

Sustainability Report

As of 31 December 2025



Società
Gasdotti
Italia



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Letter to stakeholders

GRI 2-22



“ Significant challenges await us in the coming years, to which SGI looks with confidence, strengthened by a consolidated growth path, a significant infrastructure investment program and a concrete commitment to the integration of the various energy carriers. ”

Roberto Loiola | Chief Executive Officer

Dear stakeholders,

The year 2025 was a challenging but positive year for Società Gasdotti Italia, which continued its virtuous path of growth both economic-financial and in terms of design, construction and management capacity. This took place in a very complex national and global context due to the numerous and increased geopolitical and commercial tensions. In Italy, after stabilizing in 2024, natural gas demand increased by 2% again.

In this scenario, SGI has contributed to supporting the robustness and reliability of the natural gas transmission infrastructure, which is essential for the security of the national energy system, achieving a new historical record for investment volumes that for the first time exceeded 100 million euros. During 2025, the Sardinian methanization project to which SGI contributes as a shareholder of the ENURA company that is building transmission infrastructure in the region has regained momentum.

During 2025, Società Gasdotti Italia has intensified its activities related to green molecules, with particular attention to biomethane and hydrogen. On the biomethane front, SGI has consolidated its role as a facilitator, enabling the introduction of new producers into the network through the development of dedicated connections. As regards hydrogen, the pilot projects launched in previous years continued.

During the year, numerous objectives of the ESG Plan were achieved, including:

- the reduction of emissions from venting in line with the targets set, with over 75% of emissions avoided;
- the reduction of fugitive emissions by more than 70% compared to the 2021 baseline;
- H2 ready certification on over 10.3% of its gas pipeline network;
- GHG emissions certification according to ISO 14064-1;
- the 50% reduction in total emissions vs 2021 baseline;
- obtaining a score of 99/100 and 5-star rating in the GRESB Benchmark;
- the deployment of the annual Engagement survey with a rate of 7.79/10 and a Net Promoter Score of 14.

These results reflect the commitment and professionalism of SGI's people, who remain an essential element for the implementation of complex and interconnected projects and for the success of the numerous transformation initiatives underway. SGI will continue to invest in its people through

training and skills development courses, welfare initiatives and diversity, equity & inclusion policies.

Significant challenges await us in the coming years, to which SGI looks with confidence, strengthened by a consolidated growth path, a significant infrastructure investment program and a concrete commitment to the integration of the various energy carriers.

For the Board of Directors

the Chief Executive Officer (CEO)



Methodological note

GRI 2-2, 2-3, 2-4

The Sustainability Report of Società Gsdotti Italia (hereinafter "SGI" or the "Company"), now in its 7th publication, aims to provide an overall view of the business and governance model, the strategies implemented and the results achieved in the field of sustainability during the 2025 financial year (reporting period between January 1st, 2025 and December 31st, 2025).

The document presents the main initiatives undertaken, the results achieved and the future objectives in the field of sustainability, with particular attention to the prospects for development of this area in the years to come.

The Report includes both qualitative and quantitative information relating to the aspects considered relevant for SGI and its stakeholders, identified through a materiality analysis process, illustrated in detail in the paragraph "SGI's Materiality Analysis".

In this section, the Company describes the methodology adopted to identify and assess the environmental, social and governance impacts related to its activities, from which the topics covered in this report derive. During 2025, SGI continued the materiality analysis process, following the indications set out in GRI 3: Material Topics 2021 and maintaining the approach already adopted in 2024.

Similarly to the previous edition, the Report was prepared in accordance with the 2021 version of the GRI Standards and the "GRI Oil & Gas Sector 2021" Sector Standard, according to the "in accordance" option.

The complete list of standards applied is reported in the Appendix, within the GRI Content Index. In addition, the Sustainable Development Goals (SDGs) envisaged by the United Nations 2030 Agenda, which guide the Company's strategic approach to sustainability, were recalled.

As regards the scope of reporting, the data and information reported refer to SGI, with particular attention to the offices of Frosinone, Rome, Chieti and Larino, and are presented in consolidated form.

The document presents the results for the 2025 financial year and, where possible, offers a comparison with 2024 data in order to analyze the

evolution of the Company's activities over the two-year period.

To ensure the most accurate representation possible of SGI's performance, it has mainly included directly detectable data, minimizing the use of estimates.

Any disclosure limitations are explicitly indicated in the Financial Statements and, if estimates have been used or adjustments have been made in the calculations of the indicators, the methodology adopted is specified through specific notes.

Some indicators from previous years have been restated to reflect updates in the calculation methodology, improvements in data collection and consolidation processes, or corrections of any errors detected. These restatements have been carried out with the aim of ensuring the quality, reliability and comparability of the information reported over time.

In line with the GRI guidelines, the process of collecting and managing data for the preparation of the Report was conducted according to the following principles:

- Inclusiveness, sustainability, materiality and completeness regarding the information content;
- Balance, comparability, accuracy, timeliness and clarity (reliability) in the definition of reporting parameters. Finally, it should be noted that during the reporting year there were no significant changes regarding the size of the organization, the ownership structure or the supply chain of the Company.

For further information or any suggestions regarding the Sustainability Report of Società Gsdotti Italia, please contact Giulia Martino at the e-mail address: giulia.martino@sgispa.com.

The document is also available on the Company's website at www.sgispa.com.

SGI's materiality analysis

GRI 2-29, 3-1, 3-2

In 2025, SGI continued to consolidate its sustainability strategy by maintaining, in continuity with the GRI Standards 2021 and GRI 11 – Oil & Gas Sector 2021, an approach based on Impact Materiality for the purposes of preparing this Report.

The material topics subject to reporting are substantially consistent with those identified in 2024, as no new material aspects have emerged that could significantly change their perimeter.

The assessment therefore continues to adequately reflect SGI's main strategic priorities and the most important impacts generated by its activities.

During 2025, the Company also embarked on an evolutionary path aimed at progressively and voluntarily aligning the Sustainability Report with the requirements of the Corporate Sustainability Reporting Directive (CSRD), with reference to the application of the principle of Double Materiality. This approach integrates the perspective of the impacts generated by the organization with that of the risks and opportunities related to sustainability issues, assessing their possible effects

on corporate performance and value creation in the short, medium and long term. In this context, the mapping of the value chain, upstream and downstream of the business activities that characterize SGI, has made it possible to define more precisely the connections between the environmental and social impacts generated along the value chain, the priority ESG issues and the expectations of stakeholders of reference. This analysis also made it possible to identify and assess the potential risks and opportunities present in the different segments of the value chain, promoting an integrated view of ESG dynamics along the entire corporate ecosystem.

The confirmation of the material issues already identified, accompanied by the start of the process of assessing the double materiality of the relevant topics, reflects the company's commitment to ensuring continuity, transparency and consistency in its sustainability reporting process, ensuring stakeholders clear and comparable information over time.

Material theme	Impact	Impact description	Type of impact
Climate adaptation, Resilience and Climate transition	Resilience to climate change and extreme weather events	Adaptation to climate change and extreme weather events impacting business activities	Positive
	Strategies for the energy transition	Energy efficiency and transition to the use of renewable sources	Positive
Greenhouse gas (GHG) emissions	GHG emissions generation	Contribution to climate change through direct and indirect energy GHG emissions, linked to the activities carried out in the company's offices and sites	Negative
	Generation of significant emissions into the air	Emissions from gas leaks along the transmission network and increased air pollution	Negative
Biodiversity protection	Impoverishment of natural resources	Use and consequent depletion of exhaustible natural resources	Negative
	Contribution to biodiversity loss	Alteration of ecosystems due to the impacts of SGI's activity on the territory	Negative
Employee health, safety and well-being	Employee satisfaction and well-being	Strengthening well-being, health and safety measures in the workplace	Positive
	Accidents in the workplace	Accidents or other accidents in the workplace, with negative consequences for the health of direct workers or external collaborators	Negative
SGI's value chain	Environmental, social and economic impacts along the value chain	Negative impacts related to the relationships established along the SGI value chain on environmental, social and economic aspects	Negative
	Cases of human rights violations within the organization and its value chain	Violations of human rights along the value chain and within the company, such as the right to freedom of association and collective bargaining, child labor, forced or compulsory labor	Negative
	Failure to meet customer expectations	Poor efficiency and reliability of the service with consequent increase in complaints	Negative
	Increased Brand Reputation	Greater awareness and sense of belonging, due to the involvement and empowerment of the stakeholders with whom the Company establishes	Positive

Material theme	Impact	Impact description	Type of impact
Non-discrimination and equal opportunities	Incidents of discrimination	Negative impacts on employee satisfaction and motivation due to discrimination (related to gender, age, ethnicity, etc.)	Negative
	Equal opportunities and inclusion	Respect for diversity and promotion of an inclusive corporate climate thanks to corporate activities and initiatives that combat discrimination	Positive
Employee development and enhancement	Failure to meet staff growth expectations	Failure to meet staff growth and wellbeing expectations, with a consequent negative impact on staff satisfaction	Negative
	Development and enhancement of workers' skills through training activities	Improvement of workers' skills through training and professional development activities, general and technical programs, also linked to growth objectives and personalized evaluation (e.g., career development plans)	Positive
Right to land and natural resources	Rights to land and resources	Violation of the rights of local communities related to the use, access and control of land and other natural resources due to the activities of the organization	Negative
	Strengthening of relationships with key partners and stakeholders	Strengthening of dialogue and stakeholders' involvement during the installation and development of the transmission network	Positive
Employee engagement	Talent attraction	Promotion of incentive employment policies and creation of an attractive and stimulating work environment for young talents with specialized skills	Positive
	High turnover rate	High turnover resulting in the loss of key personnel for the Company's business	Negative
Technological innovation	Technological innovation of processes and products	Increase in investments/financial resources for innovation and the energy transition for the use of more sustainable technologies	Positive
Asset Integrity and Critical Event Management	Internal/external communication not aligned with the organization's values	Corporate communication that is not always transparent and ineffective towards stakeholders regarding the values and actions of the Organization	Negative
	Continuity of service offered	Strengthen and guarantee the security of the service offered, improving its flexibility and quality through the completion of projects for the upgrading of the infrastructure, even in cases of stress and network partialization	Positive

Material theme	Impact	Impact description	Type of impact
Asset Integrity and Critical Event Management	Inefficient management of the pipeline network	Management of critical events with lower performance due to network obsolescence that does not guarantee adequate security and efficiency conditions	Negative
	Creating a culture of business ethics	Awareness and dissemination of the culture of ethics, equity and inclusion, respect for human rights by management, employees, business partners and other stakeholders	Positive
Ethics and business integrity	Incidents of anti-competitive behavior	Anti-competitive behavior: collusion with possible competitors, abuse of dominant market position or exclusion of potential competitors, thereby limiting the effect of competition on the market	Negative
	Corruption incidents	Potential involvement in corruption cases	Negative



Highlights



82 employees

+20% employees hired

27% women

151 mln

value of production

25.000 monitored emission point

89% energy consumed is renewable

-50% total emissions (Vs. Baseline 2021)

1000

trees for the SGI Forest in Guatemala

29%

of women on the Board of Directors

4056h

Training

100%

employees evaluated

0 accidents of SGI employees

0 cases of occupational disease

100%

new suppliers assessed with socio-environmental criteria

0 cases of non-compliance with rules and regulations

0 episodes of discrimination

0 cases of corruption

0 cases of non-compliance with rules and regulations

0 episodes of discrimination

0 cases of corruption

Protected habitats 17 Ha

Restored habitats 112 Ha

Habitats maintained 14 Ha

Habitat monitored 720 Ha

Donations to Associations

PLASTICFREE

Peter Pan

beeing

3 GOOD HEALTH AND WELL-BEING

5 GENDER EQUALITY

8 DECENT WORK AND ECONOMIC GROWTH

10 REDUCED INEQUALITIES

11 SUSTAINABLE CITIES AND COMMUNITIES

15 LIFE ON LAND

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

SGI – Who we are

GRI 2-1, 2-6

Società Gasdotti Italia owns and manages an integrated network of high-pressure gas pipelines for the transmission of natural gas, mainly located in central and southern Italy.

The infrastructure extends for about **1,800 km**, representing more than 5% of the entire national network.

The activity is subject to the regulation of the Italian Regulatory Authority for Energy, Networks and the Environment (ARERA), which defines the procedures for access to the gas transmission service and establishes the economic parameters, ensuring transparency and fair conditions for all operators in the sector.

SGI's network is directly interconnected with the natural gas production plants, with the storage sites owned by Edison Stoccaggio and with Snam Rete Gas national transmission network at 10 different points.

It is also connected to smaller infrastructures belonging to the Consortia for Industrial Development

of the Venafrò-Isernia and Termoli areas.

The company's registered office is located in Milan, while the main operational offices are located in:

- **Frosinone**, in Via dei Salci 25-27, subject to extensive development and modernization during 2024 (e.g. 130 kWh photovoltaic system, expansion with wooden structures, automated air exchange system) which in 2025 began the process of obtaining LEED Gold certification (which it received in early 2026);
- **Rome**, in Via Toscana 10;
- **Chieti**, in Via Padre Ugo Frasca;
- **Larino**, in Contrada Monte Arcano.



The history of SGI

1960



SGM's journey begins.

The first infrastructures of SGM (Società Gasdotti del Mezzogiorno) and Edison Gas are laid for gas production and transport in Central Italy

1973



In Basilicata, gas-in of the regional network of Garaguso (MT)

1976



In Sicily, the first gas-in of the regional network of Comiso (RG)

1983



In Calabria and Veneto, respectively, the gas-in of the regional network of Cirò (KR) and the regional network of Collalto (TV)

2000



SGM reaches 1000 km of network with the construction of the Bussi-Roccasecca infrastructure and the separation from gas production sector

2004



SGM and Edison T&S merge to establish Società Gasdotti Italia SpA (SGI)

2007



SGI is acquired by Eiser Infrastructure



2012



SGI is the first company in Italy to obtain TSO certification for the transmission of energy in the form of natural gas

2015



The SGI network reaches 1500 km

thanks to the construction of various infrastructures, including the Paliano-Busso gas pipeline

2016



The company is acquired by Macquarie and SwissLife Asset Managers;



2018



Enura,

the SGI-Snam joint venture for the construction of the methane transmission infrastructure in Sardinia, is born



2023



New authorizations and new headquarters

- SGI obtains two unique strategic authorizations for the construction of the Compressor Station in Corridonia and the Lucera – San Paolo Gas Pipeline.
- The new Strategic Plan is approved;
- The new SGI headquarters in Rome is inaugurated.

2021



Canadian Ontario Teachers' Pension Plan Fund acquires the majority stake in SGI

2024



Rebranding and new certifications

- Rebranding in line with the new corporate values;
- SGI obtains UNI/PdR 125:2022 certification for gender equality, inclusion and equity in the company;
- SGI achieves ISO/IEC 27001:2022 certification on information security and management.

2025



Continuous growth.

- Investments totaling €109.6M, of which €1M in innovative projects;
- EBITDA growth of over 8%;
- Refinancing of bank lines for a total of €775M with the participation of numerous national and international banks and institutional investors; achievement of ISO 9001;
- 10.3% certification of the SGI H2 ready network.
- Finalization of the renovation and expansion works of the historic headquarters of SGI in Frosinone.

SGI's transmission gas network

SGI's transmission network is configured as a strategic infrastructure for the national energy system. It consists of an integrated network of high-pressure gas pipelines of approximately 1,800 km, with pipelines with diameters ranging from 2" to 24" inches.

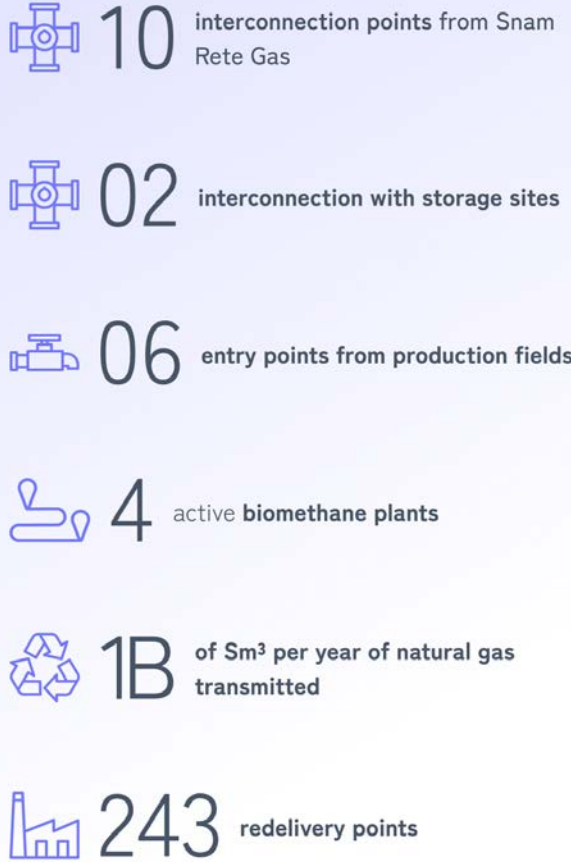
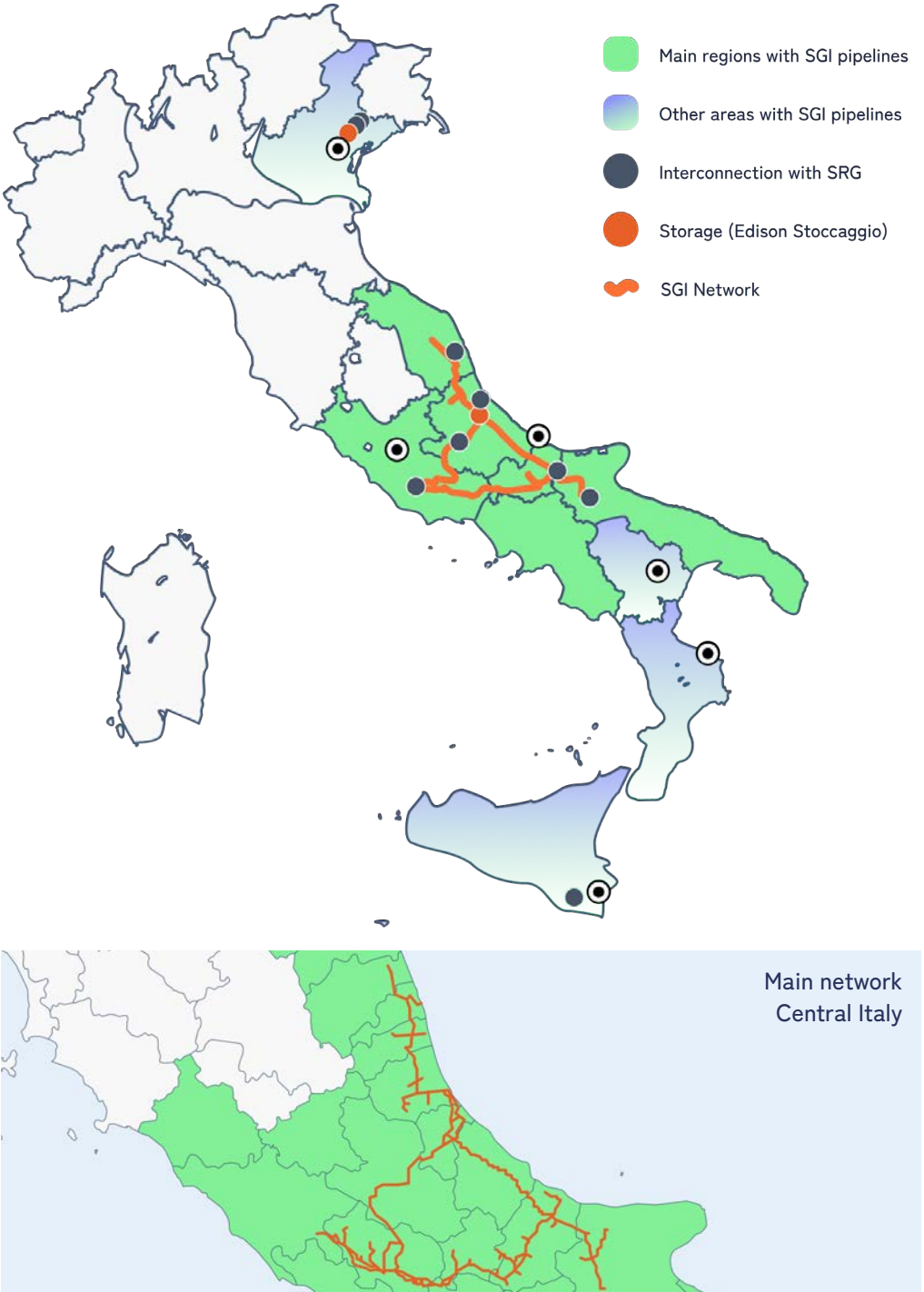
The network consists of a number of major natural gas pipelines that form part of the national grid (RNG), the remainder consisting of natural gas pipelines and regional connections (RRG), and is fully integrated with the Snam Rete Gas network in the national grid system, transmission, allowing the flow of gas between the different phases of the energy chain:

production, import, distribution and storage.

