

ALTENIA POL

ALTENIA Integrated Management System Policy

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1.0 GENERAL

The Integrated Management System Policy of Altenia S.r.l. (hereinafter the Integrated Policy) is an expression of the desire of the Board of Directors of Altenia S.r.l. (hereinafter the "Board of Directors") to adopt a guidance tool for the definition of strategic objectives, in line with the principles of the Code of Ethics and the Sustainable Development Goals ("SDGs") promoted by the United Nations as well as the requirements of the ISO Standards and the context of the organization. The Integrated Management System Policy is made available to all Stakeholders through company procedures.

2.0 PURPOSE

This document defines the approach adopted by Altenia S.r.l. in the management of its activities in compliance with legislative and regulatory requirements (ISO). The main purpose of this Integrated Management System Policy is to promote awareness, knowledge and application of the fundamental elements of the Integrated Management System by disseminating a culture of continuous improvement to all interested parties (internal and external stakeholders).

3.0 SCOPE OF APPLICATION

The Policy, appropriate to the nature, purpose and human and financial resources of the company, is applied to all employees of Altenia S.r.l. and to personnel who work in outsourcing for Altenia S.r.l., through specific contractual clauses and qualification and selection processes.

4.0 ETHICAL AND REGULATORY REFERENCES

- Code of Ethics
- Sustainable Development Goals
- UNI EN ISO 9001 "Quality management systems – Requirements"
- UNI EN ISO 14001 "Environmental management systems – Requirements and guidance for use"
- UNI EN ISO 45001 "Management systems for health and safety at work - Requirements and guidance for use"
- ISO 50001 "Energy Management Systems – Requirements and Guidelines for Use"
- ISO 37001 "Management System for the Prevention of Corruption - Requirements and Guidance for Use"

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5.0 INTEGRATED POLICY

In the current energy context marked by increasingly challenging decarbonisation objectives, the role of Altenia S.r.l. – part of Terna, the largest independent operator of electricity transmission networks in Europe – has taken on a strategic centrality. Altenia's strategy is based on a sustainable business model, aimed at creating value over time, which also considers the environmental and social impacts of its work, assessing the possible risks associated with them and identifying appropriate mitigation measures. For the development of its activities, Altenia S.r.l. is committed to punctual compliance with legal and regulatory requirements with particular attention to compliance with:

- quality of its processes (UNI EN ISO 9001);
- environmental management and protection (UNI EN ISO 14001);
- health and safety of workers (UNI EN ISO 45001);
- energy efficiency (UNI CEI EN ISO/IEC 50001);
- prevention of corruption (UNI ISO 37001);

The Integrated Management System adopted by Altenia S.r.l. guarantees compliance with these commitments, synergistically integrating the significant aspects of all systems to maximize the effectiveness and efficiency of processes, activities and resources. This Policy translates these choices into concrete commitments to all stakeholders, with the aim of building relationships of trust and creating shared value over time.

In line with its mission, Altenia S.r.l. adopts the United Nations **Sustainable Development Goals** (SDGs) as a reference for its activities. This commitment reflects the Group's strategy to contribute to a new energy model based on renewable sources, the digitalisation of infrastructures and the adoption of innovative and environmentally friendly technologies. The SDGs also guide Altenia S.r.l.'s management choices towards social and environmental responsibility objectives, contributing to the creation of long-term value.

In this sense, the management of activities, in accordance with the Integrated Management System, supports the Group in achieving the following SDGs objectives:



Specifically, Altenia S.r.l. undertakes to:

- use appropriate tools to plan and control their performance;

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- enhance the experiences and skills of staff through continuous training, from an inclusive perspective;
- recognize and manage the needs of the different generations present in the company, adopting integrated strategies;
- evaluate investments in new plants or adaptations considering, in addition to economic and financial aspects, also quality of service, health and safety, environmental impact, energy saving and compliance;
- adopt procedures in accordance with current legislation and define, where possible, objectives and improvement programmes;
- promote the reporting of wrongdoing, abuse and harassment through dedicated tools (Whistleblowing Portal) that guarantee the confidentiality of the whistleblower;
- collect reports of critical issues in the application of the IMS and monitor the initiatives adopted in response to the guidelines of the Policy;
- define and periodically report plans for the improvement of the IMS,
- monitor and review the Management Systems by collecting the relevant KPIs and verifying the implementation of improvement actions;
- communicate to stakeholders, through the most suitable channels, relevant information on its activities and on the degree of achievement of the defined objectives;
- promoting an inclusive work environment that values the diversity, equity and potential of each person;
- supporting the physical, psychological and social well-being of employees through welfare, wellbeing and prevention initiatives;
- ensure workspaces accessible to all, free of cultural, physical and sensory barriers, including IT tools and professional development opportunities;
- to promote a corporate culture open to discussion and integration, enhancing multiculturalism and diversity;
- ensure compliance with the requirements of the administration, finance and control processes, including the adoption of a risk-based approach and compliance with the competence and responsibility profiles defined for these areas.

