SUSTAINABILITY PROCEDURE

Status	Prepared by	On	Reviewed and approved by	On
1ª ISSUANCE	Andrea Emanuele (ESG & Quality Coordinator)	15 May 2025	Board of Directors	22 May 2025

SUMMARY

I. INTRODUCTION AND POLICY OBJECTIVES

BelEnergia S.p.A. (hereinafter referred to as the "Company" and, together with all its subsidiaries, "BELENERGIA" or the "Group") is committed to being a responsible company that engages with its stakeholders on relevant sustainability issues, including environmental, social and governance (ESG) issues. The Company provides high-quality services to its customers, treats its colleagues and business partners with respect, complies with its legal obligations regarding human rights, serves the communities in which it operates and is committed to understanding its impact on the environment. As a responsible company, we take our responsibilities under the main laws and regulations in force in the territories in which we operate seriously, including the duties of the Board of Directors of BelEnergia S.p.A. For this reason, the integration of sustainability principles into the culture and conduct of our business is of fundamental importance.

The Board of Directors of BelEnergia S.p.A., the delegated bodies, the control bodies and the managers of the Group companies are aware of their responsibilities towards *stakeholders*, i.e. those with an interest in the company. On this basis, Belenergia adopts this Sustainability Policy, in the belief that the objectives of growth, development and protection of stakeholders must and can be combined with the pursuit of *the* highest ethical *standards*, respect for the values underlying social life and good *governance* implemented according to clear and shared rules.

2. SCOPE

BelEnergia S.p.A. recognises that sustainability issues are interlinked in all business activities and affect (and will affect) the way the company is governed, setting strategy, making investments and taking operational decisions, engaging with all stakeholders and applying appropriate management of business risks related to ESG factors.

This ESG policy sets out how we consider and manage these issues in these three fundamental pillars of our approach to sustainability, in support of the Group's goal of building a better and sustainable energy future.

This sustainability procedure applies to all activities, processes and projects developed by the company in the design, construction and management of clean energy plants, operating both in Italy and in various European countries. It covers the entire life cycle of the plants, from the feasibility study and design phase, through construction and installation, to maintenance and decommissioning, ensuring an integrated and consistent approach to environmental, social and economic sustainability.

The territorial scope includes all operational offices, construction sites and production sites where the company operates directly or through partners and suppliers, with particular attention to compliance with local, national and European regulations and s in force in the areas of the environment, occupational safety and social responsibility.

The procedure also extends to relations with stakeholders, including customers, local communities, public authorities, suppliers and collaborators, recognising their fundamental role in promoting sustainable practices and responsibly managing the impacts generated by our activities.

The scope also includes procurement and supply chain management processes, with the aim of encouraging the adoption of sustainability criteria throughout the production cycle, promoting the use of materials with low environmental impact, reducing greenhouse gas emissions and protecting natural resources. The procedure also applies to technological innovation initiatives and the implementation of efficient and renewable energy solutions, in line with European decarbonisation and energy transition objectives, as well as climate change mitigation objectives and related controls required by the European Taxonomy Regulation.

In particular, the procedure defines the principles and operating methods for the responsible management of natural resources, the minimisation of environmental impacts (such as emissions, water consumption and waste production), the promotion of health and safety at work, and respect for human rights and social regulations. It aims to integrate sustainability as a strategic and operational element in all company activities, ensuring transparency, regulatory compliance and continuous improvement of ESG (Environmental, Social, Governance) performance.

Finally, the procedure is a dynamic tool, subject to periodic reviews and updates to respond to regulatory developments, stakeholder expectations and industry innovations, ensuring that our company maintains a leadership role in the construction of clean and sustainable energy plants in Italy and Europe.

The Sustainability Policy has been drawn up in line with the 231 Organisation, Management and Control Model and with Belenergia's various existing policies, as well as with best practices on issues such as sustainability in finance and investment, sustainable procurement, diversity and inclusion, dialogue and stakeholder engagement.