This configuration guarantees high levels of security, operational flexibility and continuity of service. In detail, the SGI transmission network is divided into the following main operating areas:

- East **Area**, which includes the network historically known as "ex Cellino", located between Marche and Abruzzo and developed along an axis that goes from the province of Foggia, in the south, to the province of Macerata, in the north;
- West **Area**, including the network partly called "ex SGM", which extends from Lazio (province of Rome) to Puglia (province of Foggia), crossing Molise and a stretch of Campania;
- **Collalto** network, located in Veneto, in the province of Treviso;
- **Garaguso** network, located in Basilicata;
- **Cirò** network, located in Calabria;
- **Comiso** network, located in Sicily, in the province of Ragusa.

Thanks to the capillarity and integration of its network, SGI plays an important role in ensuring the security of energy supplies and in supporting the evolution of the gas system towards the progressive integration of low-carbon carriers.



Physical dispatching

Dispatching is a fundamental service to ensure the efficient and safe management of the gas transmission network. Its main function is to coordinate the flow of natural gas along the infrastructure in real time, from the injection phase into the pipelines to the withdrawal points. This continuous physical balance of the network is essential to prevent situations of overpressure or shortage of supply and to ensure that gas is delivered to redelivery points according to the timing and quantities stipulated in the contracts.

The Coordination Operations Center is located in Chieti, in a strategic position that allows effective control of the entire network and rapid interventions in case of need. To further increase the reliability of the system, a redundant control room has been set up in Frosinone, which guarantees the continuity of monitoring activities and full management of the infrastructure even in emergency situations. The coordination and monitoring of the network is based on an advanced technological architecture, consisting of various integrated systems designed to ensure control, security and operational efficiency.

- Data Acquisition, Supervision and Control System (SCADA OASyS)**
It allows you to monitor in real time fundamental parameters such as volumes, pressures, temperatures and gas quality at the injection and exit points of the pipeline. In 2024, the new SCADA system was put into operation.
- Telecommunications system over IP protocol**
It uses the latest generation technologies that allow fast and secure information transmission, ensuring a continuous flow of data between the different nodes of the network.
- Telemetry System**
It allows remote reading of the main operating parameters and automatically activates alerts in the presence of significant deviations, ensuring constant and timely control of the infrastructure.
- Remote Management and Remote Alarm System**
Through operations centers distributed along the network and connected via telephone lines and dedicated computer systems, it monitors and records the parameters that describe the status of the system. In addition, it is able to quickly handle any alarm conditions, ensuring high standards of operational safety.
- Metering Management and Archiving System (MA)**
Equipped with a complete database of field metering, it allows to calculate Sm³, verify the data acquired via remote reading, archive gas metering and quality parameters and keep the history for validation activities. The system also manages the topology of the transmission network and calculates the physical balance of the entire system and its individual sections.
- Fluid Dynamics Simulation Model**
It is a tool used to analyze the transport capacity of the pipeline, define minimum operating conditions and evaluate different operational scenarios. The model also makes it possible to study possible infrastructure developments, such as new connections, variants or network extensions.

Sustainable development and *business strategy*

GRI 2-22

The sustainable development model adopted by SGI is based on the awareness of the connection between the organization and the context in which it operates.

The company carries out its business activities according to principles of ethics and transparency, with a commitment to environmental protection, health and safety safeguarding and respect for people.

In this perspective, SGI fosters the construction of relationships of trust with its stakeholders and, at the same time, seeks new growth opportunities and new markets through the diversification of energy sources.

Mission

"We pursue Climate Neutrality by ensuring the highest levels of safety in the energy sector"

"We do this through a constant commitment to innovation, technology and digitization. By straightening networks to support new energy vectors and promoting efficiency, we strive to be leaders of change. Collaboration with our stakeholders, both internal and external, is at the core of our strategy because we believe that together we can make a difference."

Vision

"We aspire to be key players of an energy change"

"We aim to contribute to enhancing Italy's energy future by supporting security of supply and accelerating the transition towards decarbonization."

SGI's sustainable development strategy fits well with 11 of the 17 Sustainable Development Goals (SDGs) approved by the UN in 2015.



The SGI's Strategic Plan

SGI's strategy is currently structured along four priority pillars, which reflect the strengthening of an industrial vision oriented towards a sustainable, innovative and resilient energy system.

Firstly, the Company promotes the **enhancement of existing infrastructure**, maximizing its use for the transmission of renewable gases, such as biomethane and hydrogen. This approach makes it possible to concretely support the energy transition path, contributing to the progressive reduction of dependence on fossil fuels and strengthening the security and resilience of the national energy system.

At the same time, SGI pursues the **development of new growth opportunities**, fostering expansion into further segments of the value chain and into high-potential industrial areas. This path is guided by a strong orientation towards innovation and the integration of the principles of environmental sustainability.

A further key element is **digital transformation**, as a strategic lever for the continuous improvement of operational performance. The adoption of advanced technologies and digital solutions makes it possible to optimize processes, increase efficiency and support decision-making processes based on data analysis.

Finally, the **sustainable growth model** adopted by the Company is based on the emissions reduction, the progressive integration of renewable energy sources and the active involvement of local communities, in line with the sustainable development goals and the expectations of stakeholders.

These four pillars clearly outline the commitment of SGI to lead the transformation of the Italian energy system, with a vision that combines innovation, sustainability and responsibility.

SGI's Sustainability objectives

SGI has set out a few priority strategic objectives as part of its sustainability journey and is committed to achieving them by 2027:

 **Environmental objectives**

- Reducing fugitive methane emissions in line with the principles and requirements of OGMP 2.0;
- Pursuing the achievement of climate neutrality, with the elimination of Scope 1 and 2 emissions by 2040 and Scope 3 emissions by 2050;
- Promoting the integration of sustainability criteria along the supply chain, incentivizing the improvement of supplier performance;
- Strengthening the involvement of stakeholders in sustainability initiatives, in line with regulatory developments and the principles of the CSRD;
- Encouraging the spread and transport of renewable gases, such as biomethane and hydrogen;
- Contributing to the preservation of biodiversity and the protection of ecosystems.

 **Social objectives**

- Consolidating the culture of health and safety at work, promoting the continuous improvement of working environments and involving contractors and subcontractors;
- Supporting people's physical and psychological well-being, extending attention to the supply chain and operational partners;
- Encouraging an increasingly active participation of employees in company life;
- Promoting the reduction of the gender pay gap;
- Increasing the representation of women in managerial roles and leadership positions;
- Strengthening welfare initiatives for the benefit of its people.

 **Governance objectives**

- Ensuring full alignment with the main applicable standards and certification schemes (ISO 45001, ISO 14001, ISO 14064, ISO 37001 and UNI PdR 125);
- Strengthening dialogue and involvement of local communities in the territories in which it operates;
- Promoting transparency, ethical conduct, accountability and integrity in business activities and in the prevention of corruption;
- Further disseminating the Enterprise Risk Management (ERM) approach in decision-making and management processes;
- Continuing the digital transformation path of the organization;
- Improving customer satisfaction and perceived quality levels.

SGI's Sustainability Policies

GRI 2-23, 2-24, 2-25

The integration of sustainability principles within the business model allows SGI to promote a path of continuous improvement, oriented towards the efficient use of natural resources, the creation of value for people and the strengthening of solid and lasting relationships with all stakeholders.

To confirm this commitment, the Company has formalized, within **its ESG Policy**, the guiding principles of the performance of activities and the management of business relationships.

In particular, SGI promotes **high standards of ethics, integrity and prevention of corruption**, through the adoption of rules of conduct, control measures and procedures applicable to employees and external collaborators.

These tools are aimed at ensuring monitoring, both preventive and final, of company activities, to prevent and combat any conduct that does not comply with ethical principles.

Responsibility, transparency and quality are the foundations of the Company's work and are essential levers for developing trusting relationships with stakeholders, as well as for responding effectively to market developments and the needs of customers and employees.

The **centrality of people** represents a further pillar of SGI's ESG approach, which translates into policies dedicated to the protection, enhancement and development of human capital, as well as the promotion of health and safety in the workplace, diversity and inclusion.

The Company requires compliance with the principles contained in the Code of Ethics from all parties working with and on behalf of the organization, including employees, suppliers, contractors and partners, in compliance with internationally recognized human rights, including those in the Universal Declaration of Human Rights, the conventions of the International Labor Organization and the principles of the United Nations Global Compact.

SGI also adopts an approach based **on continuous and transparent dialogue with local communities**

and stakeholders, who are recognised as legitimate interest holders potentially affected by the company's activities. This commitment helps build trust-based relationships, understand local needs and promote collaborative initiatives

With reference to environmental issues, the Company pursues **objectives of progressive decarbonization** and alignment with Net Zero targets, through the implementation of environmental management systems certified according to internationally recognized standards.

In this context, SGI is committed to continuously improving its environmental performance, strengthening resilience to climate change and minimizing the impacts generated by its activities, systematically monitoring environmental risks in the short, medium and long term.

SGI's commitment to maintaining high management and operational standards is also evidenced by the certifications achieved over time, attesting to the quality of the management systems adopted and the attention to environmental and social aspects.

The adoption of certified management systems is a fundamental element of the Company's governance model and a concrete tool to promote continuous improvement, risk management and the creation of sustainable value. In this perspective, SGI is aligned with the main international standards, achieving:



ISO 9001
Quality management



ISO 45001:2018
Occupational Health and Safety Management System



ISO 27001:2022
Information security and management



ISO 14064-1
Carbon Footprint



ISO 14001:2015
Compliance with Environmental Management Standards



UNI PdR 125:2022
For gender equality, inclusion and equity in the workplace

The combination of these certifications, with related policies and procedures, demonstrates the Company's desire to adopt structured and internationally recognized organizational models, capable of integrating the aspects of quality, environmental sustainability, health and safety protection, information security, management of climate-changing emissions and inclusion within company processes.

In this context, SGI also stands out internationally for its ESG performance. The Company has, in fact, obtained significant recognition in the context of the assessment conducted by GRESB, an international organization specializing in the analysis of the ESG performance of infrastructure operators. With an overall score of 99 out of 100 and a 5-star rating, SGI ranked first among the leading global players in the natural resources transmission industry that joint the assessment. The gradual improvement in the results achieved in the GRESB assessments starting from 2021, together with the achievement of ISO certifications and UNI/PdR 125, testifies to the Company's constant commitment to strengthening its management models.



5* GRESB
Global Real Estate Sustainability Benchmark
ESG score 99/100

The gradual improvement in the results achieved in the GRESB assessments starting from 2021, together with the achievement of ISO certifications and UNI/PdR 125, testifies to the Company's constant commitment to strengthening its management models. These results confirm the organization's ability to oversee risks, promote continuous improvement, ensure compliance with regulatory requirements and effectively respond to stakeholders' expectations, helping to consolidate sustainability and corporate resilience.



The Ten-Year Network Development Plan

The new Ten-Year Plan Network Development Plan 2025-2034 (hereinafter the "Plan") is the first Single Plan at national level drawn up by the largest transmission company also integrating the interventions of the other network operators, as provided for in Article 16 of Legislative Decree No. 93/11, as amended by Law 214/2023.

The Plan, drawn up every two years according to the criteria set out in Resolution 170/2025/R/Gas, is an important planning tool made available to stakeholders in the national energy system, providing a description of infrastructure needs and related planned interventions.

It illustrates the planned evolution of the gas transmission networks of all Italian operators in the period between 2025 and 2034.

Planned interventions concern both the national and regional networks and have diversified characteristics and objectives.

In particular, they are aimed at infrastructural development to guide the evolution of the market, safeguarding safety requirements and the continuity of the transmission service, improving operational performance, as well as optimizing efficiency and reducing environmental impacts.

The Plan also includes a qualitative description of some important projects for the national gas system, the implementation of which has not yet been finalized, but for which the preliminary engineering activities and obtaining authorizations fall within the time frame of the Plan.

LNG transmission, storage and regasification projects developed by third-party operators are also included, with an analysis of their effects on the gas system and a first indication of the transmission infrastructure that may be necessary following their implementation.

Finally, the Plan describes the Italian multi-vector network dedicated to the transmission of CO₂ and hydrogen, underlining its strategic role in the decarbonization of the energy system.

In addition to biomethane, which is already integrated into the existing pipeline, it will be essential to develop dedicated infrastructure to connect CO₂ capture sites to storage facilities and to support future hydrogen production and distribution.

The gradual conversion of the network, as early as 2030, will thus be able to promote energy transition, enabling the integration of new carriers and contributing to the achievement of climate goals.



SGI's Single Ten-Year Network Development Plan

Each intervention in the Plan is classified according to the main development drivers, in line with the provisions of Annex A of ARERA Resolution 170/2025/R/gas:



Security of supply

Strengthening the network through measures for managing different supply and demand configurations, to ensure coverage of consumption in every operational and supply scenario and to resolve any congestion through actions aimed at removing infrastructure constraints that could limit the full exploitation of supply capacities and/or the satisfaction of demand;



Competition and diversification of supply sources

Promoting competition and market liquidity through measures that increase the diversification and competitiveness of supply sources, including both traditional and new sources as green gases;



Safe operation of the pipeline

Maintaining and, where possible, reducing the overall level of risk of existing infrastructure, ensuring a reliable and secure energy supply service to end consumers. In particular:

- strengthening the resilience of the system through interventions that allow the company to manage extreme and unpredictable events;
- promoting service continuity through solutions that guarantee coverage of consumption in all operating conditions.



Market integration

Promoting market integration through measures aimed at improving market operation and reducing energy cost for consumers, including the creation of new transmission capacity. These interventions also help to ensure compliance with international agreements for the interconnection of the national market with those of other countries.

Initiatives aimed at promoting integration between different energy systems (e.g. between the electricity system and the gas system, the so-called “sector coupling”) also fall into this category.



Gasification of unserved areas and satisfaction of new demand

Extending the transmission network to areas currently not served and respond to the evolution of demand, through measures that allow access to gas - including green gases - in areas not yet reached by infrastructure and that are functional to support the consumption increase in traditional and/or emerging sectors.



Environmental sustainability

Adopting increasingly efficient technologies with a low emission impact, capable of reducing the environmental footprint of the system and supporting the decarbonization process, including fuel switching. In particular:

- reducing GHG emissions and cutting pollution levels through measures to minimize the environmental impact of gas transmission activities;
- encouraging the integration of renewable gases, facilitating their injection into the transmission systems;
- increasing energy efficiency through interventions aimed at optimizing consumption and improving plant performance.



Quality of service

Promoting the high quality of the service offered through interventions that respond promptly to the needs of network users and other stakeholders, while strengthening security standards.

Technological innovation

In its path of growth and innovation, SGI aims to guide and support **the evolution of the national energy system**, through targeted investments in innovation and development consistently with European strategies and with the need of a deep transition towards climate neutrality.

This commitment translates into the development of **advanced technological solutions** capable of combining environmental sustainability, security of supply, continuity of service and economic efficiency.

Looking ahead to the 2050 horizon, SGI recognizes that a significant emission reduction necessary to achieve climate neutrality will be possible through those technologies that are still in the pivotal or industrial development phase.

In this context, the Company gives a strategic role to gas infrastructure, considered a key enabler of the energy transition.

In recent years, SGI has therefore strengthened its commitment to innovation, increasing **investments in energy transition** and the adoption of solutions with a high environmental value.

The transmission network managed by SGI, designed and developed to be progressively ready to low and zero carbon gas, can already transport alternative energy carriers such as biomethane and hydrogen blends, as well as green gases obtained through innovative technologies such as Power-to-Gas.

This infrastructural flexibility is a key factor in promoting **the integration of renewable sources into the energy system** and in supporting the progressive decarbonization of final consumption.

In this context, SGI is involved in innovation initiatives and pilot projects aimed at the production and injection into the network of renewable and synthetic gases, contributing to the development of new industrial supply chains and the strengthening of the country's energy security.

SGI's Energy Transition Process

The energy transition path identifies 2030 as an important intermediate step towards the goal of a climate-neutral energy system by 2050.

In this context, the gas transmission network plays a strategic role, as it is a key infrastructure for the transmission and management of energy in the form of renewable gases.

This approach makes it possible to **fully enhance existing assets** – including transmission, storage and distribution – ensuring a high scalability of the solutions and a significant optimization of the costs of spreading new technologies.

The use of the gas network as a vector for **green gas** also makes it possible to support the transformation of the energy system without generating impacts for end users and contributing, at the same time, to the reduction of environmental pressures. In this context, SGI is actively engaged in the decarbonization process of its transmission network through the adoption of innovative technological solutions, designed to operate safely and efficiently with natural gas and hydrogen blends.

These interventions represent a significant step towards a more sustainable, resilient and integrated energy model, confirming the role of SGI's network as an enabling infrastructure for the gradual introduction of low-carbon energy carriers and for supporting the transition of the national energy system.

Power-to-Gas: the future of energy

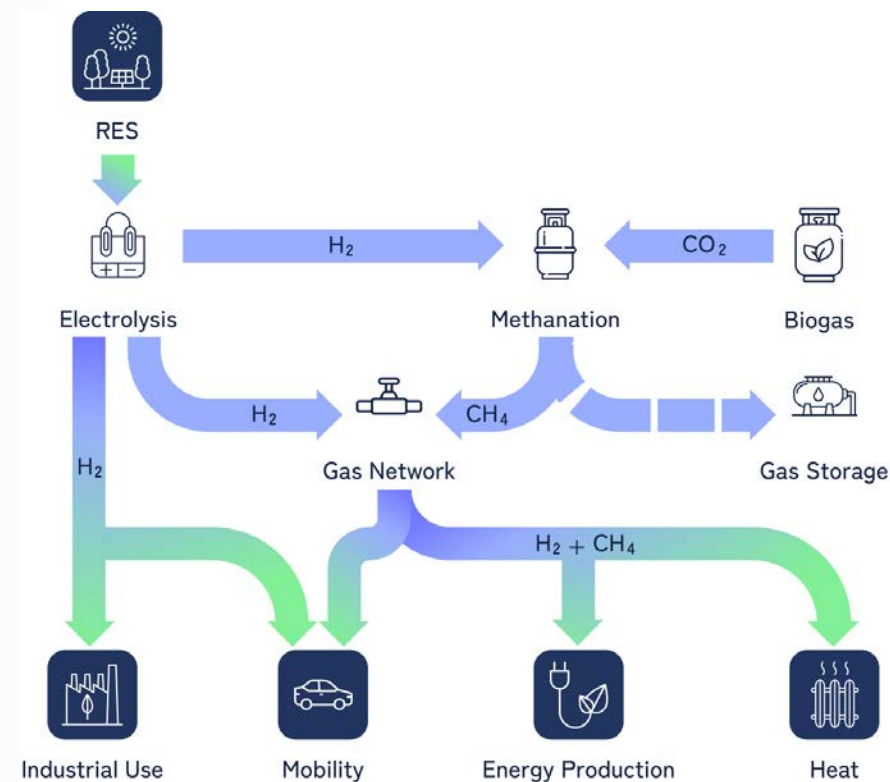
Power-to-Gas (PtG) is a **strategic technology for the integration of renewable sources within a flexible and low-emission energy system**. The process is based on the production of green hydrogen by electrolysis, powered exclusively by renewable energy sources.

