magis

2025 Consolidated Sustainability Report

TABLE OF CONTENTS

1. General disclosures

1.1. Basis of preparation of the Report

[ESRS_2, BP-1, DP 5a, 5b]

The consolidated Sustainability Reporting of the Magis Group (formerly AGSM AIM) for the 2025 financial year continues the path initiated last year, aimed at presenting sustainability-related data and information in a coordinated and integrated manner with traditional economic and financial reporting.

[ESRS_2, BP-2, DP 15]

The Consolidated Sustainability Report has been prepared in accordance with Legislative Decree No.125 of 6 September 2024, which transposes into Italian law EU Directive 2464/2022, known as the Corporate Sustainability Reporting Directive (CSRD) (hereinafter also referred to as the "CSRD" or "Directive"), as well as the new European Sustainability Reporting Standards (ESRS) adopted by the European Commission on 31 July 2023 and developed by EFRAG (European Financial Reporting Advisory Group), and the requirements of Article 8 of EU Regulation 2020/852 of the European Parliament and Council, together with the related delegated regulations. In compliance with the ESRS, this Sustainability Reporting aims to disclose and illustrate all information deemed appropriate and necessary to enable the stakeholders of the Magis Group to obtain a clear and comprehensive understanding of the impact generated by our organisation on sustainability matters and of how such matters may affect the performance, results and financial position of the Magis Group.

[ESRS 2, BP-2, DP 16]

In preparing the Consolidated Sustainability Report, the sustainability reporting principles outlined in ESRS 1 were taken into account: relevance, faithful representation, comparability, verifiability, and understandability. Furthermore, this Consolidated Sustainability Report is structured with reference to the provisions of ESRS 1 (paragraph 115), which calls for the inclusion of the following four sections: general, environmental (including disclosures required under Article 8 of EU Regulation 2020/852), social, and governance information.

The following are also included in the specific appendices within the Consolidated Sustainability Report:

I. the disclosure requirements index;

II. the list of information elements under the cross-cutting and topical standards deriving from other EU legislative acts;

III. the mapping table between material topics and the SDGS.

[ESRS_2, BP-1, DP 5a, 5c]

During the 2025 financial year, the Magis Group updated its Double Materiality Assessment (DMA) in order to identify and understand the principal impacts, risks and opportunities (IROs) relating both to its own operations and to activities across its value chain (upstream and downstream of the organisation). Where specific IROs related to its value chain have been identified, Magis discloses the available quantitative and qualitative information regarding its sustainability performance. The list of reported indicators, along with any detailed notes, is provided in the Concordance table included at the end of this sustainability section within the Report on Operations of the Group's Annual Financial Report.

It should be noted that, following the publication in the Official Journal on 10 November 2025 of Delegated Regulation (EU) 2025/1416 ("Quick Fix"), the Magis Group made use of the transitional provisions and therefore did not report on certain disclosure requirements ("phase-in").

[ESRS_2, BP-2, DP 9a, 9b]

The reference time horizons considered by Magis Group for the consolidated Sustainability Reporting are those defined in ESRS 1, in particular:

- the short-term time horizon corresponds to the financial reporting period (i.e., within a calendar year);
- the medium-term horizon extends from the end of the short-term reporting period up to five years;
- the long-term horizon refers to impacts, objectives, or actions expected over a period exceeding five years.

The reporting period runs from 1 January to 31 December 2025; data relating to the two previous financial years are presented, where available, for comparative purposes in order to facilitate the understanding of the trends in the Group's sustainability performance.

[ESRS_2, BP-2, DP 10a, 10b, 10c,10d, 11a, 11b]

For the purposes of ensuring a fair presentation of performance and guaranteeing the reliability of the data, the use of estimates has been limited as far as possible and, where applied, such estimates are based on the best available methodologies and are appropriately disclosed. In addition, any restatements of previously published comparative data are clearly indicated in the text. In particular, in preparing the reporting, the Group was required to estimate the data and information relating to the value chain for the calculation of Scope 3 emissions (described in greater detail in the paragraph "The Group's greenhouse gas emissions" contained in the subsequent paragraph "2.1.3 Metrics and targets"). It should be noted that the estimates made for the purposes of this Report are not generally characterised by a high level of uncertainty, with the exception of Scope 3 emissions, which show a low level of uncertainty for most categories and a medium level of uncertainty for category no. 1 "Purchased Goods and Services" and category no. 7 "Employee Commuting".

[ESRS_2, BP-2, DP 14 a, 14 b]

The Group's reporting contains certain amendments to the information disclosed by Magis Group in the previous reporting period, with the purpose of restating comparative information relating to prior periods subject to disclosure.

Specifically, adjustments were made to certain figures for the 2024 fiscal year shown in the following tables:

- Table 12 – Gas distribution service quality indicators;
- Table 48 – Personnel by type of employment contract (permanent / fixed-term / variable hours) and by gender
- Table 53 – Employee terminations broken down by gender, age and geographical area – environment focus;
- Table 54 – Incoming and outgoing turnover;
- Table 58 – Average training hours per capita by gender and professional category;
- Table 59 – Training hours by gender and professional category;
- Table 60 – Health and safety metrics of the Group's own workforce;
- Table 66 – Customers served at service desks.

[ESRS_2, BP-1, DP 5d, 5e]

It should be noted that the Magis Group has not made use of the option to omit information relating to intellectual property, know-how or innovation outcomes, nor of the exemption from disclosing information concerning imminent developments or matters under negotiation.

In order to avoid duplication of data and information, the Consolidated Sustainability Report refers to other sections of the Report on Operations for information already provided or for further details.

This document was submitted for approval to the Company's Board of Directors on 20 April 2026, together with the draft statutory financial statements and the consolidated financial statements, in compliance with the responsibilities reserved to the Shareholders' Meeting under the Company's Articles of Association and applicable laws.

The Consolidated Sustainability Report is subject to assurance by an independent audit firm, BDO Audit Services S.r.l., which has been tasked with verifying its compliance with Italian Legislative Decree 125/2024 and its consistency with the adopted reporting Standards.

The structure of the document is intended to present the activities carried out by the Group in a clear and organised manner, initially providing a broader and more strategic overview and progressively focusing on and analysing in detail the relationships with stakeholders and the specific characteristics of the activities performed within the territory.

This consolidated Sustainability Reporting includes, among its core preparation principles, the Double Materiality Assessment, namely the identification of those topics to which Magis is particularly sensitive, appropriately articulated through the principal objectives of the Group's Business and Strategic Plan and linked to the indicators reported therein.

The consolidated Sustainability Report of Magis (formerly AGSM AIM S.p.A.) for the 2025 financial year includes within its scope the companies that are fully or proportionally consolidated in the Consolidated Financial Statements and are considered relevant and significant to the Group's business.

Table 1 – Magis Group Consolidated Entities

Net works	Market	Smart	Heat	Power	Environment	Other companies
V-Reti S.p.A.	Magis Energia S.p.A. CogasPiù Energie S.r.l. Global Power S.p.A. Global Power Plus S.r.l.	Magis Smart Solutions S.p.A. Agisco S.r.l. Smart Care 1 S.r.l.	Magis Calore S.r.l.	Magis Power S.r.l. Bortoli Total Green S.r.l. Carapelle - 1 S.r.l. Consorzio Canale Industriale G. Camuzzoni di Verona S.c.a.r.l. Delsis S.r.l. Green Hydrogen Venezia S.r.l. JUWI Development 02 S.r.l. JUWI Development 08 S.r.l. Manfredonia S.r.l. Parco Eolico Carpinaccio S.r.l. Parco Eolico Riparbella S.r.l. RF-SIRIO S.r.l. RF-VEGA S.r.l.	Magis Ambiente S.r.l. SER.I.T. S.r.l. Società Igiene Territorio S.p.A. Blue Oil S.r.l. (in liquidazione)	Eco Tirana Sh.a. Società Intercomunale Ambiente S.r.l. Valore Ambiente S.r.l.

The reporting perimeter for the 2025 consolidated Sustainability Reporting of the Magis Group is substantially consistent with that of the previous year, except for the changes that occurred among the subsidiaries belonging to the Group.

Specifically, all subsidiaries have been confirmed except for the addition of the following companies:

- Global Power S.p.A. wholly owned through Magis Energia S.p.A.
- Global Power Plus S.r.l. wholly owned through Magis Energia S.p.A. and Global Power S.p.A.
- Smart Care 1 S.r.l. wholly owned through Magis Smart Solutions S.r.l.;
- Carapelle - 1 S.r.l., wholly owned through the company Magis Power s.r.l.;
- Delsis S.r.l., wholly owned through the company Magis Power s.r.l.;
- Manfredonia S.r.l., wholly owned through the company Magis Power s.r.l.;
- RF-SIRIO S.r.l., wholly owned through the company Magis Power s.r.l.;
- RF-VEGA S.r.l., wholly owned through the company Magis Power s.r.l.;

Each of the companies within the reporting scope presents, in different ways, information relating to environmental, social, personnel, human rights and anti-corruption issues, which is useful to better understand business performance, its results and, above all, the Group's impact on these issues.

The companies listed below are excluded from the Consolidated Financial Statements' scope and, consequently, from the scope of the present Consolidated Sustainability Report, due to their minor shareholding and/or because the Parent Company does not exercise control or coordination over them:

- Agrilux S.r.l.
- Blue Oil S.r.l. (in liquidation)
- Consorzio GPO
- Geothermal Triveneta S.r.l.
- Legnago Servizi S.p.A.
- Parco Eolico Monte Vitalba S.r.l.
- Soenergy S.r.l. (in liquidation)
- Sive S.r.l.

This Consolidated Sustainability Report has been prepared under the coordination of the Company's Finance and Control Department: the information and data presented derive from documents officially adopted by the Company, its subsidiaries, and/or reports prepared by employees within the organisation. The reported data are shared and formally confirmed, tracked and approved by the various Group companies, Business Units and competent corporate departments.

1.2. Business model and strategy

1.2.1 Our business model and value chain

[ESRS_2, SBM-1, DP 40b]

The Magis Group is one of the leading Italian multi-utilities, with Euro 2.16 billion in revenues, Euro 204 million in EBITDA, 2,402 employees (of whom 1,502 are based in Italy and 911 are employed by the subsidiary based in Albania) and approximately 937 thousand customers served in the supply of electricity, natural gas and heat.

[ESRS_2, SBM-1, DP 40a, 42a]

Magis is a multiutility that is wholly publicly owned, formed through the merger by incorporation on 1 January 2021 between AGSM Verona S.p.A. and AIM Vicenza S.p.A., resulting in the Parent Company AGSM AIM S.p.A., subsequently renamed Magis S.p.A. (hereinafter also the "Company") from March 2026. The company is 61.2% owned by the Municipality of Verona and 38.8% by the Municipality of Vicenza, territories in which the Group is historically and deeply rooted.

[ESRS_2, SBM-1, DP 42b]

The Magis Group provides essential services and high value-added products for citizens and for the development of businesses, entities and institutions throughout the Italian territory. Furthermore, through its subsidiary Eco Tirana Sha, the Group provides waste collection and transportation services in the Albanian capital.

The Magis Group is active in the following sectors:

- Sale of electricity, gas, and heat
- Generation of electricity
- Cogeneration and district heating
- Electric mobility
- Energy efficienty
- Public and decorative lighting
- Parking
- Telecommunications
- Electricity and gas distribution and metering
- Waste management

As an aggregation hub, particularly in North-Eastern Italy, and thanks to the significant critical mass achieved following the merger, Magis S.p.A. aims to carry out investments that generate direct benefits for local communities, improve the quality of services provided to citizens and effectively address the challenges facing the public utility sector.

Magis recognises the value of sustainable development and its role is characterised by both the multi-service nature and the regulatory and economic context of the sector, as well as the different demands that in each area of activity derive from the general objectives of customer satisfaction.

The integration process, started during the 2021 financial year and now completed has enabled the optimisation of the organisational structure of the Magis Group by creating six Business Units.

During the 2025 financial year, extraordinary transactions continued with the aim of promoting the simplification and rationalisation of the companies operating in the waste collection, treatment and disposal sector, as well as the numerous acquisitions of special purpose vehicles holding renewable energy generation plants (wind and solar photovoltaic). For further details regarding the corporate aggregation process, reference should be made to section 3.5 "Significant events occurring after the end of the financial year" of the Report on Operations contained in this Annual Financial Report of the Magis Group for the 2025 financial year.

[ESRS_G1, DR G1-1, DP 7, 9]

"We are among the leading Italian multi-utilities in terms of heritage and innovation. Our roots are in the Veneto region, but with determination and dedication we reach across the whole of Italy, operating in territories where every day we integrate energy, mobility, fibre, lighting and networks into a single multidimensional offering.

Like the thread that connects tradition and the future, efficiency and human warmth, we represent the energy, technological, sustainable and digital transition that makes innovation tangible. Magis S.p.A. provides quality services but aspires to be much "more" ... it is an enabler of change, transforming cities and communities into intelligent, sustainable and connected places ... it is a guide for individuals and businesses towards conscious and sustainable choices ... it is the infrastructure, including the emotional infrastructure, of change ... it is the Company of the territories that returns the value generated to those territories"

The Magis Group bases its strategy on values aligned with its development ambitions:

- **CIVIC RESPONSIBILITY:** being a publicly controlled company is a defining characteristic of Magis S.p.A., which is committed every day to generating a positive impact on people's lives and in the territories in which it operates, combining public interest with industrial efficiency. A responsibility based on listening and sharing, developed and fostered through a strong relationship with the territory;
- **INSPIRATION:** Magis S.p.A. acts as a solid, competent and reliable guide that has supported communities and businesses for over one hundred years in addressing the major challenges of our time, from the more responsible use of resources to the need to make conscious and sustainable choices through the adoption of technology and digital solutions. Through concrete initiatives and simple communication, Magis S.p.A. serves as an educational and cultural reference that inspires communities by acting before communicating its actions;
- **SENSITIVE INNOVATION:** for Magis S.p.A., innovation means taking care of people's future, helping them live in harmony with technology. It is a vocation rooted in the industrial culture of Veneto, that of innovating by fostering shared progress to respond to real needs and generate widespread well-being. Whether in energy, district heating or digitalisation, for Magis S.p.A. innovation must be easy to use, clear to understand and useful in practice, serving as a tool that returns value to those who experience it on a daily basis.
- **GROUP SPIRIT:** recognising oneself in people even before in boundaries, because identity is born from a sense of belonging. Thus, being part of a group at Magis means sharing a common vision. Its history and industrial culture teach that progress is built together and that a company's successes are the successes of the territory that hosts it. A perspective that embraces the idea of collective and shared planning inside and outside the company, in which people work with the pride of feeling part of a bigger picture, intended for people, families, productive activities and local administrations.

As part of its business activities, the Magis Group considers it essential to carry out actions in line with the declared intentions and corporate values and rules. Furthermore, it considers fulfilling commitments important, seeking solutions to solve problems, communicating and acting with transparency in order to foster the engagement of stakeholders and, as a consequence, nurture their confidence.

To develop its activities, the Company embraces every new opportunity with courage, with the aim of pursuing the result with perseverance, passion and attention to the quality of the services offered.

In pursuit of its Mission, the Magis Group has adopted its Code of Ethics, which sets out the general principles and rules of conduct that the people operating in the name and on behalf of Magis are inspired by when carrying out their activities. The ethical principles adopted by the Magis Group are listed below:

- fairness, loyalty, integrity, honesty and transparency in managing relations with counterparties and with the Group's own employees;
- fighting corruption in order to avoid any illegal act or offence;
- respect for and optimisation of people as the vital factor for the company's growth and ,business continuity;
- the protection of the corporate image in order to safeguard the Company's good reputation and credibility;
- efficiency of each work activity in pursuit of the cost-effectiveness of using company resources;
- fair competition avoiding deceptive behaviour;
- a spirit of service for all corporate initiatives aiming to pursue a high social value useful for the community;
- confidentiality of information and protection of personal data in the instruments and methods;
- impartiality in relations with stakeholders, avoiding any form of discrimination or favouritism inside or outside of the Group;
- recognition of individual responsibility for performing the work activity;
- quality of the services provided in order to constantly meet customers' requirements.

The provisions of the Group's Code of Ethics are binding, with no exception, for the Directors, the employees and for all those who directly or indirectly establish relations with it, whether permanently or temporarily (collaborators, consultants, agents, attorneys or anyone else operating in the name, and on behalf, of the Company). Il Code of Ethics is published on the website https://www.gruppomagis.it/, distributed internally and promoted through specific company training. Being a Group means respecting people, their ideas and their identities, and being able to enhance the diversity of everyone.

[ESRS_2, SBM-1, DP 40e]

The Group aims at careful and responsible innovation as the foundation for looking at the future of the business, generating connections with the surrounding ecosystem and ensuring overall awareness for common benefit. The objective for the Group becomes:

"The world changes without stopping. We give it the right pace.

For more than one hundred years we have been there when reality changes to help communities, families and businesses to find their pace, with confidence.

We bring innovation, services and presence.

We help shape the future in the places where people live, work and grow."

For each of the sectors and Business Units that make up the Magis Group's value chain, the following paragraphs describe the characteristics of the business model, with particular reference to the products and services offered, the objectives and initiatives to be implemented, as well as the main sustainability performance achieved by the Magis Group during the 2025 financial year. For specific further details on the sales of electricity, gas and heat, please refer to the following section "3.4 Consumers and end users – ESRS S4".

1.2.2 Generation of electricity

[ESRS_2, SBM-1, DP 40f, 40g, 42c]

Within the Power Business Unit, the Magis Group's generation plants produce electricity from renewable sources (hydropower, wind and photovoltaic), for a total capacity of 229.0 MW of installed RES capacity (FER), and from traditional fossil sources (thermoelectric) for a total of 190.0 MW of installed non-RES capacity (NO-FER).

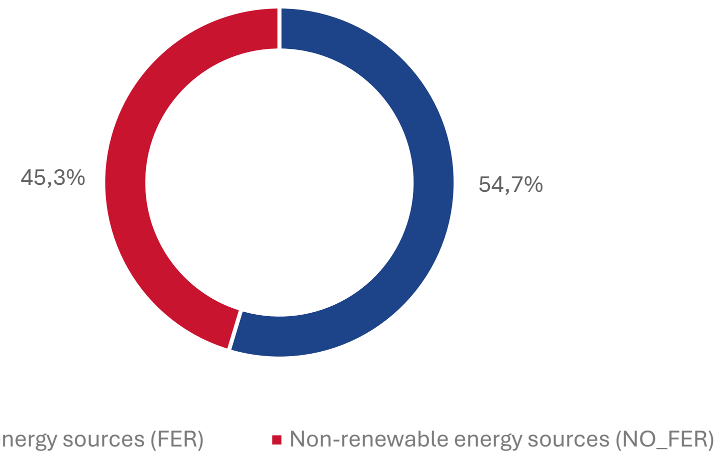

Figure 1 – Installed capacity mix for electricity generation

During the 2025 financial year, the electricity generated from plants powered by renewable sources (FER) amounted to 284 GWh and represented 81.8% of the total electricity produced by the Group's fleet of plants. The energy produced from non-renewable sources amounts to 63 GWh.

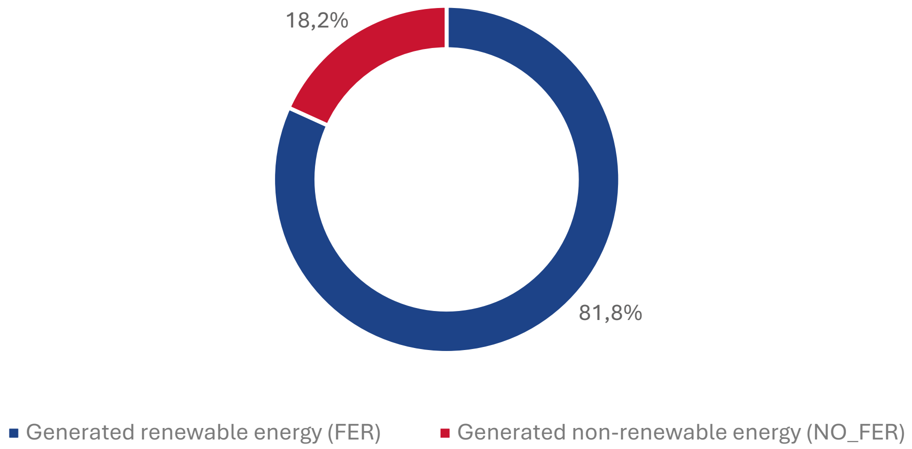

Figure 2 – Electricity production mix

Specifically, the Group's production sources of renewable energy comprise a total of 229.0 MW of installed power, unevenly distributed between:

- photovoltaic plants (50.9 MW);
- wind plants (110.7 MW);
- hydroelectric plants (67.4 MW), further divided into reservoir-based (54.2 MW) and run-of-river (13.1 MW) facilities.

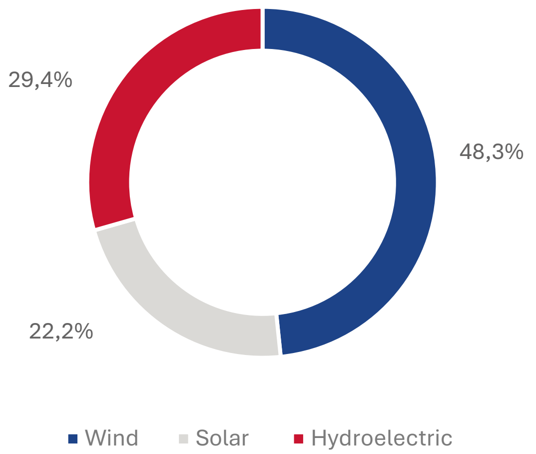

Figure 3 – Composition of the Group's renewable energy sources (FER) (so-called Installed Renewable Energy Capacity Mix)

During the 2025 financial year, the Power Business Unit recorded a decline in production compared with the previous year. The photovoltaic segment made a positive contribution, partially offsetting both the decrease in the hydroelectric segment—which fell sharply relative to the excellent performance of the prior year due to lower rainfall—and the reduced performance of the wind segment, reflecting lower wind conditions. The latter segment benefited from the additional production achieved in the final month of the year by the wind farms owned by the three recently acquired subsidiaries: Carapelle, Delsis, and Manfredonia.

With reference to the hydroelectric sector, the 2025 financial year saw lower output than the previous year, especially for the two reservoir plants of Maso Corona and San Colombano, while always remaining well above the historical annual averages. 2024 was an extraordinary year, with high output especially in the first six months of the year. The run-of-river plants of Belfiore and Diga Chievo achieved higher output than last year, while the Tombetta plant recorded a trend similar to that of the reservoir plants, with lower output than 2024 but higher than the historical averages for the period.

Energy from water
Magis' hydroelectric plants

In 2025, output in the wind sector was slightly higher than in the previous year, with an excellent January offset by lower windiness recorded in February. The subsequent months from March to September, albeit with a lower weight, were also characterised by low windiness, which affected overall output.

As of 26 November 2025, Magis Power S.r.l. acquired all shareholdings in Delsis S.r.l., Manfredonia S.r.l., and Carapelle S.r.l., companies operating in the renewable energy sector. This acquisition increased the total installed capacity of the wind segment by 52.3 MW, allocated as follows: Delsis 26 MW, Manfredonia 4.4 MW, and Carapelle 21.9 MW.

Wind Energy
Magis' wind farms

With regard to the photovoltaic sector, production was significantly higher than in the previous year, thanks to the connection of the Borgonovo and Calendasco plants at the end of 2024, adding a total of 9.5 MW of installed capacity. Solar irradiation recorded in the first and third quarters of 2025 was overall below historical period averages, affecting production levels even for plants already in operation in prior years. By contrast, production in the second quarter of 2025 was in line with budgeted expectations. Also worth noting is the connection of the photovoltaic plant in Carlino in February 2025, with an additional installed capacity of 2.7 MW. Finally, from the end of October 2025, Magis Power S.r.l. acquired all shareholdings in RF-Sirio S.r.l. and RF-Vega S.r.l., companies operating in the renewable energy sector, further increasing installed capacity by a total of 15 MW, allocated as follows: Sirio 7.6 MW and Vega 7.4 MW.

Sun Energy
Magis photovoltaic parks

The Group's production sources of non-renewable energy consist of 190.0 GW of installed power[1] at the Mincio thermoelectric power plant.

Output in the thermoelectric sector initially improved compared to the first quarter of last year. In particular, in February 2025, the Mincio plant also carried out start-ups for tuning tests on the gas turbine unit. In March, the energy scenario, characterised by a low-payoff combination of the PUN (Single National Price) and PSV (Virtual Trading Point) indices and CO2 quotas, did not favour the start-up of the plant throughout the month. This energy scenario also continued throughout the second quarter, and in August and September, allowing further start-ups of the plant only in July. The plant was subsequently started up again in the last two months of the year.

1 Il valore indicato è rappresentativo della quota parte di proprietà del Gruppo Magis pari al 50% della centrale termoelettrica di Ponti sul Mincio, dotata di una potenza complessiva installata pari a 380 MW.

Table 2 – Electricity generated broken down by type of production source (MWh)

Generation of electricity	2025		2024	
Total Non-Renewable	**63.281**	**18,2%**	**65.008**	**17,0%**
Generation of electricity - Thermoelectric	63.281	18,2%	65.008	17,0%
Total renewables	**284.162**	**81,8%**	**317.593**	**83,0%**
Generation of electricity - Hydroelectric	141.374	40,7%	200.841	52,5%
Generation of electricity - Photovoltaic	43.004	12,4%	22.117	5,8%
Generation of electricity - Wind	99.784	28,7%	94.634	24,7%
Total energy produced	**347.444**	**100,0%**	**382.600**	**100,0%**

1.2.3 Cogeneration production for district heating

[ESRS_2, SBM-1, DP 40f, 40g, 42c]

Within the Heat Business Unit and, in particular, through its subsidiary Magis Calore, the Group produces and distributes heat to customers connected to the district heating network in the municipalities of Verona and Vicenza. In particular, the company operates eight heat production plants (7 of which through cogeneration) with natural gas as energy input, a geothermal well and an extensive district heating network of approximately 210.4 km, which distributes heat to more than 141,000 equivalent inhabitants.

District heating is provided to users connected by the six networks, almost all of which are operated by natural gas cogeneration plants with a total installed electricity capacity of 55 MWe and an installed thermal capacity of 340 MWt.

The cogenerated electricity fed into the grid during the 2025 financial year amounted to 176 GWh, while the thermal energy produced and fed into the network amounted to 309 GWht.

With regard to the Heat Business Unit's heat production performance, the 2025 financial year was characterised, as in recent years, by milder temperatures than the historical averages for the period, especially in January and December. Demand for thermal energy is in fact substantially unchanged compared to last year.

Cogeneration of electricity was broadly in line with the previous financial year (-1.5%), with an excellent first half of the year offset by lower output in the second half. In particular, in October and November, the Borgo Trento power plant in Verona, which historically accounts for around half of the Heat Business Unit's electricity output, saw the completion of the works to install the two new cogeneration engines, with consequent impacts on production, which reached full operation only from mid-December 2025. The project involved replacing the combined-cycle plant, which had reached the end of its service life, with a new cogeneration plant based on two natural gas-fired Otto-cycle reciprocating engines. In addition to the engines, the recovery systems, all auxiliary systems, and the plant's control and supervision systems were also revamped. The total capacity of the two engines is 12.5 MWe and 12.5 MWt each, with an overall efficiency of 91% compared to 75% for the engines currently used in the other plants.

Magis' district heating
Cogeneration and geothermal plants

Management of cogeneration plants and their emissions

In general, managing district heating plants has the primary objective of maximising the energy transformation yields of heat and electricity generation equipment, in order to ensure compliance with mandatory regulations and minimise the impact of emissions, thus improving environmental performance.

Cogeneration plants associated with district heating networks owned by the Magis Group are subject to the "Emission trading" Directive – EU 2003/87/EC and subsequent amendments updated by Directive (EU) 2018/410, establishing the greenhouse gas "emissions market".

For two of the eight cogeneration plants (Golosine and Forte Procolo Power Plants), in relation to the characteristics of their production capacity, Magis opted out of the emission trading regulation. For these plants, there is no allocation of quotas or obligation for restitution, but there are emission limits and annual compensation requirements. For the 2025 financial year, no compensation obligations are expected..

Strategic development objectives and upcoming projects

As part of the 2025-2030 Business Plan adopted by the Magis Group, in the coming years the Heat Business Unit plans investments of approximately Euro 98 million with the aim of:

- further extending the district heating network in the cities of Verona and Vicenza;
- upgrading cogeneration plants and, more generally, heat energy production systems, also thanks to the development of geothermal energy, in order to support the energy transition and the progressive decarbonisation of the heat generation and distribution sector;
- increasing the thermal energy produced and sold.

The achievement of the strategic objectives briefly described above has already been realised through participation in the regional PR Veneto ERDF 2021-2027 call for proposals, which enabled Magis Calore to obtain two grants from the Veneto Region with a total value of Euro 6 million, earmarked for the development and strengthening of the district heating networks in the cities of Vicenza and Verona.

The call in question is dedicated to the construction, sustainable efficiency improvements, recovery and expansion of district heating networks, supporting the decarbonisation and the energy transition of the areas concerned.

In particular, Magis Calore submitted two separate projects, both approved for funding following the publication of Decree no. 719 of 19 December 2025, one for the city of Vicenza and one for Verona (Euro 3 million per project).

In Vicenza, the Est-1 project provides, by the end of 2028, for:

- the expansion of the district heating network by a further 2.25 km, allowing the simultaneous resolution of certain critical issues affecting the existing network;
- an increase in the number of users served by 16.8%, with the number of exchange substations rising from 199 to 232;
- an increase in the production of thermal energy from renewable sources (geothermal energy) at the Cricoli power plant;

- a reduction in overall consumption of fossil fuels (natural gas);
- annual CO_2 emissions savings post-intervention of 3,689 tonnes of CO_2 equivalent;
- the use of high-efficiency cogeneration units and the recovery of waste heat via heat pumps.
- The total investment for the Vicenza East-1 Project is estimated at Euro 6.9 million.

With a time horizon to 2028, the West Project in Verona provides for:

- an increase in the total serviced volume to approximately 3.62 million m³ (+3.3%);
- an increase in annual thermal energy supplied to approximately 116.3 GWh (+3.1%);
- the extension of the district heating network by a further 2.29 km;
- annual CO_2 emissions savings post-intervention equivalent to 9,759 tonnes;
- the revamping of the Borgo Trento and Forte Procolo plants, with the installation of high-efficiency cogeneration plants and waste heat recovery systems via heat pumps.

The total investment for the Verona West Project is estimated at Euro 6.8 million.

Table 3 – Characteristics of the district heating network and heat production and cogeneration plants

District heating service data	U.M.	2025	2024
Length of network	Kilometres	210,4	200,0
Thermal energy introduced into the network	Kilowatt-hours	309.211.928	309.327.675
Electricity fed into the grid	Kilowatt-hours	175.598.609	178.315.133
Heated volume - estimate (*)	Cubic metres	15.493.946	15.441.533
Number of equivalent apartments (*)	Number	69.169	68.935
Number of equivalent inhabitants served (estimate)	Number	141.389	140.910
Installed electrical capacity	Kilowatts	55.329	61.597
Installed thermal capacity	Kilowatts	340.121	348.300

(*) residential housing unit with trading area and volume of 80 m2 and 224 m3 respectively

1.2.4 Distribution of electricity and natural gas

[ESRS_2, SBM-1, DP 40f, 40g, 42c]

Within the Magis Group, the distribution and metering of electricity and natural gas is carried out by the distribution company V-Reti S.p.A., in accordance with the rules on functional unbundling for vertically integrated companies in the sector, and in compliance with the principles of cost-effectiveness, profitability, and the confidentiality of corporate data.

The consolidated experience in distribution makes V-Reti a reliable company with strong technical skills. The company looks to the future by committing to significantly increasing investments with the goal of generating direct benefits for the territories served, improving the quality of service offered to citizens and effectively responding to the challenges faced by the public utility service sector.

With constant commitment and presence, the Magis Group continuously guarantees the supervision of electricity and gas distribution networks and works to maintain the highest levels of safety standards and continuity of the service.

V-Reti ranks among the most exemplary distribution companies in Italy

The final data prepared in 2025 by the Italian Regulatory Authority for Electricity, Gas and Water (ARERA) relating to the 2024 financial year confirmed V-Reti as one of Italy's most exemplary distribution companies in terms of service standards and quality. Among the parameters considered by the Authority, it is possible to indicate the performance achieved in managing distribution networks in the following areas:

- **in the municipalities of Verona and Grezzana (VR), an average duration of annual service interruptions of less than 12 minutes and an average number of annual interruptions per customer of 0.8 were recorded;**
- **in the City of Vicenza, an average duration of annual service interruptions of less than 26 and a half minutes and an average number of annual interruptions per customer of 1.5 were recorded.**

These results were achieved thanks to the dedication and high professionalism of the distribution service operators and to the constant and increasing planned and executed investments in the electricity distribution networks, amounting to Euro 29.8 million in 2024 and a further Euro 25.2 million in the 2025 financial year.

Exceeding the targets set by the Authority enabled V-Reti to receive Euro 326 thousand in rewards from ARERA, up 35.8% compared to Euro 240 thousand in the previous financial year.

Electricity distribution service

The entire supply chain of the electricity market is composed of the following five phases:

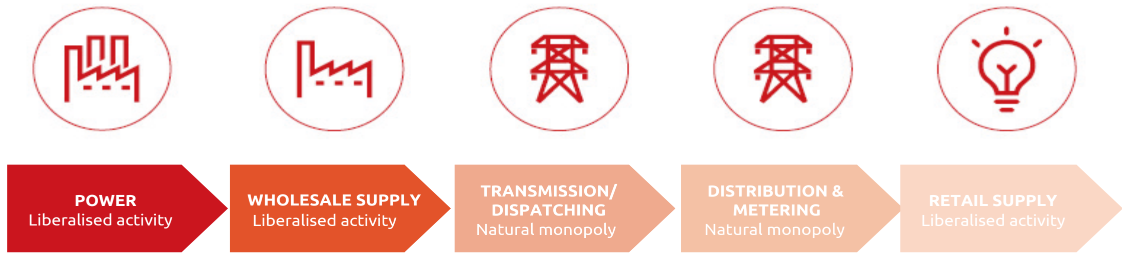

Figure 4 – Electricity supply chain

V-Reti mainly carries out the transformation, distribution and measurement of electricity throughout the Municipalities of Verona, Vicenza and Grezzana with an extension of about 4,680 km between Low Voltage (LV), Medium Voltage (MV) and High Voltage (HV).

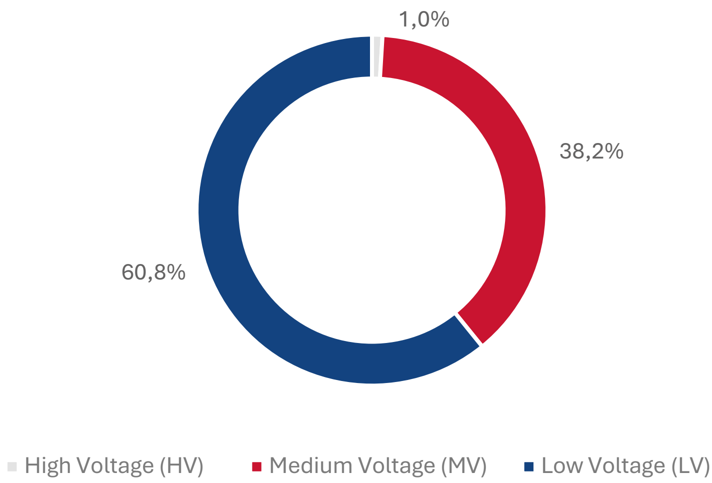

Figure 5 – Breakdown of the electricity network by voltage levels

Table 4 – Characteristics of the electricity distribution network

Electricity network extension (Km)	U.M.	2025	2024
High voltage network	Kilometres	45	45
Medium Voltage Network	Kilometres	1.788	1.789
Low voltage network	Kilometres	2.847	2.789
Total	**Kilometres**	**4.680**	**4.623**

The electricity fed into the grid during the 2025 financial year totalled approximately 2,871 GWh, distributed across low, medium and high voltage levels.

Table 5 – Electricity transported and distributed to customers

Distributed Electricity (MWh)	U.M.	2025	2024
High voltage network	Megawatt-hours	1.259.260	1.177.712
Medium Voltage Network*	Megawatt-hours	674.878	675.751
Low voltage network	Megawatt-hours	936.870	950.437
Total	**Megawatt-hours**	**2.871.009**	**2.803.900**

During the 2025 financial year, V-Reti managed a total of 320 thousand PoDs (Point of Delivery) and approximately 281 thousand meters, of which around 254 thousand were active (equal to 90.4% of the total).

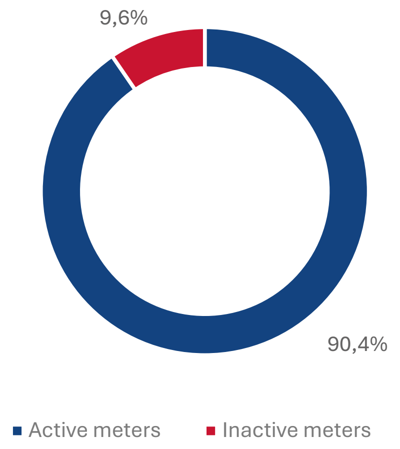

Figure 6 – Breakdown of electricity meters managed between active and inactive

The number of meters connected to the distribution network reached approximately 281 thousand in 2025, of which 90.4% were active. There are approximately 266 thousand 2G smart meters installed (equal to 94.8% of the total).

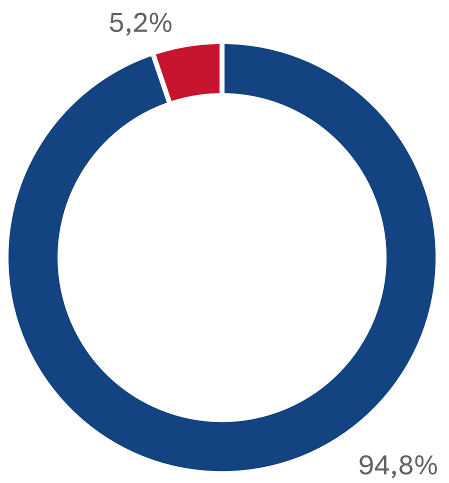

Figure 7 – Distribution of electricity meters by type

Table 6 – Electricity supply points managed

POD Summary (no.)	U.M.	2025	2024
Low voltage POD	Unit	318.372	315.565
Medium and High Voltage POD	Unit	1.163	1.122
Total	**Unit**	**319.535**	**316.687**

During the reporting period, V-Reti continued its activities to replace and modernise its electricity meters. The 2G meters play a crucial role in achieving decarbonisation and energy efficiency objectives, while addressing the evolving requirements of the electricity sector. The V-Reti meter replacement project will ensure prompt and reliable metering of consumption, facilitate its control by end customers, allow the reduction of adjustments and an improvement in the service quality.

The roll-out plan for the 2G smart metering system (PMS2) scheduled by V-Reti complies with the functional specifications established by ARERA under Resolution 87/2016/R/eel, adopted pursuant to the provisions of Legislative Decree No. 102 of 4 July 2014, implementing European Directive 2012/27/EU on energy efficiency and improvements to the national electricity system as a whole.

In order to inform the public and local stakeholders about the plan to replace electricity meters in the municipalities served by V-Reti, the "Contatore 2G, Uno di Famiglia" (2G Meter, One of the Family) communication campaign was created.

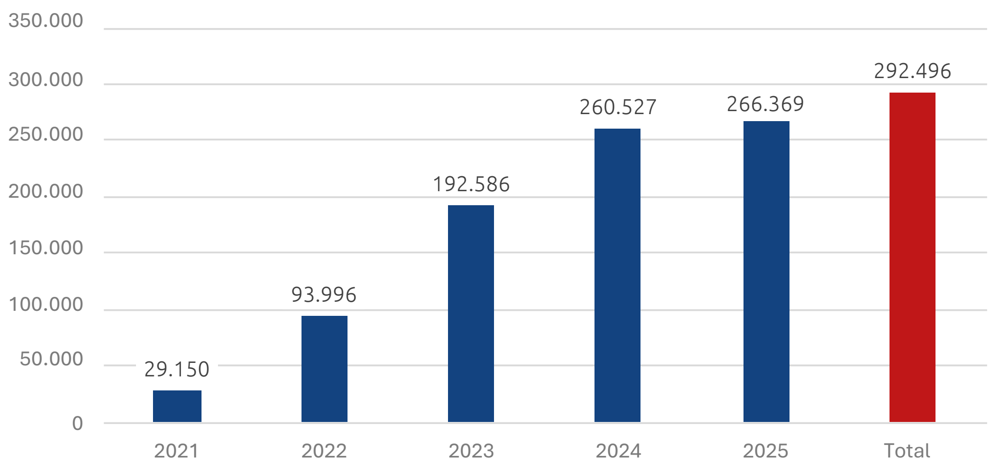

Figure 8 – 2G smart meter replacement progress

During the 2025 financial year, as in the previous financial year, ARERA recognised (see resolution 418/2025/R/eel) a prize of Euro 400,000 for V-Reti for having implemented resilience measures that improved the quality of the electricity service in the municipality of Vicenza.

Through advanced engineering solutions and a safety plan, the distribution company has carried out structural interventions that will protect the substations from flooding, thereby enhancing the network's resilience and service stability even during extreme weather events.

In 2024, the Verona and Vicenza control rooms were merged and the new ADMS (Advance Distribution Management System) was commissioned for operating the electricity grid. Subsequently, during the 2025 financial year, some additional features were developed for network modelling, integration with the emergency call centre and on-site fault management using mobile devices. In addition, training activities for internal and external staff (call centre) and a review of processes were launched, with the aim of commissioning these new features by the first half of 2026.

Quality of the electricity distribution service

For the 2025 financial year, the quality of electricity distribution and metering services is regulated by ARERA in two separate regulatory texts approved with resolution 617/2023/R/eel: the Consolidated text of output based regulation of the distribution service (TIQD 2024 2027) and the Consolidated text of the commercial quality of distribution and metering services (TIQC 2024).

These measures replace the previous TIQE 2020 2023 and reorganise quality regulation by assigning to the TIQD the rules on service continuity, technical indicators and incentive mechanisms linked to network outputs, and to the TIQC the definition of specific and overall levels of commercial quality and the related automatic compensation due to users in the event of failure to comply with the standards.

The new quality regulatory framework fits into a context of the progressive overall evolution of the tariff framework and cost recognition criteria, driven by the ROSS base methodology, introduced in 2024 for distribution and metering services.

In 2025, ARERA in fact started updating some aspects of ROSS base by adopting resolution 390/2025/R/com, with reference to the capitalisation rate and the application of the so-called “z-factor”. The same resolution also introduced, on a trial basis, tools such as multi-year regulatory business plans and cost-assessment mechanisms, which represent the first steps towards the future evolution of regulation towards ROSS integrale, intended to link technical and commercial quality levels more structurally with the total expenditure recognised for operators.

Compliance with commercial quality standards is constantly monitored through the use of dedicated software that can transmit alerts at the same time as every anomaly that is recorded and may generate an order for automatic compensation to be paid.

In 2025, V-Reti was 99.8% compliant with the specific commercial quality standards for electricity. The average time for activating the supply corresponds to 0.29 working days while the average time for reactivating the supply following suspension due to lack of payment is 0.06 working days.

Table 7 – Electricity distribution service quality indicators

Quality standards of service offered by distribution companies	U.M.	2025	2024
Total number of services performed	Unit	17.268	18.389
Total number of LV/MV supply activation cases	Unit	11.319	10.933
Total number of LV/MV supply reactivation cases following suspension due to lack of payment	Unit	5.949	7.456

Natural gas management and distribution service

[ESRS_2, SBM-1, DP 40d]

The distribution service carried out by V-Reti guarantees the withdrawal of methane gas from Snam Rete Gas pipelines and transport, through local networks, for delivery to end users[2] .

V-Reti carries out the natural gas distribution service in the following municipalities:

- Verona and in the province in Badia Calavena, Illasi, Selva di Progno and Tregnago and, for a small number of users, in Bussolengo, Buttapietra and S. Giovanni Lupatoto;
- Vicenza and in the province in Altavilla Vicentina, Altissimo, Arcugnano, Arzignano, Bolzano Vicentino, Bressanvido, Chiampo, Creazzo, Crespadoro, Grumolo delle Abbadesse, Longare, Montegalda, Monticello Conte Otto, Nogarole Vicentino, Pozzoleone, Quinto Vicentino, S.P. Mussolino, Torri di Quartesolo, Villaverla and Nanto;
- municipality of Goito in the province of Mantua;
- municipalities of Gazzo and Grantorto in the province of Padua;
- Treviso on behalf of the Parent Company, holder of the service concession.

Using its own infrastructure, V-Reti also supplies other municipalities (Costabissara, Caldogno, Carmignano del Brenta, Dueville, Thiene) where it manages the so-called "overruns", i.e. those residual groups of users who connect to the network because of their proximity.

