Environmental, Social and Governance Policy

Version 1.4 – October 2026

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ESG Policy

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CONTENTS

1. Sustainability and ESG Commitment 2
2. Business Model and Value Creation (GRI 2-6) 2
2.1. Business model 2
2.2. Operational Platforms and Industrial Assets 2
3. SDG commitments 4
4. ESG Focus Areas 5
4.1. Environmental Responsibility (GRI 302, 305, 306) 5
4.2. Social Commitment and Human Capital (GRI 403, 404, 413) 6
4.3. Governance, Ethics and Risk Management (GRI 2, 205, 206) 8
5. GRI Reference Table 10

1.Sustainability and ESG Commitment

Our Approach to Sustainability

At Renergia S.p.A., sustainability is a strategic driver of long-term value creation, asset resilience and risk management, supporting the expectations of long-term institutional investors. It is fully embedded in our industrial model, governance framework and investment decisions. This Sustainability and ESG Commitment has been prepared primarily for our financial stakeholders, including the fund supporting the Group, and is publicly disclosed on our corporate website to ensure transparency and consistency of communication.

The document follows the **Global Reporting Initiative (GRI) Standards** as its primary reference framework and is coherent with the information disclosed in the yearly **Renergia Sustainability Report**. While not a formal sustainability report, it provides a clear, narrative and comprehensive overview of how ESG factors are integrated into Renergia's strategy, operations and governance.

This commitment applies to Renergia S.p.A. and all companies within the Group's perimeter and reflects the oversight exercised by the Board of Directors and top management.

2.Business Model and Value Creation (GRI 2-6)

2.1. Business model

Renergia operates in the renewable gas sector, focusing on the production of biomethane and bioLNG through the recovery and transformation of organic waste and agricultural residues. The Group's business model is intrinsically sustainable: environmental benefits are generated by design, not as a side effect of operations.

Through a vertically integrated value chain, Renergia converts waste into energy and nutrients, contributing to decarbonisation, circular economy and energy security.

The Group:

- treats organic municipal waste and green waste;
- produces biomethane and biofertilizers;
- operates one of the few large-scale gas-grid to liquefaction plants for LNG and bioLNG production in Europe.

This model generates measurable environmental value while delivering stable cash flows, long-term contracted revenues and positive social impacts in the territories where the Group operates.

2.2. Operational Platforms and Industrial Assets

Renergia acts as the holding company of the Group, exercising direction and coordination

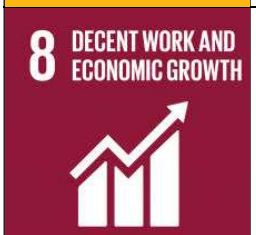
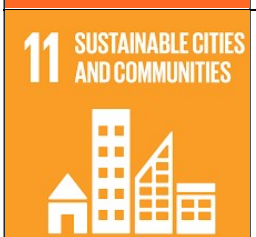
over its subsidiaries. In this role, it defines the Group's strategic guidelines, oversees investment decisions and ensures alignment across all operating platforms.
Renergia also provides centralized corporate services, including administration, finance, legal, IT, HSSE, compliance and human resources, supporting operational efficiency, governance consistency and risk management across the Group.
This centralized model enables the Group to scale efficiently while maintaining strong governance and control over its operations.
The Group's subsidiaries are responsible for the development, ownership and operation of the industrial assets, executing the core business activities across the biomethane and bioLNG value chain, in line with the strategic guidelines defined by Renergia.

