups and fostering gender equality. In this field is worth mentioning that the recruiting activities adopted are aimed at ensuring the highest possible level of inclusivity in terms of gender and generational equal opportunities</p>

	<p>and the employment inclusion of people with disabilities. In accordance with the provisions of the Convention, the PSN will prioritize hiring people (i) under the age of 36, (ii) female, and (iii) with disabilities in a number exceeding the minimum legal requirement in Italy. Specifically, according to the Convention, PSN will hire (i) a component of young workers (under the age of 36) exceeding 20% of the workforce, (ii) a component of female workers exceeding 30% of the workforce, and (iii) people with disabilities in a quota of 12 units.</p>
<p>Other sustainability aspects (as applicable)</p>	
	<p>Public consultations (part of EIA, on a voluntary basis etc.). Consultation with interested parties (in cases of relocation of people, expropriations or otherwise significant impacts on living conditions). Specific mitigation measures (in cases of, e.g. impacts on heritage, urban planning, etc.). Capacity of the project promoter/final recipient. Specific contractual arrangements. Specific monitoring and reporting requirements. Synergies across dimensions, where possible. Not applicable.</p>