In the next step, green hydrogen can be combined with carbon dioxide through a methanation process, giving rise to synthetic methane with characteristics similar to those of fossil natural gas, but entirely renewable.

Thanks to the use and absorption of CO₂, synthetic methane can have potentially negative net emissions, depending on the origin of the CO₂ used in the process.

The hydrogen produced can be injected directly into the network in blend with methane, or further converted into green methane, which maintains the same chemical-physical properties as conventional methane and is fully compatible with existing gas infrastructure.

This technological flexibility makes it possible to offer versatile and efficient solutions for the transmission, distribution and storage of renewable energy, contributing significantly to the decarbonization of the energy system.



The digitalization process as a lever for the energy transition

SGI's Digital Transformation Plan consists of an ambitious **digital transformation path** that will affect every business area, from the core business to staff and support divisions. The plan will be developed in two phases: the first aimed at digitizing and optimizing operational processes and the second that will aim at the introduction of advanced technologies.

The objectives of the Digital Transformation Plan concern:

- **Digitalizing key Project Lifecycle and Asset Management** processes to increase operational efficiency through the integration of data and activities across the entire lifecycle of projects and assets, enabling traceability, collaboration, and predictive maintenance.
- **Developing a next-generation telecommunications network**, capable of guaranteeing advanced connectivity for more effective asset management and to support field operations through integrated digital solutions.
- **Accelerating application evolution through SaaS models**, promoting a more scalable, resilient and flexible IT infrastructure, reducing development time and facilitating the integration of innovative technologies.
- **Modernizing the technological infrastructure**, through the adoption of a hybrid cloud strategy aimed at improving data management, supporting decision-making processes and ensuring real-time access to critical information.
- **Enhancing the use of innovative technologies**, such as Augmented Reality (AR), Virtual Reality (VR) and Artificial Intelligence (AI), to enhance asset monitoring, staff training and predictive maintenance activities.
- **Strengthening Cybersecurity standards**, through the adoption of best practices and advanced technological solutions for the protection of critical infrastructures, corporate data and overall digital security.



Strategic synergies towards the energy transition

In recent years, SGI, also in collaboration with leading industrial partners and research institutes, has promoted various initiatives to support the energy transition.

Among these, some pilot projects of particular importance stand out:



The HyBRIDS downstream project, developed together with Italgas Reti Spa (ITG), is aimed at supporting the energy transition through the injection of hydrogen into the natural gas transmission network. The initiative involves the construction of an infrastructure dedicated to the transmission of hydrogen in blending up to 20% at high pressure, including a connection plant to the local distribution network and a station for continuous blending with natural gas. The goal is to test and operationalize the distribution of natural gas-hydrogen blends up to 20%, without the need for substantial changes to existing infrastructure. The project, currently in an advanced commissioning phase, has received an ARERA funding of 3.5 million euros and represents a concrete step towards the use of more sustainable energy solutions, enhancing existing assets.



The PEGASUS project, launched in collaboration with ENEA and other industrial partners, concerns the production of renewable gas. The initiative aims to produce 100% synthetic methane through an integrated process that combines green hydrogen (obtained from electrolysis) and CO₂ from biomethane upgrading processes. The green methane thus produced is intended for injection into the transmission network. Preliminary activities included the analysis of the best technological solutions and the identification of the optimal site, with the development of an innovative Power-to-Gas integration model. The pilot project (Pegasus Alpha) received approximately 1.8 million euros from ARERA and envisages, in the subsequent phases, an expansion of production capacity.



The Helios Valley project was created with the aim of promoting the decarbonization of so-called hard-to-abate industrial consumption. SGI has identified the industrial cluster of Frosinone as the ideal context for the development of a real "Hydrogen Valley", thanks also to a cooperation agreement with the local Industrial Consortium and the University of Cassino. The initiative involves the production of hydrogen through electrolysis powered by renewable energy sources and its use in blend with natural gas for industrial and energy applications. The project slowed down during 2025 due to the occurrence of some operational criticalities.

SGI's Key Innovation Partnerships

During 2025, SGI has in place collaborations with various manufacturers of equipment related to Blending, Electrolyzers, H2 Storage, Methanation. In addition, as part of the study of new special energy transition projects, possible further dedicated partnerships are being evaluated.

In 2025, these initiatives will be accompanied by a further strategic step related to the collaboration with **RINA Consulting** to strengthen the commitment to reduce methane emissions along the energy value chain. The initiative is part of EU Regulation 2024/1787, which introduces stringent requirements on the measurement, monitoring, reporting and mitigation of emissions. In this context, SGI has defined, with the support of RINA, **an articulated operational plan** that provides for the **updated mapping of potential emission sources along the transmission network**, the quantification of emissions at the level of individual sources through the use of standardized factors and the preparation of **detailed reporting in compliance with the new European provisions**.

At the same time, a Methane Emissions Monitoring Plan is being developed, aimed at adopting advanced measurement methodologies and identifying the most effective solutions for their reduction. The collaboration also looks to the medium term, with the planning of monitoring campaigns in the field aimed at **improving the accuracy of detections and optimizing containment strategies**.

This path allows SGI not only to ensure full regulatory compliance within the deadlines, but also to consolidate its active role in the energy transition, promoting an increasingly sustainable and responsible management of gas infrastructure.

Asset Integrity

GRI 203-1, 203-2
SGI has always paid particular attention to the safety and flexibility of its transmission network, with the aim of ensuring safe and reliable supplies.

In line with this strategy, the Company has integrated its network into the Adriatic backbone, a key step in the gradual replacement of Russian gas with that imported through the Trans Adriatic Pipeline (TAP), **strengthening the diversification of sources and increasing the overall resilience of the system.**

The completion of significant infrastructural interventions has allowed a constant improvement of the transmission network. These include the North BiDi SGI/SRG (Snam Rete Gas) connection, with a capacity of 4 million SCM/day, built through the San Marco–Recanati DN 600 gas pipeline (35 km), as well as the completion of a section of the SGI Adriatic backbone, the Larino–Chieti DN 600 gas pipeline, which extends for over 114 km. Construction of the Corridonia Compression Station also began in 2024. Designed to support gas flow management, the station will have an installed power of 7.5 MW and a capacity of 4.8 million standard cubic metres per day. Construction is now nearing completion, with commissioning scheduled for the end of 2026. At the same time, the project for the completion of the SGI Adriatic backbone, Reggente–Biccari DN 400/500 gas pipeline, which also includes the BiDi SGI/SRG southern link, with a capacity of 2 million SCM/day, was launched.

In addition to further strengthening the security and efficiency of the network, these projects have generated concrete benefits for the local economy, promoting temporary employment, increasing sales of semi-finished products and strengthening sectors related to logistics and hospitality.

Through these investments, SGI not only consolidates its strategic infrastructure, but also contributes to the development and well-being of local communities, demonstrating how technological innovation can translate into tangible results for the economy and social sustainability of the territory.

SGI's commitment to critical event management

GRI 2-25, 416-1, 416-2
One of SGI's priority strategic objectives is to **ensure continuity of service**, through a constant commitment to **strengthening the security of the network and improving its flexibility and quality.**

In this context, the management of critical events plays a central role, especially considering some critical issues related to urban expansion in specific areas of the Italian peninsula, where the increasing proximity of infrastructures to inhabited centers makes it necessary to reduce operating pressures, with consequent impacts on transmission capacity.

To meet these challenges and ensure high levels of safety and operation, SGI has developed a **multi-year network health monitoring program**, divided into specific phases and adapted to the characteristics of the individual sections.

The program is based on the **"Asset Health"** methodology, in compliance with the requirements defined by ARERA, which makes it possible to systematically assess the condition of assets, analyzing the probability of failure and potential consequences, as well as the evolution of risks over time.

This approach makes it possible to promptly identify priorities for intervention and to make investment decisions oriented towards risk management and the optimization of the overall value of the network.

A key element of the methodology is an articulated system of indicators, used to monitor not only the health of assets, but also reliability, safety, performance and the relationship between costs and benefits, including environmental ones.

In this context, in 2025 SGI continued to implement the actions envisaged for the improvement of the infrastructure capital indicators, defining a target to reduce the kilometers of pipelines in a "warning" condition and monitoring specific mitigation actions for the most critical sections, both in terms of service continuity and in relation to the type of users served.



As of December 31, 2025, the kilometers of network in "warning" status were 52 km, down from the 64 km recorded as of December 31, 2024, mainly thanks to the replacement of Lot 1 of the Cellino – Pineto – Bussi pipeline.

Furthermore, during the year, no new pipeline had a "warning" flag, highlighting the effectiveness of the preventive and corrective maintenance activities implemented.

Confirming the solidity of the management system adopted, in 2025 SGI operated without recording any non-compliance with regulations or voluntary codes on health and safety, further consolidating its commitment to maintaining high operational and protection standards.

Cybersecurity

GRI 418-1
At SGI, Cybersecurity is a strategic factor in ensuring the reliable delivery of essential services, thanks to the ability to defense the Company's IT infrastructure — including computers, servers, network devices and electronic systems — as well as data, from threats and cyber-attacks.

The Company has adopted **a structured approach to Cybersecurity management**, intervening in various areas such as the protection of networks, applications and information, operational security, disaster recovery, business continuity and end-user training, through the implementation of appropriate risk mitigation measures. In January 2025, SGI obtained the ISO/IEC 27001:2022 certification, issued by Bureau Veritas Italia, certifying the compliance of its information security management system with the main international reference standards.

For Cybersecurity governance, SGI has adopted a national framework inspired by the NIST (National Institute of Standards and Technology) standard, which integrates NIS and GDPR compliance requirements and is enriched by additional requirements from the National Cybersecurity Perimeter (NCSP).

The management of IT incidents is governed by an internal procedure that regulates the phases of identification, classification and treatment of events, defining roles, responsibilities and methods of notification to the competent authorities, including CSIRTs.

This procedure also provides for the implementation of preventive and corrective actions aimed at containing impacts, resolving vulnerabilities and promptly restoring services. Finally, a central role is attributed to training and user awareness activities on Cybersecurity issues, considered a key element for the overall effectiveness of the protection system. Also, thanks to these initiatives, there were no episodes of privacy violations or data losses during 2025.

Responsible governance

0 CASES OF NON-COMPLIANCE WITH RULES AND REGULATIONS

0 EPISODES OF DISCRIMINATION

0 CASES OF CORRUPTION

☆☆☆☆☆

AUTORITÀ GARANTE DELLA CONCORRENZA E DEL MERCATO
LEGALITY RATING
☆☆++

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-15, 2-17

In 2025, SGI confirmed the adoption of the traditional administration and control model, divided into three main bodies: Shareholders' Meeting, Board of Statutory Auditors and Board of Directors. The latter, as the top body, is responsible for defining the guidelines and operating methods for the planning, management and control of the corporate governance system, ensuring compliance with current legislation and alignment with national and international best practices.

The Board of Directors, chaired by Francesco Profumo, is composed of seven members, appointed by the Shareholders' Meeting for a term of office not exceeding three years.

The appointments of the members of the Board are made in compliance with the principles of

fairness and equal opportunities, ensuring the absence of discrimination related to gender or other personal characteristics, through transparent and structured procedures shared with shareholders.

Particular attention is paid to the selection of the CEO, in order to prevent potential conflicts of interest, such as overlapping roles or responsibilities that could compromise his independence and effectiveness. The entire process is carried out in accordance with the provisions of the Civil Code, ensuring transparency, fairness and integrity in corporate management.

During 2025, the composition of the Board of Directors was updated, with the appointment of the new Chairman and the replacement of a director compared to the previous year, keeping the overall structure of the body unchanged and further strengthening the oversight of the requirements of professionalism and competence.

As of 31 December 2025, in addition to the President, the following are members:

- the Chief Executive Officer (CEO) Roberto Loiola;
- the Directors Roberta Benedetti, Paolo Pietrogrande, Patrick Herger, Scott Kamins and Marissa Dardi.

Francesco Profumo	President	Man	>50
Roberto Loiola	Chief Executive Officer	Man	>50
Roberta Benedetti	Director	Woman	>50
Paolo Pietrogrande	Director	Man	>50
Patrick Herger	Director	Man	30-50
Scott Kamins	Director	Man	30-50
Marissa Dardi	Director	Woman	30-50



Francesco Profumo
President



Roberto Loiola
Chief Executive Officer



Roberta Benedetti
Director



Paolo Pietrogrande
Director



Patrick Herger
Director



Scott Kamins
Director



Marissa Dardi
Director

SGI's Board of Directors, in line with the configuration in place as of 2025, has broad powers for the management of the Company, with the power to carry out all the acts deemed necessary to pursue corporate objectives, except for those reserved by law to the Shareholders' Meeting.

In this context, the Board of Directors plays a central role in defining the strategic and corporate guidelines, guiding the development of the Company also with respect to sustainability targets.

This responsibility translates into a structured assessment of long-term opportunities and risks, ensuring the consistency of strategic choices with the evolution of the regulatory and market context and with the expectations of stakeholders.

The Board identifies the main corporate impacts and defines the most suitable policies for their management, monitoring their effectiveness over time and ensuring constant alignment between strategies, performance and the operating environment. The evaluation of the performance of the governing body is conducted through a periodic self-assessment process, which considers, among other elements, the quality of decision-making processes, the effectiveness of information flows to support governance and the level of oversight of environmental, social and governance (ESG) issues.

At the same time, the Board supervises the evolution of the company's vision and mission, verifying its continuous adequacy with respect to internal and external dynamics.

To support these activities, the Board of Directors receives periodic updates on management performance, environmental policies, work organization and human resources management, intervening promptly if emerging critical elements may compromise the achievement of strategic objectives.

The Board of Directors annually approves the Sustainability Report, drawn up on a voluntary basis, as a tool for reporting and monitoring the Company's economic, environmental and social performance.

In this context, the Board of Directors examines and approves the sustainability strategy and supervises its implementation, verifying the achievement of the objectives and the consistency of the actions undertaken with the strategic guidelines and expectations of stakeholders.

The Chairman of the Board of Directors, Francesco Profumo, represents the Company in institutional relations and with shareholders, ensuring that these interactions are carried out in compliance with the principles of fairness and transparency.

This function does not entail executive powers, as the operational management of the Company remains entrusted with the Chief Executive Officer and the competent managerial structures, in line with the governance model adopted.

During 2025, the work of the **ESG Steering Committee**, established to strengthen the oversight of sustainability issues and composed of representatives of the Board of Directors and Company management, continued.

The Committee works in close coordination with the **HRCC Steering Committee (Human Resources and Remuneration)**, which supports the Board of Directors in decisions relating to the management, development and enhancement of human capital.

The strengthening of the governance structure was further consolidated through the establishment of a **Risk Committee**, responsible for supervising the internal control system and the corporate risk management process.





Business Ethics and Integrity

GRI 2-15, 205-2, 205-3 ,206-1

In 2025, SGI continues its work inspired by principles of responsibility, placing ethics, integrity and transparency at the heart of the corporate culture.

The Company recognizes that fair behavior is an essential element for establishing solid and lasting relationships with its stakeholders and for contributing to sustainable development in the long term. In this perspective, it promotes an environment based on inclusion, equity and respect for human rights, values shared at all organizational levels and along the entire chain of partners and stakeholders.

The fight **against corruption is a fundamental pillar of the corporate governance** system. SGI adopts a position of absolute zero tolerance towards any form of corrupt practice, both in the public and private sectors, aware of the impact that such phenomena can have on the credibility and reliability of the Company.

For this reason, an articulated system of rules of conduct, control measures and operating procedures has been developed, aimed at preventing, identifying and managing the risks associated with corruption through both *ex-ante* and *ex-post* verification activities. This approach helps ensure that all operations are conducted in accordance with the highest ethical and regulatory standards.

A central role is also attributed to internal and external communication activities, aimed at strengthening the dissemination of legality and integrity principles. SGI ensures that directors and employees are constantly informed about anti-corruption provisions and company procedures, with particular reference to the management of relations with public administrations, users, and suppliers. Through communication and training activities carried out for 100% of the directors and employees, the Company spreads the culture of corruption prevention both internally and externally, contributing to the development of the skills necessary to fight these phenomena. Anti-corruption regulations and procedures are shared with 100% of commercial and institutional partners, including suppliers, contractors, subcontractors, and entities.

The safeguarding of the Company's reputation is a strategic objective, pursued through the adoption

of specific operative tools and guidelines, in line with current regulations and the best practices in the sector. In particular, SGI has implemented:

- **the Organization, Management and Control Model** pursuant to Legislative Decree 231/01;
- the **Code of Ethics**, which defines the principles and reference values;
- specific **policies and guidelines on the prevention of corruption**.

To ensure a high level of control, all commercial transactions considered significant, i.e. for an amount exceeding €2,000, are subjected to a prior analysis of potential risks, including those related to corruption.

In the presence of possible conflicts of interest, even if only potential, the parties involved are required to immediately report them and to refrain from any activity that could compromise their impartiality, thus allowing the activation of the appropriate internal checks.

In line with the principles of transparency and *accountability*, it should be noted that also during 2025 no episodes of violation of the Code of Ethics emerged, nor cases attributable to corrupt practices and no anti-competitive conduct, violations of anti-trust laws and monopolistic practices were recorded.



The Code of Ethics

SGI's Code of Ethics clearly defines the principles that guide the conduct of all parties operating on behalf of or in relation to the Company. More than a set of formal rules, it represents an operational tool aimed at promoting conduct based on fairness, integrity and a sense of responsibility in relations with employees, collaborators, suppliers, customers and stakeholders, including those who act in the name and on behalf of the organization. Its widespread adoption and dissemination ensure alignment with corporate values, helping to prevent unethical behavior, mitigate the risk of unfair practices and transparently manage any situations of conflict of interest. The Code of Ethics is part of a broader value system that SGI considers essential to support solid and responsible growth. In particular, the Company's operations are based on several key principles:



Open and transparent dialogue

The promotion of collaboration and an open and transparent dialogue, both within the organization and towards stakeholders, enhancing individual skills and contributions.



Centrality of the person

The centrality of the person, through the creation of a work environment based on trust, mutual respect and inclusion, in which diversity is recognized as an element of value.



Innovation and continuous improvement

Orientation towards innovation and continuous improvement, with the aim of strengthening processes, infrastructures and organizational skills, encouraging learning even from less positive experiences.



Responsibility

The assumption of responsibility in decisions and actions, with particular attention to ethical aspects and safety, ensuring consistency between the principles declared and the conduct adopted.



Sustainability

The commitment to environmental and energy sustainability, through initiatives aimed at reducing impacts and contributing to the objectives of ecological transition, including the progressive reduction of emissions.

Through these values, the Code of Ethics not only guides daily behavior, but supports SGI in the pursuit of its strategic objectives with a view to sustainability and long-term value creation.

The Organizational Management Model 231/01 of SGI

GRI 2-27
The voluntary adoption of the Organizational and Management Model (hereinafter "MOG") by SGI confirms, once again, the Company's commitment to transparency, legality and the protection of corporate interests.