2 For more details on revenue deriving from the natural gas management and distribution service, please refer to Chapter "3. Consolidated results and management performance" of the Report on Operations.

The gas network managed by the Magis Group extends for 3,240 km divided into high, medium and low pressure.

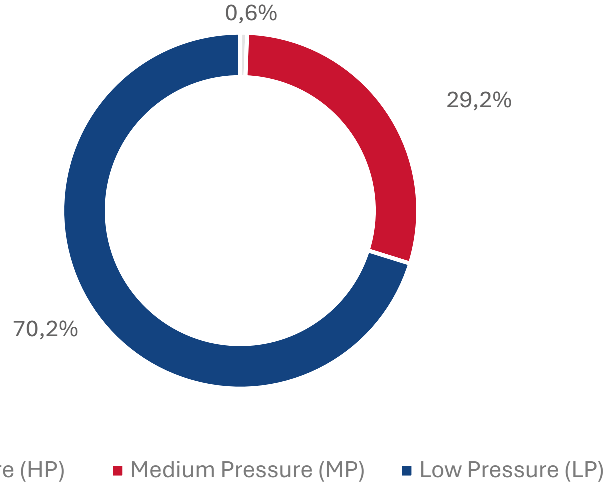

Figure 9 – Breakdown of the gas network by pressure levels

Table 8 – Characteristics of the gas distribution network

Gas network length (km)	U.M.	2025	2024
High-pressure network	Kilometres	20	20
Medium-pressure network	Kilometres	947	947
Low-pressure network	Kilometres	2.273	2.277
Total	**Kilometres**	**3.240**	**3.244**

The infrastructure for the distribution of gas resources is made of different materials, the choice of which comes from technological and performance requirements.

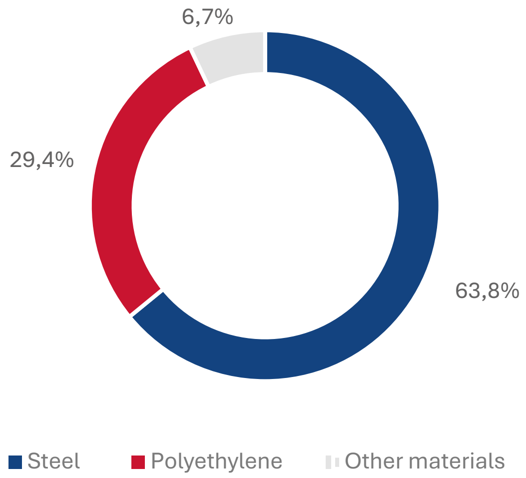

Figure 10 – Breakdown of the gas network by pipeline type

Table 9 – Types of pipelines used for gas distribution

Gas network pipelines (Km)	U.M.	2025	2024
Steel	Kilometres	2.068	2.079
Polyethylene	Kilometres	954	936
Other materials	Kilometres	218	229
Total	**Kilometres**	**3.240**	**3.244**

The Magis Group is committed to reducing leaks by gradually renewing the network. The correct management of gas distribution systems and networks, the usage of competent resources and the use of suitable instrumentation, together with continuous monitoring, are the main elements to guarantee the safety of citizens, preventing potential impacts and accidents. During the 2025 financial year, V-Reti managed a total of 355 thousand PdRs (Punti di Riconsegna – Delivery Points) and approximately 323 thousand meters, of which around 291 thousand were active (equal to 90.0%).

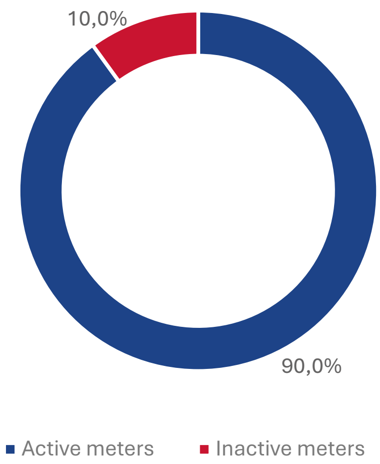

Figure 11 – Breakdown of meters managed between active and inactive

During 2025, investments in modernising the network's infrastructure led to an important campaign to replace traditional meters (active and non-active) with the so-called "smart meters", latest generation electronic meters with remote control features, as well as a digitisation campaign to increase resilience and achieve energy savings. Smart meters managed by V-Reti are around 307 thousand and represent 94.9% of the meters managed by the Magis Group.

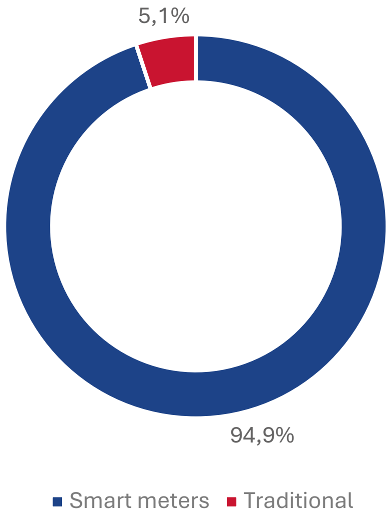

Figure 12 – Distribution of meters by type

The volume of gas fed into the distribution network during the 2025 financial year was equal to 502.7 million Scm.

Table 10 – Gas transported and distributed to customers

Gas injected into the network (Million Scm)	U.M.	2025	2024
Vicenza and province	Mil. Scm	227,0	226,3
Province of Padua	Mil. Scm	4,6	4,6
Treviso	Mil. Scm	57,9	56,7
Province of Verona	Mil. Scm	206,1	208,9
Province of Mantua	Mil. Scm	7,0	6,9
Total	**Mil. Scm**	**502,7**	**503,3**

The dispersion of methane gas in the atmosphere is one of the elements that has the greatest impact on the environment and on safety during normal operation of the gas distribution service. Methane gas, which is naturally odourless and colourless, is constantly odorised in the collection and metering plants, through a controlled and tested procedure, so that humans can smell it in the event of a leak or of accidental use, and thus limit the risk of harmful or dangerous phenomena. It represents both a dangerous element because of its flammability, and a polluting element because of the high capacity to retain terrestrial infra-red radiation, which classifies it as a greenhouse gas. For these reasons, the containment and resolution of gas dispersion represent the main aim on which the safety, quality and continuity of the service are based. In order to monitor these risks, the principal monitoring systems distributed are remote control systems that monitor the distribution system's key parameters, and the alarm systems that discourage or give warning of intentional acts. Moreover, planned checks are constantly made for any gas leaks from piping, together with the routine and extraordinary maintenance of the networks.

It should also be noted that from the 2024 financial year, V-Reti has adopted and implemented the system Picarro Advanced Leak Detection for gas monitoring: this technology is capable of detecting any gas leaks along the distribution network, with a detection sensitivity reaching one part of gas per billion. Picarro allows for more precise detection and resolution of gas leaks, thereby enhancing the quality of service and the distribution network. The system includes a device to be installed on a vehicle, called the Surveyor, along with three portable devices (known as Picarro Energy Backpacks) entrusted to distribution service operators. The Surveyor instrument uses cavity ring-down spectroscopy to measure the composition of atmospheric gases and pinpoint areas where potential gas leaks may occur. The Picarro Energy Backpacks provide even more precise measurements of methane and ethane levels in the environment: using the same technology as the Surveyor device but in a miniaturised form, these "backpacks" are employed by operators during on-foot inspections..

White Certificates (Energy Efficiency Certificates)

The White Certificates or Energy Efficiency Certificates (EEC) are tradable securities that certify the energy savings achieved in end uses of energy, implementing measures to increase energy efficiency. The promotion of energy savings through the system of the White Certificates is provided for by the Ministerial Decrees of 20 July 2004 (Ministerial Decree 20/7/04 on electricity, Ministerial Decree 20/7/04 on gas, as amended).

"Obliged" distributors of electricity and natural gas are expected to meet certain targets each year in terms of energy savings, measurable in Tonnes of Oil Equivalent (TOE) saved; each White Certificate is equivalent to savings of one Tonne of Oil Equivalent.

In 2025, ARERA awarded the Magis Group more than 6 thousand white certificates for electricity distribution and around 10 thousand white certificates for natural gas distribution.

In addition to energy distributors, other voluntary parties, typically energy service companies (ESCOs) or companies that have appointed a certified energy management expert (EGE) may also participate in the mechanism.

The voluntary parties are all the operators that freely choose to carry out consumption reduction measures in end uses of energy, and to whom the right to receive the corresponding quantity of white certificates is assigned..

Table 11 – Energy Efficiency Certificates (TEE)

White certificates (no.)	U.M.	2025	2024
Gas	Number	10.065	24.217
Energy	Number	6.250	7.016
Total	**Number**	**16.315**	**31.233**

Quality in natural gas distribution service

To distribute natural gas, V-Reti manages the transport of gas through local pipeline networks, for delivery to end users through two phases:

- the pick-up of gas from Snam Rete Gas' pipelines through first-stage pick-up points;
- transport and distribution to end users.

Gas distribution activities are carried out by the Magis Group according to the rules of functional unbundling envisaged for vertically integrated companies in the sector, in compliance with the principles of economy and profitability and the confidentiality of company data for the purpose of promoting continuity, efficiency and adequate quality levels in the service provided.

The natural gas distribution service makes reference to the commercial quality parameters set by ARERA. In 2025, the minimum times and levels required by the Gas Distribution Service Quality Regulation (RQDG) were widely complied with.

With reference to the Magis Group's distribution companies, commercial quality standards were 99.2% complied with in 2025. The average time for activating the supply corresponds to 2.95 working days while the average time for reactivating the supply following suspension due to lack of payment is 1.16 working days.

Table 12 – Gas distribution service quality indicators [3]

Quality standards of service offered by distribution companies	U.M.	2025	2024
Total number of GAS services performed	Unit	18.525	18.610
Total number of simple services	Unit	1.124	1.467
Total number of complex services	Unit	258	243
Total number of supply activation cases	Unit	7.427	7.289
Total number of supply reactivation cases following suspension due to lack of payment	Unit	1.849	1.980

3 It should be noted that the values for "Total number of GAS services performed" relating to FY 2024 were recalculated in order to ensure methodological consistency and correct comparability with FY 2025

1.2.5 Smart services

[ESRS_2, SBM-1, DP 40f, 40g, 42c]

The Smart Business Unit's mission is to facilitate the transition towards electrification of the territories served through innovative and smart solutions. Its areas of expertise include electric mobility, public lighting, telecommunications, management of car parks and energy efficiency solutions for buildings.

Innovation and sustainability drive Smart's choices, activities and projects. On the public lighting front, the BU manages around 82 thousand lighting points, 96.4% of which are LED, thus ensuring efficiency, energy savings and compliance with light pollution directives. Furthermore, to enhance the smart approach of the provinces of Verona, Vicenza and Brescia, it is committed to expanding its electric mobility offer by increasing the number of charging stations in the area.

Smart is a partner of local communities and businesses to support them in their energy transition through five business lines:

- connectivity and telecommunications
- public lighting
- energy efficiency and redevelopment of public buildings
- electric mobility and pay parking area management
- smart city services for the territories and communities

The Smart Business Unit focuses on innovation and the green economy by providing robust development models for all the services offered with the aim of accompanying the public administration in the energy and digital transition and by supporting local communities with its effectiveness in managing energy efficiency projects and its expertise in managing complex projects such as the redevelopment of public buildings.

Electric mobility

Sustainable mobility plays an important role not only in terms of the smart growth of the cities served but more generally for implementing a truly sustainable approach for the community and the territory.

In this regard, Smart proposes the creation of charging systems for electric vehicles and parking spaces dedicated to their parking and hardware and software system management for remote control and the use of charging stations by customers.

The Group actively contributes by proactively participating in the transformation of city mobility through the E-MOBILITY project, a service that uses modern charging infrastructures and a dedicated digital platform to promote city electric mobility.

During 2025, Smart's 275 public charging sockets delivered a total of 987 MWh.

The charging service can be activated by the end customer through the "Magis E-mobility" application and manages the entire car charging process, from the identification of the stations to the start of the service and its completion.

Charging stations provide a charging session of up to 300 minutes, with the requirement to move the vehicle within one hour of the end of the service. On the other hand, at night, the car can be parked with the cable connected from 11.00 pm to 7.00 am.

In the event of a request for technical assistance or to report anomalies, customers can contact the Call Centre, available 24 hours a day, at the toll-free number 800 133 966. The call centre service is carried out by technical staff who can speak four languages: English, German, Spanish and French.

Smart has extended its commercial offer by introducing a subscription formula for the electric vehicle charging service. The solution, which can be activated directly from the dedicated APP, is added to the already existing pay per use rate, which saves money and charging time.

Purchasing the subscription allows users to top up their electronic wallet with the amount of energy, expressed in KWh, depending on the type of subscription chosen, available and valid for 30 calendar days from subscription. The subscriptions can currently be used at Smart charging stations enabled for the public charging service.

The formula offered by the Magis Group includes three subscription sizes available to meet the various needs of customers who use public charging stations.

- Small, valid for 30 kWh
- Medium, valid for 75 kWh
- Large, valid for 150 kWh

The Magis Group also expanded the interoperability with other electric mobility operators, guaranteeing the possibility for customers of other national and European operators to recharge their electric vehicles on the Smart infrastructure, provided that they have joined the European Hubject circuit and have signed the service acceptance. This service allows occasional users such as tourists or visitors to recharge their cars in the Smart stations directly with their provider's app (provider). Occasional users or customers of other operators can find the Smart infrastructure through the "Magis E-mobility" app.

Public Lighting

The Group, through Magis Smart, manages the operation and standard maintenance of the public lighting service in a number of municipalities in the provinces of Verona, Padua, Rovigo, Belluno and Vicenza.

Table 13 – Municipalities where the public lighting service is managed

VERONA	PADOVA	ROVIGO	VICENZA	BELLUNO
• Affi • Angiari • Arcole • Bonavigo • Casaleone • Castagnaro • Castel D'Azzano • Cerro Veronese • Isola Rizza • Legnago • S. Mauro di Saline • Verona • Villa Bartolomea • Valeggio sul Mincio	• Battaglia Terme • Castelbaldo • Cervarese Santa Croce • Massanzago • Merlara • Mestrino • Piombino Dese • Rovolon • Torreglia • Urbana • Veggiano • Villa Estense • Pontelongo	• Costa di Rovigo	• Posina	• Alleghe • Arsiè • Chies D'Alpago • San Gregorio nelle Alpi • Alpago

In 2025, the Smart Business Unit continued to provide the management service for the public lighting network (approximately 1,051.5 km long) in the Municipality of Verona, since ownership of the distribution asset lies with the Magis Group.

The Smart Business Unit has also signed several concessions with other municipalities to upgrade the public lighting system to LED, as well as for operation and maintenance for medium-long periods, with the task of designing and replacing the gas-discharge lamps with LED lamps. In addition, there are plans for the next phase of the public lighting service and for the operation and maintenance/remote control with troubleshooting and service restoration activities.

Smart is directly responsible for the construction, design, and maintenance of public lighting systems in the territories, employing state-of-the-art technologies to ensure reduced energy consumption, minimise light pollution, and protect the environment.

All the new systems are provided with lighting equipment able to offer performance that complies with the regulations prohibiting the emission of upwards light to eliminate the effects of light pollution.

The lighting points managed by the Group are around 82 thousand, 96.4% of which are high energy-efficiency LED lighting fixtures.

The sustainable nature of the service is highlighted by the huge saving in terms of not only light pollution, but also greenhouse gas emissions saved.

The main values that characterise the public lighting service include:

- he strong emphasis on innovation, thanks to using increasingly efficient technologies that ensure low consumption and high quality;
- reliability for quick actions to solve faults;
- sustainability in reducing environmental pollution;
- the timely management of current plants with the prospect of expanding into new territories.

Table 14 – Characteristics of the public lighting service

Lighting fixtures and public lighting network	U.M.	2025	2024
Lighting points managed (total)	Number	81.974	81.764
of which LED	Number	79.025	73.503
Percentage of LED lighting points as a proportion of the total	**%**	**96,4%**	**89,9%**
Length of network in km	Kilometres	1.051,5	1.051,5

Telecommunications

The Magis Group operates in the provinces of Verona and Vicenza through a complex fibre optic telecommunications infrastructure. The optic infrastructure stretches throughout the city areas and also reaches the main population centres in the Provinces of Verona and Vicenza for a total length of approximately 722 kilometres. The telecommunications network of the Magis Group is designed to collect data traffic in urban and non-urban areas, providing the public administration, TLC operators and businesses with a portfolio of services featuring high levels of reliability and performance.

In the Vicenza area, the optical fibre network is sold in the "dark fibre" mode by national telecommunications operators, which in turn use it to provide private e-business customers with broadband telephone and telematic connectivity services in the FTTC (Fibre To The Cabinet) and FTTH (Fibre To The House) modes.

Among the main network connections are: Magis Group offices in the Vicenza area, SVT offices, Viacqua offices, municipal administration buildings, provincial administration offices, car parks, electrical substations, US military bases, Vicenza Fair, courthouse, hospital, university, Vodafone cabinets, and the 5G network.

From an infrastructural point of view, the telecommunications network employed is generally of the ring variety, thus reducing to a minimum any inefficiencies due to faults.

Smart also manages optical fibre connections among various company offices of the Group and the computer systems adopted to safeguard the technological network used to monitor and control operations. The response service is available for 24 hours a day, 365 days a year.

The Group's telecommunications network has a distinctive feature that sets it apart from other similar networks: it is a fully private network connecting various users on a point-to-point basis, with a dedicated optical fibre for each user point. This allows completely isolated data transmission within the network in order to guarantee a very high level of security and confidentiality of the transmitted communications and data.

In the Verona area, the optical fibre network managed by Smart is a telecommunications infrastructure that makes use of the capillarity of the subsoil to achieve high coverage in the area.

The service extends across five municipalities, starting from Peschiera del Garda, passing through Verona and reaching Vicenza. A route also starts from Verona that reaches, through the high voltage lines, the Ala power plant.

The metropolitan network is divided into 10 POPs (Points of Presence) connected to each other in a ring to allow high reliability in the event of a section failure.

Through the "RST – Local Services Network", high value-added services are provided, such as:

- VMPs (variable message panels) that provide public utility information to citizens and visitors;
- Number plate reading systems;
- Traffic lights that use the network for traffic programming by detecting active traffic, together with coils placed under the asphalt;
- Emergency call boxes. A network of safety points available to the community;
- Limited Traffic Zone gates controlling access to the city centre of Verona;
- Security cameras. Over 470 cameras guaranteeing constant monitoring by the local police and the police headquarters through the remote viewing of images by means of an optical fibre connection;
- Public Wi-Fi. The connection (freewifi@verona) is provided in the city's main areas as a public service to access the Internet. Under specific agreements, the service is also distributed to the Integrated University Hospital (hospitals of Borgo Trento and Borgo Roma) and to the Verona University. More than 3,000 antennas provide daily access to thousands of citizens and tourists;
- Public utility sites. The collaboration with the Municipality of Verona made it possible to bring the internet to the public sites of primary interest. To name but a few: public buildings, libraries, museums and theatres.

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Smart is an Internet Service Provider and a telephone operator which enables the provision of high-content digital services to customers:

- redundant internet bandwidth services via the main national routes;
- Domain Maintainer services (use of public IPs and Domain registrations);
- Lan-to-Lan Transport services for multi-site access;
- perimeter Firewalling services with security management;
- network design and operation;
- sensor and camera installation and maintenance;
- dark fibre;
- Housing services.

For the 54 customers who have signed a contract with the company, the toll-free number 800 394 800 and a 24-hour/365-day support and maintenance service are available.

Customers of the telecommunications service fall into three main categories:

- Public Administrations (e.g. several municipalities, including Verona);
- small/medium/large businesses in the territory;
- telephone operators using the Group's fibre (active or dark) for the services they provide to their customers.

During the reporting period, Magis Smart handled 1,038 tickets relating to reports and/or service requests from customers.

The infrastructure development plan provides for the use of existing networks and cable conduits owned by the Magis Group. This synergy will reduce excavation activities to lay new cables, limiting the impact on the territory and the inconvenience for citizens.

Car parks and car parking services

Smart manages ground-level and underground car parks and free and paid parking areas in the City of Vicenza, for a total of 2,254 parking spaces (including 1,724 barrier car parks and 530 pay-and-display car parks (i.e. blue-marked parking spaces).

During the reporting period, around 923 thousand vehicles entered the barrier car parks managed by the Group.

Convenient and smart is the parking payment method for blue-marked parking spaces and in barrier car parks, guaranteed by the various operating systems available (Android and iPhone). Blue-marked parking spaces in the city of Vicenza can be paid in cash, in the appropriate parking meters, through the EasyPark, MyCicero and MAGISFACILE apps (a customised app for parking in the Municipality of Vicenza).

In order to innovate and facilitate parking, the “POSsibile” payment service is operational at the city’s five barrier-controlled car parks. Vicenza was the first Italian city to introduce this “Card in – Card out” contactless payment system, which is based on the use of a credit/debit card and a smartphone. POSsibile makes it possible to avoid using cash and having to get out of the car while paying. This system can be used by all those who possess a contactless card, and does not require any registration or pre-authorisation.

The barrier car parks managed by Smart are equipped with POS readers where payment can be made with electronic cards, making the payment process easier and faster.

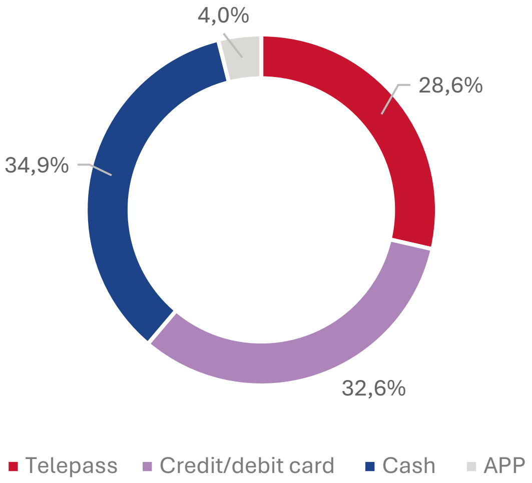


Figure 13 – Payment methods used

In order to ensure accessibility to the parking service for all citizens and the correct rotation in the paid parking areas, Smart has activated maintenance and emergency services for the payment devices (parking meters and automatic tellers) and control on the regularity of the parking, with the possibility of issuing the penalties under applicable regulations.

Table 15 – Parking and stopping service characteristics

Managed parking spaces (no.)	U.M.	2025	2024
Yellow-marked parking spaces	Number	0	0
Blue-marked parking spaces	Number	530	778
Barrier car parks spaces	Number	1.724	1.574
Total parking spaces	**Number**	**2.254**	**2.352**
Total cars entering the car parks	Number	922.697	819.574

1.2.6 Environmental services

[ESRS_2, SBM-1, DP 40f, 40g, 42c]

Through the Environment Business Unit, the Magis Group deals with both waste collection, treatment and recovery activities and urban health. The Group is also committed to the development and strengthening of material treatment plants with the aim of optimising the management of waste flows.

In carrying out its activities, the Group is committed to new circular economy models. Both in the waste sorting and treatment sector and in the plant sector, the Environment Business Unit is aware that the transformation and valorisation of waste materials is a necessary resource to support the sustainability of our industrial system.

The Environment BU intends to ensure the sustainable quality of the services offered, aiming to reduce malfunctions or service disruptions thanks to an infrastructure network closely related to the territory, which guarantees speed and control.

Waste collection

Specifically, through its subsidiaries Valore Ambiente, SERIT and Eco Tirana, the Magis Group takes care of waste collection and disposal, with particular attention to sorted waste collection, recycling processes and proper disposal. The collection of urban waste is mainly managed through door-to-door collection systems and roadside and mixed collection systems.

The method of waste collection is also diversified based on the real nature of the territory served and the characterisation of the users, in particular supplementary home services for specific types of waste are active for non-domestic users.

In the Municipality of Vicenza, Residual Urban Waste (RUR) is collected at the Monte Crocetta transfer station, where it undergoes sorting and/or shredding operations, and is subsequently sent to the two final basin facilities:

- the Grumolo delle Abbadesse landfill, managed by SIA, a subsidiary of the Magis Group;
- the Schio Waste-to-Energy Plant, owned by VIAmbiente S.p.A. (Alto vicentino Ambiente – AVA).

During the 2025 financial year, the companies of the Environment Business Unit collected 579.6 thousand tonnes of urban waste in the 65 Italian municipalities served, with a population of about 616,000 inhabitants, and a further estimated 536,000 inhabitants in the metropolitan area of Tirana in Albania.

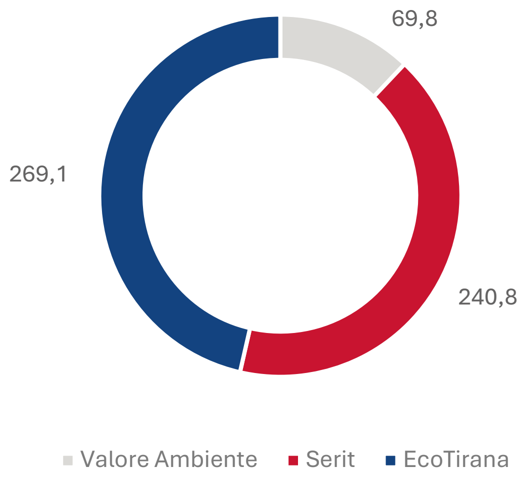


Figure 14 – Waste collected (tonnes/000)

As part of its waste collection activities, the Magis Group provides citizens with a mobile recycling service, consisting of a mobile container placed daily near local markets for the disposal of seven specific types of waste: small household appliances; used clothing; batteries; expired medicines; flammable and hazardous waste; fluorescent and energy-saving lamps. In addition to the practical waste collection function, mobile recycling serves as a communication vehicle for raising awareness among citizens.

In order to promote the proper collection and disposal of bulky waste, the Magis Group provides citizens with a bulky waste collection service at home with the collaboration of social cooperatives in equipped recycling plants.

Finally, the Magis Group provides a monitoring service for the "unauthorised" disposal of waste, concerning refuse abandoned outside the designated containers.

The Collection Centres are at the service of all domestic users for the correct disposal of bulky and recyclable waste. The Group companies directly manage 65 collection centres, 4 in the Vicenza area and 61 in the Province of Verona. The four recycling centres active in the Municipality of Vicenza and managed by Valore Ambiente are at the service of all domestic users for the correct disposal of bulky and recyclable waste. Access is also allowed to non-domestic users, covered by Annex L-quinquies to Part IV of Legislative Decree 152/2006, only for the waste indicated in Annex L-quater of the same decree, subject to filling in a specific form.

The collection centres in the reference area, managed through Valore Ambiente and SERIT, are designed with the aim of encouraging the sorted waste collection and recycling of recoverable materials.

In order to guarantee the achievement of the Circular Economy objectives, including the extension of the life cycle of products, specific areas have been set up in two Collection Centres of the Municipality of Vicenza where citizens can provide waste that they intend to dispose of but that can potentially be sent for reuse.

Waste treatment

During the 2025 financial year, the companies in the Environment Business Unit treated 244.8 tonnes of waste.

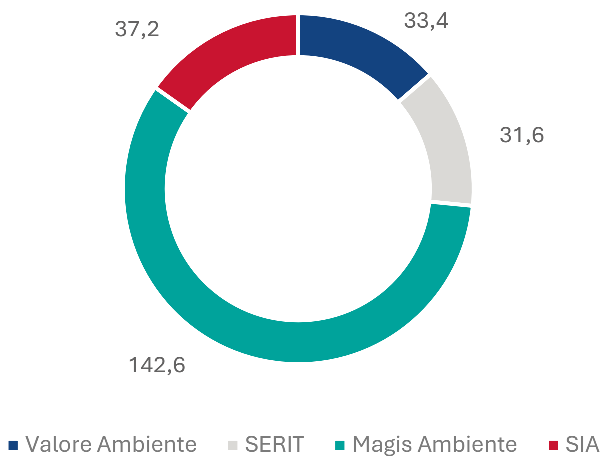


Figure 15 – Treated waste (tonnes)

Material recovery facilities

The subsidiary SERIT operates, in Cavaion Veronese (VR), a plant for the selection and recovery of urban paper and plastic waste which during 2025 treated 31.6 thousand tonnes of waste.

In the Cavaion plant, also known as the Centro Comprensoriale (CC, District Centre), as part of the COREPLA (National Consortium for the Collection, Recycling and Recovery of Plastic Packaging) circuit, the plastic resulting from sorted waste collection is pre-cleaned through a sorting process. Subsequently, the product is pressed and sent to the COREPLA Sorting and Storage Centres. This step is fundamental in the recycling process, since one of the biggest problems in sorted waste collection is precisely related to the presence of foreign material.

Through Magis Ambiente, a facility in the Verona area is operated for the treatment of non-hazardous municipal waste (primarily bulky items, wood, and paper) and non-hazardous special waste. The volume of waste managed in 2025 at the site located in Zevio (VR) amounted to 53.1 thousand tonnes.

Magis Ambiente also manages a mechanical treatment plant at the Ca' del Bue site, where urban waste coming from the city of Verona is treated for a total of 89.5 thousand tonnes during the 2025 financial year. The Ca' del Bue plant is authorised to treat 156,000 tonnes and carries out waste sorting and selection at the site, followed by refinement, resulting in the production of Refuse-Derived Fuel (RDF) suitable for use in industrial processes.

Mechanical treatment plant

In the Vicenza area, Valore Ambiente manages a transfer platform with volume shredder (shredding), storage, sorting and recovery of urban waste from collection in the Municipality of Vicenza together with other smaller quantities of waste from other adjacent municipalities. The volumes handled in the Monte Crocetta plant amount to 33,423 tonnes in 2025.

Landfills

The Magis Group, through its subsidiaries, manages a landfill in operation located in the municipality of Grumolo delle Abbadesse (VI), two post-operation landfills in the municipalities of Lonigo (VI) and Sandrigo (VI) and a landfill leachate treatment plant.

The Grumolo delle Abbadesse landfill operates in the field of disposal of urban waste mainly deriving from the sorted waste collection system, and special non-hazardous waste from urban waste sorting and mechanical separation plants, located mainly in the territory of the Province of Vicenza, within an integrated management system for urban waste disposal, organised and planned at regional level. Before being stored in the tank, the waste is reduced into pressed cubes in order to occupy less space.

INTEGRATED ENVIRONMENTAL SERVICES

Regarding the marketing of integrated environmental services, Magis Ambiente handled **11,921 tonnes of waste** broken down into 11,361 tonnes of non-hazardous waste and 560 tonnes of hazardous waste.

With regard to the integrated environmental services provided by Magis Ambiente, these include but are not limited to:

- **technical and legislative advice;**
- **environmental and waste analysis (testing);**
- **management of waste transport, recovery or disposal through third parties;**
- **sale and/or rental of storage equipment;**
- **assistance in fulfilling annual obligations with the supervisory bodies (Chamber of Commerce, Ministry of the Environment);**
- **sanitisation of premises and areas through authorised third parties.**

During 2025, **37,2 tonnes of waste were deposited** in the active landfill of Grumolo delle Abbadesse, also taking into account the rate coming from special non-hazardous waste. During the 2023 financial year, the volumetric remodulation of the landfill was approved, which will bring new volumes available for the years to come, thanks to the reconfiguration of the banks and the subsequent filling of these volumes, for a total availability of 440,000 cubic metres.

The Fossalunga landfill in Lonigo (VI) is managed by the subsidiary SIT, through a contract for the management by CIAT (Consorzio per l'Igiene Ambientale e del Territorio) regarding all post-operation activities, as well as for the Masona landfill in Sandrigo (VI), where SIT, however, holds the authorisation for the management of the related activities.

Surveillance, environmental monitoring and maintenance activities are carried out at the landfills under post-closure management. A photovoltaic plant is active in the two Vicenza sites (in Lonigo), while the technical and administrative procedures for permanent safety of the site are currently under way at the Verona site.

City services

Street hygiene is necessary for the decorum and cleaning of streets and public areas, and is a constant commitment undertaken by the Group companies, such as Valore Ambiente and SERIT, towards the territory served. Street cleaning and hygiene services are carried out exclusively in public areas, or private areas for public use. The services offered include:

- sweeping the streets (mechanically or manually) indispensable for the urban health and decorum, for the cleaning of streets, squares and pavements also following sports events and local markets. The frequency of street sweeping is defined according to the characteristics of the area, vehicle traffic and use. Manual sweeping activities also include emptying the wastepaper bins, replacing the bag and replenishing the dog waste shovel dispensers;
- street washing, normally active in the period from March to November, when the weather conditions make it possible to ensure operating in compliance with the safety of road traffic, to assist the activity of manual and mechanical sweeping for cleaning and hygiene of public streets and pavements. It takes place during the night in the monumental area, and during the day in the areas outside the city centre, and is also provided on rainy days in the case of special events. The activity is a significant sanitisation of the public streets and pavements as it combines the three basic activities: manual and mechanical sweeping and street washing;
- cleaning of municipal parks and gardens including regular emptying of waste-paper bins. The frequency of service provision depends on the location and use of the site;
- high-pressure water cleaning is an indispensable addition to standard cleaning procedures, and is used to treat important, architecturally prestigious sites, or particular situations of decay, and to rid surfaces of excreta and guano;
- collection of leaves, performed using small and large mechanical or vacuum auto-sweepers, operated by workers who either manually, or with the use of blowers, move the leaves from the roadsides and pavements towards the area where the sweepers are operating, and if necessary using a truck fitted with leaf-vacuuming equipment;
- street weeding, through manual and mechanical systems by using a ‘vapodiserbo’ (steaming of weeds), a natural system for the elimination of weeds. The service includes weeding of the roadsides, pavements and the edges of traffic islands along the entire length of the city’s road network

1.3. Our commitment to stakeholders

[ESRS_2, SBM-2, DP 45a]

Magis’s attention to its stakeholders is based on the values set out in the Group’s Code of Ethics, which defines the guidelines to be adopted in relations with each stakeholder, establishing principles and modes of conduct for each of them.

Building a relationship of mutual trust with the Group’s stakeholders starts from considering their interests and their compatibility with those of the organisation.

For Magis, being a publicly controlled company is not just a formal matter. It means committing every day to bringing a positive impact to people's lives and to the territories in which it operates, combining the public interest with industrial efficiency.

A concrete responsibility based on listening and returning value, fostering strong relationships with communities, helping to understand change and building pathways for sustainable growth. For Magis, sustainability, even before being industrial, is a cultural value and includes education, active participation and a sense of belonging.

Stakeholder engagement is at the core of the Consolidated Sustainability Reporting.

Stakeholder engagement is ongoing and takes place both through established practices (customer satisfaction surveys, meetings with employees, etc.) and in connection with regulatory requirements (e.g., shareholders' meetings, consultations with trade unions, etc.).

The Group is committed to fostering a gradual, open, and transparent process of listening and dialogue, aligned with its strategic choices, to ensure positive and lasting relationships.

Based on the results of external and internal context analysis, it was possible to identify the categories of stakeholders most relevant to the Group. This process was carried out in consideration of the potential degree of influence, interest and impact that:

- stakeholders have on our organisation;
- the organisation has on its stakeholders, in consideration of the Group's activities and products/services, as well as performance.

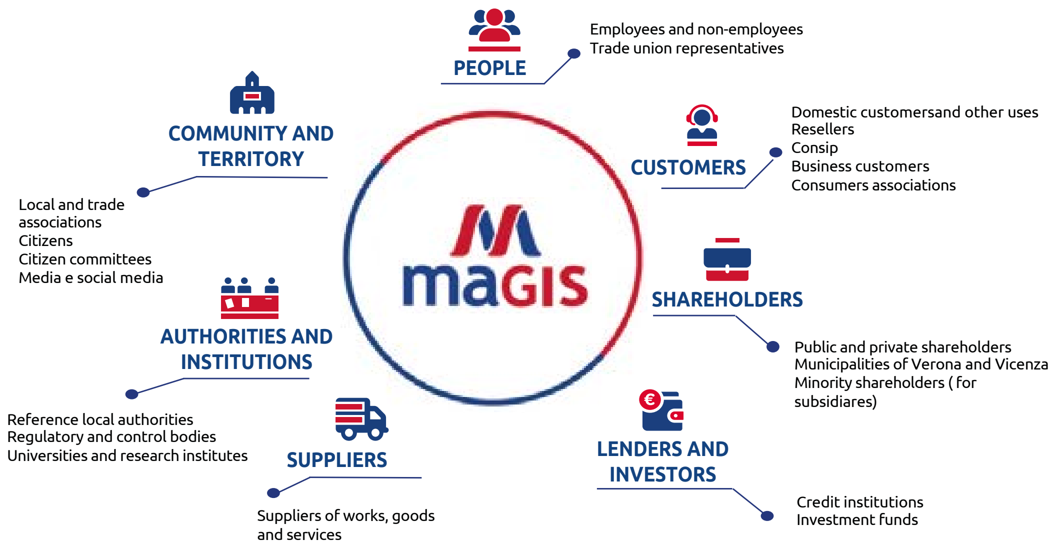


Figure 16 – Stakeholders of the Magis Group

The table below shows, for each stakeholder category identified and involved in the Double Materiality Analysis process, the types of engagement methods used and the relevant topics

Table 16 – Stakeholder Mapping

STAKEHOLDER	INITIATIVES IN ENGAGEMENT	RELEVANT TOPICS FOR THE STAKEHOLDERS
PEOPLE Employees and non-employees Trade union representatives	• Corporate intranet • Engagement initiatives • •raining meetings and webinars • Meetings with trade union representatives • Dedicated channel for reporting unlawful conduct (Whistleblowing) • Health surveillance and occupational safety monitoring actions	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Smart cities and sustainable mobility • Corporate wellbeing, diversity and inclusion – protection of human rights • Occupational health and safety • Technological innovation and digital transformation
CUSTOMERS Domestic customers and other uses Resellers Consip Business customers Associations	• Customer satisfaction surveys • Management of reports to the customer care service • Company websites	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Smart cities and sustainable mobility • Development of distribution networks • Attention to customer needs and customer satisfaction • Technological innovation and digital transformation
SHAREHOLDERS Public and private shareholders Municipalities of Verona and Vicenza Minority shareholders (for subsidiaries)	• Shareholders' meetings	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Smart cities and sustainable mobility • Development of distribution networks • Commitment to local communities and protection of the territory • Technological innovation and digital transformation • Governance geared towards sustainable success • Business integrity and corporate reputation
LENDERS AND INVESTORS Credit institutions Investment funds	• Specific meetings	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Governance geared towards sustainable success • Business integrity and corporate reputation
SUPPLIERS Suppliers of works, goods and services	• Specific meetings • Supplier audits	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Responsible supply chain management • Occupational health and safety • Technological innovation and digital transformation

STAKEHOLDER	INITIATIVES IN ENGAGEMENT	RELEVANT TOPICS FOR THE STAKEHOLDERS
AUTHORITIES AND INSTITUTIONS Reference local authorities Regulatory and control bodies Universities and research institutes	• Partnerships and collaborations • Meetings with institutions • Meetings with regulators and authorities	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Development of distribution networks • Occupational health and safety • Governance geared towards sustainable success • Business integrity and corporate reputation
COMMUNITY AND TERRITORY Local and trade associations Citizens Citizen committees Media and social media	• Interviews, services and live TV, press conferences • Working groups • Collaboration in the organisation of conferences and events • Support and participation in local events	• Climate change • Circular economy • Decarbonisation, energy efficiency and the use of renewable sources • Protection of the environment, biodiversity and ecosystems • Smart cities and sustainable mobility • Development of distribution networks • Commitment to local communities and protection of the territory • Technological innovation and digital transformation • Governance geared towards sustainable success • Business integrity and corporate reputation

[ESRS_2, SBM-2, DP 45b]

The Magis Group also adopts proactive and multi-channel communication as a complementary tool for dialogue with its stakeholders. In this regard, the activity on the main social media channels[4] involves sharing content aimed at disseminating the activities and initiatives carried out by the Group and raising awareness among stakeholders on sustainability issues.

Starting from the 2024 financial year, Magis (then AGSM AIM) initiated a stakeholder engagement process preceding and supporting the development of the Double Materiality Analysis. This process involved different categories of stakeholders through surveys designed to gather their opinions on the importance of sustainability topics - environmental, social, and governance -considered relevant and potentially material for each stakeholder category. Thanks to specific free and optional fields provided for and included in the questionnaires, stakeholder engagement activities have also allowed the collection of opinions and suggestions expressed directly by the individual stakeholders on projects and sustainability objectives that the Group should set itself.

[ESRS_2, SBM-2, DP 45a-lett. v, 45b]

Stakeholder engagement activities continued during the 2025 financial year with the specific aim of considering stakeholders' opinions and expectations when defining the Group's strategy in relation to its business model. In particular, the participatory and qualitative listening journey launched by the Magis Group for the development of its 2025-2030 Business Plan involved the engagement of external and internal stakeholders:

- interviews with external stakeholders lasting over 30 hours
- workshops lasting over 15 hours
- no. 2 public events in Verona and Vicenza
- internal personnel involved through focus groups and dedicated workshops.

4 The social channels are in the name of and managed by the Magis Spa Parent Company and are: Facebook, Instagram, LinkedIn, X, YouTube. The company V-Reti has its own LinkedIn channel available.

CREATION OF SHARED VALUE

The Magis Group aims to foster the creation of shared value by focusing its attention on three material aspects: its sustainability ambition, the drive for growth and the management of market risks.

Sustainability ambition

- **Integrate business priorities with sustainability priorities by defining a set of concrete and measurable short- and medium-to-long-term objectives, with indicators, action lines, budgets and responsibilities.**

Driving growth

- **Accelerate the energy transition by consolidating our position in the renewable energy and energy efficiency sectors.**
- **A strong drive to invest in projects with a long-term perspective, with impacts extending beyond the five-year plan period.**

Risk management

- **Implement tools to mitigate the incremental risk arising from growth in market businesses.**
- **Identify business models with revenue stability (e.g. FER incentives, PPAs, project financing) that mitigate the effects of exposure to market dynamics.**

To ensure the widest possible participation, the Magis Group also organised and promoted two free public events in Verona and Vicenza to engage citizens, stakeholders, associations and local organisations in the final stage of the process that led to the definition of the new 2025–2030 Business Plan.

The aim of the meetings was to share with the community the content and visions that emerged over months of discussion, gather input and reflections on the key themes of the Plan – from the energy transition to innovation, from social impact to the role of utilities in the future of local areas – and involve people in the project that will guide the Magis Group in the coming years.
The Arena amphitheatre hosted the Verona event on Monday 9 June at 6 p.m., as evidence of the green energy partnership signed between the Veneto multi-utility and the Arena Opera Festival 2025. The choice of location also marks the completion of the works carried out by the Magis Group to strengthen the electrical infrastructure of the Arena, a strategic project connected to the ceremonies of the Milan-Cortina 2026 Olympic and Paralympic Games. In Vicenza, the event was held on Wednesday 12 June from 6 p.m. at Teatro Astra, in contrà Barche, 53.

In line with the institutional campaign "Another hundred years and counting", both evenings provided an opportunity to reflect on the major themes that inspired the new Business Plan: the energy transition, innovation, inclusion and the role of utilities in local areas.

The meetings were led by Mario Puliero, director of Telearena in Verona, and Luca Ancetti, co-deputy editor of the daily newspaper Il Giornale di Vicenza in Vicenza. The programme of meetings included interactive sessions with the public through live polls, interviews with the mayors of Verona, Damiano Tommasi, and of Vicenza, Giacomo Possamai, discussions with representatives from the economic, social, and academic sectors, and a closing session featuring distinguished guests: Giovanni Storti, actor, comedian, and passionate nature advocate, in Verona, and Luca Mercalli, climatologist, science communicator, and President of the Italian Meteorological Society, in Vicenza.

The heart of both events was an in-depth look at the guiding principles of the new Business Plan, presented by Magis's Chief Executive Officer, Alessandro Russo.

[ESRS_2, SBM-2, DP 45d]

The analysis of the results from the surveys submitted to stakeholders was approved by the Board of Directors on 7 April 2025.

Following the stakeholder engagement process briefly described above, the new 2025-2030 Business Plan integrated with sustainability topics was approved by the Board of Directors of Magis S.p.A. on 24 June 2025, including the information on the outcomes arising from the stakeholder engagement activities that helped define it.

1.4. Key sustainability issues

[ESRS_2, IRO-1, DP 53a, 53b, 53c, 53d, 53e, 53g, 53h]

[ESRS_2, SBM-3, DP 48g]

Within its 2024 Consolidated Sustainability Report, Magis has developed a Double Materiality Analysis structured according to the requirements of the European Sustainability Reporting Standards (ESRS) established by the EFRAG (European Financial Reporting Advisory Group).

In 2025, the Group carried out an update of the analysis previously conducted. The activity confirmed the assessments carried out in 2024 and the material topics previously identified.

The Double Materiality Analysis combines two dimensions: impact materiality and financial materiality.