3. REGULATORY REFERENCES AND DEFINITIONS

The regulatory references and sustainability standards that guide our business and form the basis of this policy include the main European Regulations and Directives, national regulations on renewable energy, as well as various certifications relating to ESG issues that also apply to our core businesses, including:

- Directive (EU) 2018/2001 (RED II) and Legislative Decree 28/2011, which set targets and procedures for the promotion and authorisation of clean energy plants;
- Regulation (EU) 2018/842 on greenhouse gas emissions and the rules of the Integrated National Energy and Climate Plan (PNIEC);
- the European Taxonomy Regulation (EU 2020/852) is a classification system that defines objective technical criteria for determining whether an economic activity can be considered environmentally sustainable;

- ISO 14001 certification for environmental management (in conjunction with Consolidated Environmental Act 152/06) and ISO 45001 certification for occupational health and safety (in conjunction with the provisions of Legislative Decree 81/2008);
- ISCC certification for sustainable fuel certification and electricity production, in accordance with the sustainability requirements and greenhouse gas (GHG) emission reduction criteria defined by the European Renewable Energy Directive;
- the voluntary GRI (Global Reporting Initiative) standards for sustainability reporting, and the European CSRD (Corporate Sustainability Reporting Directive)

4. CORPORATE COMMITMENTS TO SUSTAINABILITY

Belenergia is committed to creating constant value as the company's main goal, emphasising the importance of durability over time and sustainability through the responsible use of resources. In a short time, the Company has managed to become one of the main players in the renewable energy sector on the European market.

Today, we are an integrated group, committed at all levels to the development of alternative resources. The development of our industrial initiatives and the experience gained in recent years have strengthened our conviction that there is only one way to ensure the success of our projects: to make them an opportunity for growth for the entire community and the territory that hosts them.

All our investments are evaluated not only in terms of economic return for the company, but also in terms of the benefits they can generate for all our stakeholders. We believe that the true indicator of success for a company like ours is to constantly subject ourselves to the combination of 'responsibility and ethics', bearing in mind the value of the sustainability of our actions. In this vision, the role of the company is no longer limited to the simple allocation of capital to achieve economic objectives, but extends to the ability to respond to the needs and expectations of all stakeholders, whose values and judgements reflect the degree of civilisation and development of the society in which the company operates.

Meeting these criteria requires the talent and daily commitment of every person in our Group. We have a coherent and ambitious strategy based on three lines of action: innovation and excellence as the basis for sustainable growth and transparent reporting of all our activities.

As a responsible operator, Belenergia considers sustainable success and ESG (Environmental, Social and Governance) criteria to be fundamental levers for creating value in the medium to long term and central elements in defining strategic and operational choices. The Company is committed to continuously integrating sustainability principles into its organisational structure, business model and daily activities, with the aim of driving a sustainable energy transition for customers, suppliers and communities.

Belenergia's commitment is inspired by the Sustainable Development Goals (SDGs) promoted by the United Nations, to which the Group contributes by identifying the positive and negative impacts that our activities have on the various goals, as well as the various mitigation and continuous improvement actions on those impacts.

Furthermore, Belenergia's Sustainability Policy is based on the ten principles of the United Nations Global Compact relating to human rights, labour standards, environmental protection and the fight against corruption.

5. INTEGRATION OF ESG CRITERIA INTO THE CORPORATE STRATEGY

Environmental Criteria

i. Assessment and protection of biodiversity and local ecosystems

The guiding criterion underlying the choice of areas in which we intend to develop our plants must be the ex ante assessment of the impact that energy facilities may have on biodiversity and local ecosystems. We employ the best technicians and experts to carry out the most thorough and accurate impact analyses possible, so that our mission and vision can guarantee the construction of clean energy plants with no or near-zero negative environmental impacts.

For Belenergia, it is also imperative that the protection of these two aspects is maintained throughout all stages of the plant life cycle: from the various construction phases to commissioning, decommissioning and recovery of plant materials.

ii. Natural resource management

The company is committed to managing natural resources responsibly in all its *core business* activities, promoting the efficient use of water, energy and raw materials in all phases of plant design, construction and management.