The commitments contained in the Policy are commensurate with the human and financial resources available and constitute the reference for defining performance improvement objectives.

Altenia S.r.l. contributes, together with Workers, Trade Unions and Suppliers, to the construction of a widespread culture of risk prevention and sustainable development, enhancing technical and organizational solutions aimed at continuous improvement, environmental protection and energy efficiency of its production processes and products and services.

The sub-policies referred to in paragraphs 5.1÷5.4 refer to the Management Systems for which Altenia S.r.l. has obtained third-party certification, respectively according to the UNI EN ISO 9001, UNI EN ISO 14001, UNI EN ISO 45001 and ISO 50001 standards.

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The sub-policy referred to in paragraph 5.5 refers to the Anti-Corruption Management System adopted by Altenia S.r.l. on the basis of the UNI ISO 37001 standard, for which the Company has started the third-party certification process.

The sub-policies referred to in paragraphs 5.6+5.9, on the other hand, describe the guidelines voluntarily adopted by Altenia S.r.l. in areas considered strategic for its sustainable business model, regardless of the achievement of formal certification.

5.1 Quality Management System Policy

With reference to Quality issues, Altenia S.r.l. carries out its role by keeping faith with the requirements of the Quality Management System and in compliance with the UNI EN ISO 9001 standard, committing itself to:

- assign the customer a central role in improvement strategies and processes, pursuing customer satisfaction and improving company competitiveness;
- maintain the quality of the NTG's services adequately, in particular by ensuring the efficiency, continuity and safety of the electricity service in compliance with the requirements (mandatory and non-mandatory);
- comply with the provisions of the Group's Business Plan;
- guarantee the resources necessary for the planning, implementation, control and monitoring of the Quality Management System;
- provide a framework for defining, reviewing, and achieving quality objectives, consistent with this Policy and the context of the organization;
- ensuring equal access to the network for operators in the sector;
- maintain adequate services offered to customers (Non-Regulated Activities);
- respect delivery times and optimize the cost/quality ratio of products/services (Non-Regulated Activities);
- commit to the continuous improvement of the effectiveness of the Quality Management System, also through the monitoring of performance indicators (KPIs) and the results of internal and external audit activities.

The management of activities, in accordance with the Quality Management System, supports the Group in achieving the following SDGs objectives:



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5.2 Environmental Management System Policy

With reference to the activities carried out with a view to protecting the environment, Altenia S.r.l. carries out its role by keeping faith with the requirements of the Environmental Management System and in compliance with the UNI EN ISO 14001 standard, committing itself to:

- verify the adequacy of the context in which Altenia S.r.l. operates;
- prepare a periodic assessment of the compliance obligations applicable to Altenia;
- prepare a periodic assessment of the risks/opportunities and environmental impacts of its activities and the risks associated with them, seeking solutions to minimise any negative effects of its activities on the environment considering the entire life cycle of its works;
- assess in advance the environmental aspects and impacts deriving from new processes, new plants or significant changes to existing ones, before their implementation;
- monitors company accidents (with and without accidents) in order to ensure control, identify critical issues and related corrective/training actions in order to minimise their impact on the environment;
- verify, with targeted inspections, the actions aimed at protecting the environment, carried out by the organizational structures in charge;
- promote collaboration with the Competent Authorities (ARPA, ISPRA, etc.) in order to establish an effective communication channel (input/output) aimed at the continuous improvement of performance in terms of environmental protection;
- implement transparent communication of its activities in the environmental field;
- recognise the importance of social acceptance of the Group's infrastructure by the communities in which it operates, with the aim of making the investments envisaged in the Development Plan, paying attention to the environment, the landscape and the interests of local and national communities, limiting, where possible, their impacts;
- adopt a preventive approach, listening to the point of view of the main environmental associations and the needs expressed by the institutions of the area where the grid plants are built, seeking shared solutions, which integrate the consideration of the characteristics of the territory and respect for the environment and biodiversity with those of the security of the electricity system, as well as with the more general interests of the community for the efficiency of the network and the cost-effectiveness of the service;
- pursue pollution prevention by adopting, where technically and economically feasible, the best available technologies to reduce the environmental impacts of its activities;
- pay particular attention to waste management, striving for a disposal oriented towards the recycling of materials, in accordance with circular economy guidelines;