- Impact materiality refers to the actual or potential, positive or negative effects of the Company on people or the environment, linked to its own operations and to the upstream and downstream value chain, including through the distribution of products, the provision of services, and commercial relationships (inside-out perspective).
- Financial materiality concerns risks and opportunities that have, or can reasonably be expected to have, a significant impact on the Company's development, financial position, economic results, cash flows, access to financing, or cost of capital (outside-in perspective).

The analysis was organised according to the three main phases described below.

1. Understanding and Identifying Impacts, Risks and Opportunities (IROs)

The first phase involved analysing and understanding the context in which the Magis Group operates, with the aim of defining a preliminary list (a long-list) of all impacts generated by Magis's activities along its value chain, together with a collection of risks and opportunities that could affect the Group's financial position. Specifically, for the Group, three different value chains linked to the various services provided were taken into consideration:

- Energy Services: includes the activities of generation, distribution, and marketing of energy products and services carried out by the Power, Heat, Market Business Units and the company V-Reti;
- Environmental Services: includes the activities carried out by the companies within the Environment Business Unit related to waste collection and treatment;
- Other Services: includes the added value activities carried out by the companies of the Smart Solution BU.

The mapping of Impacts, Risks and Opportunities (so-called IROs) was developed based on the 10 thematic ESRS standards found in Appendix A of ESRS 1, through a breakdown by the Group's three service lines, considering the differences between the various businesses operated. This differentiation led to the identification of a list of IROs at Group level, along with specific lists for each service line.

[ESRS_2, SBM-3, DP 48h]

The mapping process did not result in any entity-specific IROs being identified.

The identification of the aforementioned IROs was based on two primary sources of information.

1. Understanding the organisation's internal context included a review of the existing internal corporate regulations, as well as mapping and analysing the value chains of the Group's different service lines and the categories of stakeholders involved. Factors such as the types of business, the nature of activities, the geographical areas involved, and the Group's main dependencies on the supply of raw materials, goods, services, processing, processes, and target markets were also taken into account.
2. Understanding the organisation's external context, which included analysing industry reports, relevant standards and regulations, and conducting a comparative analysis of peer and competitor representative of the various business in which the Group operates.[5] The results emerging from stakeholder engagement activities carried out during the 2024 financial year through surveys submitted to various stakeholder categories were also considered.

2. Assessment of Impacts, Risks and Opportunities

The identified and mapped IROs were then assessed using a qualitative-quantitative model, developed in accordance with the requirements set out in ESRS 1.

5 The following references were used for the analysis of report, standard and sector regulations: ESRS (European Sustainability Reporting Standards), MSCI (Morgan Stanley Capital International), SASB (Sustainability Accounting Standards Board), ENCORE (Exploring Natural Capital Opportunity Risks and Exposure), UNEP (United Nations Environment Programme), Rete Natura 2000 and Aqueduct Water Risk Atlas.

Impact materiality

The assessment of impacts over the short, medium or long term (as defined by ESRS 1)[6] was carried out based on the likelihood of the impact occurring and its significance (for positive impacts) or severity (for negative impacts), using the following criteria:

- Scale: how severe the negative impact is or how beneficial the positive impact is for people or the environment;
- Scope: the extent of the impact in terms of geographical area and the stakeholders affected;
- Irreversibility (for negative impacts): the extent to which it is possible to return to the previous state or condition.

Value scales ranging from 1 to 4 were used for all the criteria mentioned above.

In the event of potential negative impacts on human rights, the severity of the impact was prioritised over the likelihood of occurrence.

The assessment of impact materiality is calculated as the product of probability and significance, resulting in a single value that reflects the expected effect.

Financial materiality

The risks and opportunities identified during the mapping phase were assessed based on the magnitude of potential financial effects and the likelihood of occurrence.

Specifically, regarding magnitude, during the assessment of the relevance of risks and opportunities, their potential financial effects over the short, medium, and long term were considered based on scenarios and forecasts deemed likely, as well as potential impacts arising from assets and liabilities not yet recognised in the financial statements.

[ESRS_2, SBM-3, DP 48 d, 48e]

The main currently observable financial impacts occur in the form of:

- operating costs (OpEx), linked to environmental regulation adaptations and mitigation efforts;
- investments (CapEx), required for improving the efficiency of plants, processes, and technologies used;
- impacts on profitability (Turnover) and margins (EBITDA).

Any risks that may lead to significant current financial impacts are periodically identified and assessed to inform industrial and financial planning and, where appropriate and relevant, the necessary provisions are made.

To promptly detect any significant changes in the financial position, the Group maintains an active monitoring system designed to identify any changes that may impact the assets and liabilities reported in the consolidated financial statements.

6 Short term: the period adopted by the company as its financial reporting reference period (i.e. twelve months).
Medium term: up to 5 years from the end of the short-term reference period (i.e. from the thirteenth month to the end of the fifth year).
Long-term: over 5 years.

The impacts described above on EBITDA, Turnover, CapEx and OpEx have been assessed using a scale from 1 to 4, consistent with the metrics defined in the Enterprise Risk Management (ERM) model adopted at the Magis Group level.

The assessment of financial materiality was ultimately determined by calculating the product of probability and magnitude, thereby obtaining a consolidated value representative of the expected financial impact.

3. Definition of results

[ESRS_2, IRO-2, DP 59]

Following the evaluation of the IROs, a single cut-off threshold was set at the value of 8 (eight), and a consistency check was carried out between the impact materiality and financial materiality results. These were then coordinated and integrated within Magis's Enterprise Risk Management (ERM) model.

In line with regulatory requirements, the Magis Group has put in place a structured stakeholder engagement plan which, during the 2025 financial year, made it possible to plan and conduct specific meetings and workshop with key opinion leader and representatives of the Group's main stakeholders, both external and internal. Further activities will be defined and scheduled, from time to time, for future financial years. For further details, please refer to the section "1.3 Our commitment to stakeholders".

This Double Materiality Analysis was approved by the Board of Directors on 30 March 2026 and will be updated annually.

[ESRS_2, SBM-3, DP 48a, 48c]

In the individual chapters on sustainability issues considered material for the Magis Group, a full list of relevant impacts, risks, and opportunities is provided, covering both the Group's direct operations and the activities upstream and downstream along the value chain.

The following table provides a summary view of the results of the Double Materiality Analysis.

Key sustainability issues

Table 17 – Double Materiality Analysis (DMA) results

Rif. ESRS	Sub-theme / Sub-sub-theme	Impact materiality		Financial materiality	
		Stage of the value chain	Time Timeframe	Stage of the value chain	Time Timeframe
E1	Climate change mitigation	Upstream Own operations Downstream	Short Medium Long	Upstream Own operations Downstream	Short Medium Long
E1	Climate change adaptation	n.a.	n.a.	Own operations	Short Medium Long
E1	Energy	Upstream Own operations Downstream	Short Medium Long	Own operations Downstream	Short Medium Long
E2	Microplastics	Upstream Own operations Downstream	Short	Own operations	Short Medium Long
E2	Air pollution	Upstream Own operations	Medium Long	Own operations	Short Medium Long
E3	Water withdrawals	Upstream Own operations	Short Medium	Upstream Own operations	Short Medium Long
E3	Water consumption	n.a.	n.a.	Own operations	Short Medium Long
E3	Water discharges	n.a.	n.a.	Own operations	Short Medium Long
E4	Direct impact drivers on biodiversity loss – Direct exploitation	Upstream	Medium Long	Upstream	Short Medium Long
E4	Direct impact factors on biodiversity loss – Changes in land use, freshwater use, and marine use	Upstream Own operations	Medium Long	Upstream Own operations	Short Medium Long
E5	Resource inflows, including resource use	Upstream	Short	Upstream	Short Medium Long
E5	Resource outflows related to products and services	Downstream	Medium Long	n.a.	n.a.
E5	Waste	Upstream Own operations	Short Medium Long	Upstream Own operations	Medium Long
S1	Working Conditions - Secure employment	n.a.	n.a.	Own operations	Short Medium
S1	Working conditions - Adequate wages	Own operations	Medium Long	Own operations	Short Medium
S1	Working conditions – Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	Own operations	Short	Own operations	Short Medium Long
S1	Working Conditions - Health and Safety	Own operations	Short Medium Long	Own operations	Short Medium Long
S1	Working conditions - Social dialogue	Own operations	Short Medium	Own operations	Medium
S1	Working conditions - Collective bargaining	Own operations	Short Medium	Own operations	Medium

Rif. ESRS	Sub-theme / Sub-sub-theme	Impact materiality		Financial materiality	
		Stage of the value chain	Time Timeframe	Stage of the value chain	Time Timeframe
S1	Equal treatment and opportunities for all - Gender equality and equal pay for work of equal value	n.a.	n.a.	Own operations	Medium Long
S1	Equal treatment and opportunities for all - Training and skills development	Own operations	Short Medium Long	Own operations	Short Medium
S1	Equal treatment and opportunities for all - Diversity	Own operations	Short Medium	n.a.	n.a.
S1	Other work-related rights - Confidentiality	Own operations	Short Medium	n.a.	n.a.
S1	Other work-related rights - Child labour	n.a.	n.a.	Own operations	Medium
S1	Other work-related rights - Forced labour	n.a.	n.a.	Own operations	Medium
S2	Working Conditions - Secure employment	Upstream Downstream	Short Medium Long	Upstream	Short Medium Long
S2	Working Conditions - Health and Safety	n.a.	n.a.	Upstream	Short Medium Long
S2	Other work-related rights - Child labour	Upstream	Short Medium	Upstream	Short Medium Long
S2	Other work-related rights - Forced labour	Upstream	Short Medium	Upstream	Short Medium Long
S2	Other work-related rights - Confidentiality	Upstream Downstream	Short Medium	Upstream	Short Medium
S3	Communities' economic, social and cultural rights - Water and sanitation services	Own operations	Short Medium	n.a.	n.a.
S3	Rights of Indigenous Peoples - Free, Prior and Informed Consent	Upstream Own operations	Medium Long	Own operations	Short Medium Long
S4	Information-related impacts for consumers and/or end-users - Confidentiality	Upstream Downstream	Short Medium	n.a.	n.a.
S4	Information-related impacts for consumers and/or end-users - Access to (quality) information	Own operations Downstream	Short Medium	Own operations	Short Medium Long
G1	Corporate culture	Upstream Own operations Downstream	Short Medium Long	Upstream Own operations Downstream	Short Medium Long
G1	Whistleblower Protection	n.a.	n.a.	Upstream Own operations Downstream	Short Medium Long
G1	Management of relationships with suppliers, including payment practices	Upstream Own operations	Short Medium	Upstream Own operations	Short Medium Long
G1	Active and passive corruption – Prevention and detection, including training	Upstream Own operations Downstream	Short Medium	Upstream Own operations	Short Medium Long
G1	Corruption and bribery – Events	Upstream Own operations Downstream	Short Medium Long	Upstream Own operations	Short Medium Long

1.4.1 Magis Group's commitments to sustainable growth

[ESRS_2, SBM-3, DP 48b]

As described in the previous paragraph, the Magis Group has identified a series of relevant impacts, risks and opportunities, appropriately detailed within the thematic ESRS chapters. These have been identified by considering all activities related to the business model and the value chain, both upstream and downstream, including the involved counterparts such as suppliers and customers.

The identified impacts directly affect people and the environment both in the short and medium-to-long term. On one hand, negative impacts such as greenhouse gas emissions, natural resource consumption, and potentially inadequate working conditions can adversely affect the environment and people. On the other hand, the positive impacts generated by the initiatives implemented by the Group can create benefits for the context in which it operates and improve the conditions of people directly or indirectly involved in the business activities. Further details are provided in the subsequent chapters of this Consolidated Sustainability Statement, which address the thematic ESRS.

[ESRS_2, GOV-2, DP 26b]

The Group tackles these impacts through their integration into strategic decision-making processes. This is achieved through the periodic update of its Business Plan and annual budget, facilitating the integration of business expansion and economic-financial results with environmental and social sustainability.

The initiatives put in place are closely linked to the Group's dedication to the Sustainable Development Goals (SDGs), defined in September 2015 as part of the United Nations Global Agenda. It is an action plan whose implementation requires States, productive sectors, enterprises, financial institutions, non-governmental organisations and civil society to orient their programmes towards these goals.

WE MAKE ALL TRANSITIONS SUSTAINABLE AND LIVEABLE

Magis has simplified the complexity of networks and cities. Now it aims to make all transitions sustainable and liveable.

It chooses renewable sources, thinks digitally, and champions a new culture of the energy transition.

Its role is to mitigate the negative effects of all transitions and to reduce the risks associated with climate change, a goal it intends to achieve by simplifying complexities and offering new opportunities and benefits for communities.

Crafting the future is already part of Magis' expertise.

The goals of the 2030 Agenda, divided into 169 targets to be achieved by 2030, represent the blueprint on which to build a path to sustainable development through an integrated approach and tangible measures to address a major socio-economic paradigm shift, the many complex environmental and institutional challenges.

The Magis Group has decided to make its own contribution to achieving these goals: in declaring its charter of commitments for the coming years, Magis has chosen to link its actions with the SDGs most akin to its core business and strategic lines of action. The strategies and actions envisaged in the Magis Group's Business Plan are aimed at sustainability and traced back to 10 of the 17 SDGs.

Figure 17 – Magis' commitment to the Sustainable Development Goals

With specific reference to environmental issues, the Group is committed to reducing its impacts through the sustainable and efficient management of energy, water, and other natural resources used, as well as safeguarding the natural value and biodiversity of the territories in which it operates by implementing appropriate controls and environmental measures.

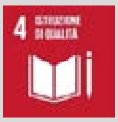
From a social perspective, the protection and promotion of its own workforce are fundamental elements of Magis' strategy, which places particular emphasis on healthy working environments and the promotion of employee training. The Group also carries out its activities with a constant commitment to establishing an inclusive approach, aimed at minimising negative impacts on workers along the value chain and on the communities in the territories where it operates.

Finally, with regard to governance aspects, the Group is committed to pursuing and promoting high standards of fairness, loyalty, integrity and transparency.

Further details are provided below on the commitments pursued by the Group for each SDG considered relevant for Magis.

NO POVERTY

The Magis Group is committed to providing practical answers to its customers every day. Aware of the impact that the expensive bills have had on families and businesses especially in recent years, Magis **has established ad hoc funds for the payment of bills** for electricity, gas and district heating. **The possibility of paying by instalments has been expanded** and more people have been assigned to addressing the numerous requests for information and enquiries from customers.



QUALITY EDUCATION

The Magis Group considers continuing education and training an essential tool for social and economic development and, therefore, provides its employees with ongoing training courses for professional and personal growth.

During 2025, the Group provided specific training courses to develop individual skills and for technical and regulatory updating in the field of personal data protection, cyber security, occupational health and safety and preventing corruption. **There were 17.64 hours of training per capita**, provided both in-house and at specialised external centres.

Magis also cooperates with several universities, giving students the opportunity to carry out curricular training projects lasting about three months.

GENDER EQUALITY

Magis supports the potential of women working within the Group by promoting full and effective participation and equal opportunities for leadership at all levels of decision-making in corporate life, preventing favouritism and gender discrimination. During the 2025 financial year, the Group continued its commitment to implementing projects aimed at raising awareness among its workforce on DE&I matters and promoting an inclusion-oriented culture. These initiatives led to **the achievement of gender equality certification in accordance with UNI/PdR 125:2022** for the Parent Company and two additional subsidiaries, Magis Energia and Magis Smart Solutions**.**

AFFORDABLE AND CLEAN ENERGY

The goal of the energy transition is an integral part of Magis' Business Plan, increasing, year after year, the share of energy generated from renewable sources and allocating 100% of investments in energy production to plants from green sources, in particular wind and photovoltaic. In 2025, **the electricity produced from renewable sources accounted for 81.8%** of the total energy produced by the Group.

DECENT WORK AND ECONOMIC GROWTH

People are at the core of the Group's growth project. Magis pays particular attention to the healthiness of the workplace. Therefore, **it undertakes to comply with the highest safety and health standards of the work environment**, to offer optimal conditions and to pay adequate wagesi.

INDUSTRY, INNOVATION AND INFRASTRUCTURE

Magis promotes **scientific and technological development aimed at environmental protection and safeguarding resources** by adopting criteria for safeguarding and energy efficiency. Specifically, the Group is engaged in infrastructure improvement projects relating to networks, smart services, environmental hygiene, energy generation, and district heating.

The Group is aware that **its commitment to environmental protection represents a competitive advantage in a market that is increasingly attentive to the quality of services**. Magis supports the circular economy by enhancing the integrated waste management service, ensures urban cleanliness, promotes cultural initiatives, develops fibre optic telecommunications infrastructure, and contributes to transforming city mobility by encouraging the use of electric vehicles.

RESPONSIBLE CONSUMPTION AND PRODUCTION

The efficient use of renewable sources and the shift towards sustainable production processes contribute to minimising our environmental footprint. Magis has always been committed to **reducing the use of fossil fuels**, one of the elements most responsible for climate change, and **improving the energy efficiency of production sites and company offices**. The Magis Group also provides customers with information about proper sorted waste collection practices and domestic energy consumption.

CLIMATE ACTION

The Magis Group contributes to caring for the planet by protecting the territory, promoting the circular economy and electric mobility. It pays great attention and makes important investments in **developing renewable sources in order to create a more sustainable energy system**, less dependent on fossil fuels and, therefore, less polluting.

PEACE, JUSTICE AND STRONG INSTITUTIONS

Magis actively contributes to achieving the United Nations Sustainable Development Goal on "Peace, justice and strong institutions" (SDG no. 16) **by carrying out business activities inspired by high standards of fairness, loyalty, integrity and transparency and in compliance with current legislation**. In this regard, the Group adopts policies aimed at spreading the culture of legality, protecting the company's reputation, thus ensuring value creation over time.

The Sustainable Development Goals of the 2030 Agenda and the extraordinary challenges arising from energy transition have heightened the awareness of sustainable development, which entails a business model able to guarantee resilience, flexibility and effectiveness in the long term. These goals and challenges are combined with the ability to reduce risks and respond to external factors, also of an exceptional magnitude.

Magis has adopted its **Sustainability Management Policy** as the set of choices and behaviours that allow the Group to pursue its corporate purpose, guaranteeing its long-term profitability and competitiveness and enhancing the interests of all its stakeholders.

The ambition to pursue sustainable success and the daily commitment to ensuring the integration of environmental, social and good governance principles into its business model are essential elements to create value to benefit its stakeholders, with particular attention to the community and the territory in which the Group operates.

For the Magis Group, "sustainability" means conducting its activities with a view to the future and orienting the business strategy towards creating value for stakeholders in the medium and long term. In this context, Magis intends to base its activities on ensuring a sustainable approach in terms of respect for people, the environment and the adoption of good governance practices of our organisation.

Magis has sustainability issues at its core and strongly believes in integrating Environmental, Social and Governance (ESG) criteria.

As a responsible operator, Magis believes that sustainable development and more generally sustainability, broken down into the three dimensions included under the acronym ESG, play a fundamental role in today's economic landscape. Sustainability represents the guiding principle for the future development of Gruppo Magis which, in its 2025–2030 Business Plan, envisages investments aimed at supporting the energy transition and decarbonisation, the circular economy and the digitalisation of the sector, including investments of more than Euro 500 million in projects for the development of renewable energy generation plants (e.g. wind and photovoltaic) and green hydrogen, together with almost Euro 400 million for the modernisation and expansion of resilient and reliable distribution networks (electricity, district heating and gas).

WELCOME TRANSITION

The Group is fully aware that sustainability is a journey made up of ambition and action that it has decided to call "The Path to sustainability".

The 2025-2030 Business Plan gives substance to our projects.

We want to accelerate the country's energy transition with determined growth, but linked to respect and attention for people, with a "kind" and "sensitive" approach that helps them navigate complexity and that transforms the company's growth into a driver of social as well as economic growth.

The Group bases its activities on the ten principles of the United Nations Global Compact (UNGC) on human rights, labour, environment and anti-corruption. In 2025, it renewed its membership in the United Nations initiative by committing to respect and integrate the ten principles on human rights, labour, the environment and the fight against corruption into its activities (www.globalcompactnetwork.org). Therefore, the Magis Group submits the COP (Communication on Progress) on an annual basis, whereby it maintains a transparency relationship with the Global Compact and its stakeholders, reporting its contribution to the dissemination and observance of the ten fundamental principles.

Magis intends to continuously adopt the 10 Universal Principles in its business strategy, but even more so in the culture of its organisation.

HUMAN RIGHTS	***1.*** **Support and respect the protection of internationally proclaimed human rights within the respective spheres of influence.** ***2.*** **Make sure that it is not, albeit indirectly, complicit in human rights abuses.** Magis respects, protects and promotes human rights and fundamental freedoms for all by committing to guarantee professional relationships with its stakeholders based on respect for human dignity.
LABOUR	***3.*** **Uphold the freedom of association and the effective recognition of the right to collective bargaining.** ***4.*** **Support the elimination of all forms of forced and compulsory labour.** ***5.*** **Support the effective abolition of child labour.** ***6.*** **Support the elimination of discrimination in respect of employment and occupation.** Attention to People is a central element of the Magis Group's growth project as they represent an essential factor for carrying out the activity and achieving the company objectives. Magis promotes an inclusive work environment, which encourages a work-life balance, able to value people, respectful of human dignity and individuality.
ENVIRONMENT	***7.*** **Support a precautionary approach to environmental challenges.** ***8.*** **Undertake initiatives to promote greater environmental responsibility.** ***9.*** **Encourage the development and diffusion of environmentally friendly technologies.** Magis safeguards the landscape heritage of the territory in which it operates by adopting policies to preserve, protect and maintain the environment, ecosystems and biodiversity. The aim is to reduce the environmental impact of its activity, adopting an approach oriented towards monitoring and continuous improvement of performance, starting from compliance with current legislation with a constant focus on protecting the environment and mitigating the loss of biodiversity.
ANTI-CORRUPTION	***10.*** **Work against corruption in all its forms, including extortion and bribery.** The Magis Group adopts policies aimed at spreading the culture of legality, protecting the company's reputation, thus ensuring value creation over time. Believing that the fight against corruption is a core value in the management of its business operations, Magis has voluntarily established and adopted its Group Code of Ethics, Anti-Corruption Policy and, where considered appropriate, an Organisation, Management and Control Model in accordance with Legislative Decree 231/2001.

1.5. Sustainability governance

[ESRS_ 2, GOV-1, DP 21b]

The organisational model of the Magis Group consists of a comprehensive system of delegated powers and powers of attorney in relation to the acts and transactions concerning the individual corporate Departments.

The Group's corporate governance system is designed to ensure sustainable success and the creation of economic, social and environmental value for shareholders and for the local community over the medium/long term, being aware of the ESG impacts of the business activities in which it is engaged and while respecting the interests of all stakeholders involved in its operations.

The Corporate Governance structure is represented by the rules and forms of behaviour adopted by Magis in order to guarantee the fair, effective and transparent working of the governance bodies and control systems of the Parent Company and the companies directly controlled by it, in compliance with the "Management and Coordination Guidelines" adopted at Group level in May 2022 and periodically updated by the Legal Department.

The Group's operating companies, in concert with the Parent Company, manage the "technical-specialist" aspects of the services carried out - marketing and distribution of gas, electricity and district heating and environmental health, parking, public lighting and telecommunications services - including through consultation with the various administrative, regulatory and control bodies.

As the Parent Company, Magis S.p.A. centralises its typical structure activities on its own by providing services to most of the companies belonging to the Group. In particular, in addition to activities directly connected with the design and development of projects for the construction of renewable energy power generation plants, the Company is responsible for administrative and financial activities, human resources management, legal and corporate affairs, compliance and quality management, occupational health and safety management, environmental protection, management of owned assets, as well as risk management, communication, and marketing activities.

The companies belonging to the Magis Group have adopted a traditional administration and control system that consists of the typical administration, management and control bodies provided for by current legislation, supplemented by the provisions of their respective articles of association.

On the other hand, the subsidiary Eco Tirana Sh.A. has adopted a two-tier system in which administration and control are exercised by a Management Board and a Supervisory Board..

Shareholders' Meeting

The Shareholders' Meeting is mainly responsible for approving the Separate Financial Statements and for deciding on the distribution of profits, the appointment and dismissal of the management body, the control body and the independent auditors, as well as on the approval of extraordinary transactions involving changes to the corporate structure, such as changes to the legal form, mergers and demergers.

Board of Statutory Auditors

The Board of Statutory Auditors is a control body that oversees that the law and the Articles of Association are complied with, that the principles of correct management are observed and that the organisational, administrative and accounting system adopted by the Group Companies is adequate and works properly.

[ESRS_S1, DR S1-9, DP 66a]

[ESRS_ 2, GOV-1, DP 21d]

Demonstrating Magis's high commitment to diversity, the members of the Control Bodies appointed in the Group companies comprise 11 women (37.9%) and 18 men (62.1%).

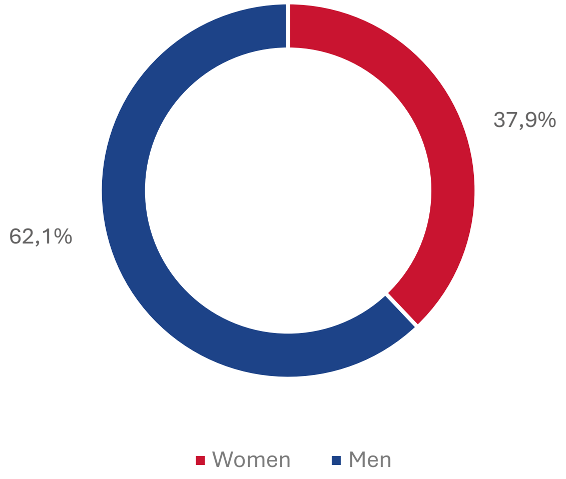


Figure 18 – Composition of the control bodies of the Group companies by gender

Governing bodies

The Management Bodies (Board of Directors or Sole Director) of the Group companies play a central role, since they are responsible for all the strategic and organisational choices that are necessary to achieve the corporate purpose.

Pursuant to the articles of association adopted individually by the subsidiaries, the Management Body is vested with all broadest powers for the ordinary and extraordinary management of the company. It is entrusted with all the necessary and appropriate acts to implement the corporate purpose, excluding only those reserved by law or the Articles of Association to the shareholders' meeting.

[ESRS_ 2, GOV-1, DP 21a, 21c, 21e]

[ESRS_S1, DR S1-9, DP 66a]

Specifically, the Parent Company is governed by a Board of Directors consisting of six members, including two women, which comprises the Chairperson, the Vice Chairperson, and the Chief Executive Officer, all vested with specifically delegated executive powers; the remaining three members of the board are non-executive and independent. The description of the process of appointment and selection of the Board of Directors is set out in the Articles of Association, which can be consulted on the Company's website in the section dedicated to corporate governance (https://www.gruppomagis.it/corporate-governance).

The Board of Directors of Magis S.p.A. approves the consolidated Sustainability Report, ensuring it is prepared and published in accordance with the provisions of Italian Legislative Decree 125/2024, Group policies, including the Sustainability Management Policy and the "Operating Procedure for the Preparation of the Consolidated Sustainability Report".

Supporting the Board of Directors, the Management Risk Committee supervises internal control and risk management matters, including those related to ESG aspects connected to the company's operations, while simultaneously monitoring the adequacy and effectiveness of the internal control system.

The Board of Directors and the Management Risk Committee (with the participation of the Parent Company CEO) play a key role in sustainability management.

All Directors meet the requirements set out in Article 2382 of the Italian Civil Code, and all directors appointed by the Shareholders' Meeting possess the skills and expertise necessary and consistent with the characteristics of Magis' business activities.

No employees or other workers are represented within the governing, executive, or supervisory bodies.

At Group level, the members of the Administrative Bodies comprise 14 women (29.2%) and 34 men (70.8%).

[ESRS_ 2, GOV-1, DP 22a, 22b, 22c, 22d]

Oversight of sustainability matters and, more generally, of relevant impacts, risks and opportunities is assigned to the administration, management and control bodies of the Magis Group. As of the reporting date, the related responsibilities are not formally and explicitly set out within the delegated powers assigned to the members of these bodies. However, the scope of competence and the arrangements for exercising oversight are defined in the organisational practice adopted by the Group.

Directors and company management ensure the monitoring and management of relevant matters through the various Operational Groups for the management of Key Risks, the Management Risk Committee (responsible for overseeing the activities to update the Double Materiality Assessment), the Green Financing Committee and the various Management Committees, which operate in an advisory and propositional capacity in order to carry out a preliminary and shared assessment of the matters to be brought to the attention of senior management and to the appropriate assessment by the relevant boards of directors.

[ESRS_2, GOV-2, DP 26a, 26b, 26c]

In this context, the Board of Directors oversees the definition of objectives relating to material topics and monitors progress on the basis of reporting prepared at Group level. Starting from FY 2026, the Group has also launched a process to strengthen the periodic reporting system, aimed at monitoring progress status and the Group's performance level on both an annual and an interim basis. This system is also aimed at assessing progress towards the objectives set out in the 2025-2030 Business Plan and the ESG Plan, as well as supporting the preparation of the Consolidated Sustainability Report.

During the reporting period, the competent bodies reviewed, among other things, the main material topics reflected in the Group's Business Plan and ESG Plan. For the related commitments and areas of action, please refer to section "1.4.1 Magis Group's commitments to sustainable growth".

[ESRS_ 2, GOV-1, DP 21c, 23a, 23b]

The adequacy of the Board of Directors' sustainability expertise is based on the experience gained by its members in corporate governance, strategic planning and oversight of matters related to energy, energy efficiency, sustainable transition and the circular economy.

Oversight of these skills may be further supported, where deemed necessary, through refresher and training initiatives.

[ESRS_ 2, GOV-1, DP 21d]

Magis ensures, in the composition of the corporate bodies, the balanced representation of gender and guarantees the presence of independent Directors in accordance with current legislation.

The members of the Management Body, appointed by the respective shareholders' meetings on the basis of lists submitted by the shareholders, hold office for three financial years and may be re-elected. Each chairperson has the powers and duties set out in Article 2381 of the Civil Code.

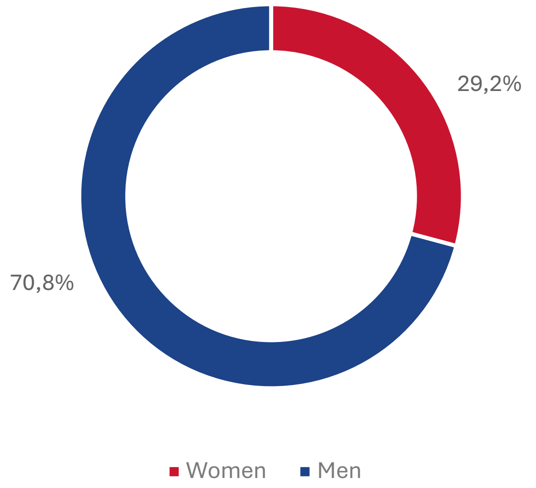


Figure 19 – Gender breakdown of the administrative bodies of Group companies

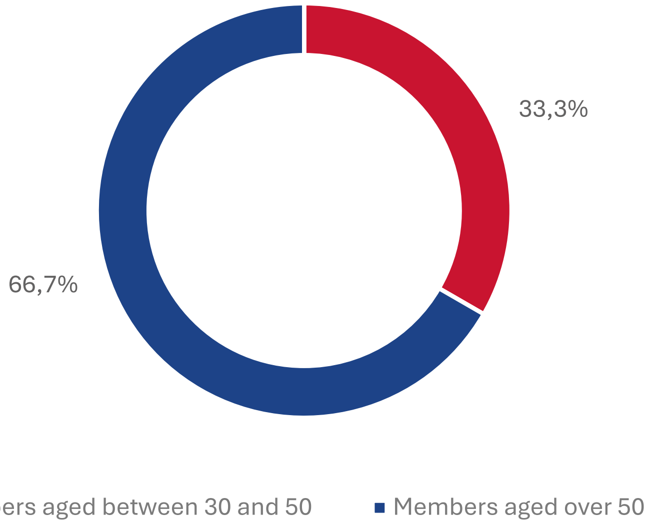


Figure 20 – Age breakdown of the administrative bodies of Group companies

1.5.1 Sustainability performance linked to incentive schemes

[ESRS_2, GOV-3, DP 13, 29a]

Within the remuneration framework for the members of the Board of Directors and the Board of Statutory Auditors, the only individuals eligible for incentive schemes are the executive directors of the Group companies. In fact, in addition to a fixed annual salary, they are also awarded an annual variable component (MBO). In the compensation package for managers and middle managers of the Magis Group, in addition to fixed remuneration, variable remuneration is also provided (so-called Management by Objectives – MBO) which, for employees with middle manager status, also includes the portion of the Performance Bonus due pursuant to the relevant CCNL.

[ESRS_2, GOV-3, DP 29e]

The management of objectives for company management (MBO) is handled by the HR Function, which defines the criteria and oversees its application. As regards managing directors, however, the review and approval of the MBOs fall within the remit of the respective Boards of Directors, in line with the prerogatives of the competent corporate bodies.

[ESRS_2, GOV-3, DP 29b, 29d]

In the 2025 financial year, ESG targets were identified within the individual incentive schemes for the delegated directors, executives, and managers. Specifically, the MBO records of the delegated directors, executives, and managers were analysed to categorise the objectives into the following four main categories:

- Environmental (E)
- Governance (G)
- Social (S)
- Financial (F)

Each person participating in the MBO incentive scheme is assigned at least one ESG objective. The share of variable remuneration that depends on sustainability-related objectives and/or impacts therefore varies from person to person depending on the number of ESG objectives assigned and their weighting over the total (e.g. from 30% up to 100%).

[ESRS_2, GOV-3, DP 13, 29a, 29c, 29d]

In particular, for the year 2025, about 85% of the objectives identified and assigned overall were categorised strictly as ESG objectives. These objectives relate, for example, to obtaining gender equality certification and maintaining or renewing existing QSA certifications, as well as projects concerning customer satisfaction and customer care, sustainable supply chains, technological innovation, and digital transformation.

Additional ESG objectives of an operational and/or managerial nature relate to climate change mitigation and adaptation (such as increasing installed capacity and the share of electricity generated from renewable sources, energy efficiency projects for the Group's plants, and the development of infrastructure for electric vehicle charging, etc.).

From the 2025 financial year onwards, a mechanism for categorising each assigned ESG objective has been implemented in ORACLE HCM. Specifically, the system requires that, when entering each objective, a dropdown menu is used to define the categorisation of all ESG-related objectives (F: Financial; E: Environmental; S: Social; G: Governance).

1.5.2 Declaration of Due Diligence

[ESRS_2, GOV-4, DP 30, 32]

In the context of preparing the Consolidated Sustainability Report, the Magis Group has initiated a process of gathering and analysing information regarding its practices on the duty of diligence (hereinafter also referred to as "due diligence"), while acknowledging that these are established operational practices not yet formalised into a specific process.

In accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, which inform certain policies of the Magis Group, the Group's duty of diligence on sustainability issues is summarised in the following mapping of disclosures.

Table 18 – Core elements of due diligence

Core elements of due diligence	Corporate practices	Ref. to the sections of the Report
Embed due diligence within governance, strategy, and the business model.	As a foundation for integrating responsibility in respect of social and environmental aspects, the Group adopts various policies. Specifically, the commitment is reflected within the following policies: • Code of Ethics • Suppliers' Code of Conduct • Internal Dealing Code • Management and Coordination Guidelines • Group guidelines for managing extraordinary Merger & Acquisition (M&A) transactions • Group guidelines for the planning and management of Investment initiatives • Guidelines for the Internal Control and Risk Management System • Anti-Corruption Policy • Policy for managing data retention and data breaches • Policy for the management of Inside Information • Quality, health and safety, environment and energy policy • Reporting Policy • Sustainability Management Policy • Policy for the prevention of corruption (ISO 3700) • Policy for the protection of human rights • Environmental protection Policy • Policy for the Protection of Diversity, Equity, Inclusion, and Gender Equality	• ESRS 2 GOV-2 • ESRS 2 GOV-3 • Sections covering governance, strategy, and policies.
Engage stakeholders in all key stages of the due diligence process.	Stakeholder engagement represents an opportunity for dialogue and collaboration for the Group. In particular, to identify and manage relevant aspects for the Group, Magis employs various methods aimed at maintaining continuous communication with its different stakeholders; including, but not limited to: • the Stakeholder Engagement process; • the whistleblowing reporting channel is available to all stakeholders, providing an important means to submit different types of reports.	• Paragraph 1.3 "Our engagement with stakeholders". • SMB-2 • S1-2 • S2-2 • S3-2 • S4-2

Core elements of due diligence	Corporate practices	Ref. to the sections of the Report
Identify and assess negative impacts.	• The Group's Double Materiality Assessment process placed particular emphasis on the assessment and prioritisation of impacts, aiming to identify those most relevant to the organisation and its stakeholders. • Verification of compliance with the minimum safeguard guarantees pursuant to EU Regulation 2020/852 (EU Taxonomy.	• Paragraph 1.4 "Relevant sustainability issues".
Take action to address negative impacts.	• The Group undertakes specific actions aimed at mitigating negative impacts and enhancing positive ones, as detailed in the respective sections of this document. • The Group Reporting Policy includes conducting investigations that may ultimately result in specific corrective or disciplinary actions.	• Paragraph 1.4 "Relevant sustainability issues".
Monitor the effectiveness of actions and communicate.	• The Magis Group defines metrics, detailed in the relevant sections of this Consolidated Sustainability Report, to ensure that the actions taken are measurable and effective. • The operational procedure "Information Flows to the Supervisory Body" governs the methods and timing for communicating information flows related to the activities considered most significant for the Magis Group to the Supervisory Body.	• • Paragraphs on objectives and channels • Paragraph 4.1.2 "Impacts, risks and opportunities management" relating to business conduct (ESRS G1)

1.5.3 Internal Control and Risk Management System

The Magis Group defined an Internal Control and Risk Management System (hereinafter also "SCI-GR") inspired by national and international good practices in terms of risk management and corporate governance processes, which divides the corporate organisation into the traditional three lines of defence:

- the first line of defence is represented by the Business Units (BU) and the operational support departments and functions of the organisation. The representatives of the business units (BU) and the various organisational structures are involved in the risk management process, with particular reference to the activities of identifying, managing, assessing and monitoring risks, including the definition of the most appropriate actions to be implemented to mitigate them;
- the second line of defence consists of the Risk Management function (set up within the Planning, Control and Risk Management Department, which in turn reports hierarchically to the Finance & Control Department), and the Compliance function (established within the Legal Department), both based at the Parent Company. They are responsible for overseeing the risk & compliance management process and supervising the application of company risk management methodologies (strategic, reporting, operational, compliance), covering both reputational aspects and the so-called ESG (Environmental, Social & Governance) areas;
- the third line of defence is represented by the Group Internal Audit function, also based at the Parent Company. It is responsible for planning and conducting audits to verify the effective implementation of the regulations and company procedures adopted by the Group, as well as supporting the Parent Company's Board of Directors in assessing the adequacy of the Internal Control and Risk Management System (SCI-GR).

[ESRS_2, GOV-2, DP 26b]

The Enterprise Risk Management Process is adopted at Group level and integrated into the Group's corporate governance system and SCI-GR. This process contributes to defining the strategic and operational choices adopted, supporting the management in identifying risks and opportunities and in assessing potentially negative impacts, both from a financial point of view and with reference to the ESG areas relevant to sustainability that could arise, thus promoting the creation of value and the achievement of sustainable success for the Group and its stakeholders.

By adopting and constantly improving its SCI-GR, the Group aims to develop and implement a solid risk culture that is consistent with the corporate values, strategies and objectives defined by the Board of Directors, promoting the adoption of informed decisions.

The Group Risk Management and ESG Function is assigned the following responsibilities:

- provide high-level support to disseminating the risk culture;
- define the integrated methodologies for the identification and analysis of risks, opportunities and impacts, to ensure an overview of them, homogeneous assessments and their accurate measurement and monitoring;
- ensure the correct application of the enterprise risk, opportunities and impacts management methods;
- constantly discuss with the first level Managers and the heads of BUs in order to ensure adequate enterprise risk control and monitoring activities carried out by them;
- produce periodic information on the enterprise risk management process to the bodies responsible for the SCI-GR and on the outcome of the monitoring activities carried out thanks to periodic reports and KPIs.

Within the scope of the responsibilities described above, the Risk Management Function coordinates and supports management when identifying and assessing risks, opportunities and impacts, supervising the methods defined and adopted to control and monitor enterprise risks, as well as consolidating the results of the risk assessment at Group and individual Business Unit level.

To ensure constant operational supervision over the management of enterprise risks since 2021, the year the new Group was set up, the Risk Management and ESG Function was established at the Parent Company and, subsequently, in 2022, the Management Risk Committee (hereinafter the "Management RC") was established, composed of the Chief Executive Officer and a selection of key Heads of the Parent Company's main Departments, and which also sees the participation of the Head of the Internal Audit Function as observer, in addition to the Head of the Risk Management Function in the role of secretary of the Management RC. Due to the topics dealt with, other first level managers, heads of BUs, and any other person inside and/or outside the organisation deemed necessary to further the issues addressed by the RC may also be invited to take part in the work of the Management RC.

The Management Risk Committee has a proactive and advisory role and meets at least every quarter to promote the sharing and in-depth analysis of issues deemed relevant to corporate risk management. Among the main tasks assigned to the Management RC are those of::

- assisting the Chief Executive Officer in evaluations and decisions relating to defining the SCI-GR within its purview;
- expressing opinions on specific aspects concerning the definition of the Risk Appetite Framework (RAF) and the relative tolerance thresholds, as well as the identification of the main corporate risks, opportunities and impacts, in addition to the periodic assessments carried out by management (so-called "Risk Self Assessment");
- analysing and evaluating the results of Risk Self-Assessment activities;
- supporting the Chief Executive Officer in implementing the guidelines defined by the Board of Directors and in designing, creating and managing the SCI-GR;
- proposing to the Chief Executive Officer the corrective measures to be implemented in a timely manner in order to mitigate business risks that exceed the limits stated in the Risk Appetite Statement (RAS);
- approving the annual plan of corporate risk management activitiesi.

The Group Compliance Function is assigned the responsibility of identifying, assessing and classifying, throughassessment activities, compliance risks and implementing the related controls (e.g. Legislative Decree 231/2001 on the administrative liability of entities, EU Reg. 2016/679 GDPR on the protection of personal data and privacy, Legislative Decree 50/2016 - Public Procurement Code, etc.). These are complemented by the following main duties:

- monitor changes in legislation related to the assigned areas of responsibility (Legislative Decree no. 231/2001, Anti-corruption, Privacy and Data Protection, Digital Preservation, Environmental regulations, Market Abuse, and any other relevant legislation), reporting any significant updates and highlighting any substantial impacts that new laws and regulations may have on the companies within the Group;
- support Group companies in the activities of preparing and updating the organisation, management and control models adopted pursuant to the Legislative Decree of 8 June 2001, also providing operational support to the appointed supervisory bodies;
- ensure regulatory compliance and observance with the requirements of the current data protection and privacy legislation (EU Reg. 2016/679 GDPR);
- assist top management and organisational units, with reference to their areas of responsibility, in defining the appropriate tools and methodologies for the identification, measurement and assessment of compliance risks, providing adequate methodological and operational support in the activities relating to the process of issuing and updating internal implementation rules to prevent the risk of non-compliance (procedures, operating instructions, regulations, etc.);
- oversee the preparation of service contracts entered into by the Parent Company with its Subsidiaries, adhering to the powers of attorney and delegation framework, with subsequent filing in accordance with company procedures;
- promote the Human Resources Department in organising training for employees in the applicable fields;
- verify, with the support of Internal Functions and Subsidiaries, the effectiveness of the procedures adopted to ensure compliance with regulations within its areas of responsibility;
- oversee the management of relations with the Supervisory Authorities and external and internal control bodies.

Internal Auditing is an independent and objective assurance and consulting activity, whose purpose is to improve the organisation's effectiveness and efficiency. This function assists the Board of Directors of the Parent Company in the pursuit of its objectives through a systematic professional approach, that generates added value given that it aims at assessing and improving the control, risk management and corporate governance processes. In particular, the Group Internal Audit Function is assigned the following main tasks:

- draft the Audit Plan proposal according to a risk-based approach to be submitted to the Parent Company's Board of Directors for appropriate evaluation and approval;
- schedule and perform audits in accordance with the approved audit plan, agree improvement measures with the Departments under review, and periodically report to the Board of Directors on audit outcomes, the progress of the audit plan, and the implementation status of the identified corrective actions;
- review business processes, both administrative and operational, to evaluate their effectiveness in achieving process objectives and their efficiency and economic sustainability, ensuring that objectives are met through the rational use of resources and appropriate cost management (Operational Audit);
- design and carry out, also with the support of external third parties, any specific audit activities such as fraud audits, IT audits, etc.
- support the Supervisory Body of the Group companies in overseeing the implementation of compliance programmes (Code of Ethics, Organisation, Management and Control Model according to Italian Legislative Decree 231) and coordinate audit activities in the event of alleged violations of these documents

The following main tasks are assigned to the Quality, Safety and Environment function:

- define management policies and models, in compliance with the regulations and internal reference guidelines, on the environment, quality and health and safety of workers, monitoring their correct implementation and ensuring adequate information flows to the top of the Group;
- manage and coordinate the execution of environmental, quality and safety audits and certification systems.