The aim is to reduce environmental impact, prevent pollution and safeguard biodiversity by adopting the best available technologies and sustainable operating practices. Through continuous monitoring of consumption and emissions, the company is committed to complying with and, where possible, exceeding regulatory requirements, promoting the circular economy and waste recovery.

Staff training and supplier involvement are an integral part of this commitment, ensuring transparent, responsible and continuously improving resource management.

iii. Emissions reduction

The commitment to reducing emissions in the sustainability policy translates into a desire to actively contribute to the fight against climate change, integrating decarbonisation and the mitigation of negative impacts as a strategic objective in all phases of the design, construction and management of all our plants.

The company is committed to reducing greenhouse gas emissions through the adoption of advanced technologies, energy efficiency and the increasing use of renewable sources, setting measurable and verifiable reduction targets over time.

Continuous monitoring of emissions, investment in innovation and collaboration with suppliers who share the same sustainability principles, and medium- to long-term emission reduction action plans are planned in order to minimise environmental impact and promote a responsible and resilient business model.

iv. Waste management, recycling and reduction

The commitment to waste management, recycling and reduction is an essential pillar of the company's sustainability policy. The aim is to integrate circular economy principles throughout the entire life cycle of the plants, promoting the reduction of waste production through the choice of sustainable materials, efficient design and the optimisation of operational processes.

The company is committed to maximising the recycling and reuse of materials, promoting the recovery of materials and energy from waste produced during both the construction and management of plants.
Innovative technologies and solutions for waste management will be adopted, in line with European and national regulations, favouring energy recovery as a complementary and residual option to recycling, in accordance with the European waste hierarchy.

Staff training and collaboration with responsible suppliers will be promoted to ensure proper waste management and material traceability.
The company is committed to constantly monitoring waste production and disposal levels, setting quantitative reduction and continuous improvement targets.

The ultimate goal is to contribute to closing the production cycle, reducing environmental impact and promoting a virtuous model of sustainable development.

v Energy efficiency and technological innovation

The commitment to energy efficiency and technological innovation is one of the fundamental pillars of the company's sustainability policy. The objective is to integrate advanced and technologically innovative solutions into all phases of plant design, construction and management in order to maximise the use of resources and reduce energy consumption.

The company is therefore committed to promoting the construction and/or management of high-efficiency plants equipped with advanced monitoring and automation systems that optimise production processes and minimise waste. Preference will be given to technologies that promote energy recovery, cogeneration, the integration of renewable sources and the digitalisation of control systems, in line with best industry practices and decarbonisation objectives.

The company will invest in research and development for the adoption of innovative solutions, contributing to the energy transition and the reduction of environmental impact.

Energy audits and periodic diagnostics will be promoted to identify further areas for improvement and ensure continuous monitoring of energy performance.
Staff training and collaboration with qualified technology suppliers will be an integral part of the

strategy to ensure the adoption of the best available technologies. The ultimate goal is to actively contribute to the creation of a more efficient, resilient and sustainable energy system, in line with national and European targets for emissions reduction and the transition to a low-carbon economy.

Social Criteria

i. Worker health and safety

Belenergia considers the health and safety of all its employees, whether they are workers, office staff and/or external collaborators, to be of fundamental importance. The objective is to protect the physical and psychological integrity of everyone, promoting well-being and shared responsibility.

In order to achieve the highest quality standards in compliance with regulatory requirements, the Group guarantees the utmost attention to the main risks involved in all its various activities through the following measures:

- constant and periodically reviewed mapping of the various risks associated with all the Company's activities, from hazards and accidents that may occur on the construction sites of new plants, to risks that may occur in the various processes of the plants in operation, to those that may occur in the administrative offices of the Group companies;
- periodic training for all employees, whether mandatory as required by law or specialised, in order to have a competent workforce capable of identifying, preventing and averting the occurrence of risks;
- the provision of all PPE necessary to ensure the highest safety standards for our employees on construction sites, at plants and in offices;
- the identification of all responsible figures, at plants and in companies, who are suitable for guaranteeing and ensuring the efficient and comprehensive management of workers' health and safety.

ii. Involvement of local communities

Belenergia is committed to actively involving local communities in all phases of its projects, promoting transparency, dialogue and collaboration from the outset. We encourage the participation of citizens and local stakeholders in decision-making processes, listening to their needs and suggestions in order to integrate local expectations into our project choices, with the dual aim of enhancing the positive impact that our plants can have in the areas where they are located and, at the same time, minimising any possible negative impact on biodiversity and on those who live near the plants.