- **Biomet Ambiente** processes organic waste into biomethane and compost. Its plant in San Rocco al Porto (LO), near Piacenza, handles 40,000 tons of organic waste annually and has the potential to scale up to 60,000 tons.
- **Biomet GNL** operates Italy's first liquefaction facility directly connected to the SNAM gas grid, producing up to 8,800 tons of LNG / bioLNG per year, with the capability to triple production. The plant is based in Belgioioso (PV)
- **Agrimet** serves as the Group's dedicated platform for the development of agricultural biomethane. It acts as the holding company for the subsidiaries active in the biogas and biomethane sector and works closely with Northern Italian farmers to foster technical partnerships and off-take agreements. Agrimet also oversees the Group's special purpose vehicles (SPVs), including Agrimet Impianti Srl Società Agricola, Azienda Agricola Sobagno Srl Società Agricola and Agrinergia Srl Società Agricola- these SPVs operate four high-efficiency biogas plants in the provinces of Cremona and Brescia.



3.SDG commitments

Renergia has assessed its alignment with the United Nations SDGs, as shown in the table below:

SDG	Target	Indicator
	7.2: By 2030, increase substantially the share of renewable energy in the global energy mix	Renergia increases the **share of renewable energy in Italy** by producing biomethane
	8.1: Sustain per capita economic growth in accordance with national circumstances and, in particular, at least 7 per cent gross domestic product growth per annum in the least developed countries	Renergia, through its investments, promotes **sustainable economic growth**.
	9.4: By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource- use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities	By producing biomethane Renergia will use agricultural residues to generate biofuels, therefore **reducing the CO_2 emissions** of farmers, heavy transport and the hard-to-abate industry
	11.6: By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management	Renergia reduces adverse environmental impacts of cities by treating **municipal organic waste** and the associated emissions, thus promoting good air quality
	12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse	By recycling organic waste into compost, Renergia is increasing the **national waste recycling rate**

Management, Board and Shareholders of the Group strongly believe that the sustainability and success of the business are highly dependent on prudent management of Environmental, Social and Governance issues throughout the course of its entire business operations. The Group is committed to caring for the external environment through professionalism, safety and wellbeing, while at the same time promoting an engaging, diverse and inspiring work environment.

4.ESG Focus Areas

4.1. Environmental Responsibility (GRI 302, 305, 306)

Renergia's approach to the environment is practical, forward-looking, and deeply rooted in our business model. We operate in a sector where the transition to renewable energy is not just an opportunity, but a responsibility. By converting organic municipal waste and agricultural residues into biogas, biomethane and bioLNG, we reduce dependence on fossil fuels and help decarbonize the transport sector and the hard-to-abate industry. As part of our commitment to energy efficiency, we track the energy produced and consumed at our plants. We set performance targets annually and link them to management KPIs to drive continuous improvement. Each year, we publish data on our Scope 1 and Scope 2 emissions, while working to expand monitoring to Scope 3 emissions across the value chain. These figures are assessed annually through internal management systems to support investment decisions, capital allocation and continuous operational improvement.
Our circular business model plays a significant role in climate mitigation. By upgrading biogas into biomethane and avoiding landfilling or incineration of organic waste, we prevent the release of methane and other harmful gases. Our plants are also designed to remove hydrogen sulphide and other pollutants from the gas stream, reducing the global warming potential of emissions. We also recognize the importance of climate adaptation. That's why we prepare an annual analysis on climate-related physical and transition risks, enabling us to develop targeted mitigation strategies. These insights help us build resilience across all our companies.
Environmental impacts are measured through KPIs such as GHG, NOx, and PM10 / PM2.5 emissions. These are reviewed monthly by our asset management team and quarterly by the Board. Emissions are regularly tested in accordance with plant permits, and safety systems— including gas leak detectors—are installed where necessary.
Odorous emissions are captured and treated before being released, ensuring compliance with environmental standards. To minimize other impacts, we also monitor and manage noise and light pollution and regularly test sound levels at plant sites.
Wastewater is treated on-site where needed, and rainwater is collected and stored at several facilities for fire safety purposes, reducing reliance on groundwater.
As part of our commitment to circularity, we sort waste, remove plastics from the input stream, and work with qualified third-party contractors to safely manage hazardous and non-hazardous outputs. Where feasible, we promote sustainable sourcing of materials and support our partners in adopting more responsible procurement practices.
Finally, our environmental risks are recorded in a comprehensive internal registry and reviewed regularly to ensure alignment with our risk management framework.