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- allow, on the basis of scientific programs agreed with institutes and associations of proven reliability, the use of its plants for the purpose of protecting and increasing biodiversity, within the limits of the safety of the plants themselves and the electricity service. In particular, with regard to the issue of birdlife, it undertakes to adopt the most modern devices to minimize any negative impacts of its plants. It therefore pays full attention to reports of negative impacts of its plants, and makes itself available for investigations and evaluations and, if necessary, for experimentation and the possible adoption of further mitigation measures; it seeks the development of protection systems consistent with the environment surrounding its plants;
- recognize the global relevance of climate change and the need to combat it by containing CO2 emissions. Although not involved in the production of electricity and not involved in emission trading schemes, the Group is committed to reducing its direct and indirect emissions, within the limits of the obligations of security, continuity and cost-effectiveness of the electricity service. It includes an assessment of the effects on CO2 emissions in the data of planned investments, enhancing its positive impact in terms of the system. To this end, it has formally adopted a Science Based Target ("SBT").

The management of activities, in accordance with the Environmental Management System, supports the Group in achieving the following SDGs objectives:



5.3 Workplace Health and Safety Management System Policy

With reference to the activities carried out with a view to monitoring and protecting Health and Safety in the Workplace, Altenia S.r.l. carries out its role by keeping faith with the requirements of the Health and Safety Management System in the Workplace and in compliance with the UNI EN ISO 45001 standard by committing itself to:

- promote collaboration with the Competent Authorities (INAIL, ASL, Labour Inspectorate, etc.) and with business associations in order to establish an effective communication channel (input/output), aimed at the continuous improvement of performance in terms of health and safety at work, of third parties and interested parties;

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- verify, through inspections, the implementation of the legal provisions on safety in the workplace, carried out by the relevant organisational structures. In this regard, Altenia S.r.l. takes into consideration and monitors all company risks related to aspects of safety at work and, in particular, those considered relevant such as "electrocution" and "falling from height". It implements all appropriate actions in order to prevent and contain them, promoting safety and health protection not only for its employees, but also for all workers involved in the processes: contractors, suppliers, designers, maintenance workers and visitors;
- assess in advance the health and safety risks arising from the introduction of new processes, equipment or significant changes to existing activities, adopting the necessary prevention and protection measures before their commissioning;
- monitor company accidents (with and without accidents) and occupational diseases in order to ensure control, identify critical issues and related corrective and training actions, with the aim of preventing accidents, accidents and occupational diseases;
- verify, in collaboration with institutes and bodies of national importance, the procedures relating to safety in the workplace, in particular with regard to electrical risk;
- enhance and enrich the wealth of experience and knowledge disseminated, through the continuous training of staff, ensuring, at a minimum, the training required by mandatory legislation;
- promote company best practices for the dissemination of a culture of health and well-being in the workplace.

The management of activities, in accordance with the Occupational Health and Safety Management System, supports the Group in achieving the following SDGs objectives:



5.4 Policy Management System of Energy consumed for own use

With reference to the activities carried out with a view to Energy Efficiency, Altenia S.r.l. carries out its role by keeping faith with the requirements of the Energy Management System consumed for its own use and in compliance with the UNI CEI EN ISO/IEC 50001 standard by committing itself to:

- implement the Energy Management System, proposing initiatives for energy efficiency, in accordance with the indications of the Energy Management Group
- ensure attention to energy saving and efficiency right from the procurement phase of external company resources by evaluating these aspects in the definition of technical specifications for the purchase of machinery, equipment, raw materials and services;