We support the economic and social development of communities through the creation of employment opportunities, training programmes and environmental education initiatives.
We collaborate with public bodies and local associations to enhance the resources of the local area, ensuring that the benefits deriving from the plants have a positive impact on the community.

We are committed to monitoring and communicating the impacts of our projects in a transparent manner, adopting an approach of continuous improvement and promoting a culture of clean energy and shared sustainability.

iii. Diversity and inclusion

Belenergia recognises diversity and inclusion as fundamental values for growth, innovation and success in the clean energy sector. We are committed to creating a fair, respectful and open working environment, where each person is valued for their uniqueness and has equal opportunities in terms of growth, salary and professional development, regardless of gender, age, culture, orientation, ability or origin.

We promote the creation of diverse and multicultural teams, encouraging the exchange of ideas, collaboration and mutual respect as levers for continuous improvement and business competitiveness. We invest in professional and personal growth paths that value individual and collective talents, promoting inclusive environments where everyone can express their potential.

We actively support initiatives aimed at ensuring equal access to opportunities, such as the periodic review of selection processes, the promotion of positions of responsibility for under-represented categories and the creation of spaces for listening and discussion. We combat all forms of discrimination and guarantee respect for the dignity of all, actively involving staff and stakeholders in building an inclusive and responsible corporate culture.

The aim is to enrich teamwork, support participation and contribute positively to the energy transition and sustainable development, aware that only by valuing diversity can we generate real value for the company and the community.

iv. Local economic development and shared value creation

The company is committed to promoting local economic development and shared value creation through the design, construction and management of clean energy plants, fostering the sustainable growth of the communities that host our projects. We aim to generate skilled employment opportunities, supporting the integration of local professionals and encouraging technical training to develop skills in the renewable energy sector.

Through collaborations with public bodies, businesses and local stakeholders, we promote initiatives that enhance local resources, stimulate investment and encourage the creation of green production chains, helping to strengthen the local economy.

We support the spread of renewable energy communities (RECs), innovative tools that enable citizens and businesses to become protagonists of the energy transition, generating economic savings, energy independence and social inclusion.

Our activities aim to reduce dependence on imported fossil fuels, increasing local and national energy security, and to create a lasting positive impact, in line with the Sustainable Development Goals (SDGs).

We constantly monitor the economic and social effects of our interventions, striving to continuously improve the positive impact on communities and promoting a responsible, inclusive and resilient development model.

Governance and Transparency

i. Integration of ESG objectives into corporate strategy and decision-making processes

BelEnergia structurally integrates ESG principles into its strategy and decision-making processes, recognising them as a key lever for creating sustainable value. As a clean energy operator, we pursue environmental excellence through low-impact technological solutions and the promotion of energy transition.

The integration of ESG objectives guides all our design, operational and strategic choices, strengthening our role in building a resilient, fair and sustainable energy future. This integration is necessary to achieve ambitious goals such as:

- reducing environmental impact,
- promoting energy efficiency
- ensuring the sustainability of our activities
- adopting practices and technologies that favour the use of renewable sources and the minimisation of emissions
- promoting a culture oriented towards sustainability
- integrate ESG criteria into operational decisions and the selection process for suppliers and human resources
- contribute to the energy transition and the development of a more sustainable future for the communities and the environment in which we operate
- comply with international standards and protocols
- prevent greenwashing practices and ensure consistency and credibility in our ESG policies