The main business risks

The integrated corporate risk management model of the Magis Group is inspired by the best market practices and the main international reference standards, in particular the Enterprise Risk Management (ERM) – Integrated Framework issued by CoSO (Committee of Sponsoring Organizations of the Treadway Commission), also declined for ESG dimensions according to the guidelines "Applying ERM to ESG-related Risks" defined by WBCSD (World Business Council for Sustainable Development). Starting from the 2024 financial year and continuing into 2025, the adopted model has been gradually developed and updated to take into account the regulatory guidelines set out in the European Union Directive 2022/2464 on corporate sustainability reporting (commonly referred to as the CSRD – Corporate Sustainability Reporting Directive).

The Group's ERM model adopted at Group level was developed under the guidance of the Group Risk Management and ESG Function, which is in charge of overseeing and coordinating the process of identifying, assessing and managing corporate risks.

The model has been implemented across the Group and enables risk profiling both at consolidated level and at the level of individual Business Units or relevant Group companies, while respecting the organisational independence of each subsidiary.

The corporate risk identification, assessment, and management process (enterprise risk assessment) is inspired by ISO 31000:2018 – Risk Management Guidelines and includes periodic updates based on the nature of the risks identified. The process is supported by benchmarking activities and by meetings and workshops involving risk owners, who are responsible individuals with the organisational authority required to oversee processes and operational activities linked, directly or indirectly, to risk events.

In line with the guidance set out in the COSO ERM – Integrated Framework, once risk events and their related causes have been identified and appropriately described, corporate risks are assessed according to the two main dimensions of likelihood of occurrence (or expected frequency) and expected potential impact, both in financial and non-financial terms (e.g. environmental, occupational health and safety, compliance, etc.). The level of inherent risk thus estimated is weighted according to the various methods of control and mitigation (i.e. preventive or subsequent controls, manual or automated, etc.) generating the so-called residual risk.

The update and periodic review activities of the risk assessment carried out during the year made it possible to identify the corporate risk portfolio of the Magis Group, divided into five homogeneous categories:

- Strategic
- Financial
- Governance
- Operational
- External events

At the end of 2025, a total of 127 risks were mapped, surveyed and assessed in the Magis Group's corporate risk catalogue (so-called Risk Register), classified according to the five categories indicated above and, in turn, divided into 27 macro-risk areas.

Certain corporate risks are identified as "key risks" and undergo both a qualitative and quantitative assessment under the ERM framework (Probability × Impact), as well as an evaluation using probabilistic methodologies that, where applicable, enable the calculation of Value at Risk (VaR) and Profit at Risk (PaR). Specifically, the key risks for which VaR is periodically calculated include customer and third-party credit exposure, commodity price risk—supported by a dedicated ETRM (Energy Trading Risk Management) application—churn-out rate, and the expected profitability of investments within the capex plan.

Further mathematical-statistical models are employed to oversee liquidity risk and support the management of investments impacting the economic and financial performance objectives set out in the Business Plan for future years. For further details regarding economic and financial risks, please refer to the other sections of the Report on Operations included in this Annual Financial Report of the Magis Group for the 2025 financial year.

Climate change-related risks are classified in the categories of strategic and/or external risks and are specifically analysed and monitored by the cross-functional working group set up at Group level and coordinated by the Risk Management and ESG Function.

Organisational Management System

To continuously improve the quality of its services and reduce its social and environmental impacts, the Magis Group has implemented the principal ISO-based standards. Moreover, in consideration of the activities carried out, the Magis Group is subject to regular checks by the Regional Environmental Protection Agencies of the regions in which the Group operates.

Table 19 – – ISO Management Systems adopted by the Magis Group

COMPANY	ISO 9001:2015 Quality Management System	ISO 14001:2015 Environmental Management System	ISO 45001:2018 Occupational Health and Safety Management System
Magis S.p.A.	√	√	√
Magis Energia	√	-	-
Magis Smart Solutions	√	√	√
Magis Calore	√	√	√
Magis Power	√	√	√
Magis Ambiente	√	√	-
Eco Tirana	√	√	√
SERIT	√	√	√
SIA	√	√	√
Valore Ambiente	√	√	-
V-Reti	√	√	√

In FY 2025, Magis Power and Magis Calore established and adopted Energy Management Systems (EnMS) certified under ISO 50001:2018, particularly in relation to the following processes:

- generation of electricity from hydropower;
- generation of electricity from cogeneration;
- generation and distribution of heat for district heating.

Also during the 2025 financial year, the Parent Company Magis S.p.A. implemented an Anti-Bribery Management System (ABMS) in accordance with ISO 37001:2016, obtaining the relevant certificate. For further information, please refer to the following paragraph 4.1.2 (Impacts, risks and opportunities management) in section "4.1 Business conduct – ESRS G1".

It should be noted that the subsidiary Eco Tirana obtained SA 8000:2014 certification (expiring on 29 January 2026), aimed at certifying the Company's management system in relation to corporate social responsibility.

Magis Calore obtained F-GAS certification (expiring on 31 January 2027) on the management of fluorinated greenhouse gases, which certifies the ability to manage the installation, repair, maintenance or support, and decommissioning of fixed cooling and air-conditioning equipment and fixed heat pumps with a maximum load size with no limits in kilograms.

In October 2025, Magis Smart obtained UNI CEI 11352:2014 certification relating to the provision of energy services (so-called energy service companies – ESCo), confirming Smart's strong vocation to support its customers in the design and implementation of measures aimed at improving energy efficiency.

Finally, the two subsidiaries of the Group, Magis Smart and SIT, obtained SOA certification, which is mandatory in order to submit bids for public works contracts. This certification proves the company's capacity to carry out, either directly or through subcontractors, public works subject to a starting price, for the submission of bids, of more than Euro 150,000, and it guarantees that the company meets all of the requirements established by current legislation governing public works contracts.

Table 20 – SOA certificates obtained by the Magis Group

COMPANY	REFERENCE LAW	NO. OF CERTIFICATE	DATE OF ISSUE	DATE OF EXPIRY	CATEGORY	CLASS
Magis Smart	Italian Consolidated Act on Tender Procedures	SOA-certificate 8949/57/01	20/02/2024	19/02/2029	OG10	IV
SIT	Italian Consolidated Act on Tender Procedures	SOA-certificate 20494/16/00	25/05/2022	24/05/2027	OG9-OS14	II

1.5.4 Risk management and internal controls relating to the Consolidated Sustainability Report

[ESRS_2, GOV-5 DP 36a]

Within the Magis Group, responsibility for managing the process for preparing Consolidated Sustainability Reporting is assigned to the Risk Management and ESG Function, which sits within the Parent Company's Finance & Control Department. This function includes, among others, a dedicated team of resources specifically focused on sustainability reporting & monitoring, called the Team ESG, which is responsible for overseeing and coordinating, in collaboration with the Group's various corporate departments and Business Units, the different phases of analysing and identifying relevant issues, collecting data and information to be reported, as well as preparing the Consolidated Sustainability Reporting.

[ESRS_2, GOV-5 DP 36b]

The process for preparing the Consolidated Sustainability Reporting is defined and formalised within a specific company procedure that outlines the roles and responsibilities assigned to the various parties involved, as well as the timelines and operational methods to be followed annually for preparing the Consolidated Sustainability Reporting. The preparation process for the Consolidated Sustainability Report helps ensure appropriate control over the reporting areas most exposed to the risk of significant errors affecting non-financial information.

The data and information included in the Consolidated Sustainability Report are gathered using office automation tools and dedicated IT systems, and are subject to internal controls designed to ensure the accuracy, reliability, completeness, and timeliness of the non-financial disclosures provided to stakeholders.

The Company's Board of Directors reviews and approves the Double Materiality Analysis, which includes the list of material sustainability issues, as well as the Consolidated Sustainability Report, taking into due consideration the results achieved and any deviations from the planned objectives.

The Board of Statutory Auditors monitors compliance with the provisions set out in Legislative Decree 125/2024 (articles 3, 4, 5, and 8) concerning corporate sustainability reporting, as well as the process of preparing and publishing the sustainability report. It exchanges information with the statutory auditor responsible for certifying the Consolidated Sustainability Report regarding the planning of related activities and the scope of controls applied to the group companies whose data are included in the document.

The audit firm has been appointed to carry out a limited review of the consolidated Sustainability Reporting in accordance with Articles 3, 4 and 8 of Legislative Decree 125/2024, for the purpose of issuing its assurance report on the compliance of the sustainability disclosures pursuant to Article 14-bis of Legislative Decree 39/2010 implementing Directive 2006/43/EC on statutory audits of annual and consolidated financial statements. In particular, Article 14-bis of Legislative Decree No. 39/2010 requires that such report include the auditor's conclusions regarding: (i) the compliance of the sustainability reporting with the provisions of the legislative decree adopted pursuant to Article 13 of Law No. 15 of 21 February 2024 (Delegation to the Government for the transposition of European directives and the implementation of other acts of the European Union – European Delegation Law 2022–2023), governing the preparation criteria thereof; and (ii) compliance with the disclosure obligations set out in Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 concerning the reporting of information relating to the so-called European Taxonomy of environmentally sustainable activities.

In the central Departments, the Business Unit and organisational units, particular figures called "Focal Point" have been appointed to fulfil the role of data owner for the information and data covered by the Consolidated Sustainability Reporting. The Focal Points are responsible for overseeing the collection, preliminary processing, and provision of non-financial data and information to the ESG Team, taking accountability for the quality and reliability of the data. They also plan appropriate control and verification activities on the data itself and on the related collection and preliminary processing procedures. The ESG Team is therefore responsible for assessing the adequacy and consistency of the data and information received, including any deviations from the planned objectives and/or performance in previous periods, highlighting the need to explain such deviations and, more generally, to comment on the Group's non-financial performance. For a subset of data and information deemed relevant, the data collection and monitoring activities are also coordinated by the ESG Team during the year, in conjunction with the quarterly closings.

The Finance & Control Department, thanks to the methodological and operational support of the Risk Management and ESG Function, considers the results of the identification and assessment of corporate risks according to the Enterprise Risk Management model adopted at Group level, suitably integrated with insights from the Double Materiality Analysis concerning impacts, risks, and opportunities, and integrates them with periodic intra-annual control and monitoring activities performed on the data and information subject to Sustainability Consolidated Reporting. Moreover, each Department, Business Unit, and organisational unit, within their respective areas of responsibility, is directly involved in the collection, processing, and verification activities concerning the reliability, accuracy, and dependability of the data and information to be reported, committing to adhere to the deadlines set by the company's financial calendar for interim and year-end closings. Similarly, the Control, Compliance, and Internal Audit functions schedule and carry out periodic auditing activities to verify compliance with current regulations, as well as company processes and procedures.

[ESRS_2, GOV-5 DP 36c]

Among the main identified risks relating to the process for preparing the Consolidated Sustainability Reporting, the following should be noted:

I. the collection of incorrect and/or incomplete data and/or information, or data not correctly aggregated and consolidated;
II. the incorrect, late, or incomplete definition of the reporting and consolidation perimeter;
III. any delays in identifying the Focal Point / data owner to be involved in the collection activities for the data point / ESG KPI;
IV. failure to comply with the timelines set out in the company financial calendar and/or delays in making the data and information available by the Focal Point / data owner;
V. shortcomings in the filing of documentary evidence capable of ensuring the traceability of the data and information to be reported;
VI. inconsistency between the levels of analysis and the scope of stakeholder potentially to be considered in the Double Materiality Analysis along the entire value chain, compared to the third parties that actually come into contact with our Group and over whom it is possible to exert a direct influence;
VII. failure to update, and/or late updating of, procedures, company operating instructions, etc.

[ESRS_2, GOV-5 DP 36d, 36e]

Within the framework of the ongoing enhancement of its Internal Control and Risk Management System, including risks associated with sustainability reporting, the Company has scheduled a number of initiatives specifically designed to improve the overall quality of sustainability disclosures, strengthen the reliability and accuracy of reported data and information, and increase the efficiency and digitalisation of the Consolidated Sustainability Reporting preparation process, including:

- periodic updating of company operational procedures related to the Consolidated Sustainability Reporting preparation process, as well as the integration, within the same documents, of the latest best practices adopted and/or referenced in the market regarding sustainability reporting;
- review and update of the mapping of database and applications used for managing relevant data and information by the central Directorates, Business Units, and organisational units involved in various capacities through their respective Focal point / data owner;
- evolution of the current application system for the digital management of the process for preparing the Consolidated Sustainability Report in order to enable the automated collection and processing of the most relevant data, promoting the reduction of repetitive manual operations that may have an impact on People and reducing the risk of material errors in the phase of inputting data into the system;
- periodic review of the sustainability reporting methodology in line with recognised best practices;
- periodic updating of the Double Materiality Analysis;
- development of a progressively wider and more effective stakeholder engagement approach.

2. Environmental information

2.1. Climate change – ESRS E1

[ESRS_2, DR SBM-3, DP 48a]

[ESRS_2, IRO-1, DP 20a, 20b, 20c, 21]

Within the Double Materiality Analysis (DMA), updated in 2025, the Group conducted a thorough mapping of business operations and activities along the upstream and downstream value chain, with the aim of identifying impacts, risks, and opportunities related to climate change. This process enabled the identification of the most significant areas in terms of total greenhouse gas emissions generated and those potentially exposed to climate-related events. The analysis conducted by the Group did not consider climate scenarios but serves as a structured foundation for more detailed assessments in the future.

The following table lists the impacts, risks, and opportunities related to climate change that the Gruppo Magis has identified and assessed as material, as described in paragraph 1.4 Relevant sustainability topics.

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E1	Climate change mitigation	The business activities carried out by the Group generate Scope 1 GHG emissions that have a direct impact on climate change (for example, electricity production at gas-fired thermal power plants, cogeneration of energy and heat for district heating networks).	Current negative impact	S-M-L	☒	✓	☒
E1	Climate change mitigation	The business activities carried out by the Group produce Scope 2 GHG emissions that have a direct impact on climate change (for example, purchasing electricity from the market to supply its plants and operational sites).	Current negative impact	S-M-L	☒	✓	☒
E1	Climate change mitigation	Scope 3 indirect greenhouse gas emissions arising from extraction, production, and transportation activities within the Group's supply chain, resulting in an impact on overall atmospheric greenhouse gas concentrations and global warming.	Current negative impact	S-M-L	✓	☒	☒
E1	Climate change mitigation	Scope 3 indirect greenhouse gas emissions resulting from the use of goods and services offered by the Group, impacting the overall concentration of greenhouse gases in the atmosphere and contributing to global warming.	Current negative impact	S-M-L	☒	☒	✓
E1	Climate change mitigation	Gas leaks in the distribution network (so-called fugitive methane emissions) further exacerbate global temperature increases and the resulting impacts of climate change.	Current negative impact	S-M-L	✓	✓	☒
E1	Energy	Energy production operations and maintenance of energy infrastructure, including generation and distribution plants, require the use of fossil fuel energy, resulting in a negative environmental impact.	Current negative impact	S-M-L	✓	✓	☒
E1	Energy	Environmental management activities, such as waste treatment, require significant energy use. This energy, obtained mainly from fossil sources, negatively impacts the climate and the environment.	Current negative impact	S-M-L	☒	✓	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E1	Energy	Energy-intensive activities upstream in the value chain that involve the use of fossil fuel energy generate a negative environmental impact (e.g. the production of metallic materials for plant construction and the extraction of fossil resources).	Current negative impact	M-L	✓	☒	☒
E1	Energy	The use of energy downstream by end users generates a negative environmental impact (ref. national energy mix).	Current negative impact	S-M-L	☒	☒	✓

Results of the financial materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E1	Climate change mitigation	Failure to achieve the decarbonisation targets due to factors both internal to the organisation and external (such as changes in the social, political, and economic context).	Risk	M-L	☒	✓	☒
E1	Climate change adaptation	Rising temperatures may pose a significant risk to workers' health and safety, increasing the likelihood of heatstroke and other temperature-related illnesses. This can lead to reduced productivity and increased healthcare costs.	Risk	S-M-L	☒	✓	☒
E1	Climate change adaptation	The rise in temperatures can cause the overheating of substations, compromising their efficiency and reliability. Similarly, servers may overheat due to increased temperatures, resulting in breakdowns and disruptions to service. Ultimately, rising temperatures result in increased costs for cooling distribution systems and servers.	Risk	S-M-L	☒	✓	☒
E1	Climate change adaptation	The progressive rise in average temperatures (e.g. milder winters) may lead to a reduced demand for district heating services (e.g. lower consumption resulting in a higher incidence of fixed/variable costs, reduced use/effectiveness of cogeneration plants, a shortening of the winter heating season, and consequent delayed start-up / early shutdown of plants, etc.).	Risk	S-M-L	☒	✓	☒
E1	Climate change mitigation	Failure or inadequate identification and management of risks and opportunities related to climate change and the associated transition process by the Group and its Business Units, as well as throughout the entire value chain.	Risk	M-L	✓	✓	✓
E1	Climate change mitigation	Government measures introduced to support the transition towards a low-carbon economy may slow down the execution of the Group's projects, potentially reducing revenues and increasing costs, including those associated with plant upgrades and decommissioning.	Risk	M-L	☒	✓	☒
E1	Climate change mitigation	The European Emissions Trading System (ETS) may impose additional costs on companies that exceed their emission limits, thereby increasing operational expenses.	Risk	S-M	☒	✓	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E1	Energy	The trend towards electrification of consumption may require investments in upgrading, enhancing resilience, and expanding electrical infrastructure, as well as improving or increasing the capacity of electricity distribution networks to manage rising demand. It may also require the development of new technologies and solutions to improve energy efficiency and meet the evolving demands of the market.	Risk	M-L	☒	☒	✓
E1	Energy	The trend towards electrification of consumption may lead to a reduction in investments in gas distribution networks (except for changes in the gas mix with other molecules/sources, such as green hydrogen or biomethane), resulting in lower profitability.	Risk	M-L	☒	☒	✓
E1	Energy	The development of new renewable energy capacity (photovoltaic, wind, hydroelectric) enables meeting the growing demand for sustainable energy, potentially leading to increased revenues and greater market competitiveness.	Opportunity	S-M	☒	✓	☒
E1	Energy	The increasing focus on energy efficiency and the tightening regulations on energy consumption present a potential growth opportunity for companies investing in innovative solutions to promote energy efficiency for residential customers, apartment blocks, public administrations, and industrial clients, while seeking further expansion in strategic markets.	Opportunity	S-M	☒	✓	☒
E1	Energy	Opportunity linked to the promotion of Renewable Energy Communities (RECs) in the target areas. Achievable through collaboration among the Group's various Business Units, aimed at supporting investments and fostering dialogue with stakeholders, particularly public authorities, by accessing available public incentives.	Opportunity	M-L	☒	✓	☒
E1	Energy	Opportunity to receive incentives for the energy transition, aimed at adapting and optimising infrastructure while reducing initial investment costs and improving project profitability. This opportunity arises from growing market awareness of sustainability and the evolving regulatory framework.	Opportunity	M-L	☒	✓	☒
E1	Energy	Opportunity linked to the introduction of zonal electricity tariffs, which will encourage investment in renewable energy and more sustainable production infrastructure.	Opportunity	S-M	☒	✓	☒
E1	Energy	The growing demand for renewable energy positively impacts the sale of electricity and the generation from renewable sources, potentially leading to increased revenues.	Opportunity	S-M	☒	✓	☒

2.1.1 Strategy

[ESRS E1, DR E1-1, DP 17, 19]

[ESRS_2, DR SBM-3, DP 48f]

To date, the Gruppo Magis has not yet developed a Transition Plan and a resilience analysis to ensure the compatibility of its strategy and business model with the transition to a sustainable economy and the decarbonisation commitments undertaken by Italy and Europe.

It should nevertheless be highlighted that, during the development and design of the Group's production plants, both existing and under construction, foreseeable climate change impacts have been assessed so that they can be incorporated at an early stage into the detailed design process. This approach reduces the need for later adaptation and mitigation interventions related to physical climate risks. The analyses performed are regularly updated to reflect changes in the current and future operating context over the useful life of each plant.

In the coming years, the Group intends to further strengthen its strategy for adapting to and mitigating climate risks by defining its model for sustainable and resilient growth.

Climate change mitigation is a core pillar of the Company's strategy and has already been incorporated into the strategic guidelines supporting the 2025–2030 Business Plan. As outlined in the previous chapters, it is also integrated into the Enterprise Risk Management (ERM) framework, where climate-related risks are specifically assessed and monitored by the cross-functional working group coordinated by the Risk Management and ESG Department.

[ESRS E1, DR E1-1, DP 18]

As anticipated in the chapter on General Information (see Section 1.4 Material Sustainability Topics), from FY 2024 the Group conducted and later updated a Double Materiality Analysis involving a more detailed evaluation of climate-related risks. This assessment considered not only the climate and environmental risks linked to the company's activities but also took into account the entire value chain. The analysis enabled the identification of the main physical risks, related to both chronic and acute adverse climatic events, as well as transition risks linked to the shift towards a more sustainable economy, providing a comprehensive overview of the implications for the Group's various business lines.

Presented below is a table that details the relevant climate risks found during the analysis, divided into physical and transition risks, with the corresponding time horizons.

Table 21 – Physical and transition risks related to climate change

Relevant climate risks		
Type of Risk	**Description**	**Time horizons**
Transition risk	Failure to achieve the **decarbonisation targets** due to factors both internal to the organisation and external (such as changes in the social, political, and economic context).	Medium and Long Term
Physical risk	The **rise in temperatures** can pose a significant risk to workers' health and safety, increasing the likelihood of heatstroke and other heat-related illnesses. This may lead to reduced productivity and increased healthcare costs.	Short, Medium and Long Term

Relevant climate risks		
Type of Risk	**Description**	**Time horizons**
Physical risk	The **rise in temperatures** can cause the overheating of substations, compromising their efficiency and reliability. Similarly, servers can overheat due to rising temperatures, leading to malfunctions and service interruptions. Ultimately, rising temperatures result in increased costs for cooling distribution systems and servers.	Short, Medium and Long Term
Transition risk	The progressive **rise in average temperatures** (e.g. milder winters) may lead to a reduced demand for district heating services (e.g. lower consumption resulting in a higher incidence of fixed/variable costs, reduced use/effectiveness of cogeneration plants, a shortening of the winter heating season, and consequent delayed start-up / early shutdown of plants, etc.).	Short, Medium and Long Term
Transition risk	Failure or inadequate identification and management of risks and opportunities related to **climate change** and the associated transition process by the Group and its Business Units, as well as throughout the entire value chain.	Medium and Long Term
Transition risk	The implementation of **government restrictions** aimed at supporting the transition to a low-carbon economy could cause delays in the management of the Group's projects, resulting in reduced revenue as well as increased costs (for example, expenses related to the upgrading and decommissioning of plants).	Medium and Long Term
Transition risk	The **European Emissions Trading System** (ETS) may impose additional costs on companies that exceed their emission limits, thereby increasing operational expenses.	Short, Medium and Long Term

[ESRS E1, DR E1-4, DP 33]

At present, the Group has not yet set specific quantitative targets regarding GHG emissions. However, in light of the analyses carried out and the 2025-2030 Business Plan, the Group has identified the following strategic growth drivers.

- Strengthening of the green vocation, with investments in generation from renewable sources, development of the circular economy and extension of the district heating networks.
- Continuous improvement of the commercial offer with the expansion of smart and innovative services.
- Investments in the digitisation of gas and electricity networks.
- Increasing energy customers by 2025.

To support these commitments and to actively contribute to achieving the United Nations Sustainable Development Goal of "Affordable and Clean Energy" (SDG 7), the Group has planned investments in the installation of new nominal capacity that will enable it to reach 70% renewable energy sources, totalling 450 MW of installed capacity (excluding cogeneration plants). Specifically, the investments will focus on new photovoltaic and wind power plants, as well as the efficiency improvements of existing hydroelectric facilities. For additional information on the Gruppo Magis's climate change mitigation investments, please refer to chapter no. 6.2 "Outlook (Article 2428, paragraph 3, point 6)" of the Report on Operations.

The Group's objective is to pursue the energy transition by increasing, through its subsidiary Magis Power, the share of electricity generated from renewable sources, with the aim of reaching the production of 780 GWh of green energy by the end of 2030, as well as covering the Group's energy requirements. To confirm this commitment, it is actively involved in the development and management of low-emission production systems, supported by research and innovation of the best available technologies, as well as by offering its customers the most efficient solutions and technologies aimed at energy optimisation and the gradual decarbonisation of consumption, supporting them throughout the ecological transition.

The Gruppo Magis is committed to making its infrastructures increasingly resilient and able to remain available even in times of climate emergency, ensuring the continuous provision of essential services and helping to mitigate the effects of climate change in the territories where it is present with its assets.

The 2025-2030 Business Plan gives substance to our goal of accelerating the energy transition by consolidating, strengthening and positioning Magis among Italy's leading multi-utilities: renewable sources, district heating and customer growth are the strategic drivers that will enable us to create value for consumers, businesses and, more generally, the entire community. A strong drive to invest in projects with a long-term perspective, which can have impacts extending beyond the Plan's five-year scope.

2.1.2 Impacts, risks and opportunities management

[ESRS_2, MDR-P, DP 65a, 65b]

[ESRS_E1, DR E1-2, DP 25a, 25b, 25c, 25d, 25e]

The Group sets out principles and guidelines for managing significant impacts, risks, and opportunities related to climate change through its Code of Ethics, the Sustainability Management Policy and the Environmental Protection Policy, which define strategies for climate change mitigation and adaptation, energy efficiency, consumption reduction, and the use of renewable energy sources.

These policies, which apply to the Parent Company and to the subsidiaries that fall within the scope of consolidation, highlight Magis's commitment to enhancing its environmental performance by implementing improvement plans aimed at containing and reducing greenhouse gas emissions, continuously improving the energy efficiency of its premises and facilities, and gradually replacing its fleet with low-emission vehicles.

[ESRS_2, MDR-P, DP 65c]

These policies are adopted by the Parent Company's Board of Directors by resolution, on the proposal of the Chief Executive Officer, who is responsible for drafting them and updating them periodically with the support of the Company's Finance & Control Department.

[ESRS_2, MDR-P, DP 65f]

To support the effective application of the above Policies, they are shared across all Group companies to ensure awareness and adoption. In addition, the Policies are shared with all stakeholders, in line with principles of transparency and cooperation along the Value Chain, through dedicated communications and publication on the Parent Company Magis' corporate website, within the sustainability section (https://www.gruppomagis.it/sostenibilita).

[ESRS_2, MDR-P, DP 65e]

The analysis of the issues that emerged through the various channels of engagement with stakeholders made it possible to gather and consolidate the expectations of the different categories of stakeholders, with particular attention to the topics in question.

As part of its operational activities, the Magis Group has adopted an ISO 14001:2015-certified Environmental Management System intended to support continuous improvement and prevent incidents and emergency events through dedicated control measures. In this context, the Group has defined and adopted operational procedures aimed at regulating roles and responsibilities for mitigating environmental impacts and/or risks to both the environment and the organisation. The Group's key operational procedures include the following:

- PO.0035 – Monitoring of greenhouse gas (CO2) emissions from cogeneration plants.
- Atmospheric emissions monitoring system, which outlines the functional requirements and specifications of the monitoring system in compliance with Annex VI, Part V, of Legislative Decree 152/2006 (Environmental Consolidation Act).

Since February 2025, the Power and Heat Business Units, managed by Magis Power and Magis Calore, have adopted an ISO 50001:2018-certified Energy Management System designed to continuously enhance energy performance, improve efficiency, reduce climate-altering emissions, and lower both costs and environmental impacts through a systematic approach integrated with the Group's other management systems. In this context, the Group has defined and adopted operational procedures aimed at regulating roles and responsibilities for mitigating impacts and/or risks in the area of energy management. The Group's key operational procedures include the following:

- Quality, health and safety, environment and energy policy;
- operational procedures relating to energy planning (PO.0283 and PO 0284);
- energy analysis of sites and facilities subject to certification;
- procedures for maintenance and management of facilities;
- procedures for measuring consumption and emissions (PO0035).

Industrial and sustainability planning

[ESRS_2, MDR-A, DP 68 a, 68b, 68c]

[ESRS_E1, DR E1-3, DP 29a, 29b]

The Gruppo Magis promotes climate change mitigation strategies in order to reduce climate-changing emissions that have a direct impact on the quality of the environment in which we live.

During the reporting year, following the joint development of the 2025-2030 Business Plan and the ESG Plan, the Group expanded its portfolio of climate- and energy-related actions and objectives, strengthening integration between strategic directions, industrial development and sustainability.

Specifically, in the area of climate resilience and adaptation, the Group has set the target of assessing 100% of assets with nominal capacity above 1 MW for exposure to physical and transition climate risks, using as a 2024 baseline the preliminary assessment performed for sustainability reporting purposes. In support of this objective, the Group plans, in the period 2026-2027, to conduct a structured analysis of resilience to physical and transition climate risks and to define the related adaptation plan. This strategic approach also encompasses the revitalisation of district heating networks in Verona and Vicenza, with a long-term objective of delivering decarbonised thermal energy in urban settings through geothermal development and, in the future, the recovery of industrial waste heat. Within this framework, assessments may gradually be expanded to cover electricity and gas networks as well.

With reference to the energy transition and the development of renewable electricity sources, the Group defined the objective of achieving production of 780 GWh of electricity from renewable sources, compared with a 2024 baseline of 317.6 GWh, as well as reaching 70% of installed electrical capacity from RES, compared with a 2024 baseline of 45.4% and 157.8 MW of installed RES capacity, in a context where the expected national mix stands at 68%. Included within this strategic initiative is the Monte Giogo di Villore wind project, involving the installation of seven wind turbines on the ridge between Monte Giogo di Villore and Monte Giogo di Corella, for a total installed capacity of 29.6 MW. According to project estimates, the plant is capable of producing about 85 GWh/year of electricity. During the 2025 financial year, work began on the civil works and the construction of the infrastructure for connection to the electricity grid, as well as the procurement of the wind turbines and the selection of the companies responsible for the installation phases.

As part of energy innovation initiatives, the Gruppo Magis takes part in the Venice "Hydrogen Valley" project, developed in line with the actions of the energy transition. Starting from the 2024 2025 two-year period, in partnership with the ENI Group, Magis is involved in building a plant for the production of green hydrogen intended to supply a fleet of around 90 hydrogen buses used in the local public transport service managed by AVM (Azienda Veneziana della Mobilità S.p.A.). Starting from July 2026, the buses will be used for the urban service of the Municipality of Venice - Mestre. Hydrogen will be produced by a water electrolysis plant based on PEM electrolysers (proton exchange membrane), powered exclusively by electricity from renewable sources.

As regards renewable thermal energy, the Group has envisaged installing geothermal heat generation plants with a total capacity of 34 MWth and expected output of 144 GWhth/year, compared with a 2024 baseline of zero. This development is intended to achieve 50% of thermal energy from geothermal energy in the district heating network, compared with a 2024 baseline of zero, a national target value of 0.4% and an expected share of renewables in the thermal sector of 35.9%. This also includes the recovery of waste heat from industrial sites, as envisaged in the Business Plan.

Finally, as regards energy efficiency, the Group has defined the objective of achieving, from 2030, a reduction of 80,000 tCO_2eq/year avoided thanks to energy efficiency measures and the generation of renewable electricity and thermal energy that will be obtained through projects to be implemented at our customers and/or partners. To support this result, the achievement of energy savings of 90 GWh/year from 2030 through energy efficiency measures is envisaged, including those relating to electricity networks.

2.1.3 Metrics and targets

Group energy consumption

[ESRS_E1, DR E1-5, DP 35]

The Group's direct energy consumption refers to the use of fuel for generating electricity and heat in the Group's owned facilities (such as cogeneration and thermoelectric plants), as well as non-renewable primary energy flows not directly linked to energy production (for example, energy used for heating premises and refuelling the Group's vehicles, employed both for staff transport and company activities like waste collection, etc.).

Indirect energy consumption, i.e. the electricity that the Group purchases and consumes, refers to the Group's production sites and plants. In 2025, the majority of the Group's electricity consumption continued to come from renewable sources certified through Guarantees of Origin, except for the electricity used by the Mincio thermoelectric plant—which is 50% owned by the Group but not operationally controlled—and a small number of operational sites with low consumption levels, namely Cogaspiù Energie and Eco-Tirana.

With the aim of reducing its environmental footprint, the Group certified the electricity used for its activities through the purchase of green certificates; these certificates cover a good part of the Group's electricity requirements[7] . Overall, green certificates were purchased to cover 34,523.6 MWh of electricity consumed.

7 Green certificates cover 86.4% of the Group's electricity consumption, equal to 34,523.6 MWh.

The Group's vehicle fleet includes various types of vehicles and powertrains, reflecting the diversity of the services offered, which require the use of different technologies. Since 2023, the Group has included within its direct consumption figures the consumption related to company vehicles assigned as fringe benefits[8].

The company vehicle fleet is subject to particular attention by the Group, which is committed to gradually reducing atmospheric emissions deriving from road traffic, through the systematic renewal of the most polluting vehicles and the improved and more efficient management of travel between company premises.

In 2025, total electricity consumption (from both fossil and renewable sources) amounts to 39,970 MWh. The share of electricity consumed internally from renewable sources is 86.4% of the total, while that from fossil sources is 13.6% of the total.

8 With regard to the consumption of cars as fringe benefits, the Group has estimated that it is responsible for 70% of the fuel used in the vehicle for mixed use.

Climate change – ESRS_E1

Energy consumption and mix

[ESRS_E1, DR E1-5, DP 35, 37a, 37b, 37c, 38a, 38b, 38c, 38d, 38e, 39]

Table 22 – Energy consumption

Energy consumption	2025	2024
Coal and coal products fuel consumption (MWh)	0,0	0,0
Crude oil and petroleum products fuel consumption (MWh)	52.643,2	45.012,8
Natural gas fuel consumption (MWh)	742.069,4	766.046,8
Other non-renewable fuels consumption (MWh)	23,0	9,6
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	5.446,4	4.222,7
Total energy consumption from fossil sources (MWh)	**800.182,0**	**815.292,0**
Share of fossil fuels in total energy consumption (%)	*95,9%*	*95,5%*
Nuclear sources consumption (MWh)	0,0	0,0
Share of nuclear sources in total energy consumption (%)	*0,0%*	*0,0%*
Fuel consumption for renewable sources, including biomass (MWh)	0,0	0,0
Consumption of electricity, steam, and cooling from renewable sources, purcha-sed or acquired (MWh)	34.523,6	38.227,9
Self-generated renewable energy consumption without the use of fuels (MWh)	0,0	0,0
Total energy consumption from renewable sources (MWh)	**34.523,6**	**38.227,9**
Share of renewable sources in total energy consumption (%)	*4,1%*	*4,5%*
Total Energy Consumption (MWh)	**834.705,6**	**853.519,9**

Electricity produced (MWh)

[ESRS_E1, DR E1-5, DP 39]

The total gross electricity produced and cogenerated by the Group during the financial year amounts to 519.7 GWh, also considering the energy required to cover the consumption necessary for production operations (auxiliary consumption) and the contribution of cogeneration at heat production plants for the district heating networks of the cities of Verona and Vicenza.

In particular, electricity production from renewable sources[9] during the financial year amounted to 284.2 GWh and represents 54.7% of total electricity produced and cogenerated. Net of cogenerated energy related to district heating operations, electricity generated from renewable sources accounted for 81.8% of total energy production. This performance confirms the Group's strong commitment to sustainability, reflected in the substantial share of renewable energy within its generation mix.

In particular, renewable energy production at the Group's plants is distributed across various Italian regions: Veneto (37.0%); Trentino Alto-Adige (24.4%); Tuscany (19.2%); Emilia-Romagna (12.2%); rest of Italy (7.2%).

For a detailed analysis of electricity production excluding cogeneration, please refer to the previous section "1.2.2 Electricity Generation".

Table 23 – Electricity produced and cogenerated broken down by type of production source (MWh)

	2025		2024	
Total non-renewable energy produced	**235.578,8**	**45,3%**	**243.322,9**	**43,4%**
Generation of electricity - Thermoelectric	63.281,4		65.007,8	
Generation of electricity - Cogeneration	172.297,4		178.315,1	
Total renewable energy produced	**284.162,3**	**54,7%**	**317.592,5**	**56,6%**
Generation of electricity - Hydroelectric	141.374,5		200.841,4	
Generation of electricity - Photovoltaic	43.003,7		22.116,9	
Generation of electricity - Wind	99.784,2		94.634,3	
Total energy produced	**519.741,2**	**100,0%**	**560.915,4**	**100,0%**

9 The value of renewable energy production stated includes energy from the Power Business Unit's plants (approx. 316.6 MWh) and a number of smaller facilities managed by other Group entities (approx. 1.0 MWh).

Energy intensity in relation to net revenues

[ESRS_E1, DR E1-5, DP 40, 41, 42, 43]

According to the provisions of Commission Delegated Regulation (EU) 2022/1288, all companies within the Group are classified as belonging to the "high climate impact" sectors[10] . Energy intensity, calculated on the basis of the Group's energy consumption and net revenues, amounted to 0.39 MWh per € thousand of net revenues. The energy intensity index was calculated based on the revenue value reported in this Annual Financial Report of the Magis Group for the 2025 financial year.

Table 24 – Energy intensity

	2025	2024
Total energy consumption of activities in high climate impact sectors (MWh)	834.705,6	853.519,9
Net revenue in high climate impact sectors (€/000)	2.158.008,4	1.918.072,0
Total energy consumption of activities in high climate impact sectors relative to net revenues generated from those activities (MWh/million €)	0,39	0,44

Thermal energy produced and fed into the network (MWht)

[ESRS_E1, DR E1-5, DP 39]

During the financial year, the Magis Group produced 309.2 GWht of thermal energy through the plants managed by the Heat Business Unit.

Table 25 – Thermal energy produced (MWht)

	2025	2024
Thermal energy produced (= fed into the network)	309.211,9	309.327,7

10 The Magis Group operates mainly in NACE sectors categories "D" and "E", relating respectively to the supply of electricity, gas, steam and air conditioning and to water and waste management activities.

The Group's greenhouse gas emissions

[ESRS_E1, DR E1-6, DP 44, 48]

The use of fossil fuels is one of the main contributors to climate change; reducing their use, in synergy with the spread of energy-efficient technologies, is strategic for the reduction of the greenhouse effect, due primarily to climate-altering gases.

The Magis Group is committed to reducing emissions from its activities, ensuring accurate reporting of its performance achieved, in order to guarantee transparency and continuous improvement.

Magis monitors direct emissions (Scope 1) and indirect emissions (Scope 2 and Scope 3).

Direct emissions - Scope 1

Greenhouse gas emissions falling within Scope 1 and arising from sources controlled by the Group are mainly attributable to:

- fuels used in waste treatment plants and in plants for the production of energy and heat;
- consumption by the company vehicle fleet;
- natural gas consumption for heating buildings at the various sites and for other production-support activities;
- fugitive natural gas emissions generated by losses along the distribution networks managed by the Group;
- fugitive methane (CH_4) emissions associated with the management of waste stored at SIA's active landfill and the production of biomethane through anaerobic digestion at the Ca' del Bue plant in Verona.

The Group's Scope 1 direct emissions also encompass greenhouse gas emissions from facilities covered by the EU ETS Directive (2003/87/EC). In this context, 64.1% of the Group's Scope 1 greenhouse gas emissions are covered by regulated emissions trading schemes.

Compared to the previous financial year, during the current reporting period a methodological refinement was introduced in the calculation of direct Scope 1 emissions, which led to the inclusion of fugitive emissions (not yet estimated in 2024).

Indirect emissions - Scope 2

The Group's Scope 2 indirect emissions are related to the purchase of electricity and heat required to carry out business activities. In line with the GHG Protocol, these emissions are reported using the location-based method and the market-based method: the former reflects the average emission intensity of the relevant energy system, while the latter considers the Group's specific energy sourcing arrangements.

The main sources of the Group's Scope 2 emissions are attributable to:

- electricity purchased and consumed internally to carry out the Group's operational activities;
- heat purchased and consumed to carry out the Group's operational activities;
- losses of purchased and resold electricity associated with the transit of energy over networks owned by or under the control of the Group[11] .

During the 2025 financial year, a methodological refinement was introduced in the calculation of indirect Scope 2 emissions, including losses arising from the transmission and distribution of electricity purchased and resold to end users through the Group's networks.

11 According to the GHG Protocol, emissions arising from the generation of the energy purchased and consumed during transmission and distribution activities are accounted for in Scope 2 by the company that owns or controls the relevant networks. This is a typical feature of the utility sector.

Indirect emissions - Scope 3

Starting from the 2023 financial year, the Magis Group has begun mapping and analysing indirect GHG emissions known as Scope 3, which relate to emission sources not under direct company control but are indirectly caused along our value chain by the conduct of business activities.

Therefore, this includes emissions upstream – such as emissions caused by the extraction, production and transport of raw materials – and downstream – such as emissions generated by using products sold – of company activities.

In recent years, the Group has concentrated its efforts on progressively expanding the reporting and monitoring of this category of GHG emissions, thus completing the assessment of its carbon footprint needed to support the development of the Group's decarbonisation strategy.

The Magis Group's current commitment is to consolidate emission estimation methodologies by defining a continuous improvement pathway aimed at refining the quality, completeness and accuracy of the data used for sustainability reporting.

Once the reference baseline has been defined, Magis intends to launch the project to define its Net Zero Strategy, identifying short, medium and long-term targets, and providing for the strategy to be validated by the international organisation Science Based Targets initiative (SBTi).

Within the context briefly outlined above, Magis carried out an analysis of the internal and external relevance of each of the categories defined by the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" (revised edition). In particular, the significance for the Group of the emission sources described in the categories of Scope 3 was evaluated by taking into account, among others, the following criteria:

- magnitude of the reference category compared to the total emissions produced;
- the contribution of the category to the Group's risk exposure (e.g. climate-related, financial and/or regulatory risks);
- the level of significance of the emission source dictated by the specific characteristics of the sector to which it belongs;
- the accessibility of the data required to develop the estimates.

The Group's total greenhouse gas emissions (Scope 1, Scope 2 market-based, and Scope 3) for the reporting year amount to 3,607,103 tonnes of CO2e.

Specifically, the emissions directly produced by the Group (Scope 1) amount to 178,129 tonnes of CO2e and represent approximately 4.9% of the Group's total emissions.

Indirect emissions from the electricity consumed by the Group (Scope 2), calculated using the market-based method, amount to 11,468 tonnes of CO2e, representing 0.3% of the Group's total emissions. When calculated using the "location-based" method, applying a national average emission factor for electricity consumption (equal to 198.9 gCO2/kWh[12]) that does not take into account the company's specific purchasing choices, Scope 2 emissions amount instead to 17,432 tonnes of CO2e.

Indirect emissions caused by the Group's activities along the value chain (Scope 3) are 3,417,506 tonnes of CO2e, representing 94.7% of the Group's total emissions (market-based).