4.2. Social Commitment and Human Capital (GRI 403, 404, 413)

At Renergia, we understand that social responsibility goes beyond regulatory compliance. It is about building lasting trust with the people we work with and the communities where we operate. Our license to operate depends on how effectively we manage our social impact, from occupational health and safety to stakeholder engagement and human capital development.

Our facilities involve complex industrial processes, making occupational safety a non-negotiable priority. We conduct detailed risk assessments at every site and work with certified external Health & Safety consultants ("RSPP" under the Italian Decree 81/08) to ensure full compliance with H&S requirements and best practices. All employees, contractors and visitors must undergo safety induction training, and specific work permits are required for hazardous activities, including confined spaces, hot work and working at height. The Safe Job Analysis (SJA) methodology is applied to assess and mitigate risks in critical operations. Regular inspections and audits ensure that all safety procedures are effectively implemented and continuously updated. We are committed to providing a safe environment not only for our employees, but also for the public and neighbouring communities—particularly users of our L-CNG fuel station.

Our social responsibility extends to the supply chain. We expect suppliers and contractors to comply with labour laws, uphold human rights and meet our health and safety standards. Whenever possible, we actively communicate these expectations and promote continuous improvement. While the current engagement model primarily focuses on direct contractors and Tier 1 suppliers, the Group intends to progressively extend its ESG monitoring approach to organizations with which it maintains indirect commercial relationships, enhancing oversight across the broader value chain.

Engaging with local stakeholders is part of our daily operations. We comply with environmental and social regulations, respond transparently to public inquiries and maintain open dialogue with local communities. The Group is progressively expanding its stakeholder engagement framework, with the objective of formalizing engagement processes and strengthening materiality analysis.

Customer satisfaction surveys are conducted in connection with ISO audits and internal quality management procedures. The results are used to monitor service quality and identify areas for improvement.

Renergia is committed to maintaining transparent and constructive relationships with the communities in which it operates. The Group engages with local stakeholders, including municipalities, institutions and associations, through structured dialogue and collaboration
across the lifecycle of its projects. Where possible, Renergia aims to hire locally and offers training programs which build capacity, support and resilience in the community.
Renergia supports local development initiatives related to sustainability, environmental protection and innovation, contributing to long-term value creation in the territories where it operates.
The Group has already supported and continues to support local investments and social initiatives in the territories where it operates on an annual basis, including through the allocation of a portion of its profits to such initiatives.
Renergia recognizes employee engagement within local communities as a key driver of responsible business practices, a healthy workplace culture and long-term organizational resilience.
The Group provides annual learning and training programs to all employees, supporting professional development and career progression, delivered by both internal and external experts.
Renergia considers employee wellbeing a strategic lever for sustainable growth, organizational attractiveness and long-term value creation. The Group is progressively strengthening its monitoring framework by defining measurable indicators related to human capital, diversity and employee wellbeing, which will be tracked and reported over time. The Group's objective is to foster human capital development by organising employee engagement initiatives, such as team lunches and cross-functional events, at least twice per year, promoting a positive and inclusive workplace culture, collaboration, knowledge-sharing, employee wellbeing, and long-term talent retention across the organisation.
The Group has implemented a corporate welfare system since 2024 that covers 100% of employees on an annual basis; it includes wellbeing, family and leisure activities, selected by employees within a defined budget.
We promote a work culture that is open, inclusive and respectful. A whistleblowing system compliant with Italian legislation allows employees to report misconduct confidentially, and guarantees whistleblower protection, reinforcing ethical conduct and accountability across the Group.
We are committed to advancing diversity and inclusion. Although we operate in a traditionally male-dominated sector, we actively promote gender balance across the organization. These principles are embedded in the Group’s Code of Ethics and in internal

HR policies and procedures, which define structured processes for recruitment, performance evaluation and career development, ensuring objectivity, transparency and traceability of decisions.
Our Board reflects diverse professional backgrounds and experiences, and we aim to extend this diversity throughout all levels of the company.