In order to achieve these challenging objectives, we define performance indicators (KPIs) to monitor progress and evaluate the effectiveness of our initiatives, ensuring transparency and active stakeholder involvement.

ii. ESG risk and opportunity management

The BelEnergia Group is committed to proactively identifying, assessing and managing risks and opportunities related to ESG (Environmental, Social and Governance) factors in the design, construction and operation of clean energy plants. We take a systematic approach that involves:

- Regular analysis of our operations, supply chain and industry dynamics to identify potential ESG risks and opportunities;
- Actively engaging stakeholders to gather input and anticipate market and societal expectations;
- Qualitative and quantitative risk assessment, with priority given to the most relevant and impactful aspects;
- Developing and implementing mitigation strategies and action plans to reduce the likelihood and impact of identified risks, as well as leveraging opportunities for innovation and sustainable growth;
- Continuous monitoring of regulatory and market trends, updating our policies and procedures in line with the best international standards;
- Transparent communication of results and actions taken to ensure trust and accountability towards all stakeholders;

This commitment is an integral part of our business strategy and helps to strengthen the resilience, competitiveness and sustainability of our activities in the long term.

iii. Transparency and ESG reporting

The Company is committed to ensuring maximum transparency in the communication of its environmental, social and governance performance by adopting the GRI international ESG reporting standards and, in line with European legislation (CSRD), the ESRS standards.

We have begun periodically collecting ESG data from all group companies with the aim of publishing clear, detailed and accessible ESG reports on a regular basis, including precise and defined KPIs, improvement targets and results achieved. The data will be subject to internal validation processes and, where necessary, independent verification to ensure its reliability.

We will actively involve stakeholders in defining reporting priorities and make information available through digital channels and official documents, such as the sustainability report and the integrated report. Transparency will be pursued not only as a regulatory obligation, but as a guiding value to strengthen trust, prevent greenwashing and promote a corporate culture focused on responsibility and continuous improvement.

This commitment is a pillar of our sustainability strategy and an essential tool for measuring, communicating and enhancing our contribution to the energy transition and sustainable development of the sector.

Ethical and Sustainable Procurement

i. Supplier selection and monitoring

BelEnergia is committed to integrating ESG (environmental, social and governance) criteria into all stages of supplier selection and monitoring, recognising the crucial role of the supply chain in achieving corporate sustainability objectives. We adopt rigorous procedures to evaluate potential suppliers, requesting detailed information on their practices in the areas of environmental protection, human rights, working conditions, ethics, safety and governance.

Selection is based on compliance with our Code of Ethics and Code of Conduct for suppliers, as well as through specific questionnaires, periodic data collection and, where necessary, audits, with the aim of identifying partners who share our values and comply with international standards and specific codes of conduct. Suppliers are periodically assessed using ESG risk indicators and self-assessment systems, with continuous monitoring of their performance and improvement plans in the event of non-compliance.

We promote transparency in the supply chain and require our partners to adopt due diligence procedures, preventing risks related to unsustainable practices or ethical violations. This approach allows us to reduce operational and reputational risks, contribute to the reduction of Scope 3 emissions and strengthen the resilience and sustainability of our business in the long term.

ii. Responsible contracts and partnerships

The Group recognises the importance of entering into contracts and partnerships that reflect the principles of environmental, social and governance (ESG) responsibility in all phases of the design, construction and operation of clean energy plants. We are committed to selecting partners and counterparties who share our sustainability values, adopting rigorous due diligence criteria and ensuring compliance with recognised international standards, such as the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

All our contracts include specific clauses on respect for human rights, environmental protection, health and safety at work, as well as transparency and integrity in business practices. We promote active collaboration with partners to identify, prevent and mitigate any negative impacts along the value chain, encouraging knowledge sharing, technological innovation and the involvement of local communities.

We constantly monitor compliance with our commitments through audits, performance indicators and independent verification mechanisms, taking prompt action in the event of non-compliance. This approach allows us to contribute to the development of sustainable supply chains, strengthen the resilience of our business and generate shared value for the environment, society and all stakeholders involved.