12 Preliminary ISPRA data available as at the publication date of this report (latest update: 7 May 2025).

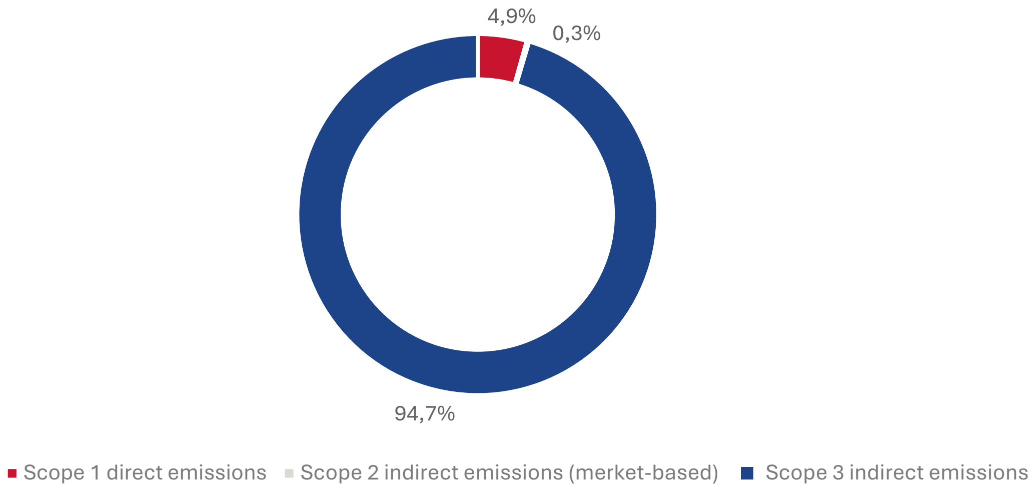


Figure 21 – Composition by scope of the Magis Group's greenhouse gas emissions (tCO2e)

The methodology for calculation adopted is based on the GHG Protocol, applying specific methods for each category, as follows:

- Category 1 – Purchased Goods and Services: emissions were calculated mainly using a spend-based approach, applying specific emission factors according to the expenditure item of the good or service considered. For natural gas purchased for resale to end customers, the calculation was based on the specific quantities acquired (measured in cubic metres), applying a Well-To-Tank (WTT) emission factor that accounts for upstream emissions generated during fuel production, transportation, and storage.
- Category 2 – Capital goods: emissions were estimated using a spend-based methodology, applying the corresponding emission factors to capital expenditure categories.
- Category 3 – Fuel- and energy-related activities: emissions were calculated on the basis of actual fuel, electricity and heat consumption, applying emission factors differentiated by fuel type or energy carrier. Upstream emissions associated with the generation of electricity purchased and resold to end users were also included, in accordance with the GHG Protocol provisions for energy utilities. For this reporting period, the calculation benefited from a methodological refinement that enabled the precise identification of the relevant emitting activities and a more accurate allocation of emission factors. In order to avoid double counting, upstream transmission and distribution losses of electricity purchased and consumed by the Group were not included in Category 3, as they are already incorporated in the ISPRA emission factor used for Scope 2 location based.
- Category 4 – Upstream transportation and distribution: emissions were calculated using a distance-based approach, which estimates emissions on the basis of kilometres (km) travelled according to the type of transport vehicle used. For the calculation of this category, estimated kilometres relating both to transport from suppliers to the Group (so-called inbound logistics) and transport departing from the organisation (so-called outbound logistics) were considered.
- Category 5 – Waste generated during operations: emissions were calculated by considering the quantities of waste generated by the Group and transferred to third-party facilities for treatment, applying specific emission factors according to the type of waste and final treatment method. The flow of urban waste collected as part of the Group's environmental services activities was excluded, as, since it is not subject to any internal treatment activity, such waste is only transferred to third-party facilities (intermediation with or without holding). As they do not undergo any transformation or processing by the Group, they are therefore not considered "waste generated during operations" under the standards set out by the GHG Protocol for this emission category. Compared with the previous reporting period, for the 2025 financial year it was possible to analyse and identify more precisely the waste flows relevant for the reporting of Category 5 emissions

which, together with a more accurate allocation of emission factors by waste type, resulted in a methodological refinement in the calculation of the category's emissions.

- Category 6 – Business travel: emissions were calculated based on an estimate of the distances travelled by employees for work purposes using different means of transport (car, train and aeroplane), adapting the estimation methodology depending on the mode of transport used (for example, as-the-crow-flies distance for air travel and rail distance tables for train travel) and applying distinct emission factors for each mode of transport used.
- Category 7 – Employee commuting: emissions were calculated assuming, in the absence of detailed data on the mode of transport, exclusive use of private cars. With regard to the calculation of emissions for Eco Tirana, in the absence of data on distances travelled and the mode of transport used, estimates were made based on a previous local study. As regards the days worked by the Group's employees (excluding Eco Tirana, for which a different estimation process was carried out), estimates were made of the days actually worked during 2025.
- Category 11 – Use of sold products: emissions were calculated based on the volumes of gas and biomethane sold, using specific Scope 1 emission factors associated with the combustion of the product by end users.
- Category 13 – Downstream leased assets: in the absence of detailed technical data relating to assets under leasing/rental, emissions were calculated using a revenue-based approach for the leasing activities carried out by the Group, associating the relevant revenue with the appropriate emission factor depending on the asset from which the revenue arises.
- Category 15 – Investments: emissions were calculated according to the formula set out in the Standard on Financed Emissions (PCAF Standard) under option 3 – Economic Activity-Based Emissions, as the companies in which the Group holds equity investments do not report an emissions inventory in their financial statements.

Finally, the following categories of emissions were deemed neither applicable nor relevant for the Magis Group and were therefore not estimated. For each category not calculated, the rationale supporting its exclusion is set out below.

- Category 8 – Upstream leased assets: this category refers to emissions arising from the operation of assets rented by the company; following the analyses carried out, this category was found not to be applicable and therefore not relevant for the Group, as the organisation has operational control over all assets under operating leases, and the resulting emissions are therefore already reported in the other categories already included.
- Category 9 – Downstream transport and distribution: this category refers to emissions arising from the transport and distribution of products sold by the reporting company during the reference year, between its operations and the final consumer; this category was found not to be applicable and therefore not relevant for the Group, as Magis does not carry out downstream transport and distribution activities for goods.
- Category 10 – Processing of sold products: this category refers to emissions arising from the processing of intermediate products sold by third parties (for example, manufacturers) following their sale by the reporting organisation; this category is not applicable and therefore not relevant for the Group, as Magis does not sell semi-finished products that undergo further downstream processing.
- Category 12 – End of life treatment of sold products: this category refers to emissions arising from the disposal and treatment of waste from products sold by the reporting company at the end of their life cycle; this category is not applicable and therefore not relevant for the Group, as Magis does not sell any type of finished product that could undergo end-of-life treatment.
- Category 14 – Franchising: this category refers to emissions arising from business activities conducted through franchising (for example, by affiliation and under licence) not included in Scope 1 or Scope 2; this category is not applicable and therefore not relevant for the Group, as it is not active in franchising activities.

The Magis Group remains committed to monitoring the evolving operating context and the relevance of those emission categories currently excluded from disclosure, activating appropriate data collection and assessment activities where necessary to further integrate Scope 3 indirect emissions reporting.

Greenhouse gas emissions (in tCO2eq)[13] .

[ESRS_E1, DR E1-6, DP 44a, 44b, 44c, 44d, 45a, 45b, 45c, 45d, 46, 47, 48a, 48b, 49a, 49b, 50a, 50b, 51, 52a, 52b]

Table 26 – Direct emissions (Scope 1)

Scope 1 (tCO2e)	2025	2024	Change %
Gross Scope 1 emissions	178.129	192.847	-7,6%
% of Scope 1 emissions covered by regulated emissions trading systems	64,1%	65,3%	-15,5%

In 2025, direct (Scope 1) emissions were broadly in line with those reported in the previous year, recording a 7.6% decrease due to an update, in the reference year, of the emission factors used.

Table 27 – Indirect emissions (Scope 2)[14]

Scope 2 (tCO2e)	2025	2024	Change %
Gross Scope 2 emissions (location-based)	17.432	10.714	62,7%
Gross Scope 2 emissions (market-based)	11.468	2.114	424,8%

Compared with the previous 2024 financial year, Scope 2 emissions, both location-based and market-based, increased due to the methodological change mentioned above (see the paragraph on “Indirect emissions (Scope 2)”).

13 Emission factors used:
Scope 1: DESNZ – GOV. UK - Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope1: ISPRA 2025 – Table of national standard parameters 2025
Scope 2 Location-based: ISPRA – Emission factors for the production and consumption of electricity in Italy, 2025
Scope 2 Market-based: AIB - 2024 European Residual Mix
Scope 2: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category1: EPA – Environmental Protection Agency 2022
Scope 3, Category1: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category 2: EPA – Environmental Protection Agency 2022
Scope 3, Category 3: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category 5: DESNZ - GOV. UK Department for Energy Security and Net Zero – Greenhouse gas reporting: conversion factors 2025 – Waste disposal 2025; EcoInvent 3.12 LCA
Scope 3, Category 6: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category 7: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category 11: DESNZ - GOV. UK Department for Energy Security and Net Zero– Greenhouse gas reporting: conversion factors 2025
Scope 3, Category 13: EPA – Environmental Protection Agency 2022
Scope 3, Category 15: Standard on Financed Emissions (PCAF Standard)

14 Total Scope 2 emissions are reported in tCO2e for the purposes of calculating the carbon footprint; however, it should be noted that emissions relating to purchased and consumed electricity were quantified in tCO2.

Table 28 – Indirect emissions (Scope 3)

Scope 3 (tCO2e)	2025	2024	% Change
Scope 3 Total Gross Indirect Emissions	**3.417.506**	**4.210.679**	**-18,8%**
1. Purchased goods and services	584.380	247.607	136,0%
2. Capital goods	30.342	51.149	-40,7%
3. Fuel- and energy-related activities	1.198.634	2.451.276	-51,1%
4. Upstream transport and distribution	426		-
5. Waste generated in operations	53.674	264.928	-79,7%
6. Business travel	32	12	166,7%
7. Employee commuting	2.997	3.774	-20,6%
8. Upstream leased assets			-
9. Downstream transport			-
10. Processing of sold products			-
11. Use of sold products	1.540.187	1.191.933	29,2%
12. End-of-life treatment of sold products			-
13. Downstream leased assets	4.727		-
14. Franchising			-
15. Investments	2.107		-
Other Scope 3 category			-
Total (Scope 1, Scope 2 location-based and Scope 3)	**3.613.068**	**4.414.240**	
Total (Scope 1, Scope 2 market-based and Scope 3)	**3.607.103**	**4.405.640**	

Compared with the previous year, in 2025 Scope 3 emissions recorded variations mainly attributable to category 1. Purchased goods and services, 3. Fuel- and energy-related activities, 5. Waste generated in operations and 11. Use of sold products.

Category 1. Purchased goods and services, which includes emissions generated upstream along the value chain, recorded an increase, mainly attributable to the rise in volumes of gas purchased and subsequently resold by the Group. This trend is also consistently reflected in category 11. Use of sold products, which includes downstream emissions associated with the end use of the gas marketed by end users.

With reference to category 3. Fuel- and energy-related activities not included in Scopes 1 and 2, show a reduction in emissions compared with the previous year, mainly attributable to a methodological refinement of the calculation scope and the emission factors adopted, as described in the paragraph "Indirect emissions (Scope 3)".

Similarly, category 5. Waste generated in operations shows a decrease in emissions compared with the previous 2024 financial year, attributable to the methodological refinement described in the same section, which enabled a more accurate and representative estimate of the associated emissions.

Lastly, category 11. Use of sold products shows an increase in emissions in line with the rise in volumes of gas and biomethane sold during the 2025 financial year, confirming the relationship between procurement dynamics and the downstream emissions associated with the use of the gas marketed.

Biogenic CO2 emissions – Outside of scope

Emissions deriving from the end use of the biomethane produced by the Ca' del Bue plant in Verona were accounted for according to the type of gas emitted. In particular, nitrous oxide (N_2O) and methane (CH_4) emissions are included in Scope 3, Category 11 – Use of sold products; whereas carbon dioxide (CO_2) emissions, being biogenic, were not considered in the Carbon Footprint calculation and are therefore presented separately in the Outside of Scope section.

Total biogenic carbon dioxide (CO_2) emissions associated with the biomethane sold and used by end users amount to 1,866 tCO_2e.

GHG intensity based on net revenue

[ESRS_E1, DR E1-6, DP 53, 54]

Table 29 – Emission intensity

	2025	2024
Total GHG emissions (location-based) (t CO2eq)	3.613.068	4.414.240
Total GHG emissions (market-based) (t CO2eq)	3.607.103	4.405.640
Net revenue from activities in high climate impact sectors (€/000)	2.158.008	1.918.072
Total GHG emissions (location-based) compared to net revenues (t CO2eq/ € thousands)	**1,67**	**2,30**
Total GHG emissions (market-based) compared to net revenues (t CO2eq / € thousands)	**1,67**	**2,30**

2.2. Pollution - ESRS E2

2.2.1 Impacts, risks and opportunities management

[ESRS_2, DR IRO-1, DP 11a]

[ESRS_2, DR SBM-3, DP 48a]

The following table lists the impacts, risks, and opportunities related to pollution that the Magis Group has identified and assessed as material in the context of the Double Materiality Assessment (DMA) carried out in the previous financial year and updated in 2025, as described in the paragraph "1.4 Material sustainability topics".

[ESRS_2, DR IRO-1, DP 11b]

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E2	Microplastics	The use of multiple operational vehicles (for example, for plant maintenance and waste collection) in Italy and Albania contributes to the dispersion of microplastics, resulting from the friction of tyres on the ground.	Current negative impact	S	☒	✓	☒
E2	Microplastics	Contamination of water sources and soil can be caused both by waste collection operations using the Environment BU's transport vehicles and by similar collection and disposal activities carried out by other companies using the waste treatment facilities of Environment BU. The wear of tyres from customers' cars using the Group's charging stations can also cause similar harmful environmental impacts.	Current negative impact	S-M-L	✓	✓	✓
E2	Air pollution	The combustion of fuel in upstream operations (such as the industrial production of plants, infrastructure, and related components) generates hazardous air pollutants (HAP), criteria air pollutants (CAP), and volatile organic compounds (VOC), which can degrade air quality and further contribute to the environmental impacts of climate change.	Current negative impact	M-L	✓	☒	☒
E2	Air pollution	The combustion of fuel in electricity generation operations produces hazardous air pollutants (HAP), criteria air pollutants (CAP), and volatile organic compounds (VOC), which can degrade air quality and further contribute to the environmental impacts of climate change.	Current negative impact	M-L	☒	✓	☒

Results of the financial materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E2	Air pollution	Harmful air emissions produced by activities (such as cogeneration heat and electricity) may lead to penalties, increased compliance costs, and capital expenditures for installing new monitoring technologies, resulting in a negative financial impact on the company.	Risk	S-M-L	☒	✓	☒
E2	Microplastics	Operations of the Heat and Environment BUs may pose a risk of contamination to water sources and soil, potentially leading to sanctions, remediation and restoration costs, and/or reputational damage.	Risk	S-M-L	☒	✓	☒

[ESRS_2, MDR-P, DP 65 a, 65 b, 65 c, 65d, 65e, 65 f]

The Group has defined its commitment to reducing environmental impact, with particular focus on controlling air pollution, through the Environmental Protection Policy[15] which outlines the values and principles guiding the Group's business model aimed at promoting sustainable and responsible behaviours towards the environment, minimising environmental impacts and optimising the use of energy and natural resources.

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

The Environmental Protection Policy was adopted by the Parent Company's Board of Directors on the proposal of the Chief Executive Officer, who is responsible for drafting it and updating it periodically with the support of the Company's Finance & Control Department.

To support effective implementation, the Policy is shared with all Group subsidiaries to ensure awareness and adoption. Furthermore, in the interest of transparency and collaboration with stakeholders across the value chain, it is communicated to all stakeholders both through publication on the corporate website and through specific communications, where deemed necessary and appropriate.

[ESRS_E2, DR E2-1, DP 15a,15c]

[ESRS_E2, DR E2-4, DP 30a, 30b, 30c]

As mentioned in paragraph 2.1 "CLIMATE CHANGE – ESRS E1", within its own operations, the Magis Group has implemented an environmental management system certified to ISO 14001:2015. In this context, the Group has defined and adopted operational procedures aimed at regulating roles and responsibilities for mitigating environmental impacts and/or risks to both the environment and the organisation. The Group's key operational procedures include the following:

- Operational Procedure 0066, which outlines the criteria adopted for conducting environmental controls in cogeneration plants;

15 The Magis Group draws on a European and national regulatory framework for the implementation of its sustainability principles, including the United Nations Global Compact (UNGC), the Sustainable Development Goals (SDGs), the GRI Sustainability Reporting Standards and the ESRS – European Sustainability Reporting Standards, the EU Taxonomy under Regulation (EU) 2020/852, the commitments arising from the Paris Climate Conference (COP21), the European Green Deal and the EU Biodiversity Strategy to 2030. In addition, this includes the recommendations of the Task Force on Climate related Financial Disclosures (TCFD), the Integrated National Energy and Climate Plan (PNIEC), the principles of the GHG Protocol and the UN Principles for Responsible Investment (UN PRI).

- Operational Procedure 0068, which identifies the processes and responsibilities for sampling and analysing air pollutants within cogeneration plants;
- Operational Procedure 0220, which defines the intervention procedures in case the threshold values set for emissions from the Group's cogeneration plants are reached or exceeded.

Pollutant control is carried out through a combination of continuous measurements and periodic sampling, ensuring constant oversight of plants' emission performance.

In particular, a continuous monitoring system (SME) is in operation at the Borgo Trento power plant (VR), enabling the daily collection and processing of data on nitrogen oxides (Nox), carbon monoxide (CO), oxygen (O_2) and ammonia (NH_3), with annual verification of the measuring systems in accordance with UNI EN 14181 and weekly and six-monthly calibration procedures.

All power plants also carry out annual sampling on engines and boilers, conducted by certified internal or external laboratories, using analytical methods recognised at European level (e.g. UNI EN 14792 for NOx and UNI EN 15058 for CO). Measurements are performed in accordance with standardised protocols that ensure the representativeness and repeatability of results, often through series of consecutive measurements or extended monitoring.

In addition to emissions monitoring, management checks are carried out to optimise combustion, such as verifying catalyst efficiency and seasonally calibrating burners, helping to reduce the pollutants produced.

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68d, 68e]

[ESRS_E2, DR E2-2, DP 19a, 19b]

In line with prior years, and in accordance with the adopted operating procedures and Integrated Environmental Authorisations (AIA), the Group implements strict controls over air emissions from cogeneration[16] facilities in order to avoid breaches of authorised limits. These measures include ongoing monitoring of emissions, the implementation of advanced filtration and purification systems, and the adoption of operational practices aimed at minimising the environmental impact of industrial activities.

To prevent negative impacts related to pollutants emitted during processes, the Group has adopted dedicated advanced filtration and purification technologies. These systems are installed in the cogeneration plants, the biomethane production facility, and the waste treatment plants.

Through the monitoring and control plans (MCP) defined by the adopted and implemented operational procedures, the Group periodically measures pollutants and production process parameters in accordance with the sector's Best Available Techniques (BAT), as outlined in Commission Implementing Decision (EU) 2017/1442 of 31 July 2017. In particular, the PMCs establish:

- self-monitoring carried out by the plant operator;
- inspections by the competent authority, with costs borne by the operator;
- Submission of data necessary to verify the plant's compliance with the conditions set out in the Integrated Environmental Authorisation (IEA).

The actions described above do not have a completion deadline, as they are ongoing activities integrated into the operational management of the plants.

16 The plants concerned are those of Borgo Trento, Centro Città, Golosine, Banchette, Forte Procolo and Fiera.

2.2.2 Metrics and targets

[ESRS_E2, DR E2-4, DP 28a]

As mentioned earlier, the Group has monitoring systems in place to track pollutant emissions from its facilities. Specifically, the substances subject to monitoring are:

- Nitrogen oxides (NO2X).
- Carbon Monoxide (CO).
- Oxygen (O_2).
- Sulfur dioxide.
- Dust.

[ESRS_2, MDR-T, DP 81a, 81b]

[ESRS_E2, DR E2-4, DP 28a]

While the Group does not currently have formal quantitative targets in this area, it systematically monitors emissions and the effectiveness of implemented measures to ensure compliance with relevant regulations.

In the reporting year, no instances of exceeding the permitted emission thresholds indicated in Annex II of Regulation (EC) No 166/2006 were recorded.

As part of its strategic development path, the Magis Group plans to launch a project aimed at defining specific pollution-related objectives.

[ESRS_E2, DR E2-4, DP 28b]

With regard to the potential release of microplastics resulting from tyre wear caused by contact with road surfaces by its operational vehicles (for example, vehicles used for waste collection), the Magis Group is committed to developing a system for monitoring and reporting the volumes of microplastics generated over the coming financial years.

2.3. Water and marine resources – ESRS E3

2.3.1 Impacts, risks and opportunities management

[ESRS_ 2, DR IRO-1, DP 8a]

[ESRS_2, DR SBM-3, DP 48a]

The table below lists the impacts, risks, and opportunities relating to water and marine resources that the Magis Group identified and assessed as material following the Double Materiality Analysis (DMA) carried out in the previous financial year and updated in 2025, as described in section 1.4 Material Sustainability Topics.

[ESRS_ 2, DR IRO-1, DP 8b]

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E3	Water with-drawals	The concentrated extraction of water from specific local sources for high water-use industrial operations (both internal production processes and those of suppliers along the supply chain) can have negative impacts on water availability, water quality, and aquatic habitats.	Potential negative impact	S-M	✓	✓	☒

Results of the financial materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E3	Water with-drawals	Unavailability of water (from rainfall, rivers, etc.) due to external natural events (acute or chronic, e.g. prolonged drought periods) required for the operation of all hydroelectric and thermoelectric plants within the Power Business Unit (e.g. the Mincio Thermoelectric Power Plant – CTE). Negative impacts are also possible along the supply chain.	Risk	S-M-L	✓	✓	☒
E3	Water with-drawals	Regulations imposed by the competent basin authorities, including mandatory dam releases and run-of-river hydroelectric power plant flows, may limit water availability for operations, increasing the risk of production interruptions and additional costs for water resource management.	Risk	S-M-L	☒	✓	☒
E3	Water consump-tion	Water scarcity, along with the resulting increase in costs and the complexity of regulatory requirements regarding water usage, can have operational, regulatory, reputational, and financial consequences.	Risk	S-M-L	☒	✓	☒
E3	Water discharges	Risk of regulatory penalties/fines for non-compliance with discharge limits and quality standards.	Risk	S-M-L	☒	✓	☒

[ESRS_2, MDR-P, DP 65a, 65b, 65c, 65d, 65e, 65f]

[ESRS_E3, DR E3-1, DP 12a ii, 12a iii, 12c]

As outlined in the Environmental Protection Policy[17] , the Magis Group is committed to using water resources consciously and sustainably, across all production processes and throughout its value chain.

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

The Policy was adopted by the Parent Company's Board of Directors on the proposal of the Chief Executive Officer, who is responsible for drafting it and updating it periodically with the support of the Company's Finance & Control Department.

17 The European and national regulatory framework adopted by Gruppo Magis as a reference for the implementation of its sustainability principles includes the guidelines of the United Nations Global Compact (UNGC), the Sustainable Development Goals (SDGs), the GRI Sustainability Reporting Standards and the ESRS – European Sustainability Reporting Standards, the EU Taxonomy established under Regulation (EU) 2020/852, the commitments undertaken through the Paris Climate Conference (COP21), the European Green Deal and the EU Biodiversity Strategy to 2030. In addition, this includes the recommendations of the Task Force on Climate related Financial Disclosures (TCFD), the Integrated National Energy and Climate Plan (PNIEC), the principles of the GHG Protocol and the UN Principles for Responsible Investment (UN PRI).

Water is primarily withdrawn for hydroelectric and thermoelectric power generation, as well as for cooling thermal cycles. Water supply at the Group's facilities is sourced from surface water, groundwater, and municipal networks. Specifically, for hydroelectric power generation, water is primarily drawn from rivers and reservoirs, while respecting the guaranteed minimum environmental flow.

In line with this commitment and as outlined in the previous paragraph, the Magis Group has implemented an environmental management system certified to ISO 14001:2015. This system includes detailed operating procedures that define roles and responsibilities for the identification and control of environmental parameters. Specifically, regarding the management of impacts, risks, and opportunities related to water resources, Operating Procedure 0066 establishes a system for monitoring water emissions. This system specifically focuses on discharges, distinguishing between those from production activities sent to the public sewer network and those released into surface water bodies.

In accordance with the adopted operating procedures and Integrated Environmental Permits (IEPs), the Magis Group therefore implements strict measures to control pollutant emissions into water. On an annual basis, the Group reports, for the plants subject to this obligation, any instances of water emissions exceeding the thresholds set by Regulation (EC) No. 166/2006.

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68d, 68e]

[ESRS_E3, DR E3-1, DP 13,14]

[ESRS_E3, DR E3-2, DP 19]

For the assessment of areas subject to water stress, the Aqueduct Water Risk Atlas+ tool[18] of the World Resources Institute was taken as a reference. The analysis revealed that only two of the Magis Group's cogeneration plants, whose water consumption accounts for 3.5% of the Group's total usage, are located in a medium water stress area.

The activities carried out at these sites do not generate significant impacts on the availability of water resources, as they are photovoltaic plants characterised by limited water use. In addition, the design and construction of the plants have incorporated measures to safeguard water resources, in compliance with the applicable legislation.

It should also be noted that, at present, the Group has not adopted policies or practices specifically dedicated to the sustainable management of marine and ocean resources, as this topic is considered not relevant with respect to the scope of the company's activities.

As previously mentioned, to prevent the negative impacts of pollutants emitted during processes, the Group has implemented specific monitoring systems. Based on the activities carried out, various parameters are monitored, including total nitrogen and phosphorus, arsenic, copper, zinc, mercury, total organic carbon, and chlorides, as specified in Annex II of Regulation (EC) No. 166/2006.

These activities do not have a completion deadline, as they are ongoing activities integrated into the operational management of the plants.

2.3.2 Metrics and targets

[ESRS_2, MDR-T, DP 81a, 81b]

At present, the Group has not yet established specific measurable targets related to water resources. While the Group does not currently have formal quantitative targets in this area, it systematically monitors emissions to water, water abstraction, and wastewater discharges to ensure compliance with relevant regulations.

18 https://www.wri.org/aqueduct

[ESRS_E3, DR E3-4, DP,28e, AR 32]

The Group's monitored water consumption relates to production plants and the offices annexed to them. Consumption relating to the registered offices where the head offices are located is excluded, as it is not significant compared with the overall volume of withdrawals.

In the 2025 financial year, the Group's water withdrawals amounted to 5,453,803,363 m3, remaining substantially identical to those of the previous reporting period. Hydroelectric power generation accounts for 99.8% of the Group's total withdrawals: water abstracted for hydroelectric plants is not consumed but used in the production process and then released without alteration.

The total water discharge at 31 December 2025 corresponds to 5,453,764,793 m3.

[ESRS_E3, DR E3-4, DP 28a, 28b, 28c, 28d]

The water consumed for carrying out its activities amounts to 38,569.50 m3. The proportion of water consumption relative to the volume withdrawn is 0.001%, thanks to the good practices adopted by the Magis Group. During the 2025 financial year, the Group consumed 2,687.00 m3 of water in areas identified as experiencing medium water stress.

During 2025, the Group also did not store or reuse water resources.

[ESRS_E3, DR E3-4, DP 29]

Water intensity, calculated as the ratio between water consumption and net revenues, amounts to 0.02m3/ million €.

Table 30 – Water consumption (m3)

	U. M.	2025	2024
Total water consumption	Cubic metres	38.569,50	37.719,00
Other water risk areas	Cubic metres	2.687,00	1.316,00
High water stress areas	Cubic metres	0,00	0,00
Total volume of water stored	Cubic metres	0,00	0,00
Water intensity rate	m3/ million €	0,02	0,02

2.4. Biodiversity and ecosystems – ESRS E4

2.4.1 Impacts, risks and opportunities management

[ESRS_2, DR SBM-3, DP 16a, 16b, 16c]

[ESRS_2, DR IRO-1, DP 17a, 17b, 17c, 17d, 17e, 19a, 19b]

[ESRS_2, DR SBM-3, DP 48a]

[ESRS_E4, DR E4-5, DP 35]

The table below presents the impacts, risks, and opportunities concerning biodiversity and ecosystems that the Magis Group identified and evaluated as material through the Double Materiality Analysis (DMA) conducted in the previous year and updated in 2025, as outlined in section 1.4 Material Sustainability Topics.

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

With specific reference to this topic, the Group identified the impacts, risks, and opportunities related to biodiversity and ecosystems, both in its own operations and in the upstream and downstream value chain. Using tools such as the Natura 2000 Viewer, the Group assessed the potential risks linked to biodiversity loss and ecosystem degradation, identifying the most vulnerable geographical areas and operational phases. This included assessing dependencies on ecosystem services and identifying ecosystem services that are disturbed or at risk of being disturbed.

Over the coming years, the Magis Group plans to complement the analysis described above with a site specific approach in order to consolidate the information already available and further strengthen the assessment of biodiversity dependencies.

The analysis carried out did not identify any material impacts related to desertification, soil sealing, land degradation, or threats to endangered species.

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E4	Direct impact drivers on biodiversity loss	Reduction in average biodiversity levels in surrounding areas where production activities take place or during the development of construction sites for new plants, due to direct alterations to soil and land.	Potential negative impact	M-L	✓	✓	☒
E4	Direct impact drivers on biodiversity loss	Upstream value chain activities (such as the extraction, processing, and storage of minerals like quartz) can contaminate and, in the long term, destroy ecosystems and the species that inhabit them.	Potential negative impact	M-L	✓	☒	☒

Results of the financial materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E4	Direct impact drivers on biodiversity loss	Local land use laws and community opposition (e.g. NIMBY and NIMTO phenomena) to the development of wind and solar plants, due to concerns about land use or other environmental impacts (e.g. local water resources, soil, air), may result in higher costs, lost revenues, or project delays.	Risk	S-M-L	✓	✓	☒
E4	Direct impact drivers on biodiversity loss	Risk of biodiversity loss due to intensive natural resource extraction, potentially leading to operational constraints and impacts on the continuity of supply to Magis.	Risk	S-M-L	✓	☒	☒

[ESRS_2, DR MDR-P, 65a, 65b, 65c, 65d, 65e, 65f]

[ESRS_E4, DR E4-2, DP 23a, 23b, 23c, 23d, 23e, 23f, 24a, 24b, 24c, 24d]

Aware that the activities carried out could potentially have impacts on ecosystems and biodiversity, the Magis Group is committed to safeguarding the natural value and biodiversity of the territories in which it operates and affected by the presence of its plants by implementing appropriate environmental safeguards and measures.

Through the Environmental Protection Policy[19] , the Group has established the principles and guidelines for environmental decision-making, including aspects related to the protection of biodiversity and ecosystems. In line with the Sustainable Development Goals, the European Green Deal and the EU Biodiversity Strategy to 2030, the Magis Group is committed to:

- promote and implement environmental improvement plans through actions aimed at protecting biodiversity-rich areas and fostering a culture of biodiversity;
- safeguard the conservation of biodiversity and ecosystems, particularly in the areas where it operates;
- respect the principle of "do no significant harm" (DNSH) to the environment in the conduct of its business activities;
- monitor and mitigate any potential impacts of activities on biodiversity;
- collaborate with associations and local communities on initiatives and projects aimed at raising stakeholder awareness about the importance of protecting the environment, ecosystems, and biodiversity.

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

The Policy was adopted by the Parent Company's Board of Directors on the proposal of the Chief Executive Officer, who is responsible for drafting it and updating it periodically with the support of the Company's Finance & Control Department. The Policy was distributed to the subsidiaries and is therefore effective at Group level.

19 The Magis Group draws on a European and national regulatory framework for the implementation of its sustainability principles, including the United Nations Global Compact (UNGC), the Sustainable Development Goals (SDGs), the GRI Sustainability Reporting Standards and the ESRS – European Sustainability Reporting Standards, the EU Taxonomy under Regulation (EU) 2020/852, the commitments arising from the Paris Climate Conference (COP21), the European Green Deal and the EU Biodiversity Strategy to 2030. In addition, this includes the recommendations of the Task Force on Climate related Financial Disclosures (TCFD), the Integrated National Energy and Climate Plan (PNIEC), the principles of the GHG Protocol and the UN Principles for Responsible Investment (UN PRI).

Additional policies for the protection of biodiversity and ecosystems in the territories in which the Group operates, as well as policies relating to deforestation, will be adopted in the coming financial years, with consideration being given to the possible integration of these matters directly into Environmental Protection Policy.

[ESRS_E4, DR E4-3, DP 28b, 28c]

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68d, 68e]

While performing its activities, the Group adopts a business model that is attentive to sustainable and environmentally responsible behaviour. It pays particular attention to the flora and fauna of the places where it operates, undertaking to carry out its activities by taking into account the needs of the surrounding ecosystem and to promptly correct any negative impacts that may occur as part of its business activities. The actions implemented do not have a specific completion deadline, as they are activities integrated into the Group's operational management.

Before implementing new projects and maintenance activities of importance, which could give rise to environmental impacts in particular areas, the Magis Group submits the intervention to more specialised assessments for the safeguard of the area affected by the service.

The assessment activity is carried out during the design and construction phases of the Group's wind farms, for which specific pre-operational monitoring activities have been conducted in order to assess environmental impacts and introduce mitigation measures. At present, this activity does not involve the adoption of biodiversity offset.

Among the Group's wind plants, the case of the wind farm in Rivoli Veronese (VR) is exemplary. It was installed in 2013 on a Site of Community Importance (SIC) and Special Protection Zone (ZPS) of particular landscape and naturalistic value. This wind farm is the only production site within the Group located in areas sensitive from a biodiversity perspective.

In collaboration with Legambiente (Baldo-Garda association "Il tasso"), the Parent Company was responsible for the restoration of the areas affected by earthworks (construction of the yards and access roads), carrying out the morphological recomposition of the land following construction activities and reconstituting the original turf on site. The protected species of the site were transferred and kept in another location during the construction works (Centre for forestry biodiversity of Peri - VR), in order to be replanted after the works. This measure made it possible to preserve rare species, even at risk of extinction.

Also when designing the photovoltaic plants in the municipality of Trissino (VI), the Group paid special attention to respecting biodiversity. In the project to construct the two plants, a hedge was planted along the perimeter fence with an ecosystemic role, choosing native plant species that produce edible fruits capable of attracting wildlife and with an aesthetic relevance due to their flowers and berries. Along this fence, at approximately every 50 metres, there are openings in the lower part of the net in order to allow small and medium-sized wildlife to pass. The supporting structures of the photovoltaic modules also allow wildlife to pass through the plant area.

In order to expand the habitat for the species of fauna present in the plant area, a group of coarse rocks has been created, providing shelter for reptiles and a suitable resting place for the wall lizard, and a meadow clearing with herbaceous stands of wild plants useful mainly to the Hierophis viridiflavus (green whip snake, a non-poisonous snake).

When designing the photovoltaic plant in the municipality of Rea (PV), the Group paid special attention to respecting biodiversity. In the authorisation process to which the project was subjected (Single Authorisation – AU), biodiversity was assessed. In particular, the Governance and Biodiversity Operational Unit of the Province of Pavia, by protocol note no. 62027 of 29 October 2024, stated that it considered it unnecessary to initiate the appropriate assessment procedure. The project developed by the Magis Group includes openings within the fencing structures to enable the unrestricted movement of small and medium-sized ground-dwelling fauna. This design proposal, which provided for keeping the perimeter fence raised above ground level by a height of approximately 30 cm, was subject to a specific requirement in the text of the authorisation decision. Finally, with regard to the construction of the perimeter hedge provided for in the project, the Province of Pavia issued a specific requirement in this respect, set out in the AU decision: “the perimeter mitigation hedge must be created in accordance with the methods and characteristics indicated on pages 35-36 of Annex F to D.G.R.4488/2021 ‘Appropriate assessment screening form for the proponent’; the green mitigation project must refer to legislation intended to prevent the introduction and spread of invasive alien species (regulatory framework relating to Invasive Alien Species – IAS) and the planting must in any case prioritise native species that harmonise with the local vegetation context. “The planting of non-native species with a merely ornamental purpose should be avoided, particularly plant species included in the blacklist of invasive alien species of the Lombardy Region (Regional Government Resolution of 16 December 2019 – No. XI/2658); furthermore, all existing native tree, shrub, and herbaceous vegetation that does not constitute an actual obstacle to the execution of the works shall be preserved.” The requirements set out in the AU were carefully complied with and implemented by the Magis Group to protect the biodiversity of the area where the plant was built.

When designing the photovoltaic plant in the municipality of Campo San Martino (PD), the Group paid special attention to respecting biodiversity. In the authorisation process to which the project was subjected (Simplified Authorisation Procedure – PAS), biodiversity was assessed. In particular, the Brenta Basin Council, as part of the Vinca Procedure – Preliminary Assessment – Specific Screening (Level I), with reasoned opinion no. 1 of 08/10/*2025 – protocol no. 9202 of 08/10/2025, issued the following detailed requirements: “Construction of the perimeter fence with lightweight elements, leaving a perimeter passage no less than 20 cm in height above the ground for the free movement of wildlife”. The same authority also required the creation of a 3 m deep perimeter woodland strip. In this case too, the requirements set out in the AU were carefully complied with and implemented by the Magis Group to protect the biodiversity of the area where the plant was built.

For the waste production and management activities carried out by the Environment BU company, there is no specific environmental hazard as the site areas are not classified as protected.

With reference to the natural gas and electricity distribution service, there is no significant impact on biodiversity and the utmost attention is paid to the use of materials and equipment for network management aimed at guaranteeing the minimum environmental impact.

2.4.2 Metrics and targets

[ESRS_2, MDR-T, DP 81b]

Although no quantitative targets have been identified at present, in carrying out its activities the Magis Group is continuously engaged in identifying and implementing actions aimed at protecting biodiversity and ecosystems through risk and impact prevention and minimisation, through the monitoring and impact mitigation systems described in the previous paragraph.

2.5. Circular economy – ESRS E5

2.5.1 Impacts, risks and opportunities management

[ESRS_2, DR SBM-3 DP 48a]

[ESRS_2, DR IRO-1, DP 11a]

The table below presents the impacts, risks, and opportunities concerning the circular economy that the Magis Group identified and evaluated as material through the Double Materiality Analysis (DMA) conducted and updated in 2025, as outlined in section 1.4 Material Sustainability Topics.

[ESRS_2, DR IRO-1, DP 11b]

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E5	Resource inflows, including resour-ce use	Consumption of resources to support business activities, thereby contributing to environmental exploitation and resource depletion.	Current negative impact	S	✓	☒	☒
E5	Resource outflows related to products and services	The treatment of certain waste categories can enable the recovery of secondary raw materials, which may be used in new production processes, thereby reducing the need to extract virgin natural resources.	Current po-sitive impact	M-L	☒	☒	✓
	M-L	Gli impianti eolici e fotovoltaici, una volta dismessi, generano rifiuti che, se non gestiti responsabilmente, possono causare impatti ambientali negativi.	Impatto Negativo Potenziale	B-M-L	✓	✓	☒
E5	Waste	Wind and photovoltaic plants, once decommissioned, generate waste which, if not managed responsibly, can cause negative environmental impacts.	Potential negative impact	S-M-L			

Risultati dell'analisi di rilevanza finanziaria

ESRS	Sustainability topic	Description	IRO	Time Timeframe (S=Short M=Medium L=Long term)	Stage of the value chain		
					Upstream	Operations owned	Downstream
E5	Resource inflows, including resource use	Shortages of critical materials (lithium, cobalt, nickel, and platinum), often concentrated in countries subject to geopolitical tensions (e.g., political and economic instability in countries involved in the processing of critical materials/ technology production) and trade issues (e.g., tariffs), may lead to supply chain disruptions and price increases or volatility for equipment, negatively impacting the development of renewable energy technologies.	Risk	S-M-L	✓	☒	☒
E5	Waste	Market opportunities arising from the increasing awareness of the circular economy among consumers, businesses, and regulators.	Opportunity	M-L	☒	✓	☒
E5	Waste	Inadequate management of the end-of-life phase of plants (e.g., photovoltaic systems, wind turbines, etc.) and the disposal of their components may result in penalties due to non-compliance with applicable regulations, as well as reputational damage.	Risk	M-L	✓	✓	☒

[ESRS_E5, DR E5-1, DP 15a,15b]

[ESRS_2, MDR-P, DP 65a, 65b, 65c, 65d, 65e, 65f]

The Magis Group defines the principles and guidelines for environmental decision-making, including aspects related to proper resource management and the development of a circular economy, through the Environmental Protection Policy[20] , which defines strategies to mitigate impacts on the environment and the territories where the Group operates.

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

With regard to the circular economy, the Group pays particular attention to optimising the use of natural resources, with the aim of limiting waste and reducing waste generation in its own operating activities. To this end, where possible, it promotes the use of equipment and components characterised by high durability, recyclability and ease of dismantling and refurbishment, in order to limit the use of virgin materials.

The Policy was adopted by the Parent Company's Board of Directors on the proposal of the Chief Executive Officer, who is responsible for drafting it and updating it periodically with the support of the Company's Finance & Control Department.

To ensure its effective implementation, the Policy is distributed to all the Group's subsidiaries so that they may acknowledge and adopt it. Furthermore, in the interest of transparency and collaboration with stakeholders across the value chain, it is communicated to all stakeholders both through publication on the corporate website and through specific communications.

20 The Magis Group draws on a European and national regulatory framework for the implementation of its sustainability principles, including the United Nations Global Compact (UNGC), the Sustainable Development Goals (SDGs), the GRI Sustainability Reporting Standards and the ESRS – European Sustainability Reporting Standards, the EU Taxonomy under Regulation (EU) 2020/852, the commitments arising from the Paris Climate Conference (COP21), the European Green Deal and the EU Biodiversity Strategy to 2030. In addition, this includes the recommendations of the Task Force on Climate related Financial Disclosures (TCFD), the Integrated National Energy and Climate Plan (PNIEC), the principles of the GHG Protocol and the UN Principles for Responsible Investment (UN PRI).

[ESRS_E5, DR E5-2, DP 19]

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68d, 68e]

The Group's commitment to reducing environmental impacts is also reflected in the sustainable and efficient management of energy, water and other natural resources consumed. Magis pays particular attention to optimising the use of natural resources by limiting wastage and minimising the generation of waste while performing its operational activities.

In line with previous periods, the management of waste produced within the Magis Group is carried out in compliance with Operational Procedure PO.0120 "Management of Produced Waste," as established by the environmental management system adopted by the Group pursuant to UNI ISO 14001:2015 regulations. This procedure identifies organisational roles and responsibilities regarding the direct management of internal waste.

The classification of waste produced by the Magis Group is carried out by the Parent Company's Quality, Safety and Environment (QSA) function in agreement with the Waste Management Contact and included in the "Waste Classification" document approved by the competent Company Director or the Legal Representative, according to the elements that influence and determine the classification, i.e.:

- process from which the waste originates (e.g. construction and demolition, packaging, disposal of obsolete equipment);
- specific description of the waste (e.g. soil, plastic packaging, monitor);
- assessment of the hazardous nature of the waste through knowledge of the substances that may have contaminated it (product/safety data sheets) and/or chemical analysis and/or from bibliographical-legislative sources (e.g. waste oil, monitors, etc.) and/or laboratory report.

After classification, the waste produced by the Magis Group is delivered to the Group's temporary warehouses and then handed over to authorised third parties. If they do not belong to the Magis Group, authorised third parties (e.g. brokers, carriers and destination plants) are identified during the tender process.

Sorted waste collection systems are installed at all the Group's premises in order to increase and promote the subsequent recycling of materials.

The actions described above do not have a completion deadline, as they are ongoing activities integrated into the Group's operational management.

2.5.2 Metrics and targets

[ESRS_2, MDR-T, DP 81b]

Given the nature of the services provided, the Group does not set specific internal quantitative targets for waste reduction, since the composition, separation and waste management methods depend on the public authorities on whose behalf the Group carries out waste collection and urban health services.

The Group's action therefore focuses on optimising operational processes, improving the efficiency of the services provided and continuously monitoring internal waste flows, managed through Operational Procedure PO.0120 "Management of Produced Waste", an integral part of the Environmental Management System compliant with UNI EN ISO 14001:2015.

[ESRS_E5, DR E5-4, DP 30]

During the reporting period, the Magis Group's main inbound resources consisted of purchased and resold energy resources. In particular, during the year, purchases of commodities (so-called sourcing) made by the Energy Management organisational unit concerned:

- electricity for 4.643 GWh, intended for sale to end customers and wholesale;
- 695 million standard cubic metres of gas, supplied both for sales to retail and wholesale customers and for the operational needs of the Group's power generation and cogeneration facilities.

Additionally, the various business units of Magis routinely purchase goods necessary for the execution of operational activities and both ordinary and extraordinary maintenance of the Group's owned assets. The cost of these goods is residual compared with the expenditure relating to energy resources, as reported in the Report on Operations (reference section 3.1 "Economic Performance") of this Financial Report.

Below are the main categories of products purchased by the Group:

- mtechnical materials and components, including but not limited to electrical materials, transformers, pipes, and cables, used in carrying out production activities;
- materials for works, installations and maintenance aimed at ordinary or extraordinary maintenance activities of the Group's assets;
- consumables for office and administrative operations.

During 2025, specific initiatives and project activities aimed at the development of corporate information systems and the revision of procurement processes continued. Once completed, these initiatives will make it possible to obtain comprehensive and accurate reporting on inbound resource flows relating to purchased physical goods, although such flows remain residual compared with the Group's overall operating costs.

For details regarding the inbound volumes of waste collected and treated, please refer to paragraph 1.2.6 "Environmental Services". For detailed information on water consumption, please refer to chapter no. 2.3 "Water and Marine Resources – ESRS E3".

[ESRS_E5, DR E5-5, DP 37a,37b,37c,37d,38a,38b,40]

The waste produced by the Group mainly derives from maintaining and operating electricity infrastructure and production facilities. Waste generation is strongly influenced by factors not directly related to routine operations, such as extraordinary maintenance activities on the Group's plants or premises, as well as external factors like regulatory approvals or changes in legislation. These factors make it difficult to set quantitative targets for waste reduction; nonetheless, the Group is committed to implementing initiatives aimed at reducing waste and promoting the collection, reuse, and recycling of materials and products.

During the 2025 financial year, the waste produced amounts to 45,723 tonnes, with a sharply rising trend (+44.0% compared to over 31.7 thousand tonnes in the previous year), mainly due to an increase in biomethane production activity at the Ca' del Bue plant in Verona and an increase in landfill leachate (which accounts for about 58.9% of the total waste produced during the reporting year).