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- apply efficiency principles to all energy aspects involving the Group Companies such as, for example, the use of office machinery, lighting, cooling and heating systems, processing methods;
- encourage the use of products (e.g. PCs and printers) with eco-friendly design and a certified energy impact (with product labels);
- promote a compatible and efficient use of means of transport in order to achieve the minimum consumption objectives of its vehicles;
- implement the monitoring and control of the energy consumption of the sites and plants, committing to encourage the implementation of the interventions necessary for the improvement of the energy performance of the sites and the consequent improvement of the associated energy class;
- plan work activities with a view to energy efficiency, where possible and in any case ensuring the continuity of processes;
- raise awareness among all employees, suppliers and contractors in the most appropriate ways.
- provide a plan of objectives at least every three years aimed at planning and implementing what is necessary to achieve the established goals
- commit to meeting the applicable legal requirements relating to energy efficiency, energy use and energy consumption, subject to a systematic analysis of the requirements and related obligations
- commit to the continuous improvement of the energy performance stability, giving priority to the identified significances
- Commit to the continuous improvement of the energy management system, reviewing the implemented system at least annually
- undertakes to procure products and services that have an influence on the energy performance on the highest feasible level of energy efficiency, subject to cost/benefit analysis, aimed at an informed choice by the procurement organization
- undertakes to identify energy systems, buildings and systems in the design phases, maximising the criteria for improving energy efficiency.

The management of activities, in accordance with the Energy Management System, supports the Group in achieving the following SDGs objectives:



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5.5 Anti-corruption Management System Policy

With reference to the activities carried out for the prevention of corruption, Altenia S.r.l. carries out its role by keeping faith with the requirements of the Anti-Corruption Management System and in compliance with the UNI ISO 37001 standard, committing itself to:

- to ensure behaviour based on criteria of fairness, loyalty and moral integrity that prohibit corruption;
- comply with all laws, rules and regulations on the fight against corruption, in Italy and in all countries in which the subsidiaries operate;
- conduct their activities in such a way as not to be involved in any corruption or not to facilitate or risk involvement in illegal situations with both public and private entities;
- provide a framework for identifying, reviewing and achieving anti-corruption objectives; - encourage the reporting of suspicions in good faith or on the basis of a reasonable belief, without fear of retaliation;
- guarantee the authority and independence of the Anti-Corruption Function (ISO 37001). Independence is guaranteed by non-involvement in activities identified as at risk of corruption;
- promote and disseminate an organisational culture based on ethics, transparency and the prevention of corruption, through continuous training and staff awareness;
- continuously monitor and evaluate the effectiveness of the Anti-Corruption Management System, including through internal audits and performance indicators

In particular, it is forbidden to:

- accept the request or authorize someone to accept or solicit, directly or indirectly, a payment or an economic advantage or other benefit from public or private entities;
- offer, promise, give, pay or authorize anyone to give or pay, directly or indirectly, money, other economic advantage, utility or benefit of any kind to public or private entities;
- request or obtain the promise of money or other benefits, for themselves or for others, to perform or omit acts in violation of the obligations inherent in their office or the obligations of loyalty, even causing damage to the Companies themselves;
- threatening or retaliating against individuals who have refused to commit an act of corruption or who have reported its occurrence.

Failure to comply with this Policy, with particular reference to the commitments and prohibitions on the prevention of corruption, involves the assessment of the violations ascertained and the adoption of measures proportionate to their seriousness, in compliance with applicable legislation and company provisions.

For employees, violations may result in the application of the sanctions provided for by the company disciplinary system, by the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 and by the applicable collective bargaining agreement, up to the termination of the employment relationship in the cases provided.

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For consultants, suppliers, contractors and other business partners, breaches may result in remedies under the applicable contractual clauses, including suspension or termination of the relationship.

Any liability provided for by law and the possibility for the Company to take action for compensation for damages suffered remain unaffected. Altenia also takes the corrective actions necessary to address the causes of violations and prevent their recurrence.