Innovation and Continuous Improvement

i. Investments in R&D for sustainable solutions

BelEnergia recognises the strategic role that technological innovation plays in the energy transition and in reducing environmental impact, and is committed to allocating significant resources to research and development (R&D) for innovative and sustainable solutions in the clean energy sector. We promote the development of new technologies, materials and processes that improve the efficiency, safety and sustainability of plants, with a particular focus on renewable energies, energy storage and the digitalisation of networks.

Investments in R&D are geared towards supporting the achievement of the United Nations Sustainable Development Goals (SDGs) and responding to the challenges posed by climate change, contributing to the decarbonisation and electrification of consumption. We monitor the impact of the innovations adopted through performance indicators and periodic reports, ensuring transparency and accountability to stakeholders. This commitment is a fundamental pillar of our strategy for sustainable growth and the creation of shared value for society and the environment.

ii. Adoption of digital and IT technologies

Our company is committed to adopting and integrating advanced digital technologies and IT solutions in all phases of the design, construction and management of clean energy plants, recognising the strategic role of digitalisation in the transition to a more sustainable energy model. The use of digital tools, such as artificial intelligence, the Internet of Things, smart monitoring systems and advanced data analysis, improves operational efficiency, optimises resource management, reduces energy consumption and emissions, and increases infrastructure resilience.

We promote the digitalisation of processes to facilitate the integration of renewable energies, real-time plant control and predictive maintenance, thus contributing to a safer, more transparent and sustainable management of our activities. We invest in digital platforms that centralise data and support informed decisions, promoting transparency and traceability throughout the value chain.

We are aware of the challenges related to cybersecurity, data protection and the environmental impact of digital infrastructure, and we take measures to ensure regulatory compliance and risk minimisation. Our commitment to adopting digital technologies is a pillar of our innovation and sustainability strategy, aimed at generating shared value for the company, stakeholders and the environment.

Stakeholder Engagement

1. *Dialogue and consultation with internal and external stakeholders*

BelEnergia considers dialogue and consultation with internal and external stakeholders to be a central element of its sustainability strategy and responsible management of activities in the clean energy sector. We are committed to identifying, mapping and actively engaging all stakeholders – employees, suppliers, customers, local communities, institutions, associations and other relevant parties – by promoting open and transparent discussion on environmental, social and economic issues related to our projects.

Through structured tools such as regular meetings, surveys and materiality analyses, we gather stakeholders' requests, expectations and suggestions, integrating them into decision-making processes and the definition of corporate strategies. This approach allows us to improve the quality of dialogue with our stakeholders, but also to anticipate risks, seize opportunities and develop shared solutions that generate value for all those involved and for the local area.

We are inspired by the main international standards on stakeholder engagement, ensuring respect for human rights, transparency and accountability in relationships, and promoting an inclusive and participatory corporate culture. Continuous dialogue with stakeholders is a key factor for us in building trust, social acceptance of projects and the long-term sustainable success of the company.

2. *Awareness-raising and training initiatives*

The Group recognises that spreading a culture of sustainability requires awareness-raising initiatives and targeted training programmes aimed at both its employees and external stakeholders. We are committed to developing ongoing training courses that explore environmental, social and governance issues, with a particular focus on renewable energy, energy efficiency and ecological transition.

We promote courses, workshops, seminars and field visits to foster the growth of technical skills and awareness of the importance of sustainability, involving young students, industry professionals and local communities. Through collaborations with training institutions and specialised associations, we support the creation of a 'green generation' capable of driving change towards a low-emission future.

We monitor the effectiveness of training initiatives through participation indicators and feedback, constantly updating content to respond to regulatory and technological developments. This commitment is a strategic lever for strengthening internal human capital, spreading shared values and actively contributing to the construction of a sustainable and inclusive development model.