4.3. Governance, Ethics and Risk Management (GRI 2, 205, 206)

At Renergia, governance is a strategic lever that underpins our ability to generate long-term value, operate transparently, and uphold the trust of stakeholders. Our governance model is designed to ensure sound decision-making, risk oversight, and alignment with our sustainability ambitions and is linked to our remuneration framework to ensure that they all work in tandem. We have established a robust and coherent governance framework that guides the way we manage and control our operations. This includes the Group's ESG Policy, Risk Management Policy, Delegation of Authority matrix, and the Organizational, Management and Control Model pursuant to Italian Legislative Decree 231/2001. These frameworks are reviewed on an annual basis and updated to reflect regulatory developments, market expectations, and stakeholder priorities. The Board of Directors plays a central role in providing strategic direction and supervision. It meets at least quarterly and is responsible for overseeing business performance, ESG integration, and adherence to key governance principles. Governance practices, including the Board's responsibilities and decision-making powers, are further outlined in the Shareholders' Agreement, ensuring transparency and alignment with shareholder expectations.
To operationalize our sustainability objectives, we implemented an annual ESG Action Plan. This plan outlines concrete projects and improvement targets across our subsidiaries. Progress is monitored monthly by the asset management team and reviewed quarterly by the Board, creating a continuous cycle of performance evaluation and enhancement. Our ethical conduct framework is equally rigorous.
Data protection and cybersecurity are also prioritized: we comply with GDPR and are advancing our digital security protocols to manage data and cyber risks effectively.
Renergia adopts a zero-tolerance approach to fraud and corruption. Internal control systems, training activities and whistleblowing mechanisms are in place to prevent, detect and address any misconduct, ensuring that concerns can be reported confidentially.
The Group ensures respect for shareholder rights in line with applicable agreements and regulatory requirements, promoting fair treatment, transparency and alignment with stakeholder expectations.

Renergia also requires employees and relevant stakeholders to identify, disclose and appropriately manage potential conflicts of interest. Specific procedures and internal guidelines support the correct handling of such situations, ensuring that decisions are taken in the best interest of the Group.

Renergia prohibits political contributions and ensures that all lobbying activities are consistent with our ESG values. Clear rules are in place regarding monetary and non-monetary benefits, with only limited, transparent exceptions allowed where they serve a legitimate business purpose and do not compromise independence.

Our governance approach is dynamic, principled, and aligned with international best practices supporting the Group's ability to manage risks, achieve its strategic goals, and create long-term sustainable value.

This Policy reflects our commitment to building a more responsible, transparent, and resilient future. We recognize that ESG is not simply a matter of compliance, but a continuous journey that requires clear direction, engagement, and accountability at every level of the organization. Renergia has achieved internationally recognized certifications in quality (ISO 9001), environmental management (ISO 14001), and occupational health and safety (ISO 45001). These certifications are crucial to align our operational practices with the highest standards and in reinforcing our promise to deliver safe, efficient, and responsible energy solutions. Looking ahead, we will continue to embed ESG principles into our business model, enhance our governance structures, and promote a culture of continuous improvement, ensuring that sustainability remains a cornerstone of Renergia's long-term value creation.

5. GRI Reference Table

Topic	GRI Standard	Coverage in this Document
Organizational profile and strategy	**GRI 2**	Sections: Our Approach; Business Model
Energy	**GRI 302**	Environmental Responsibility
Emissions	**GRI 305**	Environmental Responsibility
Waste and materials	**GRI 306**	Circular Economy and Resource Management
Occupational health and safety	**GRI 403**	Social Commitment – Health and Safety
Training and education	**GRI 404**	People Development and Inclusion
Local communities	**GRI 413**	Social Commitment – Local Communities
Anti-corruption and competition	**GRI 205, 206**	Governance, Ethics and Risk Management