Although it is not envisaged as a regulatory obligation, the Company, aware that a structured crime prevention system is not only a form of internal protection but also an element of value for shareholders, employees and stakeholders, decided to introduce it as early as 2005, approving it by resolution of the Board of Directors. With the same decision, an external Supervisory Body (hereinafter "SB") was also established, responsible for ensuring autonomous and impartial control over the implementation of the Model, as well as intervening in the presence of any critical issues.

Over time, the system has been continuously updated, to incorporate the new types of crime introduced by the legislation, demonstrating SGI's proactive approach in maintaining high levels of compliance.

The adoption of the MOG is not limited to ensuring supervision with respect to the criminal proceedings provided for by Legislative Decree 231/2001 but represents a fundamental element for the strengthening of corporate governance. To ensure its effectiveness, SGI has carried out an in-depth analysis of the areas most exposed to risk, translating the results into specific operating procedures, consistent with the provisions of Legislative Decree 231/2001 and the related guidelines.

The main elements of the model are:
• **Identification of sensitive activities** through the mapping of areas, processes and business divisions

potentially exposed to the risk of crime;
• Attribution to the SB of responsibility **for supervising** the Model (in terms of operation, effectiveness and compliance), as well as its updating and dissemination among the parties involved;
• **Traceability** and formalization of all transactions relevant for the purposes of Legislative Decree 231/2001;
• Adoption of the principle of **separation of duties**, to ensure a clear distinction of roles and responsibilities;
• **Definition of authorization powers** consistent with the responsibilities assigned;
• **Periodic monitoring** of the functioning of the Model, with updates based on the checks carried out *ex-post*;
• **Dissemination and awareness**, at all company levels, of the rules of conduct and procedures adopted.

Through the MOG, the Company guarantees constant control of governance in line with the provisions of Legislative Decree 231/2001, which requires due diligence activities aimed at verifying the supervision of company processes, the prevention of possible violations of human rights and the fight against environmental crimes, and Health & Safety at work.

Finally, it should be noted that, also during 2025, no violations of Model 231 or significant cases of non-compliance with laws and regulations were detected.

The Whistleblowing Protocol

GRI 2-16, 2-26
In line with national and European legislation, SGI has adopted a Whistleblowing Protocol and has activated a specific internal reporting channel which, in addition to the external one managed by the A.N.A.C., allows SGI employees to report any critical issues, violations or offenses relevant to the MOG, of which they have become aware, through three different ways:
• **Open**, with authorization to disclose their own identity during the investigation;
• **Confidential**, with indication of their own name to the recipient but without consent to its dissemination;
• **Anonymous**, without any reference to the identity of the whistleblower.
The recipient of internal reports is the SB, which examines and provides feedback to each report received, if it is not manifestly unfounded or irrelevant, reserving the right to carry out all the necessary preliminary verification activities.

To this end, it guarantees the utmost confidentiality regarding whistleblowers, ensuring their protection from any form of retaliation, discrimination or penalization.

This commitment takes the form of safeguarding the identity of the whistleblower, without prejudice to the presence of legal obligations that require communication or the need to protect the rights of the Company and of any person involved in unfounded reports.

The reporting obligation extends to all personnel who become aware of crimes committed within the Company or conduct that does not comply with the rules of conduct adopted. During 2025, the SB did not receive any reports.

Enterprise Risk Management (ERM)

The adoption of the Enterprise Risk Management (ERM) model allows SGI to carry out a structured and transversal assessment involving risks, resources, processes and overall objectives, promoting the strengthening of governance, the dissemination of a risk culture and a greater ability to respond to potential economic shocks and emerging critical issues.

SGI's risk management system is based on an articulated mapping that includes 51 corporate risks, divided into ten categories, which are updated and monitored annually: Corporate, Strategic, Investments, Governance, Process, Technology, Integrity, Human Resources, Information Management and Reputation.

These categories identify the most exposed organizational areas and include ESG dimensions, which are now an integral part of the overall risk assessment.

In particular, ESG risks include those related to climate change, both in their physical and transition components, such as, for example, the impact of climate change on gas demand, the risk of infrastructure obsolescence due to the electrification of consumption and the need to adapt to low-carbon technologies.

In addition to these there are other sustainability risks, such as the effectiveness of decarbonization plans, the promotion of inclusivity in the workplace, the responsible management of natural resources, and compliance with ever-changing ESG regulations.

The identification of risks derives from a joint analysis of business processes, the internal and external context and the objectives defined in the strategic plan.

In this context, the ERM function plays a role in coordination and supervision, methodologically supporting Risk Owners and monitoring both the progress of the actions taken and their effectiveness in reducing the overall exposure of the organization. Each risk was assessed based on two parameters: impact, which measures the potential consequences that a risky event can have on strategic objectives, and probability, which measures the likelihood of a risk event occurring.. Both dimensions were analyzed both in inherent terms, i.e. in the absence of controls, and in residual terms, considering the mitigation measures already in place.

The impact assessment was divided into five main drivers: economic-financial, reputational, compliance, managerial-operational and HSE (Health, Safety and Environment).

The latter is of particular importance from a sustainability and social responsibility perspective, as events related to the HSE sphere can generate significant effects on the protection of people, both internal and external to the organization, and on the environment, also directly influencing ESG performance and the commitments made in this area.

At the end of the analysis process, based on the level of residual risk, the most significant risks



were identified with respect to the strategic objectives and the reference context.

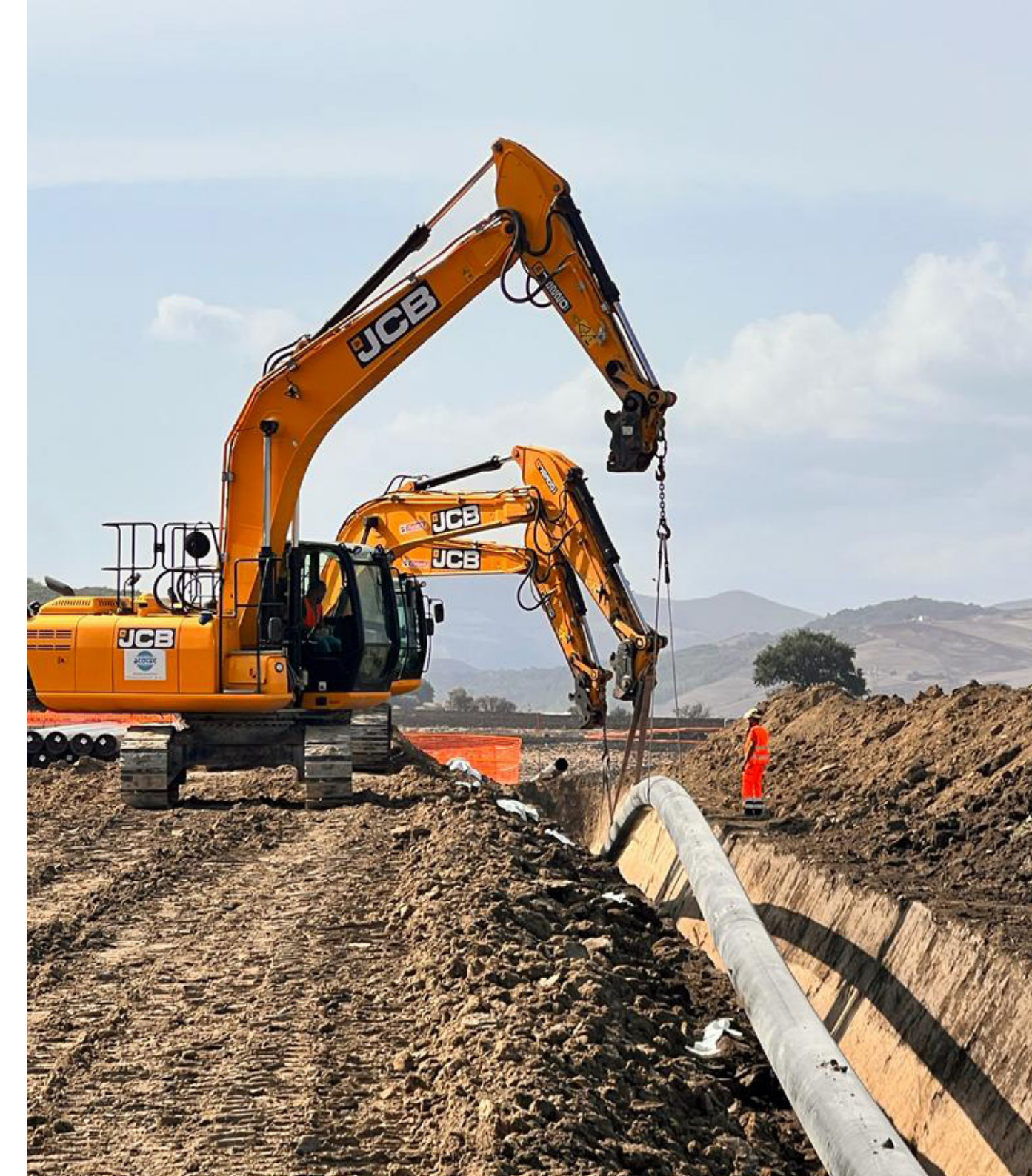
These risks were subsequently assessed through the Risk Appetite Framework (RAF), which provided for the definition of qualitative and quantitative thresholds for each of the ten risk categories, to determine the level of exposure considered acceptable.

The application of this approach has allowed the timely activation of effective treatment actions for risks considered above the threshold of acceptability.

In particular, in more than half of the cases, periodic monitoring of existing controls was envisaged, with the aim of verifying their effectiveness in containing the risk over time.

In the remaining cases, specific action plans were defined aimed at strengthening or adjust the control measures, specifying in detail the actions to be taken and the related deadlines shared with the risk owners.

Overall, the ERM system adopted allows SGI an integrated and structured management of business risks, including environmental, social and governance dimensions. This strengthens the Company's ability to proactively address challenges arising from the evolving regulatory and market environment, while seizing emerging opportunities.



SGI and its people

GRI 2-30

SGI recognizes its people as the main factor of business success and an essential strategic lever for the growth and competitiveness of the business. The Company is aware that the enhancement of human capital and the protection of the well-being of employees are the basis for solid, sustainable and lasting development.

In this perspective, SGI's future is based on the principles of open innovation, sustainability and attention to people, with the aim of promoting the adoption of innovative technologies capable of improving not only the quality of work, but also the quality of life of its employees.

The Company guarantees worker protection through the application of the Energy and Petroleum National Collective Bargaining Agreement (CCNL) to 100% of its employees and National Collective Bargaining Agreement for Industrial Executives to all executives, while also encouraging dialogue, consultation, and active participation by employees in developing labor management policies and procedures, involving worker representatives and social partners. SGI also ensures full freedom of membership and participation in trade unions.

For SGI, investing in people means investing in your future. The true value of the Company lies in the skills, ideas, relationships and daily commitment of those who contribute, with professionalism, passion and dedication, to the achievement of corporate objectives and the sustainable growth of the organization.

“People,
our most valuable resource”



SGI Staff

GRI 2-7, 2-8, 405-1

As of December 31, 2025, SGI's total number of employees numbered 82 units, up 17% compared to 2024, of which 60 men and 22 women.

The data relating to the breakdown of employees by type of contract, age group, gender and professional classification are illustrated below.

Total number of employees by contract type, gender							
Site	Type of contract	2024			2025		
		Men	Women	Total	Men	Women	Total
Italy	Permanent	52	16	68	57	21	78
	Fixed terms	1	1	2	3	1	4
Total		53	17	70	60	22	82

Total number of employees per full-time/part-time contract							
Site	Full-time/Part-time	2024			2025		
		Men	Women	Total	Men	Women	Total
Italy	Full-time	52	17	69	59	22	81
	Part-time	1	-	1	1	-	1
Total		53	17	70	60	22	82

95% of SGI's employees hold a permanent contract and 99% have a full-time contract. As far as non-employees are concerned, there are 2 trainees in force.

Table 1 - Employees by type of permanent and fixed-term contract and by gender (GRI 2-7)

Table 2 - Employees by type of full-time and part-time contract and by gender (GRI 2-7)

As shown in the table below, 6% of SGI's employees hold managerial positions, 20% hold the status of managers, 59% are white-collar workers and the remaining 16% are blue-collar workers.

Employees by classification and gender						
Percentage	2024			2025		
	Men	Women	Total	Men	Women	Total
Executives	6%	0%	6%	5%	1%	6%
Managers	11%	6%	17%	13%	6%	20%
Employees	40%	18%	58%	39%	20%	59%
Workers	19%	0%	19%	16%	0%	16%
Total	76%	24%	100%	73%	27%	100%

Table 3 - Percentage of employees by occupational categories, broken down by gender and age group (GRI 405-1)



Employee’s engagement

GRI 401-1, 402-1
In recent years, the significant growth of the company population has been driven by the development of business related to energy transition, which has made it necessary to expand the team's know-how and specialized skills.

During 2025, in fact, 15 employees joined the company's workforce, including 3 under 30, 11 employees in the age group between 30 and 50 and 1 employee over 50, with a hiring rate of 20%¹. There is an outgoing voluntary turnover rate of 2.4%, down from 2024.

All the relevant details are given below and in tables 6, 7 and 8 in the annex.
For talent search and attraction activities, SGI relies on the support of external companies specializing in recruitment and head hunting, in charge of identifying profiles consistent with the company's values and with the skills required, with the aim of inserting the best resources available on the market for open positions.

Over the years, the company has also developed consolidated collaborations with local universities, participating in projects, Masters and career days, initiatives that represent an important opportunity to meet students, recent graduates and young professionals.
The policy of attracting talent and reducing turnover are further supported by a remuneration package that includes various benefits, partly deriving from the CCNL applied (such as the productivity bonus, 14 months' salary, health insurance and supplementary pension fund) and partly offered through an internal supplementary agreement (welfare plans, flexible hours, meal vouchers, etc.).

SGI is also working on the implementation of training and development paths dedicated to all employees to stimulate motivation and engagement.

¹ The hiring rate and turnover rate were calculated based on the average total workforce during the reporting period, as this is considered more representative of the actual workforce size throughout the year.



New employees								
Number of people	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Men	0	8	1	9	2	7	0	9
Women	1	3	0	4	1	4	1	6
Total	1	11	0	13	3	11	1	15

Table 4a - Total number of new employees by gender and age group (GRI 401-1)

Exit								
Number of people	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Men	0	1	1	2	1	1	0	1
Women	0	1	0	1	0	1	0	1
Total	0	2	2	4	1	2	0	3

Table 4b - Total number of employees who left by gender and age group (GRI 401-1)

In accordance with the legal obligations relating to the involvement of employees or their representatives in company reorganization processes, it is specified that the notice period for changes to shifts or working hours is established on specific days by the Energy and Oil National Collective Bargaining Agreement.

Employees evaluation and remuneration

GRI 2-19, 2-20, 2-21, 405-2
SGI's remuneration system is based on criteria that consider the level of professionalism, the position held and the performance achieved, with the aim of ensuring a competitive remuneration system consistent with reference markets.

The determination and review of salaries take place according to defined, impartial and transparent methods, in compliance with ethical principles and contractual provisions in force.

For the members of the Board of Directors, the fixed remuneration is defined and approved quarterly by the Shareholders' Meeting. In addition to the Productivity Bonus, linked to company profitability and efficiency based on the objectives agreed with the trade union representatives, SGI has introduced an annual incentive system for the entire company population starting from 2024.

For Executives, the remuneration provides a fixed component, in line with the CCNL for Industry Executives, and a variable component (Management by Objectives – MBO), subject to the results achieved and approved by the Board of Directors.

Executives, as well as some employees who hold roles and positions of responsibility, benefit from a fixed salary established according to the National Energy and Oil Collective Bargaining Agreement, which can be supplemented with a variable quota (MBO) linked to the level of achievement of the annual individual objectives. The MBO system provides for assignment and evaluation criteria that include sustainability indicators, people development and economic-financial impacts.

All evaluation processes are structured and formalized and include periodic moments of discussion and feedback between managers and collaborators, aimed at identifying actions for growth and enhancement of resources. SGI has also calculated the ratio between the highest remuneration recognized within the organization and the median of the total salaries of all employees, which as of December 31, 2025 is equal to 17.74.

With a view to transparency and attention to gender equality, in 2025 the Company has also determined the ratio between the average basic salary and the overall average salary² of women compared to men for each professional category, the details of which are provided below.

² The total remuneration of employees for 2025 was calculated considering the fixed and variable components of the remuneration received, including: MBO, ad personam bonus, productivity bonus and LTI where applicable.

Ratio of average basic salary for women to men		
Basic salary	2024	2025
	Women to Men Ratio	Women to Men Ratio
Executives	n.a.	97%
Managers	85%	89%
Employees	91%	90%
Workers	n.a.	n.a.

Table 5a - Ratio of basic salary of women compared to men (GRI 405-2)

Ratio of average overall female to male earnings		
Total remuneration	2024	2025
	Women to Men Ratio	Women to Men Ratio
Executives	n.a.	92%
Managers	105%	117%
Employees	92%	88%
Workers	n.a.	n.a.

Table 5b - Ratio of total earnings of women compared to men (GRI 405-2)

The Employee's Evaluation Process

GRI 404-3

With a view to continuous improvement and with the aim of enhancing the contribution of each person more extensively, SGI has introduced a more inclusive remuneration policy, extending the recognition of the variable bonus to all organizational levels.

This assignment testifies a remuneration system oriented towards the enhancement of performance and reflects the Company's attention to the professional growth and well-being of its employees. The assessment process adopted allows the Company to plan, manage and monitor the contribution, both quantitative, in terms of results, and qualitative, in terms of skills and behaviour, made by each employee in relation to the role held and the responsibilities assigned to achieve the company's strategic objectives.

The structured and continuous evaluation of performance allows SGI to achieve multiple benefits.

For Managers:

- clearly define objectives and responsibilities, consistently directing the results expected by employees;
- organize a systematic process of planning, monitoring and verifying the performance of its teams;
- have transparent and shared criteria for the management and development of resources, based on the individual contribution to the results of the Unit or the Directorate.

For Collaborators:

- fully understand the value of one's contribution to the achievement of corporate objectives;
- reduce uncertainty with respect to the priorities and responsibilities assigned, making daily activity clearer and more concrete;
- develop a greater awareness of one's strengths and areas for improvement through constant feedback from the manager and the definition of actions aimed at improving performance;
- strengthen the sense of belonging and trust in the Company, actively and consciously participating in the achievement of objectives within a transparent and adequately communicated process.

The performance evaluation is based on a constant dialogue between the Manager and the Collaborator, under the supervision of the Performance and Development Validation Committee.

The path begins with the planning phase, during which the objectives to be achieved and the skills to focus on for improvement are defined. During the year, the performance is subject to continuous monitoring and structured feedback, with periodic reviews - scheduled twice a year - between the Manager and the Collaborator, aimed at verifying progress and intermediate results.

The final evaluation is focused both on the level of achievement of the assigned objectives and on the progress in the development of individual skills.

The process provides for a distinction between two company populations: on one hand, the employees included in the MBO system, mainly Function Managers; on the other hand, those who are part of the Performance Development System (SSP), who hold roles with a direct, albeit limited, contribution to the main business macro-processes.

In 2025, 100% of SGI's employees underwent performance evaluations.
For more details, please refer to Table 9 in Annex.

Corporate welfare

GRI 401-2

SGI promotes a structured system of corporate welfare initiatives, developed with the aim of protecting people's well-being and supporting, at the same time, their professional growth.

The program is an expression of SGI's values and confirms the central role of people as a fundamental lever for the achievement of the Company's strategic objectives.

In this perspective, SGI provides an articulated set of benefits designed to respond in a concrete way to the different needs of employees, both in the workplace and in the personal sphere.

Part of the welfare measures is provided for by the National Collective Labor Agreement applied and includes, among other things:

- supplementary health insurance in the sector (FASIE);
- the industry's supplementary pension fund (Fondenergia);
- the productivity bonus.