The analysis of waste produced within the Group revealed that the overall waste generation consists of only 0.5% hazardous waste, including but not limited to, batteries, lamps, mineral oils, and electrical and electronic waste.

During the 2025 financial year, over 5 tonnes of waste were sent for recovery and recycling.

In general, through the policies and operational procedures adopted, the Magis Group ensures management activities compliant with the regulatory requirements of Legislative Decree No. 152/2006, guaranteeing traceability, safety, and oversight of responsibilities throughout the entire waste management cycle, both for waste generated by the Group itself and for waste managed on behalf of the contracting authorities.

Table 31 – Composition of waste produced by the Group

Types of waste	U.M.	2025	%
Iron	Tonnes	17	0,0%
Metal	Tonnes	224	0,5%
Plastic	Tonnes	38	0,1%
Glass	Tonnes	4	0,0%
Packaging	Tonnes	129	0,3%
Biodegradable and organic waste	Tonnes	3.824	8,3%
Cement	Tonnes	129	0,3%
Ash and slag	Tonnes	32	0,1%
Excavated soil	Tonnes	27	0,1%
Insulation materials	Tonnes	1	0,0%
Electrical and electronic waste	Tonnes	337	0,7%
Batteries and cells	Tonnes	10	0,0%
Solvents and acids	Tonnes	3.621	7,9%
Mineral oil	Tonnes	17	0,0%
Washing water	Tonnes	178	0,4%
Filters and rags	Tonnes	25	0,1%
Bulky waste	Tonnes	1	0,0%
Other	Tonnes	37.110	81,2%
Total waste generated (tonnes)	**Tonnes**	**45.723**	**100%**

Table 32 – Waste produced by the Group and treatment destination

	U.M.	2025	2024
Total waste generated (tonnes)	**Tonnes**	**45.723**	**31.749**
Hazardous waste	Tonnes	247	414
Non-hazardous waste	Tonnes	45.476	31.335
Radioactive waste	Tonnes	0	0
Waste diverted from disposal (tonnes)	**Tonnes**	**5.667**	**5.371**
Hazardous	Tonnes	165	407
Non-hazardous	Tonnes	5.502	4.964
Waste destined for disposal (tonnes)	**Tonnes**	**40.056**	**26.377**
Hazardous	Tonnes	83	7
Non-hazardous	Tonnes	39.974	26.370
Rate of non-recycled waste	**%**	**87,6%**	**83,1%**

2.6. European Taxonomy Disclosure

Starting from January 2022, organisations subject to the obligation to publish non-financial and sustainability reporting (initially in the form of the consolidated non-financial statement pursuant to Legislative Decree No. 254/2016 and subsequently in the form of consolidated sustainability reporting included in the Report on Operations accompanying the consolidated financial statements pursuant to Legislative Decree No. 125/2024) are required to publicly disclose the proportion of turnover, capital expenditure and operating expenditure that qualifies as environmentally sustainable under the applicable European legislation.

Regulation (EU) 2020/852 introduced into the European regulatory framework the Taxonomy for environmentally sustainable economic activities (the so-called EU Taxonomy), which provides for a classification of activities that may be considered sustainable based on their alignment with the environmental objectives defined by the European Union, with the ambitious aim of supporting EU economic activities in adopting a common sustainability language and promoting the decarbonisation of the European economy by 2050.

With regard to the three pillars of sustainability identified by the acronym "ESG" (Environmental, Social and Governance), the European Taxonomy initially focused its attention on environmental aspects, defining six environmental objectives against which eligibility must be assessed in accordance with the criteria established by the applicable legislation:

1. Climate change mitigation (CCM);
2. Climate change adaptation (CCA;;
3. Sustainable Use and Protection of Water and Marine Resources (WTR);
4. Transition to a circular economy (CE);
5. Pollution prevention and control (PPC);
6. Protection and restoration of biodiversity and ecosystems (BIO).

In accordance with Regulation (EU) 2020/852, the European Commission is required to adopt delegated acts supplementing the Regulation by detailing the technical screening criteria and the application of the Do No Significant Harm (DNSH) principle, which make it possible to assess under which conditions each economic activity provides a substantial contribution to at least one of the six identified environmental objectives.

An economic activity is defined as aligned if:

I. **contributes substantially to achieving at least one of the six environmental objectives;**

II. **does not cause significant damage to any of the remaining environmental objectives (Do No Significant Harm - DNSH);**

III. is carried out in compliance with the **Minimum safeguards** (based on international guidelines for the respect of human rights.

In 2021, the European Commission adopted Delegated Regulation (EU) 2021/2139 (the "Climate Delegated Act"), published in the Official Journal of the European Union on 9 December 2021 and applicable from 1 January 2022, which defines the technical screening criteria for the first two objectives (climate change mitigation and adaptation), subsequently supplemented on 15 July 2022 by the Complementary Delegated Act (Delegated Regulation (EU) 2022/1214), which includes gas- and nuclear-based energy generation within the Taxonomy.

Subsequently, on 27 June 2023, the European Commission adopted additional delegated acts, later published in the Official Journal of the European Union on 21 November 2023: (i) Delegated Regulation

(EU) 2023/3850 which, by amending the Climate Delegated Act, expands the scope of economic activities contributing to climate change mitigation and adaptation, as well as updating the technical screening criteria for existing economic activities; and (ii) Delegated Regulation (EU) 2023/3851 (Taxonomy Environmental Delegated Act), which establishes the technical screening criteria for determining the economic activities that contribute substantially to one or more of the remaining four environmental objectives not covered in the previous regulatory phase and provided for under Regulation (EU) 2020/852.

Pursuant to the provisions of Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation - TR), the organisations subject to the Non-Financial Reporting Directive (Non-Financial Reporting Directive - NFRD) and, subsequently, the new Corporate Sustainability Reporting Directive (Corporate Sustainability Reporting Directive - CSRD) are required to disclose information on Taxonomy eligibility and alignment using some indicators: turnover, capital expenditure and operating expenditure. In particular, non-financial companies must publish information on:

- share of turnover from products or services associated with economic activities aligned with the Taxonomy (so-called Turnover);
- share of capital expenditure (CapEx);
- share of operating expenditure (OpEx) related to activities or processes associated with economic activities aligned with the Taxonomy.

The **European Taxonomy** constitutes a **classification system** aimed at identifying economic activities that may qualify as environmentally sustainable, as well as a reference:

for **companies**, in order to assess their activities, define corporate policies with a view to environmental sustainability and report to stakeholders their performance in a complete and comparable manner;

for **investors,** in order to integrate sustainability issues into investment policies and enable a clear understanding of the environmental impact of economic activities in which they invest or could invest;

for **public institutions**, which can use the Taxonomy to define and improve their ecological transition policies.

The objective of the Taxonomy Regulation is to increase market transparency, i.e. increase the quantity, quality and comparability of information on sustainability issues regarding companies, operators and financial products. In addition, it allows the examination of each operating line and production facility – in the context of investment analysis or assessment of the company's position with respect to competitors – through performance indicators (KPIs).

In the sectors with the greatest climate impact (e.g. energy, construction and transport), this information makes it possible to select the companies that have undertaken ecological transition processes. Finally, thanks to the availability of data on the alignment of business plans with the Taxonomy, investors can make their engagement actions more effective, measuring their effects over time and strengthening their dialogue with the investees.

The adoption of the Taxonomy is relevant since it allows the following objectives to be pursued:

- provide adequate and consistent indications to companies and investors with regard to which economic activities can be considered environmentally sustainable;

- be an enabling factor to achieve the objectives set by the Green Deal, as a strategy for transforming climate issues and environmental challenges into growth opportunities in every economic sector;
- limit the risk of greenwashing;
- help companies plan their transition to business models in line with a low-carbon economy.

In February 2022, the Platform on Sustainable Finance, a group of experts that assists the European Commission in developing sustainable finance policies, presented the Final Report on Social Taxonomy with the aim of extending the concept of sustainable investment within the European Union. This proposal, oriented towards objectives of decent work, adequate living standards and inclusive and sustainable communities, has not yet, to date, been formally adopted.

In January 2026, at the end of a simplification process launched during 2025, the European Commission adopted Delegated Regulation (EU) 2026/73, which supplements and amends, among others, Delegated Regulation (EU) 2021/2178. The new Regulation introduces significant simplifications to the disclosure requirements laid down by the EU Taxonomy, as well as revisions to the methods for calculating KPIs, with the aim of reducing the administrative burden for European companies, while ensuring adequate levels of transparency and clarity in sustainability disclosures.

Delegated Regulation (EU) 2026/73, applicable from 1 January 2026, allows non-financial undertakings to determine the reporting approach to be adopted with reference to the 2025 financial year, providing for three alternative options:

- use of the templates and rules already applied for reporting for the 2024 financial year;
- adoption of the new reporting approach set out in Delegated Regulation (EU) 2021/2178, as amended by Delegated Regulation (EU) 2026/73;
- non-reporting of the Taxonomy KPIs, accompanied by the inclusion of a specific statement within the Report on Operations..

With reference to the reporting relating to the 2025 financial year, the Magis Group elected not to adopt the new reporting methods introduced by Delegated Regulation (EU) 2026/73 and therefore applied the templates and rules previously adopted for the 2024 financial year, in accordance with the first option provided for under the legislation.

2.6.1 Implementation process

In accordance with Regulation (EU) 2020/852 and the related delegated acts, the Magis Group carried out an analysis of its activities in order to identify those attributable to the environmental objectives of the EU Taxonomy currently relevant to the Group. Based on this analysis, the economic activities potentially eligible under the Taxonomy were identified within the environmental objectives governed by the Regulation itself, in particular with reference to climate change mitigation and the sustainable use and protection of water and marine resources.

During the 2025 financial year, the Magis Group continued the cross-functional project involving all key departments of the Parent Company and the companies included within the scope of consolidated sustainability reporting. The aim was to identify, with reference to the aforementioned Taxonomy objectives, the Group's activities as eligible and aligned, eligible but not aligned, or non-eligible. In addition, to ensure an adequate process for the extraction, analysis, processing and aggregation of administrative and accounting data, specific software tools currently used by the Finance & Control Department have been developed and/or integrated.

Attività ammissibili
Aligned eligible activities: activities carried out by the Magis Group explicitly included in the Delegated Acts that meet the technical screening criteria and/or the minimum safeguards.
Non-aligned eligible activities: activities carried out by the Magis Group explicitly included in the Delegated Acts that do not meet the technical screening criteria and/or the minimum safeguards.

Non-eligible Activities
Non-eligible activities: activities carried out by the Magis Group not explicitly included in the Delegated Acts.

The analysis was carried out according to the following steps:

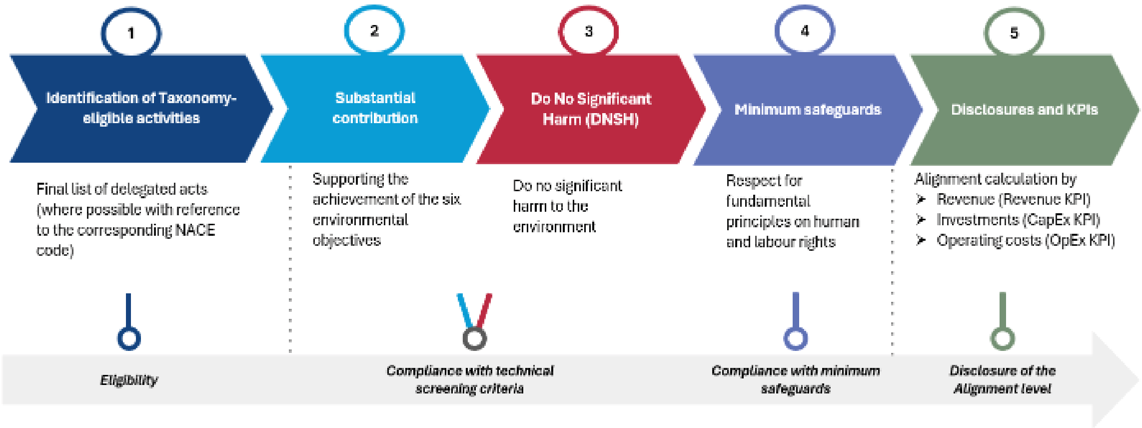


Figure 22 – Economic activities analysis process

1. Identifying eligible activities

The first stage of the process allowed for the identification, through a careful analysis of the activities included in the Taxonomy Regulation, of those applicable to Magis's business, also considering the description provided and the potentially applicable NACE codes (i.e. Statistical Classification of Economic Activities of the European Community).

2. Substantial contribution

After identifying eligible activities, the technical contacts of the Departments and subsidiaries were involved in order to initiate the Substantial Contribution Assessment. The activities classified as eligible were analysed in detail for their compliance with the specific technical criteria established to measure their substantial contribution to achieving the three objectives in scope and our Group.

3. Do No Significant Harm (DNSH)

For eco-sustainable activities identified as eligible, an analysis of existing environmental procedures was performed to verify compliance with the Do No Significant Harm (DNSH) principle also with reference to the other environmental objectives identified by the EU Taxonomy.

What does DNSH mean?

The DNSH (Do No Significant Harm) principle requires that an economic activity, in order to qualify as environmentally sustainable under the EU Taxonomy, does not cause significant harm to any environmental objectives other than the one to which it makes a substantial contribution. Compliance with this principle is verified on the basis of the criteria set by the European Commission for individual economic activities in the related delegated acts.

4. Minimum safeguards

Compliance with the minimum social safeguards in the area of human and labour rights provided for in Article 18 of the Taxonomy Regulation was then verified. For further details, see the dedicated box.

5. Disclosures and KPIs

The corresponding indicators were associated with each economic activity according to the classification made in steps 1 to 4 above, gathering the relevant administrative-accounting information from the Group's applications, and ensuring consistency with the data reported in the consolidated financial statements.

Verifying compliance with the minimum safeguards

The Magis Group operates in compliance with current Italian and European regulations. In particular, the Magis Group's operational activities are carried out in accordance with the OECD Guidelines for Multinational Enterprises, the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the principles issued by the Global Compact.

In line with international reference standards, the Magis Group has defined and adopted a series of internal policies and operating practices to ensure compliance with minimum safeguards:

- in order to protect and promote human rights, the Magis Group has defined and adopted the Policy for the protection of human rights in order to indicate the fundamental principles on which the Group inspires its work in order to safeguard and promote human rights when conducting its business and activities. The Group has also adopted a Code of Ethics that defines the values and principles of conduct that each person working in the name and on behalf of the Group must respect when performing their duties. In order to protect the confidentiality of its stakeholders' personal data, the Magis Group has implemented a privacy governance system in which roles, responsibilities and operating methods are defined in compliance with the GDPR;
- with reference to combating corruption, a Group Anti-Corruption Policy has been adopted containing rules, controls, and safeguards for the prevention of active and passive corruption offences. In addition, several Group companies have adopted their own organisation, management and control model pursuant to Italian Legislative Decree 231/2001, which defines protocols and procedures aimed at mitigating the risk of the offences provided for in Decree 231 being committed by directors, senior managers or employees in the interest or to the advantage of the entity. The Group has also adopted a communication system aimed at employees reporting potential conduct in breach of the Code of Ethics, the Anti-Corruption Policy and the Organisation, Management and Control Model;
- with reference to tax management, the Group has adopted a tax strategy aimed at ensuring fair, responsible and transparent taxation;
- with reference to respect for the principle of competition and the market, the values enshrined in the Group's Code of Ethics and the safeguards set out in the operational procedures for the management of business activities, help to ensure fair competition, free from improper, collusive or predatory conduct, to the detriment of consumers, suppliers and business partners.

2.6.2 Our Commitment to the European Taxonomy

The analysis carried out during the 2025 financial year enabled the redefinition and consequent expansion of the number of eligible activities attributable to the inclusion of the four environmental objectives introduced with the Taxonomy Environmental Delegated Act EU 2023/3851. The table below lists the Group's environmentally sustainable activities together with the corresponding Business Unit.

Table 33 – Eligible environmentally sustainable activities

#	ELIGIBLE ENVIRONMENTALLY SUSTAINABLE ACTIVITIES	BUSINESS UNIT
	CLIMATE CHANGE MITIGATION	
3.10	**Hydrogen Production,** which consists of producing hydrogen and hydrogen-based synthetic fuels.	**Power**
4.1	**Electricity generation using solar photovoltaic technology,** which consists in building and operating photovoltaic panels to develop green and sustainable electricity from renewable sources.	**Power**
4.3	**Electricity generation from wind power,** which consists in building and operating plants for the production of electricity from wind power, sustainable and renewable energy for significant environmental benefits.	**Power**
4.5	**Electricity generation from hydropower,** which consists in building and operating plants using a renewable and sustainable energy source.	**Power**
4.9	**Transmission and distribution of electricity,** which consists in building and operating networks to transport electricity throughout the territory via low, medium, high and extra-high voltage systems.	**Networks**
4.15	**District heating distribution** involving the construction, refurbishment and operation of pipelines and associated infrastructure for distribution of heating and cooling, ending at the sub-station or heat exchanger.	**Heat**
4.29	**Electricity generation from fossil gaseous fuels,** which consists in constructing or operating plants to generate electricity using fossil gaseous fuels.	**Power**
4.30	**High-efficiency cogeneration of heat/cold and electricity from gaseous fossil fuels** consisting of the construction, redevelopment and management of combined heat/cold and electricity generation plants using gaseous fossil fuels.	**Heat**
5.5	**Collection and transport of non-hazardous waste sorted at source,** which involves the sorted waste collection and transport of non-hazardous waste in single or mixed fractions intended for preparation for reuse or recycling.	**Environment**
5.7	**Anaerobic digestion of organic waste** which consists of the construction and management of dedicated plants for the treatment of separately collected organic waste through anaerobic digestion, resulting in the production and use of biogas and digestate and/or chemical products.	**Environment**
5.9	**Material recovery from non-hazardous waste,** which consists in building and operating plants for sorting and processing separately collected non-hazardous waste streams into secondary raw materials involving a mechanical transformation process, except for backfilling purposes.	**Environment**
6.15	**Infrastructure enabling road transport and low-carbon public transport,** consisting of the construction, upgrading, maintenance, and management of infrastructures required for zero CO2 emissions from road transport exhausts, as well as transshipment facilities and infrastructure necessary for urban transport management.	**Smart**
7.3	**Installation, maintenance and repair of energy efficiency devices** carried out by the Business Unit Smart through upgrades involving new installations, maintenance and repair of public lighting devices with the virtuous aim of increasing energy efficiency.	**Smart**
8.1	**Data processing, hosting and related activities** carried out through the storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centres, including edge computing.	**Smart**

#	ELIGIBLE ENVIRONMENTALLY SUSTAINABLE ACTIVITIES	BUSINESS UNIT
	SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES	
2.1	**Water supply** activities consisting in the construction, expansion, operation, and renewal of systems for the collection, treatment, and supply of water intended for human consumption, based on the extraction of natural resources from surface or groundwater sources.	**Corporate**
2.2	**Urban wastewater treatment** that consists of the construction, expansion, modernisation, management and renewal of urban wastewater infrastructure, including treatment plants, sewage networks, stormwater management facilities, connections to wastewater infrastructure, decentralised wastewater treatment plants, including individual and other appropriate systems, and discharge facilities for treated sewage.	**Corporate**

With reference to activities related to the sustainable use and protection of water and marine resources, it is worth noting that the Parent Company owns the assets related to the supply (2.1) and treatment (2.2) of water in the Municipality of Verona. The aqueduct and the treatment plant are operationally managed by the companies Acque Veronesi S.c.a.r.l. and Viacqua S.p.A., which are responsible for carrying out both ordinary and extraordinary maintenance. The values of the indicators reported in the following paragraphs therefore represent the revenues derived from leasing the assets to the two in-house companies, while no operating costs or investments specifically attributable to these assets are present.

In general, the values reported in the following paragraph relating to revenue, direct operating costs, and increases in overall tangible and intangible assets are consistent with the data presented in the current Magis Group Annual Financial Report for the 2025 financial year.

For the purposes of reporting pursuant to the Taxonomy Regulation, each of the economic activities of the Magis Group mentioned above was subject to specific (by cost centre) and detailed analyses (on the individual accounts and the related accounting entries), in order to avoid the risk of double calculation and determine the economic, financial and equity performance, broken down into the three categories listed below.

2.6.3 Results of the Group's Eco-Sustainable Activities

The indicators that represent the results achieved by the Magis Group in 2025 relating to the share of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) in relation to eligible, aligned and non-eligible activities for the European Taxonomy are shown below.

KPI – Turnover

The analysis of turnover for the 2025 financial year identified total revenues of Euro 801.8 million, including both Taxonomy-eligible and non-eligible activities; of this amount, 28.7%, corresponding to Euro 229.9 million, was considered eligible under the European Taxonomy regulation for sustainable activities. The remaining Euro 571.8 million, amounting to 71.3%, is made up of non-eligible revenue from economic activities that are currently outside the scope of EU Regulation 2020/852.

Revenue from sales and services relating to eligible business activities and aligned with the climate change mitigation objective amount to approximately Euro 214.6 million, equal to about 26.8% of the share of Taxonomy-eligible activities.

Table 34 – Revenue generated from eligible and non-eligible activities

REVENUE FROM SALES AND SERVICES (Turnover)	€/000	% of the total (A+B)	% of the activities Eligible
A.1. Environmentally sustainable activities (aligned with the taxonomy)	214.642	26,8%	93,4%
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)	15.288	1,9%	6,6%
A. TAXONOMY-ELIGIBLE ACTIVITIES	**229.930**	**28,7%**	**100,0%**
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	571.855	71,3%	
Totale (A + B)	**801.785**	**100,0%**	

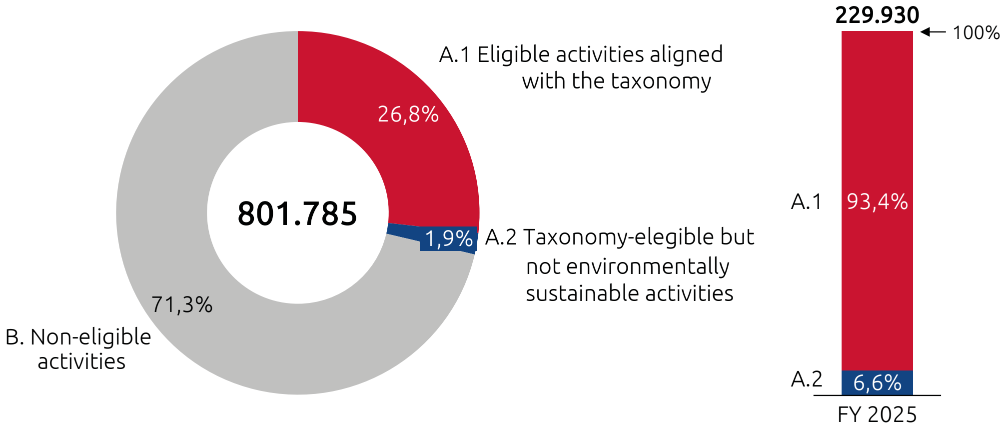


Figure 23 – Distribution of turnover by eligible activities (aligned and not) and non-eligible activities

Table 35 – Proportion of revenue

	Taxonomy Alignment by objective	Taxonomy Eligibility by objective
CCM	26,77%	28,06%
CCA	0,00%	0,00%
WTR	0,00%	0,62%
PPC	0,00%	0,00%
CE	0,00%	0,00%
BIO	0,00%	0,00%

With reference to the revenues of eligible (A.1 and A.2) and ineligible activities (B) under the EU Taxonomy criteria, it is possible to highlight the economic impacts attributable both to some general macroeconomic phenomena and to the Group's characteristic operations:

- waste collection activities (5.5) managed within the Environment Business Unit recorded an increase in revenues:
  - by approximately Euro 3.8 million, driven by revised tariffs for waste collection and management services in the municipalities of Verona, Vicenza, and other municipalities across the related provinces;

- by approximately Euro 2.9 million following the adjustment of the fees recognised to the subsidiary Eco Tirana for waste management services in the Municipality of Tirana, previously limited to the historic centre and subsequently extended to the remainder of the city (an extension already partially initiated during the previous 2024 financial year);
- the electricity distribution management activities (4.9) recorded an increase attributable to higher 2025 revenue recognised under the new TIROSS tariff method and the TIROSS 2024 adjustment;
- during 2025, the energy market was characterised by the gradual downward stabilisation of energy prices (both electricity and gas); the variation compared with the previous financial year in the revenues recorded and considered relevant for the purposes of reporting under the European Taxonomy for environmentally sustainable activities is substantially attributable to the combined effect of changes in energy prices and production volumes, broken down by the various generation sources – solar photovoltaic (4.1), wind (4.3) and hydroelectric (4.5).

Operating Expenses (OPEX)

The analysis of operating expenditure (e.g. costs for services, leases and rentals, operating expenses, etc.) relating to the 2025 financial year identified total operating costs of Euro 588.6 million, including both Taxonomy-eligible and non-eligible activities; of this amount, 16.7%, corresponding to Euro 98.0 million, was considered eligible under the European Taxonomy regulation for sustainable activities. Euro 490.6 million, amounting to 83.4%, is made up of non-eligible costs from economic activities that are currently outside the scope of EU Regulation 2020/852. Operating costs relating to eligible business activities and aligned with the climate change mitigation objective amount to approximately Euro 91.0 million, equal to about 15.5% of the share of taxonomy-eligible activities.

Table 36 – Operating expenditure from eligible and non-eligible activities

OPERATING COSTS (OPEX)	€/000	% of the total (A+B)	% of the activities eligible
A.1. Environmentally sustainable activities (aligned with the taxonomy)	91.064	15,5%	92,9%
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)	6.935	1,2%	7,1%
A. TAXONOMY-ELIGIBLE ACTIVITIES	**97.999**	**16,7%**	**100,0%**
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	490.574	83,4%	
Totale (A + B)	**588.574**	**100,0%**	

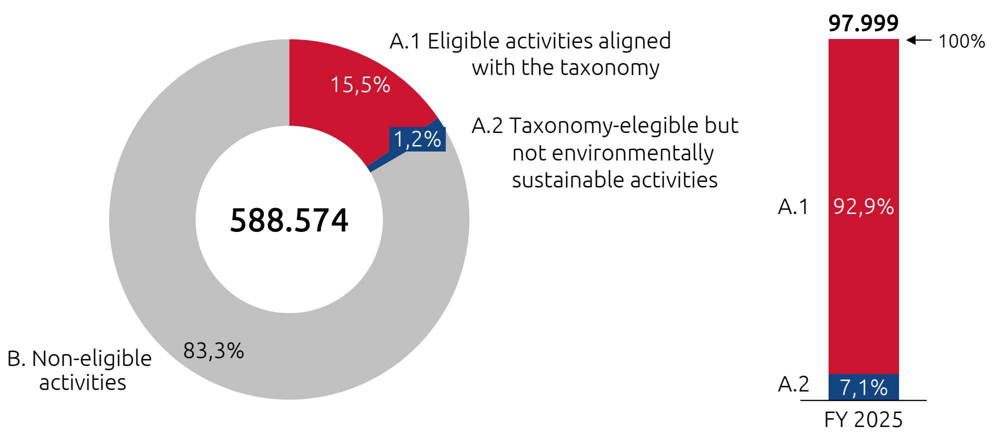


Figure 24 – Distribution of operating expenditure by eligible activities (aligned and not) and non-eligible activities

Table 37 – Proportion of operating expenditure

	Taxonomy Alignment by objective	Taxonomy Eligibility by objective
CCM	15,47%	16,62%
CCA	0,0%	0,0%
WTR	0,0%	0,03%
PPC	0,0%	0,0%
CE	0,0%	0,0%
BIO	0,0%	0,0%

With reference to the operating costs relevant to the eligible (A.1 and A.2) and non-eligible (B) activities under the EU Taxonomy criteria, it is possible to highlight the economic impacts mainly attributable to the Group's characteristic operations:

- waste collection activities (5.5) managed within the Environment BU recorded an increase in operating costs of approximately Euro 1.2 million, due to higher waste disposal and transport costs (including landfill leachate);
- within the Power Business Unit, electricity generation activities using solar photovoltaic technology (4.1), wind power (4.3) and hydropower (4.5), as well as generation from fossil gaseous fuels (4.29) at the Mincio thermoelectric power plant, recorded limited changes compared to the previous year, mainly attributable to the different management of scheduled and completed operational maintenance activities, as well as to the costs for charged rights and usage fees that include certain variable components;
- the electricity distribution management activities (4.9) recorded an increase in operating costs attributable to the application of the new TIROSS tariff method.

KPI – Capital Expenditure (CAPEX)

The analysis of capital expenditure relating to intangible and tangible non-current assets for the 2025 financial year identified total investments of Euro 196.1 million, including both Taxonomy-eligible and non-eligible activities; of this amount, 73.9%, corresponding to Euro 144.9 million, was considered eligible under the European Taxonomy regulation for sustainable activities. The remaining Euro 51.3 million, amounting to 26.1%, is made up of non-eligible costs from economic activities that are currently outside the scope of EU Regulation 2020/852.

Capital expenditure relating to eligible business activities and aligned with the climate change mitigation objective amount to approximately Euro 129.0 million, equal to about 65.7% of the share of taxonomy-eligible activities.

Table 38 – Capital expenditure from eligible and non-eligible activities

CAPITAL EXPENDITURE (CAPEX)	€/000	% of the total (A+B)	% of the activities eligible
A.1. Environmentally sustainable activities (aligned with the taxonomy)	129.009	65,7%	92,9%
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)	15.861	8,1%	7,1%
A. TAXONOMY-ELIGIBLE ACTIVITIES	**144.870**	**73,9%**	**100,0%**
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	51.256	26,1%	
Total (A + B)	**196.126**	**100,0%**	

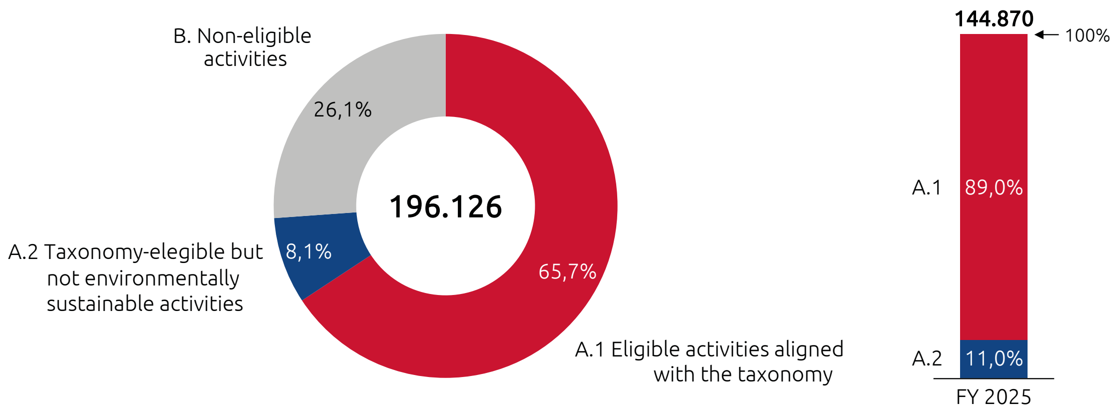


Figure 25 – Distribution of capital expenditure by eligible activities (aligned and not) and non-eligible activities

Table 39 – Proportion of capital expenditure

	Taxonomy Alignment by objective	Taxonomy Eligibility by objective
CCM	65,78%	73,87%
CCA	0,0%	0,0%
WTR	0,0%	0,0%
PPC	0,0%	0,0%
CE	0,0%	0,0%
BIO	0,0%	0,0%

With reference to the capital expenditures relevant to the eligible (A.1 and A.2) and non-eligible (B) activities under the EU Taxonomy criteria, there are investments increasing by 44.5% compared to the previous year, mainly due to the Group's commitment to implementing the projects indicated in its Business Plan 2025-2030, in particular:

- waste collection activities (5.5) managed within the Environment BU recorded an increase in investment costs of approximately Euro 14.0 million, relating to the purchase of the vehicles used for the waste collection and transport service (effect of the IFRS reclassification of the value of the signed leasing contracts);
- within the Heat BU, cogeneration activities for heat and electricity (4.30) and the management of the district heating network (4.15) were affected by revamping investments (boilers and cogeneration engines) and by network expansion in the cities of Verona and Vicenza aimed at enabling new buildings to be connected to the network;
- the activities for managing the electricity distribution network (4.9), which fall under the responsibility of the Distribution BU, were affected by various investments including:

    - the improvement of the network and remote-control systems (approx. Euro 5.4 million);
    - the acquisition of a new operational site in Vicenza (approx. Euro 3.0 million);
    - the enhancement of the high, medium and low-voltage networks and the construction/ renewal of certain primary substations (approx. Euro 22.2 million);
    - the replacement and installation of the new 2G meters (approx. Euro 1.3 million;

- within the Generation Business Unit, electricity generation activities through solar and photovoltaic technology (4.1) and wind energy (4.3) were affected by various investments, including:
  - the completion of the Trissino (VI) photovoltaic plant, with a further investment of approximately Euro 4.5 million;
  - the purchase of the entire share capital investment in Sirio S.r.l. and Vega S.r.l. and their respective photovoltaic plants, for an investment of approximately Euro 12.7 million, relevant for reporting on the European Taxonomy of environmentally sustainable activities;
  - the purchase of the entire share capital investment in Delsis S.r.l., Manfredonia S.r.l. and Carapelle S.r.l. and their respective wind farms, for an investment of approximately Euro 31.1 million, relevant for reporting on the European Taxonomy of environmentally sustainable activities;
  - the continuation of development activities for new wind farms to be built internally within the Group;

- the project activities aimed at constructing the sustainable hydrogen production plant (3.10) at the Marghera plant are almost completely finished (approx. Euro 4.6 million).

2.6.4 Key performance indicators (KPIs) pursuant to the European Taxonomy

Models for key performance indicators (KPIs)

Key for interpreting the models of key performance indicators (KPIs)

Activity code: contains the number corresponding to the eco-sustainable activity and the abbreviation of the objective to which the economic activity can make a substantial contribution.

CCM	Climate change mitigation
CCA	Climate change adaptation
WTR	Water and marine resources
CE	Circular economy
PPC	Prevention and mitigation of pollution
BIO	Biodiversity and ecosystems

Criteria for substantial contribution

Y	The activity is taxonomy-eligible and aligned with the taxonomy concerning the relevant environmental objective
N	The activity is taxonomy-eligible but not aligned with the taxonomy concerning the relevant environmental objective
EL	The activity is taxonomy-eligible for the relevant objective
N/EL	The activity is taxonomy-non-eligible for the relevant objective

DNSH Criteria ("Do No Significant Harm").

Y	DNSH criteria are met for the activity in question
N	DNSH criteria are not met for the activity in question

Minimum safeguard criteria

Y	The minimum safeguard criteria are met for the activity in question
N	The minimum safeguard criteria are not met for the activity in question

Activity Category

E	Enabling activities directly allow other activities to make a substantial contribution to an environmental objective.
T	Transition activities are those for which no low-carbon alternatives currently exist and which have greenhouse gas emissions levels corresponding to the best performance in the sector or industry, as well as meeting the following two conditions: i. do not hinder the development and deployment of low-carbon alternatives; and ii. do not lead to a lock-in of carbon-intensive assets, considering the economic lifetime of those assets.

Table 40 – Share of Turnover derived from products or services associated with Taxonomy-aligned economic activities

				Criteria for substantial contribution					
Economic activities	**Code activities**	**Revenue**	**Share of Revenue**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**
		Thousands of Euro	%	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL
Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (aligned with the taxonomy)									
Generation of electricity using solar photovoltaic technology	4.1 CCM	7.866	1,0%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from wind power	4.3 CCM	4.154	0,5%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from hydropower	4.5 CCM	9.391	1,2%	Y	N	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	4.9 CCM	64.776	8,1%	Y	N	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste sorted at source	5.5 CCM	78.675	9,8%	Y	N	N/EL	N/EL	N/EL	N/EL
Recovery of materials from non-hazardous waste	5.9 CCM	46.612	5,8%	Y	N	N/EL	N/EL	N/EL	N/EL
Infrastructure enabling low-carbon road transport and public transport	6.15 CCM	3.169	0,4%	Y	N	N/EL	N/EL	N/EL	N/EL
Turnover from environmentally sustainable activities (taxonomy-aligned) (A.1)		**214.642**	**26,8%**	**26,8%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Of which enabling		**67.945**	**8,5%**	**8,5%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Of which transitional		**-**	**0,0%**	**0,0%**					
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)									
Water supply	2.1 WTR	3.005	0.4%	N/EL	N/EL	EL	N/EL	N/EL	N/EL
Urban wastewater treatment	2.2 WTR	1.935	0.2%	N/EL	N/EL	EL	N/EL	N/EL	N/EL
Generation of electricity from hydropower	4.5 CCM	7	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
District heating/cooling distribution	4.15 CCM	536	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	4.29 CCM	712	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels	4.30 CCM	2.167	0.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency devices	7.3 CCM	3.934	0.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Data processing, hosting and related activities	8.1 CCM	2.992	0.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Turnover from taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities) (A.2)		**15.288**	**1,9%**	**1,3%**	**0,0%**	**0,6%**	**0,0%**	**0,0%**	**0,0%**
Turnover from taxonomy-eligible activities (A.1 + A.2)		**229.930**	**28,7%**	**28,1%**	**0,0%**	**0,6%**	**0,0%**	**0,0%**	**0,0%**
B. Taxonomy-non-eligible activities									
Turnover from non-taxonomy-eligible activities (B)		**571.855**	**71,3%**						
Total (A + B)		**801.785**	**100,0%**						

DNSH criteria ("Do No Significant Harm"):									
Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Revenue share aligned (A.1.) or eligible (A.2.) to taxonomy, FY 2024	Category activities enabling	Category activities of transition
S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	A	T
Y	Y	Y	Y	Y	Y	Y	1,0%	-	-
Y	Y	Y	Y	Y	Y	Y	0,4%	-	-
Y	Y	Y	Y	Y	Y	Y	0,3%	-	-
Y	Y	Y	Y	Y	Y	Y	8,0%	A	-
Y	Y	Y	Y	Y	Y	Y	9,4%	-	-
Y	Y	Y	Y	Y	Y	Y	6,2%	-	-
Y	Y	Y	Y	Y	Y	Y	0,1%	A	-
							25,4%		
							0,4%		
							0,3%		
							-		
							0,1%		
							0,2%		
							0,3%		
							0,0%		
							0,4%		
							-		

Table 41 – Share of Operating Expenditure (Opex) derived from products or services associated with Taxonomy-aligned economic activities

				Criteria for substantial contribution					
Economic activities	**Activity code**	**Operating costs**	**Share of operating costs**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**
		Thousands of Euro	%	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL
Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (aligned with the taxonomy)									
Generation of electricity using solar photovoltaic technology	4.1 CCM	248	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from wind power	4.3 CCM	3.014	0.5%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from hydropower	4.5 CCM	3.084	0.5%	Y	N	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	4.9 CCM	36.425	6.2%	Y	N	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste sorted at source	5.5 CCM	28.740	4.9%	Y	N	N/EL	N/EL	N/EL	N/EL
Anaerobic digestion of organic waste	5.7 CCM	13	0.0%	Y	N	N/EL	N/EL	N/EL	N/EL
Recovery of materials from non-hazardous waste	5.9 CCM	18.300	3.1%	Y	N	N/EL	N/EL	N/EL	N/EL
Infrastructure enabling low-carbon road transport and public transport	6.15 CCM	1.240	0.2%	Y	N/EL	N/EL	N/EL	N/EL	N/EL
Operating costs of eco-sustainable activities (aligned with taxonomy) (A.1)		**91.064**	**15.5%**	**15.5%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Of which enabling		**37.665**	**6.4%**	**6.4%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Of which transitional		**-**	**0.0%**	**0.0%**					
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)									
Water supply	2.1 WTR	187	0,0%	N/EL	N/EL	EL	N/EL	N/EL	N/EL
Generation of electricity from hydropower	4.5 CCM	1.373	0,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
District heating/cooling distribution	4.15 CCM	1.033	0,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	4.29 CCM	1.231	0,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels	4.30 CCM	896	0,2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency devices	7.3 CCM	1.733	0,3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Data processing, hosting and related activities	8.1 CCM	482	0,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Operating costs of taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities) (A.2)		**6.935**	**1,2%**	**1,2%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Operating costs of taxonomy-eligible activities (A.1 + A.2)		**97.999**	**16,6%**	**16,6%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
B. Taxonomy-non-eligible activities									
Operating costs of non-taxonomy-eligible activities (B)		**490.575**	**83,4%**						
Total (A + B)		**588.574**	**100,0%**						

DNSH criteria ("Do No Significant Harm"):									
Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Revenue share aligned (A.1.) or eligible (A.2.) to taxonomy, FY 2024	Category activities enabling	Category activities of transition
S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	E	T
Y	Y	Y	Y	Y	Y	Y	0,1%	-	-
Y	Y	Y	Y	Y	Y	Y	0,5%	-	-
Y	Y	Y	Y	Y	Y	Y	0,3%	-	-
Y	Y	Y	Y	Y	Y	Y	5,3%	A	-
Y	Y	Y	Y	Y	Y	Y	4,5%	-	-
Y	Y	Y	Y	Y	Y	Y	0,0%	-	-
Y	Y	Y	Y	Y	Y	Y	2,8%	-	-
Y	Y	Y	Y	Y	Y	Y	0,0%	A	-
							13,6%		
							0,0%		
							0,2%		
							0,1%		
							0,2%		
							0,2%		
							-		
							0,1%		

Table 42 – Share of Capital Expenditure (Capex) derived from products or services associated with Taxonomy-aligned economic activities

				Criteria for substantial contribution					
Economic activities	**Activity code**	**Capital expenditures**	**Share of capital expenditure**	**Climate change mitigation**	**Climate change adaptation**	**Water and marine resources**	**Pollution**	**Circular economy**	**Biodiversity and ecosystems**
		Thousands of Euro	%	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL	Y, N, N/EL
Taxonomy-eligible activities									
A.1. Environmentally sustainable activities (aligned with the taxonomy)									
Hydrogen production	3.10 CCM	4.649	2,4%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity using solar photovoltaic technology	4.1 CCM	19.213	9,8%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from wind power	4.3 CCM	39.868	20,3%	Y	N	N/EL	N/EL	N/EL	N/EL
Generation of electricity from hydropower	4.5 CCM	507	0,3%	Y	N	N/EL	N/EL	N/EL	N/EL
Transmission and distribution of electricity	4.9 CCM	38.190	19,5%	Y	N	N/EL	N/EL	N/EL	N/EL
Collection and transport of non-hazardous waste sorted at source	5.5 CCM	21.943	11,2%	Y	N	N/EL	N/EL	N/EL	N/EL
Recovery of materials from non-hazardous waste	5.9 CCM	3.084	1,6%	Y	N	N/EL	N/EL	N/EL	N/EL
Infrastructure enabling low-carbon road transport and public transport	6.15 CCM	1.554	0,8%	Y	N/EL	N/EL	N/EL	N/EL	N/EL
Operating costs of eco-sustainable activities (aligned with taxonomy) (A.1)		**129.009**	**65,8%**	**65,8%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Of which enabling		**39.744**	**20,3%**	**20,3%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Of which transitional		**-**	**0,0%**	**0,0%**					
A.2. Taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities)									
Generation of electricity from hydropower	4.5 CCM	576	0,3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
District heating/cooling distribution	4.15 CCM	4.109	2,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Electricity generation from fossil gaseous fuels	4.29 CCM	681	0,4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
High-efficiency cogeneration of heat/cool and power from fossil gaseous fuels	4.30 CCM	8.331	4,3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Installation, maintenance and repair of energy efficiency devices	7.3 CCM	158	0,1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Data processing, hosting and related activities	8.1 CCM	2.006	1,0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL
Capital expenditures of taxonomy-eligible but not environmentally sustainable activities (Taxonomy non-aligned activities) (A.2)		**15.861**	**8,1%**	**8,1%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
Capital expenditures of taxonomy-eligible activities (A.1 + A.2)		**144.870**	**73,9%**	**73,95%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**
B. Taxonomy-non-eligible activities									
Capital expenditures of non-taxonomy-eligible activities (B)		**51.256**	**26,1%**						
Total (A + B)		**196.126**	**100,0%**						

DNSH criteria ("Do No Significant Harm"):									
Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Revenue share aligned (A.1.) or eligible (A.2.) to taxonomy, FY 2024	Category activities enabling	Category activities of transition
S/N	S/N	S/N	S/N	S/N	S/N	S/N	%	E	T
N	N	N	N	N	N	N	-		
Y	Y	Y	Y	Y	Y	Y	7,3%	-	-
Y	Y	Y	Y	Y	Y	Y	3,6%	-	-
Y	Y	Y	Y	Y	Y	Y	0,1%	-	-
Y	Y	Y	Y	Y	Y	Y	31,6%	A	-
Y	Y	Y	Y	Y	Y	Y	9,93%	-	-
Y	Y	Y	Y	Y	Y	Y	4,5%	-	-
Y	Y	Y	Y	Y	Y	Y	0,6%	A	-
							59,8%		
							0,4%		
							1,2%		
							0,4%		
							6,8%		
							0,2%		
							1,0%		

Learn more about electricity production from nuclear and gas activities

Table 43 – Nuclear energy-related activities

NUCLEAR ENERGY RELATED ACTIVITIES		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO

Table 44 – Fossil gas related activities

FOSSIL GAS RELATED ACTIVITIES		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

The Power and Heat Business Units are directly involved in the management, redevelopment and energy efficiency of plants for the production of electricity from gaseous fossil fuels, also in cogeneration, and heat for district heating in the cities of Verona and Vicenza.