MONITORING, EVALUATION AND REPORTING

i. *ESG performance indicators*

BelEnergia is committed to implementing a rigorous ESG performance monitoring and evaluation system to ensure transparency, accountability and continuous improvement in the design, construction and operation of clean energy plants. We use clear, measurable ESG performance indicators that are consistent with international standards, in particular the GRI Standards, to assess the environmental, social and governance impact of our operations.

The adoption of these indicators allows us to monitor key aspects such as greenhouse gas emissions, energy consumption, water management, occupational safety, diversity and inclusion, and corporate governance, in line with industry best practices and stakeholder expectations. In addition, we ensure that our activities are aligned with the criteria of the European Taxonomy, assessing the compliance of our investments and projects with environmental sustainability requirements and the "Do No Significant Harm" (DNSH) principles.

We are also committed to following regulatory developments, in particular the implementation of the Corporate Sustainability Reporting Directive (CSRD), to ensure full alignment with the new ESG reporting and transparency requirements set out by the European Union. ESG reporting will be integrated into our sustainability reports, which are published regularly and subject to quality checks, in order to provide reliable and useful information to investors, customers and communities, thus contributing to the responsible and sustainable management of our business in the long term.

ii. Internal audits and periodic policy review

The Company is committed to ensuring a structured and continuous system of monitoring and evaluating ESG performance through regular internal audits and periodic review of its sustainability policy. Internal audits, conducted by qualified and independent personnel, aim to verify compliance with procedures, the effectiveness of actions taken and compliance with current regulations, as well as to identify any areas for improvement in corporate processes related to sustainability.

The annual audit programme is defined in agreement with management, taking into account the results of previous audits, stakeholder reports, regulatory changes and the complexity of activities. Audits cover all critical areas, from environmental management to health and safety, to social and governance aspects, ensuring thorough and transparent control.

The review of the sustainability policy, carried out at least once a year by senior management, is based on audit results, ESG performance indicators and stakeholder feedback. This process allows the suitability, adequacy and effectiveness of the policy to be assessed, defining any updates, new objectives and corrective actions to continuously improve the sustainability management system.

Through this commitment, the company ensures continuous improvement, strengthens its culture of sustainability and guarantees transparency and accountability to all stakeholders, helping to consolidate its leadership in the clean energy sector.

NON-COMPLIANCE MANAGEMENT AND CORRECTIVE ACTIONS

BelEnergia is committed to rigorously and promptly managing all non-conformities identified in the design, construction and management of clean energy plants in order to ensure compliance with quality, safety, environmental and sustainability standards. Each non-conformity is promptly identified, documented and analysed to understand its root causes through a structured and transparent process.

Based on this analysis, effective and timely corrective actions are defined and implemented, aimed at eliminating the root causes and preventing their recurrence, involving all relevant company departments. Monitoring the effectiveness of corrective actions is an integral part of the management system, with periodic checks and internal audits ensuring continuous improvement.

Non-compliance management also extends to the supply chain, where suppliers are subject to constant checks and assessments; any non-compliance may result in the implementation of improvement plans or, in the most serious cases, the revision of contractual relationships, in line with internationally recognised best practices and sustainability principles.

This rigorous approach helps to maintain high standards of regulatory compliance, reduce operational and reputational risks, and consolidate stakeholder confidence in our commitment to responsible and sustainable management of clean energy plants.

BELENERGIA SPA POLICY UPDATE

BelEnergia's commitment to updating its sustainability policy is based on a continuous and structured review process, aimed at ensuring full consistency with regulatory, technological and market developments. The policy is reviewed periodically by management, with the involvement of internal and external stakeholders, to integrate ESG best practices and respond effectively to the new challenges of energy transition and environmental sustainability.

BelEnergia is committed to keeping its strategy up to date in line with the latest international standards, such as the European Taxonomy and the CSRD, ensuring transparency, accountability and continuous improvement. This approach allows it to consolidate its leadership in the renewable energy sector, promoting a sustainable development model that generates value for the community, the local area and all stakeholders involved.

The policy update is supported by an internal monitoring and audit system, which facilitates the timely identification of opportunities for improvement and the adoption of effective corrective actions, with a view to excellence and continuous innovation.