Alongside these contractual instruments, SGI has chosen to introduce further facilities aimed at providing tangible support to its employees.

Those include:

- specialist medical examinations, with particular attention to the health of the female population;
- additional paternity leave for the birth of the child;
- leave for medical examinations or personal needs, both for employees and children;
- permits for the school integration of children;
- school allowances;
- optional medical check-up;
- Corporate partnership with a network of gyms and sports centers at discounted rates;
- Benefits and discounts program available to all employees.

A further element of SGI's corporate welfare is represented by the welfare plans dedicated to employees, with the exclusion of Executives.

The "on top" Plan constitutes a common basis for all employees; the "PdR" Plan allows the partial or total conversion of the productivity bonus into welfare services, offering a greater level of personalization of benefits; finally, the "Incentive" Plan is reserved for employees who choose to convert

their productivity bonus to welfare.

In addition, SGI guarantees additional forms of benefits recognized to the entire company population or to specific categories of employees, including:

- life, accident and disability insurance;
- meal vouchers of a value above the market average;
- equipped with PC and company telephone;
- company car for some positions.

Taken together, these initiatives are designed to strengthen people's sense of belonging and promote well-being, demonstrating how attention to their needs is a determining factor for the professional satisfaction of employees and for the overall success of the Company.

Employee development and enhancement

During 2025, SGI promoted and supported numerous initiatives aimed at promoting people's well-being, internal cohesion, social responsibility and attention to safety, environmental and sport issues.

In particular, in the field of solidarity and health promotion, an SGI delegation participated in the Fun Run on 16 March 2025, included in the context of the ACEA Rome The Marathon, and in the Race for the Cure on 19 May 2025, an event in support of the fight against breast cancer. At the same time, the Company has encouraged participation in sports and sectoral networking activities, taking part on 14 June 2025 in the SAFE Cup Rome, a sports initiative organized as part of the SAFE Master focused on the environment and energy, which annually involves companies in the energy sector with the aim of promoting correct lifestyles and psycho-physical well-being.

Great attention was then paid to strengthening internal collaboration and team spirit.

The Company Day held in Roccaraso on 27 June 2025 fits into this perspective, a team building day aimed at all staff, divided into bushcrafting activities and aimed at consolidating the sense of belonging, cooperation and contact with nature through a shared group experience.

SGI's commitment has also extended to environmental protection, through

participation, on 4 October 2025, in a Plastic Free volunteer day in Sora, during which a company delegation took part in plastic waste collection activities, making a concrete contribution to the protection of the territory.

On the subject of occupational health and safety, on 5 November 2025 SGI organized Safety Day, a day dedicated to all staff and suppliers on the construction site, with the aim of strengthening the culture of prevention, safety and health in the workplace along the entire value chain.

In terms of institutional positioning and stakeholders' relations, the new SGI headquarters in Frosinone was officially inaugurated on 25 November 2025. The institutional event was designed to strengthen the Company's position as a key operator in the sector and to foster dialogue among employees, suppliers, institutions and shareholders. On 19 December 2025, SGI also held its Company Day in Rome, bringing together all employees for a day dedicated to sharing the Company's vision and strategic priorities. The programme combined opportunities for discussion with a cultural team-building activity, including a staff lunch and a guided tour of Villa Farnesina. The event further strengthened employees' sense of identity, connection and belonging to the Company.



Fun Run – March



Company Day Roccaraso – June



Safety Day – November



Safe Cup Rome – June



Race for the Cure – May



Frosinone Headquarters Inauguration – November



Plastic Free – October



Company Day Rome – December

Upskilling and reskilling of SGI staff

GRI 404-1, 404-2
SGI supports the professional growth of its people through customized training and development plans, aimed at strengthening and evolving individual skills and knowledge. The Company encourages each employee to believe in their potential, promoting the enhancement and continuous improvement of professional skills.

Training plays a strategic role not only for the consolidation and expansion of technical and specialized skills, but also for promoting greater awareness of corporate objectives and sustainability strategies.

During 2025, SGI invested over 4,000 hours of total training, equal to an average of about 50 hours of learning for each employee. Particular attention was paid to health, safety and environmental (HSE) issues, an area in which 978 hours of mandatory training were provided, with the aim of ensuring full compliance with current regulations and strengthening the contribution of all employees to the sustainability of the organization. SGI has provided a specific internal budget for training, supplemented by external funds made available through the "Fondimpresa" and "Fondir" programs. Training needs are identified by the HR

Training hours by professional category and gender						
Training hours	2025					
	N. Hours Men	No. of hours per capita Men	No. of Hours Women	No. of hours per capita Women	Total Hours	No. of hours per capita
Executives	126	31	52	52	178	36
Managers	525	48	288	58	813	51
Employees	1,757	55	552	34.5	2,309	48
Workers	756	58	-	-	756	58
Total	3,164	53	892	41	4,056	49

Table 6 - Average number of hours of training per year by occupational category and gender (GRI 404-1)

Non-discrimination and equal opportunities

GRI 406-1
Open discussion and the exchange of ideas are distinctive elements of SGI's corporate culture, which has always been committed to creating a work environment in which each person can freely express his or her point of view, with the certainty of being heard and respected.

The Company focuses on the protection of people's moral integrity and respect for fundamental rights, promoting equal opportunities and ensuring a context marked by maximum inclusiveness.

SGI recognizes that a safe, inclusive and respectful work environment is an essential prerequisite for enhancing the potential of the organization and individuals, fostering both individual and collective growth.

From this perspective, the Company actively supports sharing and participation through the organization of monthly all-hands meetings, moments of discussion during which all employees have the opportunity to express opinions, suggestions and reflections.

These meetings allow not only to collect useful feedback, but also to promote a climate in which the plurality of points of view is recognized as a value capable of enriching the organization and contributing to common success.
At the same time, SGI strongly condemns and opposes all forms of discrimination, regardless of whether it is related to political opinions, religious beliefs, racial or national origin, age, gender, sexual orientation, health conditions or any other personal characteristic.

The Company is committed to ensuring that each employee operates in an environment free from prejudice and discriminatory behavior. Confirming this commitment, during 2025 SGI did not record any incidents of discrimination or human rights violations, highlighting the constant focus on promoting a fair, inclusive and respectful work environment for all.



SGI's initiatives for the promotion of Diversity & Inclusion

GRI 401-3
SGI considers diversity to be a key element and a powerful driver of innovation.

From this perspective, the company values the unique contribution of each person, promoting the comparison of different experiences and points of view through initiatives dedicated to Diversity & Inclusion and gender equality. As evidence of this, since 2024 SGI has obtained from KIWA CERMET the certificate attesting to the compliance of its Gender Equality Management System with the UNI/PdR 125:2022 standard.

The company intends to continue on this trajectory, aiming to further expand the presence of women and consolidate an increasingly solid gender balance in decision-making processes and *leadership* positions. The goal is to build an inclusive environment that guarantees equal opportunities in all areas of the company, while promoting a better work-life balance.

In line with its focus on social sustainability, SGI has also introduced work flexibility measures, such as adaptable schedules and welfare programs geared towards the well-being of employees and their families. The company guarantees the protection of the job and the maintenance of remuneration in the period following maternity, paternity and parental leaves, in compliance with national leave policies.

All employees have access to this right, and in 2025, 2 people have benefited from it.



Parental leave			
Number of people	Male	Female	Total
Employees who took parental leave in 2025	-	-	-
still on leave	-	-	-
returned and still employed	-	2	2
of which resigned	-	-	-
Return-to-work rate	100%	100%	
Retention rate	100%	100%	
Employees who took parental leave in 2024	2	2	4
still on leave	-	-	-
returned and still employed	2	2	4
of which discharged	-	-	-
Return to Work rate	100%	100%	
Retention rate	100%	100%	

Table 7 - Parental leave (401-3)

Number of employees who received time off		
Number of people	2024	2025
	Total	Total
Mandatory and optional parental leave (including breastfeeding) and childcare	4	3
Study	1	-
Other (e.g. Law 104 permits)	12	32
Total	17	35

Table 8 - Number of employees who received separate leaves according to the type of motivation

SGI integrates Diversity & Inclusion policies into its risk management model, thanks to which it provides for their periodic assessment (at least annually) with specific metrics and defines action plans, integrated to all intents and purposes into the broader corporate sustainability strategy. Programs related to the topic are monitored by means of indicators developed annually in line with the corporate sustainability plan. SGI also verifies the effectiveness of the approach adopted with specific listening initiatives aimed at the corporate population.

Employee’ Health, Safety and Well-being

The Company manages health and safety issues through a structured and organic approach, based on constant, clear and transparent communication aimed at both internal staff and workers of contractors and subcontractors (management, supervisors and workers).

In this context, SGI promotes a proactive culture that reinforces an essential principle: safety must never be compromised.

Through the adoption of rigorous processes and procedures, the company is committed to minimizing risks, preventing accidents and ensuring safe working conditions for all.
The priority is to protect the health of employees and all the people who work within its plants and offices.
SGI operates in full compliance with current legislation on health, safety and the environment, developing and disseminating clear operational guidelines for the management of activities.

At the same time, it encourages the active involvement of workers in risk prevention and the safe-guarding of health and safety, not only for their own benefit, but also for the benefit of colleagues and all third parties involved.

The Employee’s Health and Safety Management System

GRI 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8
Since 2014, the Company has voluntarily adopted an Occupational Health and Safety Management System certified according to the ISO 45001 standard, extended to all offices, company processes and entire personnel.

This system allows SGI to monitor risks in a structured and proactive way, promptly identifying potential hazards and intervening with corrective actions before they can generate negative impacts.

With a view to continuous improvement, SGI has implemented various operational practices, including periodic interviews with workers to collect reports, field checks and analysis of *near misses*, managed through a dedicated procedure.

Health surveillance is entrusted to an external Competent Doctor, who carries out periodic checks on all employees.

In addition to the mandatory tests, the Company offers the possibility of accessing voluntary medical examinations, such as hematology tests, eye checks and prevention screenings, with particular attention to female staff.

To encourage the active involvement of workers, SGI maintains a constant dialogue with the Workers' Health and Safety Representative (RLS), sharing risk assessments and defining the relevant improvement actions.
The monthly "All Hands" meetings are an important moment of information and awareness, while

on an annual basis the Health and Safety Committee – made up of management, RLS and workers' representatives – meets to analyze risks and plan preventive interventions.

To further strengthen participation and the dissemination of good practices, the Company has introduced tools that allow employees to send proposals for improvement, questions and reports of potential risk situations, including through an anonymous communication system.

To support these initiatives, in 2025 SGI provided a total of 978 hours of mandatory health and safety training, confirming its continuous commitment to prevention and updating skills.



Accidents at work

GRI 403-9, 403-10
Similarly to 2024, no accidents or occupational diseases were recorded for employees in 2025 during 2025. As a result, the rates related to occupational injuries and illnesses for employees are zero. As far as non-employee workers are concerned, in 2025 there was only one low-severity workplace accident and no occupational disease, compared to 714,426 hours worked on construction sites by contractors. To minimize the risks of accidents at work, SGI implements a cultural process aimed at training employees, identifying and distinguishing the functions competent in the field and leading to a change in mentality. Please refer to the attached tables for details on the accident rate and hours worked by employees and non-employees during 2025.

- Several initiatives were launched in the 2025 financial year, including:
- **Organization of Safety Day**, with the involvement of all employees and supplier and contractor companies operating on behalf of the company, to promote the culture of safety and the sharing of good practices;
 - Health and safety training in addition to the mandatory training required by Legislative Decree 81/2008;
 - **HSE Alert system**, with dissemination of near misses that occurred in individual construction sites and sharing of the related analyses and preventive actions to all company construction sites;
 - **Near miss** reporting and management system, aimed at proactive accident prevention;
 - **Active involvement** of workers and external companies through moments of discussion, coordination and awareness on HSE issues, with safety site talks;
 - **Promotion of well-being** and health, through the organization of ergonomics courses aimed at the prevention of musculoskeletal disorders and the improvement of working conditions;
 - **Safety Masterclass**, a course of 8 meetings with experts in the sector, aimed at CSE, CSE and ASPP assistants of works supervision and contractors, with experts in the sector and public bodies.



SGI's value chain



The involvement and integration of all value chain stakeholders in the business processes allow for the creation of solid relationships, based on responsible and conscious collaboration, which support the achievement of SGI's sustainability goals.

Improving technological efficiency involves optimizing the safety, reliability and sustainability of assets, without forgetting the importance of developing technological skills along the entire value chain, always in compliance with the company's ethical and social principles.

SGI places emphasis on developing social responsibility practices between suppliers and customers, ensuring that human rights are respected throughout the value chain.

This commitment is a fundamental pillar of the Company strategy, which is also reflected in training and awareness-raising activities.

The goal is to improve reliability and safety, promote the reduction of emissions and stimulate the adoption of innovative solutions, thus contributing to the development of sustainable businesses.

SGI's supply chain

GRI 204-1, 308-1, 414-1, 414-2, 407-1, 408-1, 409-1

SGI adopts a structured and rigorous process for the selection of suppliers, based on an integrated assessment of several key factors, including ESG (environmental, social and governance) performance, the quality of the products and services offered, the level of innovation, economic competitiveness, operational efficiency and the ability to guarantee continuity of supply.

This approach allows the Company to build solid, transparent and collaboration-oriented supply relationships throughout the value chain, while ensuring the contribution to the achievement of sustainability goals and the creation of value for all stakeholders.

Monitoring the ESG performance of suppliers is not only monitoring risks, but it is also a strategic lever for identifying opportunities, for improving and promoting increasingly sustainable practices, with particular attention to social aspects.

In this context, **SGI requires its partners and suppliers to respect fundamental principles on human rights and working conditions**, promoting the protection of freedom of association and the right to collective bargaining and prohibiting any form of forced, mandatory or child labor. The Company also undertakes to prevent and monitor the potential risks associated with the violation of these principles along the supply chain, through specific requirements and assessment criteria applicable to its partners. Suppliers are also required to ensure high standards of health and safety in the workplace and to operate in an environmentally responsible manner. Attention to ethical and sustainability aspects is an essential requirement for operating in a competitive context that is increasingly oriented towards the balance between economic performance, protection of people and protection of the environment.

In line with this approach, **SGI prefers, where possible, national and local suppliers**, with the aim of ensuring high levels of quality and reliability, optimizing logistics and reducing procurement times, while contributing to the economic development of the territories in which it operates.

A significant example is the restructuring of the operational headquarters in Frosinone, for which the Company has selected only suppliers from the Lazio region. Confirming this orientation, in 2025 about 95% of operating expenditure was allocated to Italian suppliers, highlighting SGI's concrete commitment to enhancing the national entrepreneurial fabric.

New suppliers		
Number of suppliers	2024	2025
New suppliers assessed based on social and environmental criteria	9	19
Total new suppliers	9	19
Total Percentage	100%	100%

Table 9 - Percentage of new suppliers who were selected using social and environmental criteria (GRI 308-1, 414-1)

Negative social impacts on the supply chain and actions taken				
Number of suppliers	2024		2025	
	N.	%	N.	%
Suppliers assessed for social and environmental impacts	34	100%	38	100%
Suppliers who have significant, potential and current negative social impacts	-	0%	-	0%
[of which] suppliers with whom improvements have been agreed because of the evaluation	-	0%	-	0%
[of which] suppliers with whom contractual relationships have been terminated because of the assessment	-	0%	-	0%

Table 10 - Negative social and environmental impacts in the supply chain and actions taken (GRI 308-2, 414-2)

The Supplier Selection Process

The management of the supplier qualification, evaluation and monitoring process, including the creation and updating of the Supplier Register, is entrusted to the Procurement Department, which operates according to structured, transparent and traceable criteria. The process is divided into several phases and is applied to different categories of suppliers (companies, consortia, cooperatives and service companies), ensuring an approach proportionate to the type of activity and the level of criticality.

The selection of suppliers is based on an integrated evaluation system that considers, among others, the following aspects:

- Economic and financial solidity
- Organizational and managerial skills
- Technical skills and quality of the solutions offered
- Regulatory compliance and permitting requirements
- Reputational profile (including legal and integrity aspects)
- Health, safety, environmental and quality standards
- ESG criteria

Classification by level of criticality

In order to ensure an adequate level of detail, suppliers are classified according to their impact on business activities:

- High impact, with significant effects on operating performance;
- Medium impact, with moderate influence;
- Low impact, with limited effects.

Depending on this classification, the qualification process involves different levels of analysis and verification.

Stages of the qualification process

The qualification path includes:

- Registration in the company system
- General and technical-specialist documentary verification
- ESG performance assessment
- Audits, where required, on technical, organizational, economic-financial and ethical aspects

Only after passing all the phases can the supplier be qualified for specific product categories.



Continuous monitoring and evaluation

SGI carries out periodic monitoring of the performance of qualified suppliers, through a structured system that guarantees traceability, objectivity and comparability of data.

The main areas of assessment include:

- Quality**

Quality, in terms of contractual compliance and compliance with technical and regulatory requirements
- Reliability**

Reliability in deliveries, with reference to compliance with the agreed deadlines
- Behavior**

Behavior, understood as the ability to collaborate, operational flexibility and relationship management
- ESG performance**

with attention to environmental, social and governance impacts

The assessment is not only a control tool, but also a lever for the continuous improvement and development of the *supply chain*.

For activities with significant environmental impacts (e.g. waste management, emissions, discharges), SGI has only qualified suppliers with the necessary authorizations.

The Company requires compliance with specific environmental and operational requirements, also formalized at the contractual level, and verifies their application through audit and control activities.

Among the tools adopted:

- Environmental Procedures and Guidelines;
- Environmental Management Operational Plans;
- Periodic checks in the executive phase.

Since 2019, SGI has also introduced sustainability-related reward criteria in tender procedures, progressively strengthening the integration of ESG factors into procurement processes.

Environmental requirements for suppliers

During the selection and evaluation of the offers, the following are valued in particular:

- Environmental certifications**
(es. ISO 14001, EMAS)
- Technical solutions**
Technical solutions aimed at reducing environmental impacts
- Greenhouse gas CO₂eq emissions**
Ability to monitor and report greenhouse gas (CO₂eq) emissions

Sustainable construction site

SGI has adopted the Sustainable Construction Site Management procedure, which allows the integration of the main ESG aspects into the operational management of construction site activities.

In particular, suppliers are called upon to monitor and manage:

- Emissions into the atmosphere;
- Waste production and management;
- Energy consumption;
- Protection of biodiversity and the territory;
- Social and governance aspects.

This approach makes it possible to systematically monitor impacts along the entire value chain, promoting responsible behavior in line with corporate sustainability objectives.

Customer Centricity

SGL places the customer at the heart of its business strategy, directing all strategic decisions toward meeting and anticipating the needs of both current and potential customers.

The goal is to create value in the short, medium and long term through the provision of gas transmission services characterized by high quality standards, combining economic competitiveness and full compliance with the regulations on competition and protect market fairness. To respond effectively to customer needs, SGL adopts an approach based on active listening and constant monitoring of satisfaction, collecting *feedback*, conducting market research and maintaining a direct and continuous dialogue. These tools allow the Company to progressively improve the quality of the services offered and to develop innovative and sustainable solutions, in line with the expectations of a constantly evolving context.

As part of this approach, SGL aims to build strong, long-lasting relationships with its customers by ensuring timely assistance, continuous support, and a high level of responsiveness in handling requests and reports. A concrete example of this commitment is represented by the direct channel "SOS Gas Emergency", active through the toll-free number 800.182.782, dedicated to reporting gas leaks, breakdowns or inefficiencies, to safeguard the safety and continuity of the service.