Table 45 – Economic activities related to nuclear and fossil gas that are eligible but not aligned with the taxonomy

		Amount and share					
	Economic activities	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Value (€/000)	%	Value (€/000)	%	Value (€/000)	%
Revenue							
(...)							
4	Amount and share of eligible economic activity but not aligned with the taxonomy referred to in section 4.29 of appendices I and II of delegated regulation (EU) 2021/2139 to the revenue denominator	712	4,6%	712	4,7%	-	-
5	Amount and share of eligible economic activity but not aligned with the taxonomy referred to in section 4.30 of appendices I and II of delegated regulation (EU) 2021/2139 to the revenue denominator	2.167	14,2%	2.167	14,2%	-	-
(...)							
8	Amount and share of other eligible economic activities but not aligned with the taxonomy not included in lines 1 to 6 to the revenue denominator	12.409	81,2%	12.409	81,2%	-	-
9	Total amount and share of eligible economic activities but not aligned with the taxonomy to the revenue denominator	15.288	100,0%	15.288	100,0%	-	-
CapEx							
(...)							
4	Amount and share of eligible economic activity but not aligned with the taxonomy referred to in section 4.29 of appendices I and II of delegated regulation (EU) 2021/2139 to the CapEx denominator	681	4,3%	681	4,3%	-	-
5	Amount and share of eligible economic activity but not aligned with the taxonomy referred to in section 4.30 of appendices I and II of delegated regulation (EU) 2021/2139 to the CapEx denominator	8.331	52,5%	8.331	52,5%	-	-
(...)							
8	Amount and share of other eligible economic activities but not aligned with the taxonomy not included in lines 1 to 6 to the CapEx denominator	6.849	43,2%	6.849	43,2%	-	-
9	Total amount and share of eligible economic activities but not aligned with the taxonomy to the CapEx denominator	15.861	100,0%	15.861	100,0%	-	-

Opex

		Amount and share					
	Economic activities	CCM + CCA		Climate change mitigation (CCM)		Climate change mitigation (CCM)	
		Value (€/000)	%	Value (€/000)	%	Value (€/000)	%
(...)							
4	Amount and share of eligible economic activity but not aligned with the taxonomy referred to in section 4.29 of appendices I and II of delegated regulation (EU) 2021/2139 to the OpEx denominator	1.231	17,8%	1.231	17,8%	-	-
5	Amount and share of eligible economic activity but not aligned with taxonomy referred to in section 4.30 of appendices I and II of delegated regulation (EU) 2021/2139 to the OpEx denominator	896	12,9%	896	12,9%	-	-
(...)							
8	Amount and share of other eligible economic activities but not aligned with the taxonomy not included in lines 1 to 6 to the OpEx denominator	4.808	69,3%	4.808	69,3%	-	-
9	Total amount and share of eligible economic activities but not aligned with the taxonomy to the OpEx denominator	6.935	100,0%	6.935	100,0%	-	-

3. Social information

3.1. Own workforce – ESRS S1

3.1.1 Strategy

[ESRS_2, DR SBM-3, DP 13a, 13b, 14a, 14b, 14c, 14d, 15, 16]

[ESRS_ 2, DR SBM-3, DP 48a]

The following table presents the impacts, risks, and opportunities concerning the Group's own workforce identified and evaluated as material through the Double Materiality Analysis (DMA) conducted and updated in 2025, as outlined in section 1.4 Material Sustainability Topics.

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S1	Adequate wages	Failure to comply with fair wage conditions constitutes a violation of workers' rights regulations and causes difficulties and hardship for the workforce. This can lead to financial insecurity, reduced motivation and productivity, as well as an increase in staff turnover.	Potential negative impact	M-L	☒	✓	☒
S1	Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	Potential interference in the election of union representatives and the establishment of representative bodies.	Potential negative impact	S	☒	✓	☒
S1	Health and safety	Injuries and illnesses caused by the failure to promote a healthy and safe working environment for company staff and third parties working with the Magis Group, with consequent impact on the national health service and regulatory bodies.	Potential negative impact	S-M-L	☒	✓	☒
S1	Health and safety	The operation and maintenance services (so-called O&M) of wind farms, which include installation, maintenance, monitoring, and repair of turbine installations, are subject to high safety standards due to the inherent risks of the work (such as working at height); this presents a potential negative impact on employee and environmental safety.	Potential negative impact	S-M	☒	✓	☒
S1	Training and skills development	Negative impact associated with the lack of skills development/training opportunities for staff.	Potential negative impact	S-M-L	☒	✓	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S1	Training and skills development	The implementation of training and educational activities (such as workshops, technical training programmes, and courses) is essential for developing workers' skills and abilities. Training programmes also help to improve employee satisfaction.	Current positive impact	S-M-L	☒	✓	☒
S1	Diversity	The occurrence of gender-based violence and racism can negatively affect perceptions of the workplace and create discomfort during work activities. These kinds of incidents negatively impact staff wellbeing, lower their drive and output, and may affect their mental health.	Potential negative impact	S-M	☒	✓	☒
S1	Social dialogue	Potential impairment and obstacle to social dialogue between workers, employers, and trade union representatives, resulting in difficulties in securing equitable and favourable agreements for workers.	Potential negative impact	S-M	☒	✓	☒
S1	Confidentiality	There is a risk to employee privacy and personal safety if confidentiality is compromised or if cyberattacks affect company data.	Potential negative impact	S-M	☒	✓	☒
S1	Collective bargaining	Violation of the provisions contained in the national collective labour agreements (CCNL), resulting in a negative impact on the working conditions guaranteed to employees.	Potential negative impact	S-M	☒	✓	☒

Results of the financial materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S1	Adequate wages	Risk of non-compliance with fair wage laws, leading to increased dissatisfaction, higher turnover rates, and potential penalties.	Risk	S-M	☒	✓	☒
S1	Gender equality and equal pay for work of equal value	The lack of gender equality and equal pay for work of equal value can lead to discrimination claims from employees. This risk can arise from unfair hiring, promotion, and pay practices, which may be perceived as discriminatory.	Risk	M-L	☒	✓	☒
S1	Health and safety	Workplace injuries or personal harm (due to deficient workplace occupational health and safety, inadequate risk assessments, improper use of personal protective equipment, or external events) could lead to increased fines and penalties, higher compliance costs due to stricter oversight, and potential legal disputes, all impacting the Group's economic performance.	Risk	S-M-L	☒	✓	☒
S1	Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	A high rate of unionisation, combined with ineffective management of work-related issues, might cause strikes that disrupt operations and cause delays. This poses a risk of increased operational costs, disruption of cash flows, and potential legal disputes.	Risk	S-M-L	☒	✓	☒
S1	Training and skills development	Opportunity to benefit from incentives to provide specific training to staff, enhancing the Group's appeal in the market and helping to improve the ability to retain skilled and trained personnel (talent retention).	Opportunity	S-M	☒	✓	☒
S1	Secure employment	Loss of a key person due to pay disparities compared to other companies in the sector, low engagement, or retirement, which could cause possible disruption or underperformance of certain business activities due to the loss of know-how and operational costs associated with recruiting, hiring, and onboarding new personnel.	Risk	S-M	☒	✓	☒
S1	Social dialogue	When social dialogue is compromised, workers and employers may find it more difficult to reach fair and sustainable agreements. This can lead to conflict, strikes and decreased productivity.	Risk	M	☒	✓	☒
S1	Collective bargaining	When a company fails to comply with the regulations set out in the national collective labour agreements (CCNL), workers and trade unions may take legal action to enforce their rights, leading to costly and potentially lengthy lawsuits. Moreover, such violations can cause strikes and other forms of protest, disrupting business operations and reducing productivity. This climate of conflict can also damage the company's reputation, making it harder to attract and retain talent and customers.	Risk	M	☒	✓	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S1	Child labour	Risk of financial losses or damage that may arise from the violation of the fundamental rights of working-age individuals. This risk materialises when current regulations prohibiting child labour are not respected. Failure to comply with such regulations can lead to serious financial consequences and damage to the company's reputation.	Risk	M	☒	✓	☒
S1	Forced labour	Risk of financial losses or damage arising from the violation of individuals' fundamental rights. This risk materialises when current regulations prohibiting forced labour are not respected. Failure to comply with such regulations can lead to serious financial consequences and damage to the company's reputation.	Risk	M	☒	✓	☒

The Magis Group considers people to be crucial in ensuring the achievement of its objectives. For this reason, it is committed to ensuring a work environment in which all people feel respected and have equal opportunities for growth and development, spreading a culture that respects and values diversity. An inclusive work environment that promotes work-life balance, values people, and respects human dignity and individuality.

Within the Double Materiality Analysis, no specific impacts, risks, or opportunities have been identified for particular groups of people. All the relevant impacts identified concern the entire company workforce of the Group, with no exceptions.

The identified significant negative impacts are potential and linked to individual events.

With reference to the currently identified positive impact in the area of training, the "Training" paragraph in the subsequent section "3.1.3 Metrics and Objectives" details and describes the main activities carried out by the Group.

For Magis, people's wellbeing is a priority, inside and outside the company.

The entire workforce is actively involved in governance through shared sustainability objectives.

By 2030, Magis aims to eliminate the gender pay gap and engage 80 per cent of staff in change management projects and training on artificial intelligence.

3.1.2 Impacts, risks and opportunities management

[ESRS_S1, DR S1-1, DP 19]

[ESRS_S1, DR S1-1, DP 20a, 20b]

[ESRS_2, MDR-P, DP 65a, 65d]

The Magis Group is committed to achieving sustainable success by ensuring the well-being and protection of the rights of people working directly or indirectly for the Group. It respects, protects and promotes human rights and fundamental freedoms for all by committing to guarantee professional relationships with its stakeholders based on respect for human dignity. In this regard, Magis has defined and adopted the Policy for the protection of human rights[21] in order to indicate the fundamental principles on which the Group inspires its work in order to safeguard and promote human rights when conducting its business and activities.

The Group encourages the recipients of the Human Rights Protection Policy to report, including anonymously, any behaviour or omission that constitutes or may constitute a violation, or an inducement to violate, the principles set out in the Policy. Recipients are required to submit reports through the channels adopted by the Group within the violation reporting system (the Whistleblowing system).

In the specific areas of activity of the Magis Group, no operations have been identified that, by type or geographic area, expose the own workforce to a risk of forced, compulsory or child labour.

[ESRS_S1, DR S1-1, DP 21, 22]

[ESRS_2, DR SBM-3, DP 14f, 14g]

Through the adoption of the aforementioned Policy, Magis reaffirms its commitment to protecting human rights, including the labour rights of its employees, ensuring that all activities are carried out in compliance with the United Nations Universal Declaration of Human Rights and applicable national and international laws. Furthermore, it formally rejects any form of forced or child labour and ensures working conditions compliant with current regulations both within the Group's companies and among its partners and suppliers.

[ESRS_S1, DR S1-1, DP 24a]

[ESRS_2, MDR-P, DP 65a, 65d]

In order to promote diversity in all its forms, combat harassment and discrimination, and ensure fair treatment for all staff, the Magis Group has established its Policy for the Protection of Diversity, Equity, Inclusion and Gender Equality[22] (DE&I-PdG) with the ultimate aim of creating an inclusive work environment where diverse ideas and perspectives are valued and encouraged to foster innovation and creativity.

[ESRS_S1, DR S1-1, DP 24b, 24c]

Thanks to the definition of this DE&I-PdG Policy, the Magis Group declares its dedication to preventing all forms of discrimination in employment, starting from the selection and hiring stages through the adoption of inclusive and merit-based criteria, with reference to aspects such as gender, nationality, age, sexual orientation, marital status, disability, physical appearance, skin colour, ethnic and social origins, language, religion or personal beliefs, social and educational background, family and caregiving responsibilities, political opinions, or any other characteristic.

21 The European and national regulatory framework that Magis refers to for the implementation of the Policy for the protection of human rights includes the guidance issued by the United Nations Global Compact (UNGC); the Sustainable Development Goals (SDGs); the ILO Conventions (International Labour Organization); the OECD Guidelines for Multinational Enterprises (Organisation for Economic Co-operation and Development); the Universal Declaration of Human Rights adopted by the United Nations General Assembly; the guiding principles for the promotion of gender equality – Women's Empowerment Principles (WEPs); the Guiding Principles on Business and Human Rights – Implementing the United Nations "Protect, Respect and Remedy" Framework; the European Convention on Human Rights; and the General Data Protection Regulation (GDPR) – Regulation (EU) 679/2016.

22 The European and national regulatory framework that Magis refers to for the implementation of the DE&I-PdG Policy includes the guidance issued by the United Nations Global Compact (UNGC); the Sustainable Development Goals (SDGs); the ILO Conventions (International Labour Organization); the Universal Declaration of Human Rights adopted by the United Nations General Assembly; the guiding principles for the promotion of gender equality – Women's Empowerment Principles (WEPs); the European Convention on Human Rights; and the guidelines on the gender equality management system (UNI/PdR 125:2022)

[ESRS_2, MDR-P, DP 65b, 65c, 65e]

The Policy for the protection of human rights and the Policy for the Protection of Diversity, Equity, Inclusion and Gender Equality, which apply to the Parent Company and its subsidiaries, were adopted by the Parent Company's Board of Directors on the proposal of the Chief Executive Officer, who is responsible for drafting them and updating them periodically with the support of the Company's Finance & Control Department.

The analysis of the issues that emerged through the various channels of engagement with stakeholders made it possible to gather and consolidate the expectations of the different categories of stakeholders, with particular attention to the topics in question.

[ESRS_S1, DR S1-1, DP 20c]

[ESRS_S1, DR S1-1, DP 24d]

[ESRS_2, MDR-P, DP 65f]

To ensure effective implementation of the above-mentioned Policies, they are circulated to all Group companies so that they may acknowledge and adopt them. Furthermore, with a view to ensuring transparency and collaboration with stakeholders across the Value Chain, the information is communicated to all stakeholders through dedicated communications and publication on the Magis Group Parent Company's corporate website, in the section dedicated to sustainability (https://www.gruppomagis.it/sostenibilita).

The implementation of the Policies is monitored by reviewing reports and verifying corrective actions. In the event of a violation, specific protocols proportionate to the severity are activated, including possible disciplinary action.

[ESRS_S1, DR S1-2, DP 27a]

As outlined in the section "1.3 Our Commitment to Stakeholders", the Magis Group uses various channels to directly engage its people, including through trade union representatives, who play a central role in representing employees' needs and concerns.

[ESRS_S1, DR S1-2, DP 27b, 27c]

Communication with employees, which can take the form of formal consultations or informal meetings, is an essential aspect of building a relationship based on trust and collaboration. For this reason, Magis is committed to ensuring a work environment that values active listening and open dialogue, recognising the importance of giving every individual a voice. Responsibility for ensuring effective dialogue is entrusted to the Director of the People & Transformation function, as well as to the organisational unit responsible for Internal Communication.

[ESRS_S1, DR S1-2, DP 27e, 28]

[ESRS_S1, DR S1-3, DP 32a,32b,32c,32d,32e]

The following represent some of the most relevant engagement and discussion opportunities.

- Stakeholder Engagement process as part of the development of the new Business Plan and the ESG Plan. Employees across the Group participated in dedicated focus groups and workshops designed to collect feedback, expectations, and evaluations on key sustainability matters, fostering stronger alignment between initiatives, targets, and internal priorities.
- To ensure ongoing employee engagement on diversity, equity, and inclusion, the Group has implemented a mechanism for submitting anonymous reports (https://gruppomagis.wbisweb.it/#/) and suggestions for improvement on the topic (inclusione@gruppomagis.it). As part of the training provided to staff on diversity, equity, and inclusion, the level of understanding of the topics presented is assessed, including the option to submit anonymous reports through dedicated channels.
- "Diversity and inclusion" survey: through the completion of a survey focused on key topics related to gender equality, diversity, and inclusion, the People Transformation Department engaged the Parent Company's staff to gather their perspectives and awareness on these issues.
- Whistleblowing: a mechanism that allows all staff to confidentially and securely report any breaches of the Code of Ethics, laws, regulations, and company policies and procedures. In accordance with current legislation, this mechanism prohibits any direct or indirect acts of retaliation or discrimination against the whistleblower for reasons connected, directly or indirectly, to the report.
- Reports can be made in writing, through the specific channel available on the Company's institutional website on the whistleblowing page, or verbally by meeting directly with the channel manager.

[ESRS_S1, DR S1-3, DP 33]

As part of the training activities carried out by the Group for the benefit of personnel working in subsidiaries adopting an organisational model pursuant to Legislative Decree 231/01, the level of understanding of the topics covered is assessed, including awareness of the possibility to submit reports through dedicated channels (e.g. Whistleblowing).

For further details, please refer to the following chapter "4. Governance information".

[ESRS_S1, DR S1-4, DP 38a, 38b, 38c, 38d, 39, 40a, 40b, 41, 43]

[ESRS_S1, DR S1-5, DP 47a, 47b, 47c]

[ESRS_2, MDR-A, DP 68e]

[ESRS_2, MDR-T, DP 79a, 79b, 79c, 79e, 80h, 80i, 80j, 80f]

During the reporting period in question, following the joint development of the new Business Plan and the ESG Plan, the Group structured a portfolio of initiatives and objectives aimed at its employees. These objectives were identified from a continuous improvement perspective through comparison workshops with management, benchmarking analyses and sector studies, with the aim of ensuring that the initiatives were aligned with best practice and actual organisational needs.

The initiatives were organised by priority areas, indicating for each the expected outcomes, the areas of intervention and the implementation timeline. As these measures and related targets were introduced in the current financial year, no historical monitoring data are yet available. Progress monitoring will be launched and reported in the next financial years using quantitative and qualitative indicators consistent with the established objectives.

Each initiative provides, within the defined strategic Plans, dedicated financial resources and internal resources. Management is supported by a managerial function that ensures coordination of activities and alignment with the plan's priorities. Specifically, the People Transformation and Organisation and Development functions ensure the overall guidance and governance of programmes aimed at people.

For occupational health and safety aspects, the Head of the Health and Safety Service supervises the implementation of the planned initiatives.

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68d]

[ESRS_2, MDR-T, DP 80a, 80b, 80c, 80d, 80e]

With regard to diversity and inclusion, the Group has initiated a programme aimed at progressively eliminating the gender pay gap by 2030 through the adoption of a compensation policy intended to prevent and address any disparities. In parallel, by the same deadline, the gender equality certification is expected to be extended to a further three Group companies (Magis Smart and Magis Energia by 2026, V Reti by 2028), through the adoption of a dedicated policy and the related adjustment of organisational structures. Awareness-raising initiatives on the D&I topic have also been planned, involving the entire company population, with interim targets set at 20% in 2026 and 50% in 2028. To support these objectives, empowerment programmes have been created for female employees, supported by specialist training, mentoring activities and measures to ensure equal opportunities. The strategic objective is to achieve 45.6% female representation in Magis's workforce and 35% women among managers and coordinators.

As regards employee wellbeing, the Group plans to introduce a system for measuring employee satisfaction with welfare services, based on the identification of employee needs through surveys and focus groups, targeted communication initiatives including campaigns, newsletters and dedicated meetings, and easier access to services via digital portals and mobile applications. The data collected periodically will be used to feed a cycle of continuous improvement for initiatives dedicated to employees. The objective is to achieve a satisfaction rate of over 24% by 2030, with interim targets set at 18% in 2026 and 22% in 2028.

In the area of professional development and training, the VOLT UP project – focused on the development of tailored individual competencies – will be extended to cover the entire employee population aged over 40, with the objective of moving beyond the current coverage rate of below 10% expected for 2024, supported by intermediate targets of 50% in 2026 and 90% in 2028. In order to improve accessibility and efficiency, the Group plans to deliver 30% of training activities through innovative methodologies such as gaming, augmented reality and artificial intelligence-based solutions, integrating them with in-person sessions, digital sessions, microlearning and coaching, with interim targets set at 10% in 2026 and 20% in 2028. In addition, the involvement of 80% of the population in change management initiatives and training programmes on artificial intelligence is planned, with interim targets set at 20% in 2026 and 50% in 2028, significantly increasing the level of participation compared to the 2024 figure of 7%.

In the context of performance management, the objective has been set to increase by 62.5% by 2027 the number of employees involved in performance and competence assessment, integrating – where envisaged - MBO objectives and ensuring that assessments are aligned with the corporate competence model. In 2025, the figure refers to 74 employees. In addition, the definition of succession plans has been scheduled, to be completed by 2026, through the mapping of critical positions, the identification of potential successors through specific talent reviews and the design of individual development plans.

Finally, in relation to health and safety, targets have been set to reduce both the injury frequency rate and the severity rate below the averages of the last three years, setting the year-end 2025 reference values at 19.11 for frequency and 0.52 for severity. To achieve these goals, a Behaviour Based Safety system will be implemented, enabling workers to provide feedback on behaviours in order to prevent accidents and improve operating procedures.

Table 46 – Targets for reducing the frequency rate and severity rate

	2023	2024	2025	2023-2025 average
Frequency rate	25,00	16,60	15,73	19,11
Severity rate	0,65	0,46	0,44	0,52

[ESRS_2, MDR-A, DP 69a, 69b, 69c]

With reference to these actions envisaged by the ESG Plan and the Business Plan, economic estimates are updated on an annual basis as part of the planning and budgeting process. The organisation does not prepare multi-year cost projections for each individual target, as the resources required for the implementation of the initiatives are allocated on an annual basis and defined by the HR Department according to operational priorities. In addition, these actions do not currently entail capital expenditure of a significant amount; consequently, it is not necessary to provide a forecast of dedicated CapEx.

3.1.3 Metrics and targets

[ESRS_S1, DR S1-6, DP 50a, 50f]

2.402

Total employees
in the 2025 financial year[23]

611 Women

1.791 Men

97,8%

Employees with
a permanent contract

The centrality of people for the Magis Group is also shown by its continuous investment in human resources, which increased by 55 overall during the reporting period (45 of whom following the inclusion of employees from the two subsidiaries belonging to the Business Unit Mercato, Global Power and Global Power Plus).

Women in the Magis Group represent 25.4% of the company population, 11.9% of whom, out of the total workforce, hold clerical positions. The employee population is mainly composed of men, who represent 74.6% of the workforce, reflecting the characteristics of the sectors in which the Group operates.

In particular, male blue-collar workers account for the largest share of the workforce (50.7%), reflecting the operational management of the services provided throughout the territory, including environmental health services, waste collection and treatment activities, and the maintenance of distribution networks and energy and heat generation facilities.

23 ESRS_S1, DR S1-6, DP 50d] The employee data reported in this section of the Consolidated Sustainability Statement have been calculated using the "headcount" methodology at the end of the reporting period (31/12/2025).
[ESRS_S1, DR S1-6, DP 50f] The employee data reported in the Consolidated Financial Report, in "Note 32 Employee costs" in section "9. Operating costs", have been calculated as an average over the reporting period (01/01/2025 - 31/12/2025).

The workforce composition consists of 0.9% executives, 3.2% managers, and 32.5% and 63.4% clerical and manual workers, respectively.

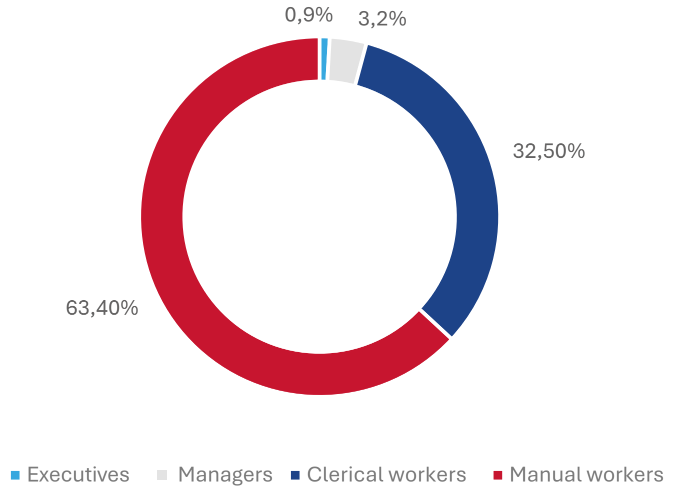


Figure 26 – Distribution of the professional structure

The Group seeks to contribute to local employment. Almost all employees actually reside within the areas in which the Group operates, in particular Veneto (Magis), Milan (Magis Energia), Abruzzo (CogasPiù Energie) and Albania (Eco Tirana).

The activities put in place to support the development of people are also expressed by using contractual forms that offer greater guarantees, such as that of permanent employment. This classification represents almost all of the employment relationships at Magis (97.8% of the employment contracts of the Group Companies).

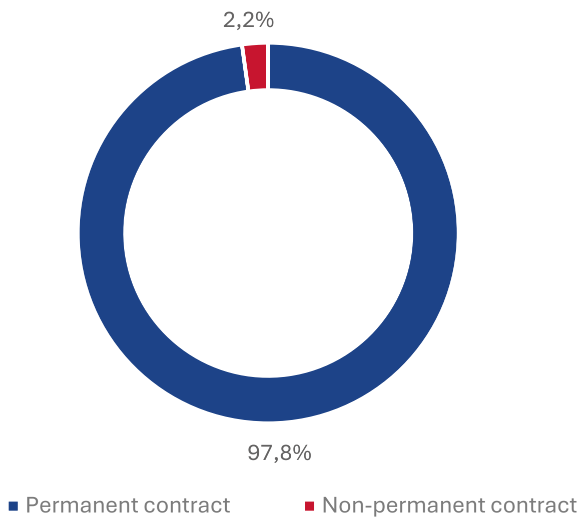


Figure 27 – Distribution of contractual forms in place with workers

Part-time contracts, which account for 3.9%, arise mainly for workers' personal needs.

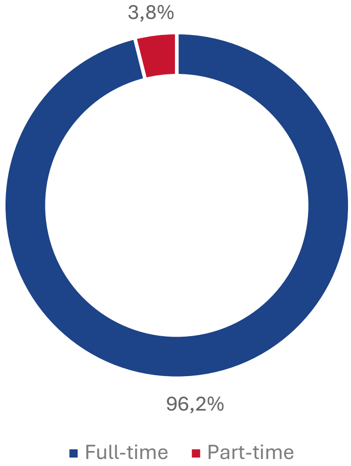


Figure 28 – Distribution of full-time / part-time contracts

[ESRS_S1, DR S1-7, DP 55a, 55c, 56]

The Magis Group's non-employees are mainly staff on manpower supply contract for the purpose of temporary employment with the Group and staff on internship contracts to perform the curricular training projects lasting about 3 months. During the 2025 financial year, the Group engaged 32 non-employee workers[24] , including 19 men and 13 women.

The Magis Group does not carry out any operations exposed to a serious risk of forced labour or child labour.

[ESRS_S1, DR S1-9, DP 66b]

The average age of the people in the Magis Group is 48 years old[25] .

At Group level, during 2025, 168 people were hired (52.4% of whom were related to the Group's environmental companies). Of the new hires, 17.3% were women and 43.5% were aged between 30 and 50: these data demonstrate the Magis Group's commitment to investing in younger people and supporting generational turnover.

[ESRS_S1, DR S1-6, DP 50e]

The inbound turnover rate, calculated as the ratio of the total number of people hired during the year to the total workforce in the reference year, stands at 7.0% (5.8% for men and 1.2% for women).

The outbound turnover rate is 6.6% (5.9% for men and 0.7% for women).

[ESRS_S1, DR S1-6, DP 50c]

During the reporting period, 158 people left the Group, of which 67.3% related to the Group's environmental companies which, due to the type of activities carried out and the relevant sector (waste collection and treatment), are characterised by a high overall turnover rate.

[ESRS_S1, DR S1-6, DP 50e]

The main reasons for outbound turnover are voluntary resignations (54.3% of cases), followed by retirement (21% of cases) and the expiry of fixed-term contracts, accounting for 16.7% of the total.

24 [ESRS_S1, DR S1-7, DP 55b] Please note that the data relating to non-employee workers have been calculated using the "headcount" methodology at the end of the reporting period (31 December 2025).
25 The average age data do not include Eco Tirana and SERIT.

Staff recruitment

The Group's process for selecting and hiring new employees involves acquiring the most suitable resources, both in terms of number and quality, aligned with the actual business needs and available financial resources, based on the principles of:

- adequate publicity of the recruitment;
- impartiality;
- cost-effectiveness and speed of execution;
- respect for equal opportunities between female workers and male workers.

Selection processes are managed by the People and Transformation Department based on job descriptions prepared in collaboration with the managers of the Parent Company and the Business Units, using objective criteria.

The selection process includes one or more interviews, both motivational and technical, deemed appropriate to preliminarily verify the candidate's possession of the aptitude and professional requirements necessary for the role and to assess the candidate's potential. Each step of the process, as well as the different interactions with candidates, are tracked within a dedicated management software.

CVs received at the registered office are deleted after a period of two years, in accordance with the applicable data protection legislation.

Hiring takes place with an individual employment contract, in line with the national collective agreements (of a private nature) applied by the various Group companies depending on the relevant sector in which they operate (for example, electricity, environment, etc.).

The 2025 recruitment plan pursued the following objectives:

- the enhancement of the skills available within the Magis Group through the identification of specialised professionals in the labour market, with the objective of adjusting the operational scope of certain organisational units or establishing new ones according to the needs of the Business Plan;
- to address replacement requirements resulting from turnover, the Group promoted a diversification of skills, specialisations and generational profiles across all business units by identifying labour market candidates who, where possible, featured: an age below 30, strong expertise in technical functions, advanced digital and data science capabilities for managerial positions, robust technical-professional training for operational roles, and strong problem-solving and interpersonal skills across all profiles recruited;
- give preference to internal career development and mobility, limiting the recruitment of senior professionals to specific cases of skills gaps and urgent role requirements;
- continued focus on inclusion matters, particularly with regard to gender equality.

Table 47 – Workforce distribution by gender and location (no.)

[ESRS_S1, DR S1-6, DP 50a]

Group employees	2025	2024
Italy	**1.491**	**1.447**
Female employees	303	265
Male employees	1.188	1.182
Other	0	0
Not disclosed	0	0
Albania	**911**	**900**
Female employees	308	304
Male employees	603	596
Other	0	0
Not disclosed	0	0
Total Group employees	**2.402**	**2.347**

Table 48 – Workforce by contract type (permanent / fixed-term / variable hours) and gender (no.)[26]

[ESRS_S1, DR S1-6, DP 50b]

Type of contract	2025		2024	
Total employees on permanent contracts	**2.350**	**97,8%**	**2.305**	**98,2%**
Female employees	607	25,8%	566	24,6%
Male employees	1.743	74,2%	1.739	75,4%
Other	0	0,0%	0	0,0%
Not disclosed	0	0,0%	0	0,0%
Total employees on fixed-term contracts	**52**	**2,2%**	**41**	**1,7%**
Female employees	4	7,7%	3	7,3%
Male employees	48	92,3%	38	92,7%
Other	0	0,0%	0	0,0%
Not disclosed	0	0,0%	0	0,0%
Total employees on variable-hours contracts	**0**	**0,0%**	**1**	**0,0%**
Female employees	0		0	
Male employees	0		1	
Other	0		0	
Not disclosed	0		0	
Total Group employees	**2.402**		**2.347**	

26 It should be noted that some personnel data by professional category for FY 2024 have been restated to ensure methodological consistency and accurate comparability with FY 2025.

Table 49 – Workforce by contract type (full-time / part-time) and gender (no.)

[ESRS_S1, DR S1-6, DP 52a, 52b]

Type of contract	2025		2024	
Full-time	**2.310**	**96,2%**	**2.263**	**96,4%**
Female employees	535	23,2%	498	22,0%
Male employees	1.775	76,8%	1.765	78,0%
Other	0	0,0%	0	0,0%
Not disclosed	0	0,0%	0	0,0%
Part-time	**92**	**3,8%**	**84**	**3,6%**
Female employees	76	82,6%	71	84,5%
Male employees	16	17,4%	13	15,5%
Other	0	0,0%	0	0,0%
Not disclosed	0	0,0%	0	0,0%
Total Group employees	**2.402**		**2.347**	

Table 50 – Workforce by contract type (permanent/fixed-term/variable hours) and location (no.)

[ESRS_S1, DR S1-6, DP 50b, 51]

Type of contract	2025		2024	
Permanent contract	**2.349**	**97,8%**	**2.305**	**98,2%**
Italy	1.438	61,2%	1.405	61,0%
Albania	911	38,8%	900	39,0%
Fixed-term contract	**53**	**2,2%**	**41**	**1,7%**
Italy	53	100,0%	41	100,0%
Albania	0	0,0%	0	0,0%
Flexible working hours	**0**	**0,0%**	**1**	**0,0%**
Italy	0		1	100,0%
Albania	0		0	0,0%
Total Group employees	**2.402**		**2.347**	

Table 51 – Workforce by contract type (full-time / part-time) and location (no.)

[ESRS_S1, DR S1-6, DP 50b, 51, 52a, 52b]

Type of contract	2025		2024	
Full-time	**2.310**	**96,2%**	**2.263**	**96,4%**
Italy	1.404	60,8%	1.368	60,5%
Albania	906	39,2%	895	39,5%
Part-time	**92**	**3,8%**	**84**	**3,6%**
Italy	87	94,6%	79	94,0%
Albania	5	5,4%	5	6,0%
Total Group employees	**2.402**		**2.347**	

Table 52 – Recruitment broken down by gender, age, and location (no.)

Recruitment	2025	2024
Total recruitment	**168**	**880**
Female employees	29	252
Male employees	139	628
Other	0	0
Not disclosed	0	0
Under 30 years old	45	168
30-50 years old	73	390
Over 50 years old	50	322
Italy	133	157
Albania	35	723

Table 53 – Terminations broken down by gender, age, and location – environmental focus (no.).[27]

[ESRS_S1, DR S1-6, DP 50c]

Terminations	2025	2024
Total terminations	**158**	**353**
Female employees	17	56
Male employees	141	297
Other	0	0
Not disclosed	0	0
Under 30 years old	9	59
30-50 years old	41	157
Over 50 years old	108	137
Italy	134	134
Albania	24	219

Table 54 – Employee inflow and outflow.[28]

[ESRS_S1, DR S1-6, DP 50c]

Employee turnover (inflow and outflow)	2025	2024
Employees in total[29]	**2.402**	**2.347**
Total recruitment	168	880
Incoming turnover	**7,0%**	**37,5%**
Total terminations	158	353
Outgoing turnover	**6,6%**	**15,0%**

27 It should be noted that the data relating to terminations that occurred in FY 2024 were recalculated in order to ensure methodological consistency and correct comparability with FY 2025.
28 It should be noted that employee turnover (inflow and outflow) data relating to total terminations in FY 2024 were recalculated in order to ensure methodological consistency and correct comparability with FY 2025. In addition, the data presented in this table are reported net of any intra-group transfers of people.
29 The increase in the total number of employees, equal to +55 people, is attributable to the combined effect of employee turnover (inflow and outflow) (+10 people) and the addition of no. 45 employees of Global Power and Global Power Plus.

Table 55 – Employees by gender and professional qualification (no.)

[ESRS_S1, DR S1-9, DP 66a]

	2025						2024					
	Women	**%**	**Men**	**%**	**Total**	**%**	**Women**	**%**	**Men**	**%**	**Total**	**%**
Senior managers	4	0,7%	17	0,9%	21	0,9%	2	0,4%	15	0,8%	17	0,7%
Middle managers	21	3,4%	57	3,2%	78	3,2%	17	3,0%	53	3,0%	70	3,0%
White collar workers	286	46,8%	494	27,6%	780	32,5%	253	44,5%	491	27,6%	744	31,7%
Blue collar workers	300	49,1%	1.223	68,3%	1.523	63,4%	297	52,2%	1.219	68,6%	1.516	64,6%
Total	**611**	**25,4%**	**1.791**	**74,6%**	**2.402**	**100,0%**	**569**	**24,2%**	**1.778**	**75,8%**	**2.347**	**100,0%**

Table 56 – Employees by age group and professional qualification (no.)

[ESRS_S1, DR S1-9, DP 66b]

	2025					2024				
	<30 years old	**30-50 years old**	**> 50 years old**	**Totale**	**%**	**< 30 years old**	**30-50 years old**	**> 50 years old**	**Totale**	**%**
Senior managers	0	6	15	21	0,9%	0	2	15	17	0,7%
Middle managers	0	35	43	78	3,2%	0	32	38	70	3,0%
White collar workers	68	342	370	780	32,5%	63	320	361	744	31,7%
Blue collar workers	145	604	774	1.523	63,4%	146	612	758	1.516	64,6%
Total	**213**	**987**	**1.202**	**2.402**	**100,0%**	**209**	**966**	**1.172**	**2.347**	**100,0%**

Collective bargaining and welfare

[ESRS_S1, DR S1-4, DP 38 a, 38b, 38c, 38d]

[ESRS_S1, DR S1-10, DP 69]

The Magis Group sets its remuneration policy in full compliance with internal equity and Italian legislation, with scrupulous reference to the relevant National Collective Bargaining Agreements, excluding any type of discrimination.

With regard to supplementary pensions, Magis favours the registration of workers both in the negotiated supplementary pension funds (Pegaso, Previambiente, Previndai, Fonte) and in the open funds (of a private nature and promoted by the main insurance companies and credit institutions). Membership in a Negotiation Fund entitles the employer to contribute at least the same amount paid by the worker.

The Group provides different opportunities for both supplementary health protection and the development of recreational activities for employees.

For personnel based in Verona, "ordinary membership" is envisaged in CRAEM, a welfare and recreational club set up among all employees in accordance with the provisions of the National Collective Bargaining Agreement and trade union agreements, which has as its purpose the moral and physical elevation of workers with the implementation of welfare, social security, cultural, artistic, recreational and sports initiatives. Employee membership can also be of the "voluntary type" by paying a percentage of the gross monthly salary based on the package (recreational activity and/or care activity) and the type of membership selected (ordinary or voluntary).

Personnel based in Vicenza are expected to join FISDE OPEN to ensure greater health coverage as well as to join CRAIM to develop recreational activities and opportunities for colleagues to share.

The performance bonus, negotiated during second-level bargaining, is linked to measurable and quantifiable increases in productivity, profitability, quality, or efficiency and innovation of the production process. In all Group companies, the targets for the 2025 bonus are closely linked to the business of each legal entity, or functional to it, and are aimed at enhancing and measuring collective performance.

Regarding the Parent Company, it consists of numerous staff units whose main objective is to support and enhance the service provided or the activities carried out by the subsidiaries.

For the subsidiaries, on the other hand, the objectives are aimed at improving qualitative and quantitative performance, achieving specific results, or implementing and developing new businesses or phases thereof.

Payment of the bonus, subject to the Group reporting a profit in its consolidated financial statements, will be contingent upon the achievement of the Group's objectives.

Therefore, the annual Performance Bonus for the employees will be related:

a. to the profitability parameter for a percentage of 40%;
b. to the productivity and quality parameter for a percentage of 60%.

In this regard, the possibility of converting, in whole or in part, the amount of the Performance Bonus into forms of welfare was also maintained in 2025. In particular, to all workers who freely chose to convert their Bonus into welfare goods and services and who are entitled to do so under current tax legislation, the Company made available an additional package of welfare goods and services with a value equal to 20% of the converted portion of the Bonus. Instead workers who chose to convert the Performance Bonus by allocating it in whole or in part to the sector Supplementary Pension Fund, were granted a further amount equal to 5%, in addition to the above value of 20%, of the converted portion of the Performance Bonus.

Among the "Flexible Benefits" made available are: fuel vouchers, food vouchers, shopping vouchers, health packages, travel packages, cinema, theatre, gym and swimming pool season tickets, educational and training expenses, and other care costs.

The Magis Group made available an individual budget to beneficiaries, equal to the portion of the envisaged Performance Bonus, to be paid via the forms described above. Beneficiaries can convert their Bonus into welfare benefits by logging on to the dedicated welfare portals. Failure to choose conversion into one of the proposed benefits results in full payment of the Bonus in the salary, with reduced taxation, for those entitled in accordance with the provisions of current tax regulations.

WE INVEST IN THE WELLBEING OF OUR PEOPLE

The Magis Group considers flexibility to be a useful and indispensable tool for improving the quality of life of its employees and, at the same time, one of the levers for improving performance and productivity.

Magis facilitates the work-life balance by applying flexible working hours, providing part-time employment contracts (part-time), and allowing the use of smart working.

In the 2025 financial year, smart working involved 264 people within the Magis Group (17.6% of the total workforce based in Italy), accounting for a total of 112,888 hours.

In support of employment and in order to reconcile private life with work commitments, the Magis Group intends to gradually adopt some measures which are currently being developed and studied, such as:

- **Flexibility under exceptional circumstances**
  The Group takes into account the needs of workers, analysing each situation and arranging ad hoc management for each individual, based on a linear organisation.
- **Part-time on return from maternity leave**
  Every request received is carefully reviewed with the aim of enabling all individuals to balance caregiving responsibilities or other personal needs with their career path.
- **Remote working**
  Magis has introduced and consolidated smart working arrangements for all roles classified as "smartable". Smart working represents a form of flexibility and at the same time a new management philosophy, which evaluates work on objectives and not on schedulesi.

As mentioned in the previous paragraph, in order to monitor employee satisfaction with reference to the welfare package and benefits offered, the Group has planned to introduce a satisfaction measurement system based on surveys and focus groups, with targeted communication of the offering and simplified access via digital channels and mobile applications.

[ESRS_S1, DR S1-8, DP 60a, 60b]

[ESRS_S1, DR S1-8, DP 63a, 63b]

The Group supports freedom of association and the effective recognition of the right to collective bargaining, considering dialogue with trade unions and workers' representatives essential. Periodic meetings with company union representatives are planned in order to promote not only constant communication but also proactive cooperation on all relevant issues, with particular attention to safety, training and sustainability initiatives.

With specific reference to the workforce based in Italy, within the Group numerous National Collective Employment Contracts (CCNL) are in force,[30] including:

- UTILITALIA National Collective Bargaining Agreement – Electricity Sector (79.2%)
- Single National Collective Labour Agreement for Environmental Services (17.0%)
- Confcommercio National Collective Bargaining Agreement for the Tertiary Sector (2.3%)
- Confservizi-Federmanager National Collective Bargaining Agreement for Executives in Public Utility Service Companies (1.6%).

30 The figure provided does not include the Serit, Eco Tirana, Global Power and Global Power Plus companies.

At present, there are no specific agreements for representation by international bodies such as, for example, the European Works Council (EWC).

100% of the employees in Italy are covered by the above-mentioned National Collective Bargaining Agreements.

The costs that Magis incurs for its employees mainly take into consideration: both immediate (remuneration and fringe benefits) and deferred (severance indemnities and additional months) direct remuneration, and indirect remuneration (social security contributions borne by Group companies).

Personnel costs are a significant indicator of the contribution of the Magis Group to employment in the local area (Veneto) in which 58.9% of its employees reside.

[ESRS_S1, DR S1-8, DP 60a]

The unionisation rate within the Magis Group in 2025, calculated as the number of union members over the total employees[31] based in Italy, is 39.8%.

[ESRS_S1, DR S1-15, DP 94]

In addition, the Magis Group complies with the Consolidated Law on the protection and support of maternity and paternity (Italian Legislative Decree 151/2001 and subsequent amendments), which regulates the leave, rest, absence and economic support of workers, related to maternity and paternity of natural, adoptive and foster children.

Magis also supports its personnel in parenting by providing a maternity allowance of 100% of salary instead of the 80% envisaged by applicable legislation during the period of compulsory leave.

During the reporting period, a number of initiatives were introduced to support employee wellbeing, including the "Solidarity Hours" initiative, enabling employees to voluntarily and without compensation donate holiday hours to colleagues needing to care for minor children or family members, together with paid leave for the assistance of children under 18, parents aged over 65, and spouses or de facto partners.

It should be noted that all employees of the Magis Group are entitled to family leave in accordance with the social policy adopted by the Group and the applicable collective agreements.

Diversity & Inclusion

[ESRS_S1, DR S1-17, DP 103 a, 104 a]

Diversity, equity and inclusion are fundamental values to promote and create an open, respectful and plural working environment, where everyone can contribute with their own uniqueness, and bring added value to the organisation and the community in which it operates.

Diversity represents people as distinct identities, fostering a heterogeneous cultural environment, nurturing creativity, innovation, productivity and the generation of ideas, and improving the working environment. Therefore, it must be safeguarded and protected in all its forms, as a source of wealth for the growth of the Group and for the community in which it operates.