The management of activities, in accordance with the Anti-Corruption Management System, supports the Group in achieving the following SDGs objectives:



5.6 Information Security Management System Policy

With reference to the activities carried out for the purposes of Information Security, Altenia S.r.l. voluntarily adopts a structured approach to the management of IT security, inspired by the best international practices of cyber-security, committing itself to:

- develop and maintain an internal regulatory framework based on an Information Security Policy that defines the governance model, roles and responsibilities;
- protect company information by guaranteeing its confidentiality, integrity and availability, through control measures proportionate to the sensitivity of the data and the criticality of the technologies involved;
- systematically carry out risk analysis and management activities to identify the necessary controls and integrate security into the life cycle of ICT projects;
- monitor the state of information security and ICT systems, preventing and managing events and incidents and ensuring compliance with internal standards and current legislative constraints;
- observe the evolution of the cyber threat landscape to update defense programs;
- promote training and awareness plans on information security and collaborate with the institutions responsible for the protection of national critical infrastructures.

The management of activities, in accordance with the Information Security Management System, supports the Group in achieving the following SDGs objectives:



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5.7 Asset Management System Policy

With reference to asset management activities, Altenia S.r.l. carries out its role by committing to:

- maximize the availability, reliability and useful life of assets in a framework of safety and cost containment, through maintenance and management inspired by the principles of UNI standards on maintenance;
- comply with the legal regulations on electric and magnetic fields by adopting a prudential principle that considers – in the construction of new power lines – the request for more precautionary measures (which can be accepted if technical feasibility is found, without prejudice to the obligations of continuity, safety and cost-effectiveness of the service) and maintaining constant attention to scientific developments on the subject, relating to correct external information and contributing to a balanced understanding of the phenomenon;
- Creating value:
 - for the customer through the availability and reliability of network elements;
 - for the shareholder through the optimal conservation of assets throughout their life cycle, reliability of components and cost-effectiveness of maintenance activities;
 - for the community and for the environment through compliance with mandatory regulations.

The management of activities, in accordance with the Asset Management System, supports the Group in achieving the following SDGs objectives:



5.8 Gender Equality Management System Policy

With reference to gender equality issues, Altenia S.r.l. voluntarily adopts a structured approach to the promotion of diversity and inclusion, committing to:

- supporting the diversity, equity and uniqueness of people, through an inclusive and stimulating work environment in which to develop one's potential and humanity;
- enhancing people's distinctive skills, removing cultural, organisational and material obstacles that limit full self-expression;
- recognize the value of work-life balance, developing specific programs and initiatives to support this reconciliation;
- to develop targeted awareness-raising, communication, information and training campaigns on Diversity, Equity & Inclusion issues, encouraging initiatives aimed at promoting behaviour and language that are respectful and inclusive of all gender identities and affective orientations, reporting any discriminatory behaviour;

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- recognize equal opportunities for all its people regardless of any permanent or temporary sensory, cognitive and motor disabilities;
- promote the overcoming of stereotypes and unconscious biases through welfare policies and actions aimed at promoting work-life balance, the protection of parenthood, the sharing of family and care responsibilities (caregiving) and the removal of potential obstacles to equal pay;
- promote specific training courses to support women's empowerment and ensure gender balance in positions of responsibility.

The management of activities, in accordance with the Gender Equality Management System, supports the Group in achieving the following SDGs objectives:



5.9 Compliance Management System Policy

With reference to the activities carried out for the Management of Compliance, Altenia S.r.l. voluntarily adopts a structured system for monitoring regulatory compliance, committing itself to:

- continuously monitor regulatory developments, ensuring their dissemination and application at all company levels;
- promptly adapt processes to changes in provisions, through a preventive approach to the risks of non-compliance;
- prepare regulatory and operational tools for the identification, management and monitoring of compliance risks;
- encourage the reporting of alleged regulatory violations, without fear of retaliation, through dedicated tools (e.g. Whistleblowing portal);
- ensure that the Compliance Function is equipped with the appropriate competence, authority and independence to supervise the System and provide advice to personnel;
- ensure effective and transparent communication that spreads the culture of compliance at all organizational levels;
- monitor the effectiveness of the Internal Control System over time through appropriate reporting tools and KPIs.

The management of activities, in accordance with the Compliance Management System, supports the Group in achieving the following SDGs objectives:

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6.0 DISSEMINATION AND UPDATING

This Integrated Policy is disseminated internally through the document system, the intranet (repositories dedicated to the Integrated Management System), externally, to all Stakeholders.

This document is evaluated at least once a year during the Review of the Integrated Management System, based on the results achieved. In the event of changes and changes at a strategic and/or operational level regarding the Integrated Management System, it is submitted by the Representative for the Integrated Management System to the approval of the Board of Directors.

The Chief Executive Officer

Massimo La Gioia


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