Digital transformation is also a fundamental enabler of SGL's customer centricity: the digitalization plan, which includes the adoption of the IFS Cloud platform, is aimed at optimizing operational processes and offering an increasingly efficient, flexible and customer-oriented service. To ensure continuous improvement of the customer experience, SGL sets clear and measurable goals, including reducing technical and logistical complaints, increasing the speed of responding to issues, and constantly monitoring customer satisfaction levels. Customer centrality is also integrated into corporate governance through the Code of Ethics, which guarantees transparency, fairness and responsibility in business relations, strengthening trust and collaboration in the long term.



Brand Reputation

Throughout 2025, SGL continued to strengthen its reputation by promoting a responsible, transparent and recognizable corporate identity, aligned with the Company's values, strategic priorities and role within the energy sector.

SGL's reputation is based not only on the reliability and quality of the services it provides, but also on its ability to contribute to industry debate, maintain an ongoing dialogue with its stakeholders and generate shared value for the communities and territories in which it operates.

During the year, SGL actively participated, including as a speaker, in conferences, round tables and initiatives focusing on key energy and energy transition topics, sharing its expertise in infrastructure, innovation and renewable gases. Among these, SGL's participation in RENMAD Renewable Gases 2025 provided an important opportunity for discussion on the development and integration of renewable gases into the energy system. The Company also promoted and supported volunteering and local community engagement initiatives, with the aim of combining its strong connection with local communities with a focus on social and environmental issues. These included, for example, participation in Race for the Cure, in support of women's health and cancer prevention, and the organization of a voluntary plastic collection initiative at the Castello di San Casto in Sora. The latter aimed to raise awareness of environmental protection while contributing to the preservation and enhancement of a site of particular historical and natural significance.

SGL's commitment to the territories in which it operates is also reflected in the protection and enhancement of the historical and archaeological heritage uncovered during the construction of its infrastructure. In this context, the Company organized several initiatives, including an event dedicated to the archaeological remains discovered during construction work on the "Ceprano-Sora" gas pipeline, which brought to light a significant section of the ancient Via Latina. At the same time, SGL maintained an active and consistent presence on LinkedIn, using the platform to provide regular insights into the Company's people, activities and ongoing development. Its communication covered corporate projects and their progress, operational activities, sustainability and social responsibility initiatives, partnerships, events and the main topics of interest to the energy sector.



Particular attention was also devoted to highlighting SGL's people through content presenting their roles, skills, professional expertise and experiences. This contributed to increasing awareness of the organization, promoting the Company's corporate culture and strengthening employees' sense of belonging.

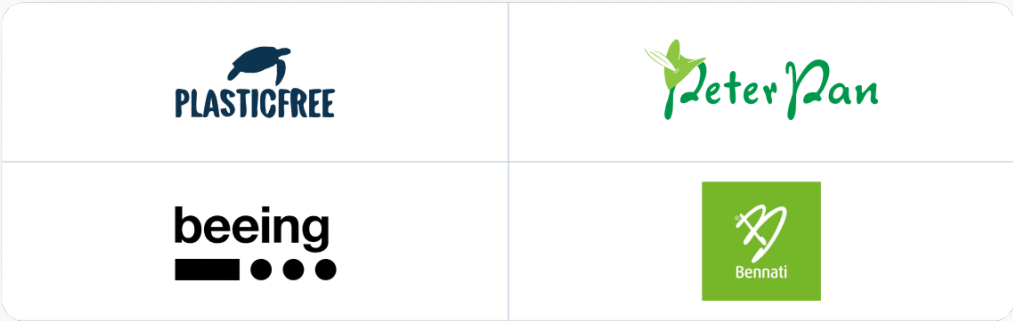
Partnerships, Associations and Donations

SGI has developed over time, and continues to strengthen, a portfolio of strategic partnerships that support the growth of its business and the achievement of its sustainability objectives. These collaborations involve well-established organizations operating in fields such as research, healthcare, support for people with disabilities, child welfare, women’s empowerment, environmental protection, as well as industrial development and the energy transition. Dialogue and cooperation with institutions, associations, and Third Sector organizations foster the implementation and support of projects and initiatives capable of generating shared value, creating positive social and environmental impacts in the territories where SGI operates and benefiting both its employees and those working throughout its value chain.

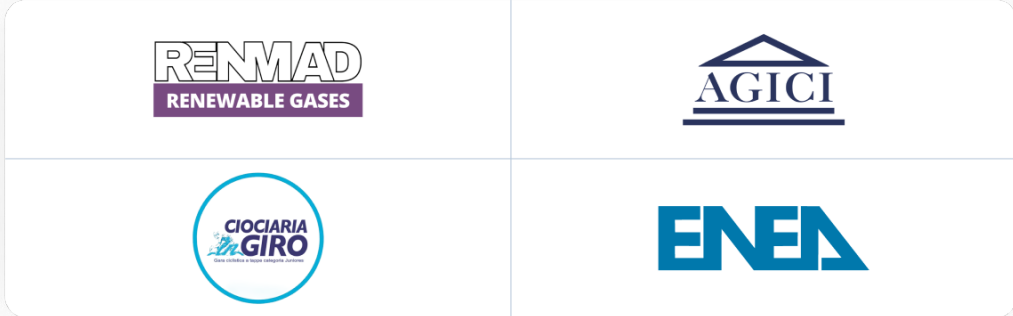
During 2025, the Company reaffirmed its support for its existing partner organizations by renewing ongoing collaborations, while also expanding its network through the engagement of new entities. In doing so, SGI further strengthened its commitment to sustainable development and to creating value for the wider community.



In addition to developing strategic partnerships, SGI supports social, environmental, and cultural initiatives through a programme of donations and contributions directed to institutions, associations, and organizations engaged in projects benefiting the communities and territories in which the Company operates. These donations represent a tangible means through which SGI contributes to the promotion of social inclusion, scientific research, health protection, support for vulnerable people, and environmental conservation, reaffirming its commitment to creating shared value. During 2025, SGI renewed its support for numerous initiatives launched in previous years and promoted new projects in collaboration with institutions and associations, further expanding its contribution to sustainable development and community well-being. The activities carried out covered a wide range of areas, including social solidarity, education and training, research, environmental protection, and local community development.



Alongside its donations and social and environmental projects, SGI also supports local communities through sponsorship initiatives aimed at cultural, sporting, and social events and projects. These initiatives are designed to foster the growth and development of local communities, promote the dissemination of shared values, and strengthen engagement with stakeholders, thereby contributing to the creation of positive and long-lasting impacts in the areas where the Company operates.



Relations with local communities

GRI 2-29, 203-1, 203-2, 411-1, 413-1, 413-2

SGI systematically monitors and analyzes the economic, environmental and social impacts from its activities, with the aim of promoting a continuous and constructive dialogue with local communities and all interested stakeholders.

The involvement of stakeholders from the early planning stages and throughout the entire implementation cycle of operations enables the Company to identify local stakeholders' expectations and proactively anticipate and manage potential impacts.

In this context, SGI has activated dialogue initiatives with local communities through meetings with the Regions of Sardinia, Marche, Molise, Puglia and Abruzzo, as well as with various institutional bodies, including the Ministry of the Environment and Energy Security (MASE) and ARERA, launching development programs and carrying out preventive assessments on the impacts generated by its activities.

Direct dialogue with stakeholders, particularly in the phases of construction and expansion of the transmission network, has proved to be essential to collect specific requests and answer to the needs that have emerged, also through the activation of compensation measures, contributions or, where possible, design adaptations.

In order to reduce the effects related to the construction of infrastructure, SGI takes targeted actions such as limiting the time of temporary occupation of land and restoring habitats in conditions as close as possible to the original ones.

In addition, in order to contain the impact of heavy vehicle traffic and the related greenhouse gas emissions, the Company has prepared specific road plans for the construction site areas, promoting the use of vehicles with a reduced environmental impact.

Strongly present in the territories in which it operates, SGI actively collaborates with local institutions to promote knowledge of natural gas transmission activities and enhance the opportunities generated for communities. The initiatives carried out include, in particular, support for cultural projects and the organization of exhibitions dedicated to archaeological artefacts discovered during construction activities. In 2025, no cases of violations of the rights of indigenous peoples were reported.

The economic value generated and distributed by SGI

GRI 201-1, 413-2

SGI supports the economic development of the territory in which it operates, promoting its growth through its activities.

The value generated is shared with SGI’s stakeholders, as illustrated by the data reported in the statement of generated and distributed economic value presented below.

Economic value generated, distributed and retained		
Income statement items	2024	2025
Value generated	161,06	151,57
Sales revenue	152,68	145,43
Increases in fixed assets, other income and financial income	8,38	6,14
Distributed value	116,07	105,24
Operating costs	69,33	52,00
Employee Wages and Benefits	8,41	9,22
Payments to lenders	25,01	29,71
Payments to the Public Administration	13,30	14,30
Economic value retained	44,99	46,33

Table 11 - Direct economic value generated and distributed (GRI 201-1)

In 2025, the economic value generated by SGI amounted to €151.5 million, recording a decrease compared to the previous year, essentially due to the reduction of the so-called Passive Items, which are reflected in operating costs to the same extent, consequently not resulting in a reduction in gross operating margin (EBITDA).

In line with the ten-year development plan, in 2025 SGI completed the construction of several infra-structures intended to upgrade the transmission network, including:

Cellino-Pineto-Bussi gas pipeline: re-construction of the first section of the Cellino-Pineto-Bussi pipeline, about 20 km long. The work consists of the laying of a new DN 200 pipeline, DP 75 bar, to replace the existing DN 200 pipe dating back to the 60s and is essential to maintain high standards of infrastructure safety. The new hydrogen ready pipeline interconnects with the Pineto-Cellino DN 500 (20") backbone of the National Network and with the Cellino storage (Edison Storage), ensuring continuity of supply to the Adriatic route of the SGI network towards the Marche region and the redelivery points in the Teramo area;

Lucera-San Paolo gas pipeline: gassing of the second section and completion of the entire gas pipeline of the National Network of about 69 km. The work consists of DN 300 pipes interconnected with the existing lines of the Larino-Reggente route which will make it possible to meet the connection needs in the north-eastern area of Puglia. The pipeline will enable the supply of the Capitanata area, which is currently not served by the gas network, facilitating the connection of CNG supply facilities and biomethane production plants under development in the region;

Completion of 2 connections serving biomethane production plants that will be activated during 2026, with the aim of injecting an additional 3 million SCM/year into the SGI network.



Community initiatives

GRI 202-2
SGI considers local employment to be an important element in supporting the economic and social development of the territories in which it is present.

However, the current regulatory framework, and in particular on the public procurement regulation, does not allow the Company to define binding targets relating to the recruitment of personnel from local communities.
In this context, SGI is committed to promoting, where possible, the involvement of local workers and suppliers, contributing to the enhancement of the local economic fabric.

The Company also ensures constant monitoring of employment dynamics in the areas in which it operates. The percentage of senior managers from the local community is as follows:

Percentage of senior managers hired by the local community						
No. of people	2024			2025		
	Men	Women	Total	Men	Women	Total
Senior manager	1	-	1	-	1	1
Senior managers hired by the local community	1	-	1	-	1	1
Percentage of senior managers hired by the local community	100%	0%	100%	0%	100%	100%

Table 12 - Percentage of senior management recruited from the local community (GRI 202-2)

SGI fosters collaboration with local organizations committed to creating shared value and generating social benefits for the community.

Every year, the Company's employees choose solidarity initiatives to support, allocating contributions to associations and foundations, both locally and nationally.

During 2025, SGI carried out its infrastructure activities by adopting a structured approach of involvement of local communities, based on participatory authorization processes, continuous dialogue with local stakeholders and activation of environmental compensation and rebalancing measures.

Service Conferences and Stakeholders Engagement

For each project under construction or development in 2025, SGI participated in the Service Conferences (*Conferenze dei Servizi*), which represent the institutional forum for discussion and coordination, involving all public and private entities affected by the projects. These include Municipalities, Regions, Provinces, environmental authorities, network operators, competent administrations, and relevant stakeholders.

The Service Conferences have been a central tool for:

- The sharing of project contents;
- The assessment of potential environmental and social impacts;
- The definition of the conditions for the execution of the works;
- The identification of mitigation measures, environmental compensation and territorial rebalancing interventions.

Within these procedures, SGI has operated with a view to transparency and institutional collaboration, acknowledging the requests expressed by the territories and promoting solutions consistent with the needs of local communities.

Meetings and dialogue with local authorities

In addition to the Service Conferences, in 2025 SGI maintained a constant and direct dialogue with local institutions, through numerous face-to-face and videoconference meetings. The meetings involved, among others:

- Mayors and municipal administrations (including Spoltore, Cassino, Montalto delle Marche, Lucera, Morroboro, Cellino Attanasio);
- Regions and regional technical structures (Abruzzo, Lazio, Marche, Puglia, Sardinia);
- Authorities and institutional bodies such as MASE, ARPA, Prefectures, Metropolitan Cities and ANCI.

These moments of discussion were aimed at managing operational activities, sharing the progress of projects, analyzing territorial needs and overseeing relations with the local communities concerned.

Environmental compensation and rebalancing works

In 2025, SGI followed up on the commitments made in the context of the authorization procedures and the Service Conferences, implementing environmental compensation measures in accordance with current regulations and agreements signed with the competent local authorities. The compensations concerned, among others, the Municipalities of Corridonia, Montefiore dell'Aso, Montedinove, Carassai, Cellino Attanasio, Spoltore, Cepagatti, Morroboro, as well as the Marche and Abruzzo Regions, and were aimed at:

- environmental protection and rebalancing interventions;
- mitigation of the impacts deriving from the works;
- support for initiatives to enhance the territory.

Based on the activities carried out during 2025, it can be confirmed that SGI systematically engaged local communities in all initiatives and projects implemented. In particular, the involvement of local communities and territorial stakeholders took place through:

- Participation in the Service Conferences, held for each intervention, which guaranteed the involvement of all the public and private bodies involved in the works;
- A continuous and targeted dialogue with local administrations and competent institutions, through dedicated meetings, aimed at sharing activities, listening to the requests of the territory and managing local impacts.

Environmental protection

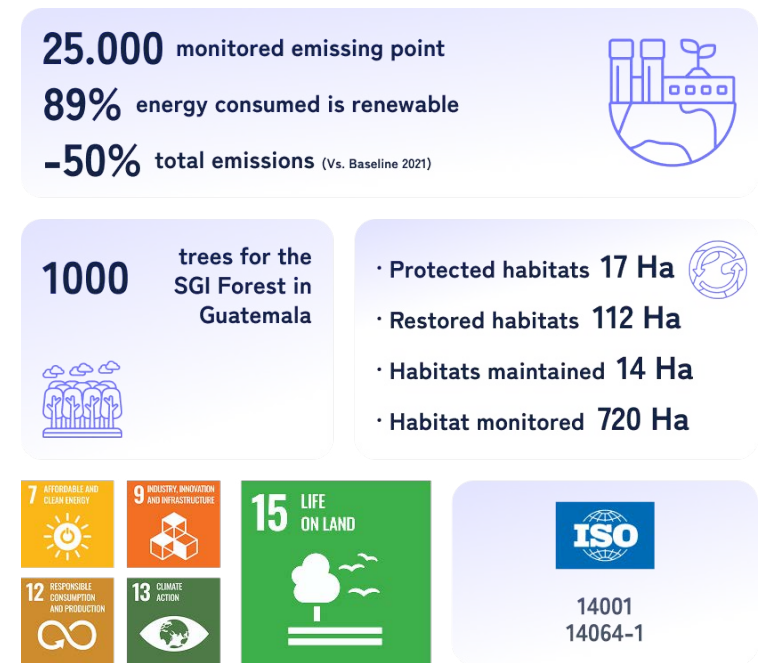
Environmental protection is achieved through conscious choices that require investment and continuous commitment, with the aim of reducing the impact of business activities and safeguarding natural resources over time.

SGI works every day in this direction, integrating these principles into a corporate strategy that is aligned with the broader global energy transition pathway.

A tangible sign of this alignment is the adoption of the **Net Zero** objective, which embeds decarbonization requirements into business decision-making.

Efficiency and innovation are, in fact, core elements of SGI's strategy and are reflected in a more responsible management of energy and resource consumption, as well as in the reduction of operational waste.

This approach creates a virtuous chain effect: the responsible use of resources contributes not only to the sustainability of business activities, but also to the protection of biodiversity and ecosystems, whose preservation is an integral part of the projects developed by SGI.



The ISO 14001:2015 Environmental Management System

To ensure effective and structured management of environmental impacts, SGI has adopted and constantly maintains updated Environmental Management System compliant with the UNI EN ISO 14001:2015 standard.

This system, which is voluntarily adhered to, is subject to periodic checks by independent third parties, which certify its full compliance with both the applicable regulatory requirements and the criteria set out in the reference standard on environmental protection.

As part of this system, and in accordance with the procedure for the “Identification and Assessment of Significant Environmental Aspects,” SGI carries out in-depth analyses of the environmental aspects associated with its activities, systematically assessing their most significant impacts.





Environmental Analysis

In line with the above, the Environmental Analysis document is aimed at identifying environmental aspects, both direct and indirect, as well as assessing the related significant environmental impacts.

Through this analysis, SGI is able to acquire an overall view of the environmental issues related to its activities, identifying, monitoring and managing the Significant Environmental Aspects. These represent a fundamental element of the Environmental Management System and constitute the starting point for the definition of actions and interventions aimed at the continuous improvement of the organization's environmental performance.

The following table shows the basic environmental aspects taken into account for the identification of the significant environmental impacts of SGI related to the organization's activities:

Environmental aspect	Environmental impact
Use of energy sources	Electricity consumption
	Consumption of diesel, LPG and natural gas
Use of natural resources	Water consumption
	Other resource consumption
Use of harmful substances	Cleaning products
	Consumer products such as Svitol, grease and sealants
Emissions into the atmosphere	Emissions into the atmosphere
	Natural gas
	Noise
Water discharges	Wastewater discharge
Waste production	Septic Tank Waste
	Waste assimilated to municipal waste (undifferentiated) and differentiated (paper, cardboard, plastic and cans)
	Organic waste (grass cutting)
Storage of hazardous or toxic-harmful liquid materials	LPG, diesel
Vehicle handling	Traffic by employees
	Induced traffic by carriers
Storage and handling of flammable material	Fire loading archive, data center rooms, transport and treatment systems for flammable fluids
Landscape - Panorama	Presence of elements with a visual impact on the environment (height and type of systems); Noise reduction
Selection of suppliers according to environmental criteria	Eco-friendly behaviour of suppliers

Based on the environmental aspects and impacts identified, specific analysis activities were carried out for each operating area through inspections and interviews with personnel, with the aim of obtaining an in-depth assessment of the company's environmental performance.

In particular, the activity involved:

- Identification of the applicable environmental regulation, in order to verify compliance with legal requirements and applicable permits and authorizations;
- Assessment of the environmental performance of the organization's activities;
- Identification of the most significant environmental impacts, on which improvement objectives and actions should be focused;
- Evaluation of the magnitude and significance of environmental impacts in the areas affected by the company's activities;
- Review of the operating procedures and management practices already in place;
- Analysis of any environmental incidents or events that may have occurred, with the aim of assessing the effectiveness of the preventive and corrective measures implemented.

This approach allows SGI to systematically monitor its environmental aspects, identify opportunities for improvement and strengthen its commitment to sustainable and responsible management of business activities.



Energy Management

GRI 302-1, 302-3
Total energy consumption recorded by SGI was 5,355 GJ, up 20% compared to 2024. The main reason for this increase was the higher number of business trips carried out during the year, which led to a significant rise in fuel consumption..

Energy consumption within the organization				
Energy source	UoM	2024	2025	Delta %
Total energy consumption	GJ	4,460	5,355	20%
Energy carriers for heating use	GJ	58	-	-100%
Natural gas	GJ	58	-	-100%
Fuel for company vehicles	GJ	2,121	3,027	43%
Diesel	GJ	629	677	8%
Gasoline	GJ	1,251	2,084	67%
Methane	GJ	241	266	10%
Electricity purchased from the network	GJ	2,281	2,328	2%
of which purchased from renewable sources (kWh) (energy covered by certificates of guarantee of origin)	GJ	2,100	2,065	-2%
of which purchased from non-renewable sources (kWh)	GJ	181	263	45%

Table 13 – Energy consumed within the organization (GRI 302-1)

In 2025, SGI recorded a consumption of fossil fuels (natural gas, petrol, diesel) of 3,027 GJ (56.5% of the total), of which:

- 9% road transport CNG;
- 22% road transport diesel;
- 69% road transport petrol.

Of the electricity purchased from the network, 11% comes from non-renewable sources and 89% of the electricity consumed comes from renewable sources, as certified by the Guarantees of Origin that accompany the supply by Edison.

Sites, network and plants on SGI's pipeline network therefore use green electricity in a percentage close to 100%.

In 2025, the 20% increase in energy consumption and the 5% decrease in sales revenues led to a 26% increase in energy intensity.

Energy intensity				
Energy intensity	UoM	2024	2025	Delta %
Sales revenue	€	152,687,000	145,427,000	-5%
Energy consumed within the organization	GJ	4,460	5,355	20%
Energy intensity	GJ/€	0.000029	0.000037	26%

Table 14 - Energy intensity (GRI 302-3)

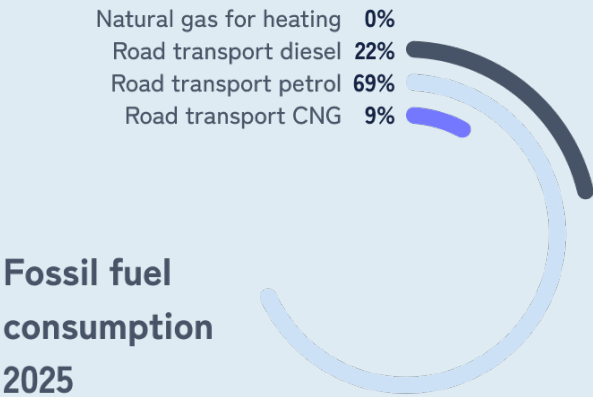


Table 15a - Energy consumption within the organization (GRI 302-1)

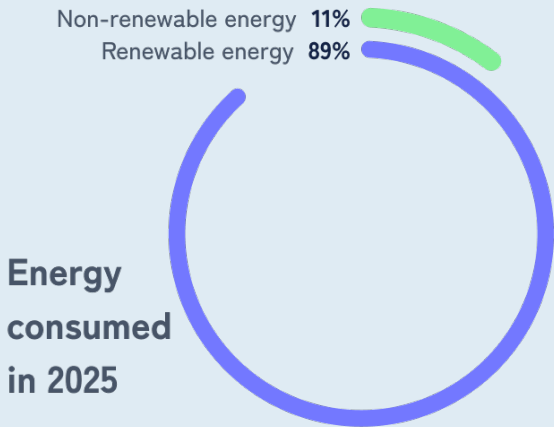


Table 15b - Energy consumption within the organization (GRI 302-1)

Emissions into the atmosphere

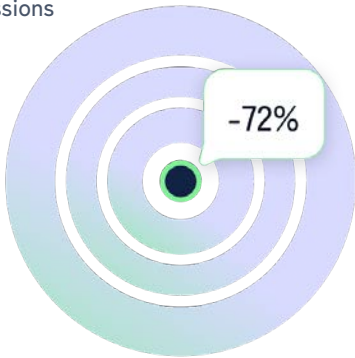
GRI 305-1, 305-2, 305-3, 305-4, 305-7

For several years, SGI has been actively engaged in the fight against climate change through the implementation of initiatives aimed at reducing emissions and reforestation. In this perspective, the Company has also embarked on the process of developing a Net Zero Plan, aimed at eliminating greenhouse gas emissions generated by its activities.

The Net Zero Plan, currently in the preliminary validation phase, provides for the definition of punctual and measurable goals. As part of this, SGI has set the goal of achieving climate neutrality for *scope* 1 and 2 greenhouse gas emissions by 2040, extending the scope to *scope* 3 emissions by 2050, confirming a long-term commitment.

The year 2021 has been identified as the reference year for the initial measurement of emissions, with a value of approximately 32,000 tons of CO₂ equivalent, certified by IMQ S.p.A. in accordance with the UNI EN ISO 14064-1 standard. This baseline represents the starting point for monitoring the evolution of emission performance over time and for assessing the progress made towards achieving the defined reduction targets.

In 2025, emissions will be reduced by approximately 50% compared to 2021, highlighting the path taken by the Company towards a progressive reduction in its carbon footprint.



The emission categories reported by SGI include direct Scope 1 emissions, related to the direct use of fossil fuels, indirect Scope 2 emissions, deriving from the use of electricity produced from fossil sources, and finally other indirect Scope 3 emissions, which concern business-related processes and operations.

In the period considered, there was an overall increase in Scope 1 emissions of 23%, with an increase from 3,098 tCO_{2eq} in 2024 to 3,810 tCO_{2eq} in 2025. This change is driven by an increase in venting emissions due to an increase in construction sites and extraordinary maintenance interventions that have determined, in absolute value, greater venting dispersions while remaining within the limits set by the EU directive with a total recovery of 75%. On the other hand, fugitive emissions decreased compared to 2024 thanks to the replacement of some gas pipelines and an improvement in the calculation method. SGI has also implemented a fugitive emissions monitoring plan, identifying 25,000 potential emission points.

The frequency of checks carried out quarterly or half yearly is defined according to the type of equipment. Emissions associated with fuel for company vehicles increased by 42%, from 148 to 210 tCO_{2eq}. The increase is mainly driven using petrol, which recorded significant growth (+69%), while diesel showed a smaller increase (+6%). This trend can be attributed to an intensification of operational and logistics activities, as well as to changes in the vehicle fleet and the number of kilometres travelled.

Direct greenhouse gas (GHG) emissions (Scope 1)				
Energy source	UoM	2024	2025	Delta %
Energy carriers for heating/production use	tCO _{2eq}	3	-	-100%
Natural gas	tCO _{2eq}	3	-	-100%
Fuel for company vehicles	tCO _{2eq}	148	211	42%
Diesel	tCO _{2eq}	45	48	6%
Gasoline	tCO _{2eq}	89	151	69%
Methane	tCO _{2eq}	14	12	-17%
Fugitive emissions/venting/normal gas operation	tCO _{2eq}	2,947	3,600	22%
Methane	tCO _{2eq}	2,947	3,600	22%
Total Scope 1	tCO _{2eq}	3,098	3,810	23%
Emission Factor - Petrol combustion for company vehicles	Kg		3.28	
Emission Factor - Diesel combustion for company vehicles	Kg		3.20	
Emission Factor - Natural Gas Combustion	Sm3		2.03	
Emission Factor - GWP Methane	kg gas/kg CO2		29.8	

With regard to indirect Scope 2 emissions related to the consumption of electricity purchased from the network, SGI uses the "Location Based" methodology, which considers the average CO_{2eq}

Table 16 – Direct GHG emissions (Scope 1) (GRI 305-1)

emission factor of the national electricity network, and the "Market Based" methodology, which assigns a zero CO_{2eq} emission factor for energy consumption deriving from the purchase of energy from renewable sources.

Based on the first approach, a total of 146 tonnes of CO_{2eq} were recorded in 2025, which is broadly in line with 2024, with a variation of 3%. Regarding the second approach, which enhances the use of energy from renewable sources certified with Guarantee of Origin, a total of 30 tons of CO_{2eq} generated in 2025 was detected.

Scope 2 - Location Based				
Electricity purchased from the network	UoM	2024	2025	Delta %
Electricity purchased from the network	tCO ₂	142	146	3
Total Scope 2 - Location Based	tCO ₂	142	146	3
Emission Factor - Electricity Consumption - Location-Based Production	kWh		0,226	

Table 17 – Indirect GHG emissions from energy consumption (Scope 2 – Location Based) (GRI 305-2)

Scope 2 - Market Based				
Electricity purchased from the network	UoM	2024	2025	Delta %
Electricity purchased from the network (net of GO)	tCO ₂	28	30	10%
Total Scope 2 - Market Based	tCO ₂	28	30	10%
Emission Factor - Electricity Consumption - Production (Market-Based, without GOs)	kWh		0.41	

Table 18 – Indirect GHG emissions from energy consumption (Scope 2 – Market Based) (GRI 305-2)

It should be noted that, as a result of its *business model*, SGI does not have significant emissions into the atmosphere other than climate-changing ones, as it does not provide for combustion processes at high temperatures capable of generating pollutants such as nitrogen oxides (NO_x), Sulphur oxides (SO_x) or fine particulate matter (PM₁₀), and is therefore not subject to authorization and monitoring of emissions into the atmosphere.

SGI also monitors indirect Scope 3 emissions, considering all relevant and applicable categories related to activities carried out upstream in the value chain.

- In particular, the analysis includes:
- goods and services purchased (Category 1);
 - transmission and distribution activities (Category 4);
 - business travel (Category 6);
 - home-work travel of staff (Category 7).

On the other hand, as regards activities downstream of the value chain, other emissions related to construction site activities were considered.

The quantification of emissions in each Scope 3 category was carried out in accordance with the methodologies set out in the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. In particular, for the Goods and services purchased category, the calculation of CO_{2eq} emissions was conducted by applying the quantity-based approach, based on the analysis of the total weight of the goods purchased during the year.

An examination of the results of the monitoring conducted in 2025 shows a significant decrease in indirect emissions compared to the previous year.

In this context, the "Goods and services purchased" category emerges as the main emission item, with 5,406 tonnes of CO_{2eq}, a sharp reduction compared to 2024 (equal to 16,327 tonnes of CO_{2eq}), mainly linked to the accounting for the purchase of the pipes of the Lucera - San Paolo gas pipeline in 2024 and a lower installation of the pipes necessary for the implementation of the interventions on the network in 2025.

A further significant contribution is represented by the category of "Capital goods", mainly related to the increase in shipbuilding activities, which generates 5,926 tons of CO_{2eq}. On the other hand, emissions attributable to the item "Fuel and energy for related activities (excluding those indicated in GRI 302-1)" are lower, amounting to 153 tonnes of CO_{2eq}.

Based on data for 2025, total *Scope 3* emissions therefore stand at 11,890 tonnes of CO_{2eq}.

Other indirect GHG emissions (Scope 3)				
Activities	UoM	2024	2025	Delta %
Upstream	tCO ₂	18,714	11,890	-36%
Goods and services purchased	tCO ₂	16,327	5,406	-67%
Capital goods	tCO ₂	1,729	5,926	243%
Fuel and energy for related activities (excluding those indicated in GRI 302-1)	tCO ₂	132	153	16%
Transmission and distribution	tCO ₂	333	207	-38%
Business trips	tCO ₂	8	25	209%
Employee commuting	tCO ₂	141	174	23%
Total Scope 3²	tCO ₂	18,714	11,890	-36%

With the aim of actively contributing to climate change mitigation and containing the impact of its emissions, SGI has defined and launched an articulated set of strategic initiatives. These actions include the adoption of operational processes, business strategies and targeted investments aimed at reducing the environmental impacts of activities and counteracting the effects of global warming. A central role is also entrusted to investments in innovative technological solutions, aimed at optimizing energy consumption and reducing CO_{2eq} emissions.

At the same time, the Company carries out constant monitoring of the main environmental risk factors, to prevent and limit the effects of operations on the environment.

SGI also promotes a growing internal awareness, raising awareness among staff on the responsible use of resources and the correct management and disposal of waste. In this perspective, the measures adopted also include the reduction of work travel, incentivizing, where possible, operating methods based on remote work.

Table 19 - Other indirect GHG emissions (Scope 3) (GRI 305-3)

Climate adaptation and resilience

GRI 201-2

SGI is aware of the progressive deterioration of climate conditions and the increasing frequency of extreme weather events. In this context, it is essential for the Company to assess the potential effects of such phenomena on its operations, with the aim of anticipating and mitigating possible adverse impacts. This also involves identifying the measures required to enhance the resilience and adaptive capacity of the gas transmission network.



The Company also recognizes the need to adopt preventive actions and rapid, effective response strategies capable of ensuring service continuity and proactively managing current and future challenges associated with environmental disasters.

In this perspective, SGI has started the development of specific business resilience plans focused on the risk of extreme natural events, aimed at identifying the most suitable mitigation solutions. Among the main risks associated with climate change that could significantly affect business operations, SGI has identified landslides, floods and earthquakes.



At the same time, the mitigation measures adopted in response to the identified risks represent important levers for strengthening organizational resilience.

These interventions include:

- The securing of existing infrastructures against current and future threats deriving from extreme natural events;
- The construction of containment works to counteract ground instability phenomena;
- The installation of gabions for the defense of riverbanks from erosion;
- The construction of pilings to support escarpments and slopes;
- The adoption of photovoltaic systems and energy storage systems in plants, to reduce the risk of interruptions in the electricity supply

Protection of biodiversity

GRI 304-1, 304-2, 304-3, 304-4

Italy stands out for its high richness in terms of biodiversity, and the protection of the national natural heritage that is a priority objective for SGI.

This commitment translates into the full application of the Habitats and Birds Directives, the management of the Natura 2000 Network and the protection of habitats and species of Community importance.

The results achieved derive from constant discussion and structured collaboration with the Regions, the Autonomous Provinces and all the subjects involved, engaged daily in the implementation of interventions aimed at the conservation of the ecosystems and biodiversity they host.

In 2025, SGI confirmed the commitment made in 2019 on the monitoring of habitats and biodiversity, with the aim of ensuring the protection of the environmental components of the areas affected by its interventions.

In the context of the design of new infrastructures, the Company adopts procedures that meet stringent requirements of environmental compatibility and safety.

In particular, for the construction of the gas pipeline network, which represents the majority of the infrastructure works, the route is identified through the assessment of several design alternatives, with the aim of avoiding or minimizing impacts on urbanized areas, land designated for future residential development, environmentally sensitive areas (such as Special Protection Areas (SPAs), Natura 2000 sites, and similar protected areas), sites of cultural or archaeological interest, and



areas characterized by geological instability.

The construction of the infrastructure takes place only after the completion of the Environmental Impact Assessment (EIA) procedure, at the end of which the competent authorities issue the authorizations required by current legislation.

Once the necessary permits have been obtained, SGI will design and implement specific environmental protection measures aimed at restoring the ecological value of the areas involved, through interventions aimed at recovering the naturalness of the places.

Type	Number
Environmental accidents	0
Flora accidents	-
Wildlife accidents	-
Habitat Removed	-
Protected Habitat	17,15 Ha
Habitat Restored	112,86 Ha
Monitored habitat	720,9Ha
Habitat Maintained	14,4 Ha

Table 20 – Operational sites owned, leased or managed in protected areas and in areas of high biodiversity value outside or close to protected areas (GRI 304-1)

From the preliminary design stages, SGI carries out in-depth field investigations to acquire detailed knowledge of the characteristics of the area concerned.

The analyses concern faunal, floristic and pedological aspects, with the aim of preventing possible negative impacts on vegetation, water resources and local ecosystems.

These activities are carried out by a highly specialized multidisciplinary team, composed of engineers, topographers, geologists, agronomists, foresters and naturalists, engaged in the study of the territorial context to identify the most suitable design solutions.

The results of the investigations constitute a fundamental support for design decisions, making it possible to minimize the effects on biodiversity, particularly during the construction phase of the works, and to facilitate subsequent environmental restoration and monitoring activities, carried out in synergy with the competent authorities.

SGI carries out continuous monitoring of the activities implemented, with the aim of limiting the risk of negative interference on the habitats crossed, whether they are protected areas or contexts characterized by a high biological richness.

 Protected habitats	About 17 hectares of protected habitats have been protected using trenchless crossing techniques applied to the Cellino, Mosciano, Ceprano, Sesto Campano and Lucera San Paolo pipelines, reducing the impact on the environmental matrices and the continuity of the ecosystems concerned.
 Restored habitats	Approximately 112 hectares of habitat have been the subject of environmental restoration interventions following the construction of the Lucera, Larino Lot 1B and Ceprano-Sora pipelines, with the recovery of the ecological and functional conditions of the areas concerned.
 Habitats maintained	The maintenance of habitats continued in 2025 through planting interventions involving about 14.4 hectares. In particular, on the Larino pipeline lot 1b
 Monitored habitats	The monitoring conducted by SGI, provided for as a prescription during the authorization phase, concerns 720 hectares of habitat. This area is increasing compared to 2024 following the extension of monitoring activities to the sites of San Marco Recanati, Larino Chieti and Larino Montagano, which are added to those already included previously: Cellino, Cellino-Pineto, Lucera San Paolo, Larino Lot 1B, Val d'Aso and Patrica.

Attachments

Table 1- (GRI 205-2)		
Members of the Board of Directors to whom anti-corruption policies and procedures have been communicated		
No. of people	2024	2025
Members of the Board of Directors who have received notice	7	7
Total Board members	7	7
% of communication	100%	100%

Table 2- (GRI 205-2)		
Employees who have been notified of anti-corruption policies and procedures		
No. of people	Total	
	2024	2025
Executives Who Received Notice	4	5
Total Executives	4	5
% of communication	100%	100%
Executives who have received communication	11	16
Total Executives	11	16
% of communication	100%	100%
Employees who received communication	43	48
Total Employees	43	48
% of communication	100%	100%
Workers who received communication	12	13
Total Workers	12	13
% of communication	100%	100%

Table 2.1- (GRI 205-2)		
Employees who received anti-corruption training		
No. of people	Total	
	2024	2025
Executives who received training	4	0
Total Executives	4	5
% participation	100%	0%
Managers who received training	11	4
Total Managers	11	16
% participation	100%	25%
Employees who received training	43	36
Total Employees	43	48
% participation	100%	75%
Workers who received training	12	11
Total workers	12	13
% participation	100%	85%

Table 3- (GRI 405-1)								
Employees by classification and age groups								
Percentage	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Executives	0.0%	2.9%	2.9%	5.6%	0%	3.7%	2.4%	6.1%
Managers	0.0%	12.9%	4.3%	17.1%	0%	15.9%	3.7%	19.5%
Employees	7.0%	47.1%	7.1%	58.6%	10%	45.1%	7.3%	58.5%
Workers	8.0%	15.7%	1.4%	18.6%	8%	13.4%	1.2%	15.9%
Total	6%	78.6%	15.7%	100%	7%	78%	14.6%	100%

Table 4- (GRI 405-1)								
Composition of the Board of Directors								
Percentage	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Men	0%	14%	43%	57%	0%	29%	43%	71%
Women	0%	29%	14%	43%	0%	14%	14%	29%
Total	0%	43%	57%	100%	0%	43%	57%	100%

Table 5- (405-1.b.iii)							
Total number of employees for other diversity indicators							
Number of people	2024			2025			
	Protected categories	Disability	Other	Protected categories	Disability	Other	Total
Executives	0	0	0	0	0	0	0
Managers	0	1	0	0	1	0	1
Employees	0	4	0	0	5	0	5
Workers	0	0	0	0	0	0	0
Total	0	5	0	0	6	0	6

Table 6- (GRI 401-1)								
New Hires								
Percentage	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Men	0%	12%	1.5%	13.4%	2.6%	9.2%	0%	12%
Women	1.5%	4.4%	0%	5.9%	1.3%	5.2%	1.3%	8%
Total	1.5%	16.4%	1.5%	19%	3.9%	14.5%	1.3%	20%

Table 7- (GRI 401-1)								
Exit								
Percentage	2024				2025			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Men	0%	1.5%	3%	4.5%	1.3%	1.3%	0%	2.6%
Women	0%	1.5%	0%	1.5%	0%	1.3%	0%	1.3%
Total	0%	3%	3%	6%	1.3%	2.6%	0%	4%

Table 8- (GRI 401-1)						
Terminations by reason						
Number of terminations by reason	2024			2025		
	Men	Women	Total	Men	Women	Total
Voluntary resignation	1	1	2	1	1	2
Contract Term	0	0	0	0	0	0
Retirement	1	0	1	0	0	0
More	1	0	1	1	0	1
Total	3	1	4	2	1	3

Table 9- (GRI 404-3)								
Employees who receive regular performance and career reviews								
Number of people	2025							
	Men	Total Men	%	Women	Total Women	%	Total	%
Directors	4	4	100%	1	1	100%	5	100%
Managers	11	11	100%	5	5	100%	16	100%
Employees	32	32	100%	16	16	100%	48	100%
Workers	13	13	100%	0	0	-	13	100%
Total	60	60	100%	22	22	100%	82	100%

Table 10- (GRI 403-9)				
Accidents at work	Employees		Non-employees	
	2024	2025	2024	2025
Total number of deaths due to accidents at work	0	0	0	0
Total number of serious occupational accidents (excluding deaths)	0	0	0	0
Total number of recordable occupational accidents	0	0	0	1
Rate of deaths due to accidents at work	0	0	0	0
Rate of serious accidents at work (excluding deaths)	0	0	0	0
Rate of recordable occupational accidents	0	0	0	1.39
Hours worked	124,456	121,824	333,775	714,426

Table 11- (GRI 302-1)				
Total energy consumption within the organization				
Energy	UoM	2024	2025	Delta %
Total energy consumption	GJ	4,460	5,355	20%
Non-renewable energy	GJ	2,360	3,290	39%
Renewable energy	GJ	2,100	2,065	-2%
% Renewable energy in total energy consumption	%	47%	39%	-18%

Table 12- (GRI 205-2)	
Anti-corruption non-compliance cases	-

Table 13- (GRI 206-1)	
Lawsuits for anti-competitive behaviour, antitrust and monopolistic practices	-

Table 14- (GRI 205-3)	
Confirmed corruption incidents	-

The Workplace Injury Rate is calculated using 1,000,000 hours worked as a standardization factor

Table 15 - Scope 3 emission factors				
Category	Sector	Process	UoM	kg CO ₂ eq.
CAT. 3	Home-work commuting	Cars - petrol	p*km	0.16
		Cars - petrol	p*km	0.17
		Cars - diesel	p*km	0.17
		Cars - methane	p*km	0.17
		Cars-Hybrid	p*km	1.33
	Transport of goods	By sea	ton*km	0.12
		By land	ton*km	0.15
	Smartworking	Methane gas - heating	p*day	2.72
		Electricity consumption smartworking	p*day	0.22
	Business trips	Train Travel - AV	p*km	0.04
		Train Travel - Regional	p*km	0.04
		Travel	p*km	0.13
		Overnight stays	p*night	8.62
	Waste transport	Waste transport	kg*km	0.00
CAT. 4	Fuel Extraction and Processing (WTT)	Gasoline production for company vehicles	kg	1.01
		Diesel production for company vehicles	kg	0.87
		Natural gas production	m3	0.68
	Steel pipes	Production of installed pipes	kg	2.63
		Production of installed pipes - Corynth	kg	2.60
	cls	Laid concrete production	m3	406.41

Category	Sector	Process	UoM	kg CO ₂ eq.
CAT. 4	Sand	Sand production for substrates or other building uses	kg	0.00
		Steel rod production	kg	2.13
	Central Thrust Construction Site	Compressors	kg	3.32
		Electric motor electrocompressor	MW	9735.00
		MT Frame	kg	4.31
		BT Frame	kg	10.14
		Compressor SKID	kg	2.24
	Waste generated on construction sites	015007 - Drilling Mud	kg	0.01
		080409* - Waste adhesives and sealants containing organic solvents or other hazardous substances	kg	2.40
		170504 - Non-hazardous excavated earth and rocks	kg	0.02
		170405 - Iron and steel	kg	0.04
		170604 - Insulating materials, other than those falling within heading Nos 17.06.01 and 17.06.03	kg	0.03
		120113 - Welding residues	kg	0.13
		170302 - Asphalt (Non-hazardous bituminous mixtures)	kg	0.01
		130205* - Mineral oils for engines, gears and lubricants	kg	2.85
		150110* - Packaging containing residues of hazardous substances or contaminated with such substances	kg	1.33
		150203 - Absorbents, filter materials, rags and non-hazardous protective clothing	kg	0.77
		160107* - Oil filters	kg	1.46
		150101 - Paper and cardboard packaging	kg	0.01
		150102 - Plastic packaging	kg	1.13
		150106 - Mixed material packaging	kg	0.57

Category	Sector	Process	UoM	kg CO ₂ eq.
CAT. 4	Waste generated on construction sites	161002 - Test water	kg	0.00
		160216 - Components removed from end-of-life equipment	kg	0.05
		170101 - cement	kg	0.02
		170201 - Wood	kg	0.06
		170202 - Glass	kg	0.03
		170203 - Plastic	kg	1.13
		170402 - Aluminum	kg	0.30
		170405 - Iron and steel	kg	0.01
		170802 - Gypsum-based building materials	kg	0.02
		170904 - Mixed waste from construction and demolition activities	kg	0.02
		200201 - Mowing and pruning	kg	0.06
		200307 - Bulky waste of urban, domestic or similar origin	kg	0.64
		Plastic packaging	kg	1.13
		Wrapping waste	kg	2.40
		Municipal solid waste	kg	0.64
		Used grinding wheel discs	kg	0.64
		170411 - Cables, other than those referred to in heading 17.04.10*	kg	0.90
		080111* - waste paints and varnishes, containing organic solvents or other hazardous substances.	kg	2.40
		150111* - metal packaging containing hazardous porous solid matrices	kg	1.22
		170107 - Mixtures of cement, bricks, tiles and ceramics, other than those referred to in heading 170106	kg	0.02
		170407 - Mixed metals	kg	0.04

Category	Sector	Process	UoM	kg CO ₂ eq.
CAT. 4	Waste generated on construction sites	170604 - Non-hazardous insulating materials	kg	0.03
		200102 - Paper	kg	0.07
		200307 - Bulky waste of urban, domestic or similar origin	kg	0.64
	Products used on construction sites	Propane	liters	2.07
		Acetylene	liters	0.01
		Water	kg	0.00
		Oxygen	liters	0,00

Alignment table between material topics of SGI and GRI 11 Oil & Gas

Alignment Table		
SGI Material Topic	Material Topic GRI 11	
Greenhouse Gas (GHG) Emissions	11.1	Greenhouse Gas (GHG) Emissions
	11.3	Air Emissions
Climate Adaptation, Resilience, and Transition	11.2	Climate Adaptation, Resilience, and Transition
Biodiversity Protection	11.4	Biodiversity
Employee Engagement	11.7	Closure and Rehabilitation
	11.10	Employment Practices
Employee Health, Safety, and Well-being	11.9	Occupational Health and Safety
Employee Development and Enhancement	11.10	Employment Practices
	11.11	Non-discrimination and Equal Opportunities
Non-discrimination and Equal Opportunities	11.11	Non-discrimination and Equal Opportunities
Value Chain Management	11.12	Forced Labor and Modern Slavery
	11.13	Freedom of Association and Collective Bargaining
	11.14	Economic Impacts
	11.17	Rights of Indigenous Peoples
Relations with Local Communities	11.15	Local Communities

GRI Content Index

Statement of Use	Società Gasdotti Italia has submitted a report in accordance with the GRI Standards for the period 1 January 2025 – 31 December 2025
Use GRI 1	GRI 1: Fundamental Principles 2021
Relevant GRI industry standard	GRI 11: Oil & Gas 2021

Reference GRI Standard	Disclosure	Location	Omissions
Organization and reporting practices			
GRI 2: General Disclosure 2021	2.1 Organizational details	SGI - About Us	
	2.2 Entities included in sustainability reporting	Methodological note	
	2.3 Reporting period, frequency and contacts	Methodological note	
	2.4 Re-exposure of data	Methodological note	
	2.5 External Assurance	These Financial Statements are not subject to external assurance	
Activities and workers			
GRI 2: General Disclosure 2021	2.6 Activities, value chain and other business relationships	SGI - About Us	
	2.7 Employees	SGI staff	
	2.8 Workers who are not employees	SGI staff	
Governance			
GRI 2: General Disclosure 2021	2.9 Structure and composition of governance	Responsible governance	

Reference GRI Standard	Disclosure	Location	Omissions
GRI 2: General Disclosure 2021	2.10 Appointment and selection of the highest governance body	Responsible governance	
	2.11 Chairman of the highest governing body	Responsible governance	
	2.12 Role of the highest governance body in controlling impact management	Responsible governance	
	2.13 Delegation of responsibility for impact management	Responsible governance	
	2.14 Role of the highest governance body in sustainability reporting	Responsible governance	
	2.15 Conflicts of interest	Ethics and Business Integrity	
	2.16 Communication of critical issues	The whistleblowing protocol	
	2.17 Collective knowledge of the highest governance body	Responsible governance	
GRI 2: General Disclosure 2021	2.18 Evaluation of the performance of the highest governance body	Responsible governance	
	2.19 Rules on remuneration	Employee evaluation and compensation	
	2.20 Procedure for determining remuneration	Employee evaluation and compensation	
	2.21 Annual Total Compensation Ratio	Employee evaluation and compensation	GRI 2.21 lett. b) not available
Strategies, policies and practices			
GRI 2: General Disclosure 2021	2.22 Sustainable Development Strategy Statement	Letter to stakeholders	
	2.23 Policy commitment	SGI's Sustainability Policies	

Reference GRI Standard	Disclosure	Location	Omissions
GRI 2: General Disclosure 2021	2.24 Integration of policy commitments	SGI's Sustainability Policies	
	2.25 Processes to remedy negative impacts	Sustainable development and business strategy	
	2.26 Mechanisms for requesting clarification and raising criticism	The whistleblowing protocol	
	2.27 Compliance with Laws and Regulations	The Organizational Management Model 231/01 of SGI	
	2.28 Membership of associations	SGI's key innovation partnerships	
Stakeholders Engagement			
GRI 2: General Disclosure 2021	2.29 Approach to stakeholder engagement	SGI's Materiality Analysis Relations with local communities	
	2.30 Collective bargaining agreements	SGI and its people	
Material Topics Management (2021)			
GRI 3 Material Themes	3.1 Process for the determination of material issues	SGI's Materiality Analysis	
	3.2 List of material topics	SGI's Materiality Analysis	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
Asset Integrity and Critical Event Management				
GRI 3 Material Themes	3.3 Management of material topics	11.8.1	Asset Integrity	
GRI 306: Water and waste discharges 2016	306.3 Significant spills	11.8.2		Not applicable
Economic impacts				
GRI 3 Material Themes	3.3 Management of material topics	11.14.1	Sustainable development and business strategy The economic value generated and distributed by SGI	
GRI 201: Economic benefits 2016	201.1 Economic value directly generated and distributed	11.14.2	The economic value generated and distributed by SGI	
GRI 202: Market Presence (2016)	202.2 Percentage of senior management hired by the local community	11.14.3	Community initiatives	
GRI 203: Indirect Economic Impacts (2016)	203.1 Investments in infrastructure and supported services	11.14.4	Asset integrity	
	203.2 Significant indirect economic impacts	11.14.5	Relations with local communities	
GRI 204: Procurement Practices (2016)	204.1 Percentage of Spend with Local Suppliers	11.14.6	SGI's supply chain	
Air emissions				
GRI 3 Material Themes	3.3 Management of material topics	11.3.1	Environmental protection	
GRI 305: Emissions 2016	305.7 Nitrogen oxides (NOx), sulphur oxides (SOx) and other emissions to air	11.3.2	Emissions into the atmosphere	
GRI 416: Customer Health and Safety 2016	416.1 Assessment of Health and Safety Impacts by Product and Service Categories	11.3.3	SGI's commitment to critical event management	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
Biodiversity protection				
GRI 3 Material Themes	3.3 Management of material topics	11.4.1	Biodiversity protection	
GRI 304: Biodiversity 2016	304.1 Operating sites owned, leased or managed in protected areas and in areas of high biodiversity value outside or close to protected areas	11.4.2	Biodiversity protection	
	304.2 Significant impacts of activities, products, and services on biodiversity	11.4.3	Biodiversity protection	
	304.3 Protected and restored habitats	11.4.4	Biodiversity protection	
	304.4 IUCN National Conservation List and IUCN Red List species with habitats in areas affected by operations	11.4.5	Biodiversity protection	
Ethics and business integrity				
GRI 3 Material Themes	3.3 Management of material topics	11.20.1	Ethics and Business Integrity	
GRI 205: Anti-corruption 2016	205.1 Transactions assessed to determine corruption risks	11.20.2	Ethics and Business Integrity	
	205.2 Communication and training on anti-corruption legislation and procedures	11.20.3	Ethics and Business Integrity	
	205.3 Confirmed incidents of corruption and measures taken	11.20.4	Ethics and Business Integrity	
Employee health, safety and well-being				
GRI 3 Material Themes	3.3 Management of material topics	11.9.1	Employees' health and safety and Well-being	
GRI 403: Occupational Health and Safety 2018	403.1 Occupational Health and Safety Management System	11.9.2	The employees' health and safety management system	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
GRI 403: Occupational Health and Safety (2018)	403.2 Hazard Identification, Risk Assessment, and Accident Investigation	11.9.3	The employees’ health and safety management system	
	403.3 Occupational Health Services	11.9.4	The employees’ health and safety management system	
	403.4 Worker participation and consultation on occupational health and safety programmes and their communication	11.9.5	The employees’ health and safety management system	
	403.5 Training of workers on health and safety at work	11.9.6	The employees’ health and safety management system	
	403.6 Promotion of workers' health	11.9.7	The employees’ health and safety management system	
	403.7 Prevention and mitigation of occupational health and safety impacts directly linked to business relationships	11.9.8	The employees’ health and safety management system	
	403.8 Workers covered by an occupational health and safety management system	11.9.9	The employees’ health and safety management system	
	403.9 Accidents at work	11.9.10	Accidents at work	
	403.10 Occupational diseases	11.9.11	Accidents at work	
Anti-competitive behavior				
GRI 3 Material Themes	3.3 Management of material topics	11.19.1	Ethics and Business Integrity	
GRI 206: Anti-competitive behavior 2016	206.1 Lawsuits Relating to Anti-Competitive Behavior, Trust Activities, and Monopolistic Practices	11.19.2	Ethics and Business Integrity	
Climate adaptation, resilience and transition				
GRI 3 Material Themes	3.3 Management of material topics	11.2.1	Environmental protection	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
GRI 201: Economic benefits 2016	201.2 Financial implications and other risks and opportunities resulting from climate change	11.2.2	Climate adaptation and resilience	
GRI 305: Emissions 2016	305.5 GHG Emission Reduction	11.2.3		Not available
GHG emissions				
GRI 3 Material Themes	3.3 Management of material topics	11.1.1	Environmental protection	
GRI 302: Energy 2016	302.1 Energy Consumption Within the Organization	11.1.2	Energy management	
	302.2 Energy Consumption Outside the Organization	11.1.3		Not available
	302.3 Energy Intensity	11.1.4	Energy management	
GRI 305: Emissions 2016	305.1 Direct Greenhouse Gas (GHG) Emissions (Scope 1)	11.1.5	Emissions into the atmosphere	
	305.2 Indirect greenhouse gas (GHG) emissions from energy consumption (Scope 2)	11.1.6	Emissions into the atmosphere	
	305.3 Other indirect greenhouse gas (GHG) emissions (Scope 3)	11.1.7	Emissions into the atmosphere	
	305.4 Greenhouse Gas (GHG) Emission Intensity	11.1.8	Emissions into the atmosphere	
Employment practices				
GRI 3 Material Themes	3.3 Management of material topics	11.10.1	Employee's engagement Employee development and enhancement	
GRI 401: Employment (2018)	401.1 New Employee Hiring and Employee Turnover	11.10.2	Employees engagement	
	401.2 Benefits Provided to Full-Time Employees Not Provided to Temporary or Part-Time	11.10.3	Corporate welfare	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
GRI 401: Employment (2018)	401.3 Parental leave	11.10.4	SGI's initiatives to promote diversity and inclusion	
GRI 402: Labour and Trade Union Relations Management (2016)	402.1 Minimum Notice Period for Operational Changes	11.10.5	Employees’ engagement	
GRI 404: Training and Education (2016)	404.1 Average hours of training per employee	11.10.6	Upskilling and reskilling of SGI staff	
	404.2 Employee Upskilling Programs and Transaction Assistance	11.10.7	Upskilling and reskilling of SGI staff	
GRI 414: Social Evaluation of Suppliers (2016)	414.1 New suppliers selected on the basis of social criteria	11.10.8	SGI's supply chain	
	414.2 Negative Social Impacts in the Supply Chain and Measures Taken	11.10.9	SGI's supply chain	
Non-discrimination and equal opportunities				
GRI 3 Material Themes	3.3 Management of material topics	11.11.1	Non-discrimination and equal opportunities	
GRI 202: Market Presence (2016)	202.2 Percentage of senior management hired by the local community	11.11.2	Community initiatives	
GRI 401: Employment (2018)	401.3 Parental leave	11.11.3	SGI's initiatives to promote diversity and inclusion	
GRI 404: Training and Education (2016)	404.1 Average hours of training per employee	11.11.4	Upskilling and reskilling of SGI staff	
GRI 405: Diversity and Equal Opportunities (2016)	405.1 Diversity of Governing Bodies and Employees	11.11.5	SGI staff	
	405.2 Ratio of basic salary to salary	11.11.6	Employees’ evaluation and compensation	
GRI 406: Non-discrimination (2016)	406.1 Cases of discrimination and corrective measures taken	11.11.7	Non-discrimination and equal opportunities	

Reference GRI Standard / Material Aspects	Disclosure	Reference GRI 11 Oil & Gas	Location	Omissions
Local communities				
GRI 3 Material Themes	3.3 Management of material topics	11.15.1	SGI's value chain	
GRI 413: Local Communities (2016)	413.1 Operations with local community involvement, impact assessments and development programmes	11.15.2	Relations with local communities	
	413.2 Transactions with actual and potential significant adverse impacts on local communities	11.15.3	Relations with local communities	
Freedom of association and bargaining				
GRI 3 Material Themes	3.3 Management of material topics	11.13.1	SGI's value chain	
GRI 407: Freedom of Association and Bargaining (2016)	407.1 Activities and suppliers where the right to freedom of association and collective bargaining could be at risk	11.13.2	SGI's supply chain	
Forced or compulsory labour				
GRI 3 Material Themes	3.3 Management of material topics	11.12.1	SGI's value chain	
GRI 409: Forced or Compulsory Labour (2016)	409.1 Activities and Suppliers Presenting a Significant Risk of Child Labor Incidents	11.12.2	SGI's supply chain	
GRI 414: Social Evaluation of Suppliers (2016)	414.1 New suppliers selected on the basis of social criteria	11.12.3	SGI's supply chain	
Land and resource rights				
GRI 3 Material Themes	3.3 Management of material topics	11.16.1	Relations with local communities	
Rights of indigenous peoples				
GRI 3 Material Themes	3.3 Management of material topics	11.17.1	Relations with local communities	
GRI 411: Rights of Indigenous Peoples (2016)	411.1 Incidents of violations of indigenous peoples' rights	11.17.2	Relations with local communities	

Topics in the GRI 11 Non-Material Oil & Gas Industry Standard for SGI	
11.5 Waste	The topics are not material for the 2025 Sustainability Report as they are not directly related to SGI's core business
11.6 Water and Water Drains	
11.18 Conflicts and security	
11.21 Payments to governments	
11.22 Public Policy	





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