The Group promotes respect for equal opportunities in each dimension of diversity.

[ESRS_S1, DR S1-16, DP 97a]

Gender: Magis is committed to fighting stereotypes, prejudices, including unconscious ones, and any form of discrimination associated with gender or gender identity differences.

Interculturality: Magis recognises the value that the integration of different cultures and experiences can offer on a human, social and professional level, generation and disability.

31 The figure provided does not include the Eco Tirana, Global Power and Global Power Plus companies.

Generation: Magis addresses the challenges associated with the evolution of society, the market and innovation by valuing the knowledge, experience and different perceptions of work, roles and relationships that characterise each age group.

[ESRS_S1, DR S1-12, DP 79, 80]

Disability: Magis is committed to recognising equal opportunities for all, irrespective of sensory, cognitive or motor disabilities, by implementing actions and measures designed to eliminate cultural, structural, sensory and physical barriers. Within the Group some personnel belong to the protected categories, representing 2.8% of the total workforce.

[ESRS_S1, DR S1-17, DP 103 a, 103b, 103c, 104 a, 104b]

Magis also promotes equality right from the time of recruiting staff with job growth paths based on criteria of competence and performance and is committed to eliminating all forms of discrimination based on gender, age or personal and ideological beliefs, in order to foster a harmonious and stimulating working environment.

In 2025, the Inclusion initiatives defined in previous financial years were consolidated with the launch of the "Energeticamente" project, open to all people in the Magis Group through training actions, internal communication on topics related to wellbeing, harassment, inclusive language and, finally, by making a Psychological desk available to all Group employees. In addition, the management system relating to the Gender Equality Certification (UNI/PdR 125:2022) for the Parent Company Magis S.p.A. was maintained, with the certification also being extended to Magis Smart and Magis Energia at the end of 2025.

During the 2025 financial year, no reports were submitted through the channels available to Magis Group personnel, and no incidents of discrimination, harassment or human rights violations were identified. In the same period, no sanctions were recorded with reference to these matters.

[ESRS_S1, DR S1-16, DP 97 a, 97c]

Magis's commitment to combating and preventing all types of discrimination is also reflected in the remuneration structure of its staff. The Group's system of remuneration policies is based on the ability to recognise the most appropriate remuneration package on the basis of individual performance and professional skills. Any distinction in remuneration between the persons of Magis may be exclusively attributable to these factors. The ratio of women's remuneration to men's shows limited differences in the categories of executives and middle managers (96.5%) and employees (92.5%), with a more marked difference for manual workers (72.8%) due to the fact that female manual workers are mainly employed in support activities at operational sites, whereas male manual workers, working in the field, have technical and operational skills and specialisations that are correspondingly reflected also in remuneration (for example, because they work shifts at night and during public holidays). Similarly, the base salary ratio shows limited differences for executives and middle managers (97.7%) and for employees (92.7%), with more significant differences recorded in the manual workers category (74.6%) for the same reasons as those reported above[32] . In principle, any differences between genders are related to factors such as the organisational weight of the position, level of responsibility and length of service. The analysis of specific deviations did not reveal discriminatory trends but dynamics linked to the representativeness of the female sample in the reference cluster.

[ESRS_S1, DR S1-16, DP 97b]

The ratio between the total annual remuneration of the highest-paid individual and the median total annual remuneration of all other employees in the 2025 financial year is 5.88%.

32 The data provided do not include the Eco Tirana and Serit companies.

Table 57 – Remuneration metrics (pay gap and total compensation)

[ESRS_S1, DR S1-16, DP 97a, 97b, 98]

Female/male ratio	2025		2024	
	Base Pay	**Remuneration**	**Base Pay**	**Remuneration**
Senior managers and middle managers	**97,7%**	**96,5%**	**93,0%**	**94,9%**
Less than 6 years	91,5%	81,8%	83,3%	82,7%
Between 6 and 15 years	74,5%	76,7%	76,9%	73,1%
Between 16 and 25 years	102,4%	103,2%	96,5%	98,2%
More than 26 years	133,5%	143,7%	122,1%	135,1%
White collar workers	**92,7%**	**92,5%**	**92,4%**	**91,8%**
Less than 6 years	91,6%	91,4%	92,8%	91,5%
Between 6 and 15 years	97,2%	96,9%	97,0%	96,8%
Between 16 and 25 years	91,7%	91,3%	91,9%	91,7%
More than 26 years	92,6%	92,3%	92,0%	91,2%
Blue collar workers	**74,6%**	**72,8%**	**76,0%**	**73,9%**
Less than 6 years	76,4%	74,3%	0,0%	0,0%
Between 6 and 15 years	0,0%	0,0%	0,0%	0,0%
Between 16 and 25 years	80,4%	79,1%	77,3%	75,3%
More than 26 years	0,0%	0,0%	0,0%	0,0%

Training

[ESRS_S1, DR S1-13, DP 83b]

The Magis Group promotes a working environment where all employees feel positively involved in ensuring the definition of their own skills and career development path, while maintaining high performance and motivation.

Training is an important part of developing personnel. Given the nature of the activities provided, continuous updating in the regulatory and technical field is essential for providing an adequate and efficient level of service.

On-the-job training plays a primary role and is guaranteed thanks to the involvement of hierarchical superiors, who are encouraged to take a leading and coaching role in the development of their co-workers, to ensure that they are successful in their current role while increasing their awareness for future career aspirations.

In 2025, 41,578 hours[33] of training were provided to employees, broadly in line with the previous financial year (-6.9%). In 2025, the per capita training hours per participant in the Magis Group amounted to 17.2.

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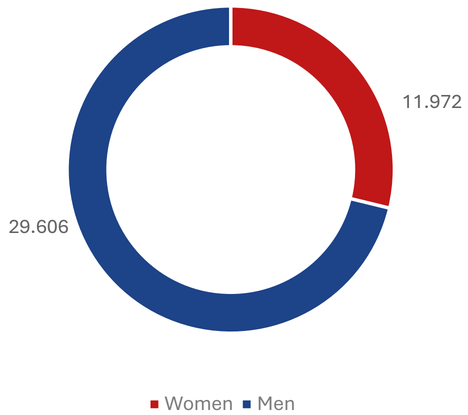


Figure 29 – Hours of training by gender

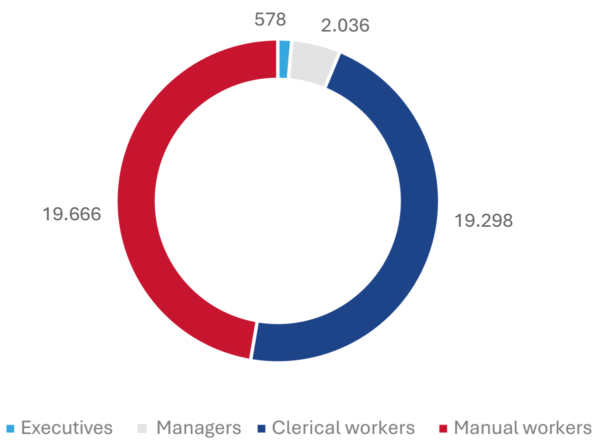


Figure 30 – Hours of training by qualification

At the end of each training course, employees are asked to evaluate the teaching, the content covered and the overall effectiveness by completing an anonymous questionnaire. E-learning training will be provided to allow greater flexibility for employees.

33 The figure provided does not include Global Power and Global Power Plus.

The 2025 training plan provided mandatory occupational health and safety training and technical training to maintain the technical and professional skills of all the employee categories.

An initial training course on Artificial Intelligence and Copilot was delivered, and a community was launched, open to all people in the Magis Group who, regardless of their role, requested a Copilot licence. Training initiatives were launched to strengthen the feedback-based leadership model.

In addition to the training activities planned and delivered in 2025, the Magis Group continued to invest in staff development.

- Onboarding process that supports all new hires during their first year of work. The process includes the delivery of a welcome kit, the organisation of the first day's agenda, the digitalisation of onboarding documentation, the distribution of short informational videos designed to communicate key information about the Group and its values, a digital pathway for tracking touchpoints involving the employee, their manager and the Organisation and Development team, as well as two dedicated meetings: the "New Hires' Coffee" and a visit to Magis Group facilities. Each new hire is paired with a "Buddy", a person in the Group who has made themselves available to support and guide colleagues, including on informal topics, during the initial period after joining.
- The "Corporate Erasmus" project enabled 31 employees in 2025 to spend a short period within a different business function, working on topics unrelated to their day-to-day activities.
- The VOLT UP < 40 project, aimed at developing individual skills and targeted at all Magis Group employees under the age of 40 holding technical qualifications or degrees. In 2025, the project continued with the creation of the VOLT UP Academy for 20 employees of the Magis Group, who during the year participated in training initiatives, online coaching, reverse mentoring activities and working groups.
- Project VOLT UP >55, aimed at engagement and skills development for office staff over the age of 55. In the second half of 2025, the assessment methodology and the scope of the project were defined, and the supplier was identified who, in the 2026 financial year, will carry out the assessment and identify development and engagement actions.

Finally, during the 2025 financial year, the Risk Management and ESG Function developed a specific training programme relating to the Internal Control and Risk Management System (the "ERM Training" programme), delivered through differentiated approaches according to the participants involved and including a dedicated test to verify the adequacy of the learning outcomes achieved. In particular, the course was delivered to Italian employees through:

- a series of workshops dedicated to all company management (executives and middle managers), which made it possible to achieve a participation and test-pass rate of 100% of those invited;
- via e-learning for all office employees and operational staff with administrative duties (and therefore provided with a fixed workstation and personal computer), resulting in a participation and successful test completion rate of 93.5% of invited employees.

From 2026 onwards, ERM Training will continue in e-learning mode for all new people who join the Magis Group.

[ESRS_S1, DR S1-13, DP 83a]

A total of 405 employees (equal to 37% of the company workforce included in the applicable scope[34]) participated in regular performance and career development reviews during 2025. Among the participants, 280 are men and 125 are women, representing 69% and 31% of the total, respectively. The data include employees involved in compensation review and performance management processes, i.e. individuals for whom the assessment cycle supported decisions regarding pay rises, category changes, one-off bonuses or other compensation and/or development initiatives. For 16% of the population included in the applicable scope, the performance review was part of the performance management process and had therefore been agreed in advance.

34 For the purposes of this indicator, the companies Eco Tirana Sh.a., Global Power S.p.A., Global Power Plus S.r.l. and SER.I.T. S.r.l. have been excluded from the calculation scope, as they are not equipped with a performance management system.

Table 58 – Average per capita training hours by gender and professional qualification (no.)[35]

[ESRS_S1, DR S1-13, DP 83b]

Average hours per employee	2025	2024
Total average hours per employee	**17,3**	**19,0**
Women	19,6	16,2
Men	16,5	19,9
Other	0,0	0,0
Not disclosed	0,0	0,0
Senior managers	27,5	19,5
Middle managers	26,1	27,3
White collar workers	24,7	31,9
Blue collar workers	12,9	12,4

Table 59 – Training hours by gender and professional qualification (no.)[36]

[ESRS_S1, DR S1-13, DP 83b]

Hours of training	2025	%	2024	%
Total training hours	**41.578**	**100,0%**	**44.682**	**100,0%**
Women	11.972	28,79%	9.239	20,68%
Men	29.606	71,21%	35.443	79,32%
Other	0	0,00%	0	0,00%
Not disclosed	0	0,00%	0	0,00%
Senior managers	578	1,39%	331	0,74%
Middle managers	2.036	4,90%	1.913	4,28%
White collar workers	19.298	46,41%	23.696	53,03%
Blue collar workers	19.667	47,30%	18.743	41,95%

35 It should be noted that the values of average training hours per employee by job level relating to FY 2024 were recalculated in order to ensure methodological consistency and correct comparability with FY 2025. The overall figure for average training hours per employee, disaggregated by gender, did not require recalculations and is therefore confirmed as originally reported.

36 It should be noted that the values relating to training hours by professional category for FY 2024 have been restated to ensure methodological consistency and accurate comparability with FY 2025.

Occupational health and safety

[ESRS_S1, DR S1-1, DP 23]

[ESRS_S1, DR S1-14, DP 88 a]

The Group is committed to the health and safety of all its workers.

The occupational health and safety management system adopted, as defined by the current provisions of Italian Legislative Decree no. 81/08 "Consolidated Law on Health and Safety at Work", provides for a careful examination of the risks of each sector of activity with the aim of continuously improving work and social performance.

The Group's managerial approach to this issue has long been inspired and guided by international standards and rules: firstly, the reference was the OHSAS 18001 standard and then the ISO 45001 standard, which are observed by the systems implemented in eight Group companies. The staff of the Group companies that have adopted their own Occupational health and safety management system in accordance with the ISO 45001 standard[37] represent 30.7% of total employees; thanks to the voluntary application by our organisation of the same operational management methods for accident prevention issues, the other Italian employees of the Group (approx. 31.5%) also indirectly benefit from the coverage of the Occupational health and safety management system

The Magis Group identifies the hazards present in company activities that may cause accident or illness through inspections carried out jointly in the workplace by the Heads of the Health and Safety Service (RSPP), Company Doctors, Workers' Health and Safety Representatives (RLS) and the related heads of unit. The Group Companies then assess the risks to the health and safety of workers due to the hazards detected in the workplace, and check whether there is the possibility of eliminating or reducing them by adopting prevention and protection measures.

In the event of an accident, an investigation is launched which may include, in addition to interviewing the injured person and any witnesses, an inspection of the site of the event. The objective of the investigation is to determine its causes in order to identify the measures to be taken to prevent it from happening again. A similar investigation is opened in the case of near misses.

In accordance with the provisions of Articles 17, 18, 28 and 29 of Legislative Decree 81/08, Employers, in collaboration with the Heads of the Health and Safety Service (RSPP) and the Company Doctors, implement a process to identify the hazards and assess risks to health and safety in the workplace and in the activities carried out by the personnel. This process allows Employers to identify suitable prevention and protection measures to avoid or, if not possible, reduce the likelihood of an unfavourable event or, in any case, reduce its consequences.

The provision of Personal Protective Equipment (helmet, footwear, high-visibility clothing, etc.) or Collective Protective Equipment is the responsibility of the company, which also provides training for correct use. The Health and Safety Service (SPP) identifies the characteristics of the necessary PPE by preparing a special catalogue and verifies its effectiveness with the support of the workers, supervisors, Workers' Health and Safety Representatives and heads of department.

The risk assessment and the consequent prevention and protection measures are contained in the Risk Assessment Document (DVR) prepared for each Group company.

37 The Group companies that have adopted their own management system in accordance with the ISO 45001 standard are the Parent Company Magis S.p.A. and its subsidiaries Magis Power, Magis Calore, Magis Smart and V-reti.

ENERGICAMENTE PROJECT

In May 2025, the "Energicamente" project was launched, an initiative promoted by the Magis Group and dedicated to the topics of psychological well-being, diversity and inclusion, parenthood, caregiving and female empowerment.

The initiative was developed in collaboration with a company specialising in psychological support and organisational training.

The project includes a training programme consisting of webinars and editorial content, focusing on everyday psychological health and on the topics of diversity, equity and inclusion.

The sessions provide practical tools and food for thought to address personal and professional challenges with greater awareness.

In addition, a psychological support service via video call is available, accessible from any device, in complete confidentiality and with maximum flexibility.

Up to five individual online sessions with experienced professionals are available to each employee, selectable according to their needs.

At the various company sites, plans are in place to manage possible emergencies, known as "Emergency Plans". To this end, in each Group company, there are personnel specifically trained in fire-fighting, first aid and also in using a defibrillator, available in various company premises. The emergency procedures require that anyone who detects an abnormal or dangerous situation should call the internal designated numbers answered by the personnel in charge.

The Magis Group has implemented a trade union agreement aimed at protecting health and safety in the workplace through the adoption of a "man-down" system for employees working alone or in isolated conditions

Health surveillance, as regulated in Section V (Health Surveillance) of Italian Legislative Decree no. 81/08 and in the Risk Assessment Document, is entrusted to external professionals (Article 41 of Italian Legislative Decree no. 81/08) who meet the legal requirements. Company doctors, based on risk assessment and regulations, define health protocols for health surveillance and subject employees to medical examinations during working hours.

In addition to regular medical examinations, according to the health protocol, examinations are made in the event of hiring, change of job, due to absence for illness/accident of more than 60 days and upon request to the doctor by the worker. The frequency and type of examinations are contained in the health protocol prepared by the Company Doctors based on the job, age and risk to which the employee is exposed. All expenses associated with health surveillance are fully covered by the relevant Company, and medical examinations are conducted at the workplace.

Blood tests and specialist exams, which take place on the prescription of the company doctors, are entrusted by the Group to external medical laboratories based on an agreement. Personnel are invited to attend the medical examination within the time limits laid down in the regulations, by means of individual written communications from the Health and Safety Service.

All health data is processed in accordance with current legislation and remains with the company doctors.

Health surveillance includes the prevention of occupational diseases that the worker could contract in carrying out their activity. 18 applications were received in 2025 for the recognition of occupational diseases by Group employees or former Group employees, all in the environmental area.

It is believed that the jobs most exposed to risks are those of the environmental sectors or in any case operational.

Meetings are scheduled at least once a year involving the Employers, the Health and Safety Service, company doctors and workers' safety representatives to manage potential problems related to workers' health and safety. During the meetings, an analysis is made of the Risk Assessment Document, the trends of accidents, near misses, occupational diseases and health surveillance, as well as the suitability of the PPE provided and the personnel safety training programmes.

It is extremely important for each employee to be aware of the risks to which they are exposed in their activities; this awareness is also gained by participating in safety training organised by the Company. The Group is strongly committed to involving employees, on all levels, in safety training to spread the culture. Traditional meetings with operational personnel and their operational managers have partially resumed, involving the analysis, together with the RSPP, of workplace accidents and near misses recorded within the Group in the previous year.

[ESRS_S1, DR S1-14, DP 88c]

In 2025, there were 68 accidents at work, of which the main causes were tripping, slipping, stress injury and injuries caused by working. There were 10 commuting accidents, this term indicating those accidents occurring when travelling from home to the workplace with means owned by the individual worker. In these events, the causes depend on factors that cannot be managed by the companies of the Magis Group.

[ESRS_S1, DR S1-14, DP 88e]

Finally, there are 18 accidents that can be classified as accidents with serious consequences for absence from work of more than 40 days. No event had an initial prognosis of more than 40 days.

[ESRS_S1, DR S1-14, DP 88d]

Although certain requests for the recognition of occupational diseases were submitted, no occupational illness cases were officially recognised during 2025.

[ESRS_S1, DR S1-14, DP 88b]

No fatalities resulting from injuries or illnesses related to work activities were recorded during the reporting period.

Table 60 – Health and safety metrics of the Group's own workforce[38]

[ESRS_S1, DR S1-14, DP 88a, 88b, 88c, 88d, 88e]

Own workforce	Unit of measure	2025	2024
Deaths	Unit	0	0
Deaths resulting from occupational illnesses	Number	0	0
Accidents	Unit	68	60
Occupational Illness Claims Submitted	Unit	18	18
Hours worked	Number	4.323.321	3.603.988
Absences Due to Workplace Accidents	Days	2.132	2.198
Severity rate	Number	0,44	0,46
Rate of occupational accidents with serious consequences serious workplace accident rate	Number	4,16	3,61
Rate of recordable occupational accidents	Number	15,73	16,65
Percentage of employees covered by the health and safety management system	Percentage	100%	100%

Table 61 –Health and safety metrics relating to value chain workers operating at the Group's sites

[ESRS_S1, DR S1-14, DP 88b, 89]

Value chain workers at the Group's sites	Unit of measure	2025	2024
Deaths	Unit	0	0
Deaths resulting from occupational illnesses	Number	0	0

38 It should be noted that the own workforce health and safety data relating to the "Severity Rate" and the "Rate of Occupational Accidents with Serious Consequences" for FY 2024 have been recalculated in order to ensure methodological consistency and proper comparability with FY 2025.

3.2. Workers in the value chain – ESRS S2

3.2.1 Strategy

[ESRS_2, DR SBM-3, DP 48a]

The table below presents the impacts, risks and opportunities concerning workers in the value chain that the Magis Group identified and deemed material as a result of the Double Materiality Analysis (DMA) conducted and updated in 2025, as outlined in section 1.4 "Material Sustainability Topics".

[ESRS_2, DR SBM-2, DP 9]

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S2	Secure employment	Potential inadequate protection of workers in temporary employment, lacking a contract, or facing non-compliance with contractual terms, leading to insufficient safeguards and exposure to financial insecurity.	Potential negative impact	S-M-L	✓	☒	✓
S2	Health and safety	In the construction and maintenance of electricity and gas transmission and distribution lines, workers are exposed to prolonged periods of work at height or underground, the use of heavy machinery, and the risk of electrocution or explosion, which negatively impacts their physical safety and mental wellbeing.	Potential negative impact	S-M-L-	✓	☒	☒
S2	Health and safety	Workers employed in the fuel cell and industrial battery sector are exposed to risks to human health, including solvents, corrosive substances, lead (and its compounds), arsenic (and its compounds), cadmium and sulphuric acid, as well as known or suspected carcinogenic, teratogenic and mutagenic substances. They also face potentially hazardous working conditions that may result in fires, explosions, frostbite burns, and electrocution.	Potential negative impact	S-M	✓	☒	☒
S2	Health and safety	Operation and maintenance (O&M) services for wind farms carried out by third-party providers, including turbine installation, maintenance, monitoring, and repair, are subject to high safety standards due to the inherent hazards of the work, particularly working at height. This poses a potential negative impact on worker safety and the environment.	Potential negative impact	S-M	✓	☒	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S2	Child labour	The employment of child labour, contrary to international law, is a serious concern in high-risk countries with weaker regulatory enforcement. This situation constitutes a serious violation of human rights and harms the proper development of children.	Potential negative impact	S-M	✓	☒	☒
S2	Forced labour	Forced labour, which violates international law, is a major concern in high-risk countries where regulatory enforcement is weak. Notably, this includes components originating from China and materials used in solar panel production. This situation is a serious violation of human rights and harms the health and safety of workers.	Potential negative impact	S-M	✓	☒	☒
S2	Confidentiality	Failure to protect personal data due to the rise of cybercrime and/or lack of measures to ensure cybersecurity.	Potential negative impact	S-M	✓	☒	✓

Risultati dell'analisi di rilevanza finanziaria

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S2	Health and safety	Workplace accidents in cases of contracting or subcontracting due to ineffective supervision by managers or contract representatives, which could lead to reputational and financial damage (such as legal disputes and extra costs for finding new suppliers)	Risk	S-M-L	✓	☒	☒
S2	Secure employment	Poor management of supplier relationships and failure to monitor social issues (such as unpaid overtime, insecure work contracts, etc.) can cause reputational damage and lead to loss of trust from stakeholders	Risk	S-M-L	✓	☒	☒
S2	Child labour	Risk of financial losses or damage that may arise from the violation of the fundamental rights of working-age individuals. This risk arises when suppliers and business partners fail to comply with current regulations prohibiting child labour. Failure to comply with such regulations can lead to serious financial consequences and damage to the company's reputation. This situation could pose a risk to Magis in terms of supply disruption and impact on its production activities.	Risk	S-M-L	✓	☒	☒

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S2	Forced labour	Risk of financial loss or damage arising from violations of fundamental rights in the workplace. This risk arises when suppliers and business partners fail to comply with current regulations prohibiting forced labour. Failure to comply with such regulations can lead to serious financial consequences and damage to the company's reputation. This situation could pose a risk to Magis in terms of supply disruption and impact on its production activities.	Risk	S-M-L	✓	☒	☒
S2	Confidentiality	Failure or inadequate management of confidentiality and data protection regulations (GDPR 679/2016) that could lead to litigation with a critical financial impact on the Group	Risk	S-M	✓	☒	☒

[ESRS_2, DR SBM-3, DP 10, 10b, 11, 11b, 11c, 11e, 12, 13]

As part of the Double Materiality Analysis process, Magis has mapped its value chain, identifying the main categories of suppliers and customers involved upstream and downstream. This analysis has highlighted certain specific features, appropriately assessed, related to the identified risks and negative impacts.

Specifically, regarding the risks and negative impacts related to child labour and forced labour, workers employed in non-EU companies are considered at greater risk, as they are not subject to the current European regulations protecting workers' rights. Regarding health and safety at work, workers considered most at risk are those performing tasks involving long periods working at heights, such as in the construction and maintenance of power distribution lines, or those potentially exposed to harmful substances, such as in battery production.

The identified IROs, which refer to isolated incidents and are not systemic in nature, are closely linked to the Group's commitment to promoting responsible management throughout the entire value chain and protecting workers' rights, as detailed in the following paragraph.

3.2.2 Impacts, risks and opportunities management

[ESRS_S2, DR S2-1, DP 17a, 17b, 17c, 18, 19]

[ESRS_2, MDR-P, DP 65 a, 65 b, 65 c, 65d, 65e]

To manage impacts, risks, and opportunities related to workers in the value chain, the Magis Group promotes responsible management throughout the entire supply chain by adopting targeted policies that reflect a strong commitment to human rights protection and compliance with international regulations. These principles are clearly stated in the Code of Ethics, which is binding for the conduct of all those who take part in the Group's business organisation, in the Sustainability Management Policy and in the Policy for the protection of human rights[39], in which Magis reaffirms its commitment to reject any form of forced, slave, or child labour and to ensure working conditions comply with current legislation, including among its partner and suppliers.

The above-mentioned Policies, which apply to the Parent Company and its subsidiaries, were approved by the Board of Directors of the Parent Company upon proposal by the Chief Executive Officer, who is responsible for drafting and periodically updating them with the support of the Company's Finance & Control Department.

The analysis of the issues that emerged through the various channels of engagement with stakeholders made it possible to gather and consolidate the expectations of the different categories of stakeholders, with particular attention to the topics in question.

To ensure effective implementation of the above-mentioned Policies, they are circulated to all Group companies so that they may acknowledge and adopt them. Furthermore, with a view to ensuring transparency and collaboration with stakeholders across the Value Chain, the information is communicated to all stakeholders through dedicated communications and publication on the Magis Group Parent Company's corporate website, in the section dedicated to sustainability (https://www.gruppomagis.it/sostenibilita).

The implementation of the Policies is monitored by reviewing reports and verifying corrective actions. In the event of a violation, specific protocols proportionate to the severity are activated, including possible disciplinary action.

To date, no cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises have been reported within the Group's upstream and downstream value chain.

[ESRS_S2, DR S2-4, DP 36]

In the same period, no serious incidents relating to human rights connected to the value chain were reported.

39 The European and national regulatory framework that the Magis Group refers to for the implementation of the Policy for the protection of human rights consists of the guidance issued by the United Nations Global Compact (UNGC); the Sustainable Development Goals (SDGs); the ILO Conventions (International Labour Organization); the OECD Guidelines for Multinational Enterprises (Organisation for Economic Co-operation and Development); the Universal Declaration of Human Rights adopted by the United Nations General Assembly; the guiding principles for the promotion of gender equality – Women's Empowerment Principles (WEPs); the Guiding Principles on Business and Human Rights – Implementing the United Nations "Protect, Respect and Remedy" Framework; the European Convention on Human Rights; and the General Data Protection Regulation (GDPR) – Regulation (EU) 679/2016.

SUPPLIERS' CODE OF CONDUCT

As evidence of the Magis Group's commitment to managing a sustainable supply chain, during the 2025 financial year Magis defined and adopted its Suppliers' Code of Conduct, valid at Group level, with the aim of building, with its partners and suppliers, relationships based on transparency, integrity and collaboration, and of ensuring the adoption of high standards in terms of environmental and social sustainability and respect for the principles of fairness and transparency in the management of business relationships.

The Code applies to all suppliers, contractors and partners that work with the Magis Group and sets out minimum standards that must be respected throughout the performance of activities, including environmental protection, social responsibility and governance principles.

As part of its relationship with suppliers, the Magis Group reserves the right to monitor suppliers' compliance through audits, assessments and self-reporting: non-compliance with the requirements may lead to corrective actions which, in the most serious cases, may also result in termination of the contractual relationship in place.

The focus on responsible supply chain management starts from the phase of supplier selection and contracting and continues over time, through regular dialogue, support, monitoring and control activities.

All new suppliers are required to accept the Code of Ethics, Model 231, the Integrity Pact and the Suppliers' Code of Conduct during the onboarding phase. All suppliers of the Group receive information on the content of the Group's Code of Ethics, where the use of the Group's reporting channels is also encouraged.

The selection of suppliers is carried out in compliance with the principles enshrined in the EU Treaty for the protection of competition and is inspired by principles of impartiality, competence, and cost-effectiveness, as well as principles of transparency and excellence, in compliance with the highest quality standards. The supply relationships are based on compliance with the laws and regulations in force also in the field of labour, human rights, health and safety, environmental protection, the fight against corruption and illegality.

For the acquisition of goods and for the award of the provision of services and the execution of works to third parties, the companies of the Magis Group are subject, in the respective sectors, to the provisions of Italian Legislative Decree no. 50/2016 as amended ("Public Contracts Code"). Pursuant to Article 36, paragraph 8, of Italian Legislative Decree 50/2016, the Magis Group has adopted its "Company Regulation for works, services and supply contracts for an amount below the EU threshold".

The internal rules of awards of contract and performance are also inspired by the legislative principles of proportionality, rotation, non-discrimination and equal treatment between economic operators.

[ESRS_G1, DR G1-2, DP 15a]

In order to ensure transparent and effective management of the procedures for awarding works, services and supplies, the Magis Group has established the "Procurement Portal", a tool for communicating and interacting with suppliers, available on https://www.gruppomagis.it/fornitori.

Through this Portal, the Magis Group manages its Supplier Register on-line, which allows the registration of those who intend to apply and express their interest in being invited to submit bids, without prejudice to the fact that the economic operators are qualified on a case-by-case basis according to the call for tenders.

With a view to absolute transparency, the general conditions of participation and the rules for registration in the Supplier Register and the supplier registration guide are published on the Procurement Portal. In addition, an online technical assistance service is provided to use the Portal for operators who request it.

The economic operators to be consulted are identified on the basis of information regarding compliance with requirements related to general qualification, professional ethics, characteristics of economic-financial and technical-organisational qualification, and in particular, minimum environmental requirements.

[ESRS_S2, DR S2-3, DP 27 a]

For some types of supplies and services, the Magis Group Companies require potential suppliers, within reason and where permitted, to possess specific technical, organisational and economic-financial skills, as objective as possible and always proportionate to the nature and the subject of the contracts, as well as, more and more frequently, to prove the fulfilment of and compliance with the management standards issued on the basis of the European standards of the UNI EN ISO series relating to systems for managing quality, health and safety, environment, etc.

[ESRS_G1, DR G1-2, DP 15b]

The inclusion in the Supplier Register is, in any case, subject to the prior acceptance of and compliance with the Integrity Pact, the Suppliers' Code of Conduct, the Code of Ethics and the Organisation, Management and Control Model adopted pursuant to Italian Legislative Decree no. 231/2001, which constitute the necessary and indispensable prerequisite for contracting with the Magis Group.

The Magis Group is promoting the dissemination and awareness of sustainable topics and criteria related to procurement and contracting, especially for specific types of purchases and projects, including through the application of Minimum Environmental Criteria (CAM), which are necessary for a contract to be classified as "green" according to the guidelines of the National Action Plan for Green Public Procurement (PAN-GPP).

For the Magis Group it is especially important to spread knowledge and use of quality, safety and environment certifications, not only referred to products and services but also within the scope of other processes and projects (a requirement that is now consolidating in many tenders) through ISO 9001:2015, ISO 14000:2015 and ISO 45001:2018 certifications.

Magis favours the selection of qualified and reliable suppliers and, wherever possible, suppliers located within its local area of operation. Support for local production is, in fact, an integral part of the Group's commitment to the communities where it operates, in order to foster the development of the local economy, promoting the creation of shared value.

As of 31 December 2025, the Group has not identified any significant events related to negative impacts directly or indirectly caused to workers within its value chain.

[ESRS_S2, DR S2-3, DP 27b, 27c, 27d]

Magis also makes specific channels available to workers in the value chain for reporting issues or relevant needs in relation to human rights, working conditions or other sensitive matters. These channels include the Group's whistleblowing channel, established and managed by Magis and accessible in compliance with the requirements of confidentiality, protection of the reporting person's identity and prohibition of retaliation, in accordance with applicable legislation.

If potential impact areas are identified, Magis commits to addressing any adverse situations and managing them promptly, in accordance with the Reporting Policy adopted by the Magis Group in compliance with Italian Legislative Decree 24/2023 (the so-called Whistleblowing Decree).

Gestione degli appalti

[ESRS_S2, DR S2-3, DP 27 a]

The requirements to participate in tenders are related to professional competence as well as to the priority compliance with the requirements of professional ethics. It is also generally required to meet requirements relating to economic and financial standing, and technical and professional suitability. With reference to tenders concerning waste disposal, the legal authorisations required from the contractor for the transport, storage and disposal of waste, both with regard to the vehicles used and the plants of destination, are always verified so as to ascertain the legal suitability to operate with total respect for the environment.

Tenders are mainly awarded based on the best price, or alternatively on the economically most advantageous offer (best value for money) based on both technical and economic criteria that consider the different parameters depending on the type and characteristics of the awards.

The Group companies undertake to inform the supplier in a correct and timely manner regarding the characteristics of the contracts, the payment methods and times in compliance with current regulations and internal accounting procedures, contents and contractual clauses in general. The Magis Group guarantees its contractors that the performance of the contract is carried out in a manner consistent with the principles of equality, fairness, diligence and good faith in compliance with current legislation, the contracts signed and company procedures.

The professional and technical suitability of contractors or subcontractors in relation to works, services and supplies to be awarded under a tender, by works contract or manpower supply contract, is scrupulously verified, providing companies with detailed information on specific risks in the environment in which they are intended to operate and on the preventive and emergency measures taken in relation to their activities. The supplier companies cooperate in the implementation of the measures designed to prevent and protect from risks on the work site that have an impact on the work activity subject to contract, coordinate the operations aimed at the protection from and prevention of the risks to which the workers are exposed, thereby exchanging information, in order to eliminate risks due to interference between the activities of the different companies involved in the performance of the overall work (Articles 14 and 26 of Legislative Decree 81/2008).

In the awarding of tenders relating above all to companies operating in the environmental field (e.g. Valore Ambiente, SIA, etc.), if considered appropriate also on the basis of the movement of the vehicles involved, the containment of the movement of vehicles within the territory and the homologation classes referring to the emissions into the atmosphere of the discharges are often evaluated in rewarding terms. The aim of the valuation criteria is to reduce atmospheric emissions and hence air pollution as much as possible. Considering the extent of the movements and the use of means for collecting and transporting waste for disposal, this criterion is particularly effective in terms of respect for the environment and with a view to sustainability.

[ESRS_2, MDR-A, DP 68 a, 68 b, 68 c]

[ESRS_S2, DR S2-4, DP 32 a, 32 b, 32 c, 32 d, 33 a, 33 b, 33 c, 34 a, 35, 36, 38]

[ESRS_2, MDR-T, DP 80 a, 80 b, 80 c, 80 d, 80 e]

[ESRS_S2, DR S2-5, DP 41]

As described in this paragraph, the Magis Group is continuously committed to ensuring that no negative impacts occur along its supply chain, particularly with regard to operational activities carried out in situations presenting risks of interference. This commitment is primarily put into practice through the adoption of control and prevention tools, such as the Code of Ethics and the Organisation, Management and Control Model required by Legislative Decree 231/2001, along with procedures and operational instructions adopted within the ISO 45001 occupational health and safety management system, which define the expected behaviours and integrity criteria for business partners. Where deemed appropriate, suppliers are required to provide their services and work only if they hold equivalent certifications and adopt international standards.

In 2025, as part of the development of the new Business Plan and ESG Plan the Magis Group outlined a series of actions and objectives to promote sustainable practices throughout the value chain and strengthen the protection of the rights of the workers involved.

At the core of this approach is the implementation, from 2026 onwards, of a supplier evaluation system that includes ESG performance metrics and takes them into account as preferential elements in qualification, selection and contract renewal procedures. The system will be supported by a Group Responsible Sourcing Policy which defines the social, environmental and ethical assessment criteria, promotes the adoption of recognised standards to protect workers – for example SA8000 or PAS 24000 – and governs the Group's expectations in terms of safe working conditions, respect for human rights, working hours and fair pay, freedom of association, non-discrimination and the responsible management of subcontracting. In the event of actual critical issues, the Policy will provide for the activation of improvement plans with defined timelines, the monitoring of corrective actions and, where necessary, the suspension or termination of the business relationship. To ensure the effectiveness of remediation measures, the Group will strengthen its reporting channels and non-compliance management processes, ensuring that reports can be received and handled with guarantees of confidentiality, traceability and timeliness.

In terms of preventing and mitigating negative impacts, the integration of social criteria into procurement processes makes it possible to identify risk situations at an early stage and steer purchasing decisions towards suppliers that demonstrate responsible behaviour towards their workers.

VENDOR ACADEMY

Alongside the control tools, the Group has planned, by 2029, to launch a Vendor Academy dedicated to strategic suppliers, with the aim of increasing their maturity on social, environmental and ethical compliance topics. This training infrastructure is designed to address the structural causes of non-conformities, encouraging the stable adoption of responsible working practices and improving, over time, the quality of the services provided by partners.

3.2.3 Metrics and targets

[ESRS 2 S2-5, DP 42a, 42b, 42c]

As detailed in the previous paragraph, during the current reporting period, following the joint development of the new Business Plan and the ESG Plan, the Group defined a portfolio of initiatives and objectives aimed at strengthening the monitoring and oversight of impacts, risks and opportunities along the value chain. These targets and initiatives were identified, with a view to continuous improvement, through the stakeholder engagement processes carried out in that context, which included dedicated meetings and workshops with opinion leaders and representatives of the main internal and external stakeholders.

As these measures and related targets were introduced in the current financial year, no historical monitoring data are yet available. Progress monitoring will be launched and reported in the next financial years using quantitative and qualitative indicators consistent with the established objectives.

3.3. Affected Communities – ESRS S3

3.3.1 Strategy

[ESRS_2, DR SBM-3, DP 8a, 8b,48a]

The table below presents the impacts, risks and opportunities concerning affected communities that the Magis Group identified and deemed material as a result of the Double Materiality Analysis (DMA) conducted and updated in 2025, as outlined in section 1.4 "Material Sustainability Topics".

[ESRS_2, DR SBM-2, DP 7, 45 a, 45 b, 45d]

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

[ESRS_ 2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S3	Water and sanitation services	Leachate leakage from landfills can negatively impact local communities' water and sanitation services, as it may contain hazardous chemicals that, if reaching groundwater, could contaminate drinking water supplies.	Potential negative impact	S-M	☒	✓	✓
S3	Free, Prior and Informed Consent	The lack of involvement and communication with local communities about the acquisition, planning, and construction of buildings and facilities, as well as the management or closure of sites or plants, can lead to negative impacts on communities and social conflicts.	Potential negative impact	M-L	✓	✓	☒

Risultati dell’analisi di rilevanza finanziaria

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S3	Territory-Related Impacts	The inability to manage and reduce the ecological impacts associated with the Group’s operations (such as air pollutants, odours, etc., emitted from landfills, management activities, and treatment plants) could cause dissatisfaction in the local community, resulting in reputational damage.	Risk	M-L	☒	✓	☒
S3	Free, Prior and Informed Consent	The absence of free, prior, and informed consent can lead to strong opposition from local communities (e.g. NIMBY and NIMTO phenomena) against the design and construction of facilities, including wind and solar plants. This risk may arise from environmental, social, or economic concerns related to the company’s projects. Community resistance may manifest through protests, petitions, legal actions, or requests for project modifications.	Risk	S-M-L	☒	✓	☒

[ESRS_2, DR SBM-3, DP 9a, 9b, 9d, 10, 11]

Within the framework of the Double Materiality Analysis, Magis carried out a mapping of its value chain, identifying the local communities impacted by its own operations and by the activities of stakeholders operating upstream and downstream. The analysis revealed that significant negative impacts and risks mainly affect communities living or working near the company’s and suppliers’ operational sites.

For further information on the mitigation measures adopted by the Group regarding the negative impact of leachate leakage from landfills, please refer to chapter “2.2 Pollution – ESRS2”.

The identified IROs refer to isolated incidents and do not exhibit a systemic nature.

3.3.2 Impacts, risks and opportunities management

[ESRS_S3, DR S3-1, DP 15]

Magis supports the development and economic growth of the communities in the areas where it operates by creating employment opportunities, supporting local employment and, where possible, operationally consistent and economically advantageous, giving preference to the selection of local suppliers.

Although it currently does not have a specific policy on managing relations with affected communities, the Code of Ethics of the Group provides certain key references and underlying principles, recalling the Group’s commitment to contribute to the development of the area and to operate in respect of stakeholders’ interests, including those of local communities potentially impacted by its activities. These principles guide the Group’s actions and also constitute the reference values framework for the social and territorial initiatives promoted.

In this context, the Group is committed to enhancing not only the economic, but also the social and cultural development and well-being of the communities in which it operates, through sponsorships and donations, investing in projects capable of generating a positive impact on people. The initiatives in the area, partly funded by Magis, aim to protect and enhance the historical and cultural heritage, as well as to promote education and training for young people in the fields of academics, music, and sports.

[ESRS_S3, DR S3-3, DP 27a, 27b, 27c, 27d]

The Magis Group is committed to ensuring ongoing and structured dialogue with its stakeholders, including through the support and participation in local events.

In this context, Magis also makes specific channels available to affected communities for reporting issues or relevant needs. These channels include the Group's whistleblowing channel, established and managed by Magis and accessible in compliance with the requirements of confidentiality, protection of the reporting person's identity and prohibition of retaliation, in accordance with applicable legislation.

If potential impacts or areas of attention are identified, Magis commits to addressing any adverse situations and managing them promptly, in accordance with the Reporting Policy adopted by the Magis Group in compliance with Italian Legislative Decree 24/2023 (c.d. Whistleblowing Decree), available to all stakeholders on the Group's website.

The Channel Manager is tasked with diligently following up on each report, carrying out a preliminary verification of the facts presented, ascertaining the existence of the reported circumstances, assessing the outcomes of the investigation activities and promoting any consequent measures.

[ESRS_S3, DR S3-4, DP 36]

Through these channels, during the year, no human rights incidents were reported in the local communities near the facilities and operational areas.

[ESRS_2, MDR-A, DP 68 a, 68 b, 68 c]

[ESRS_S3, DR S3-4, DP 32a, 32b, 32c, 32d, 33a, 33b, 33c, 34a, 34b, 35, 38]

During the current financial year, following the joint development of the new Business Plan and the ESG Plan, the Group has planned to launch a strategic engagement plan designed to support 100% of new markets through preliminary listening and involvement initiatives, in order to identify in advance any critical issues related to community expectations, the perceived quality of service or the potential impacts of commercial activities.

At the same time, the plan is intended to enhance opportunities such as understanding the needs of the local areas, strengthening community trust and promoting ongoing dialogue based on shared objectives. Implementation of the plan will start in the areas of greatest interest, such as Padova, northern Lombardy and Emilia-Romagna.

This initiative was identified, with a view to continuous improvement, through the stakeholder engagement processes carried out in that context, which included dedicated meetings and workshops with opinion leaders and representatives of the main internal and external stakeholders.

[ESRS_2, MDR-A, DP 69a, 69b]

During 2025, in line with the commitments described above, the Group also played an active role in promoting and supporting several significant cultural, sporting, social, musical and environmental events of both local and national importance, with a financial commitment of Euro 1.6 million.

Each year, to maintain a strong connection with the community, the Magis Group prioritises backing small cultural organisations, amateur sports clubs and associations for people with disabilities, non-profits, and groups dedicated to promoting local traditions.

The criteria adopted for the allocation of financial resources through sponsorships and donations comply with the principles set out in the "Guidelines for the Management of Sponsorships and Donations" and in the "Guidelines for the Award of Contributions" of the Fondazione AGSM AIM.

AGSM AIM Foundation

The AGSM AIM Foundation commenced its activities in 2025 with the objective of supporting development projects for the territories and communities of Verona and Vicenza in the social, educational and cultural fields, while also placing particular emphasis on environmental sustainability. The Foundation's activities are specifically structured around three areas of intervention: "Energy for Education", "Energy for the Community" and "Energy for Culture".

Over the course of the year, the AGSM AIM Foundation published two funding calls; the first focused on supporting projects in which sport serves as an instrument for social inclusion, while the second supported initiatives in the field of performing arts - including theatre, dance, music and circus arts - specifically aimed at young people aged 12 to 24. Through these initiatives, The AGSM AIM Foundation supports local organisations capable of creating innovative networks and producing positive impacts for communities.

Social Initiatives

During 2025, the Magis Group participated in numerous solidarity initiatives in favour of people and families in difficulty, becoming a reference point in the social sustainability of the Verona and Vicenza area. The Magis Group also supported numerous associations and social promotion initiatives, including "Ci sto Affare Fatica", "La Grande Sfida", the women's self-defence courses of Usacli APS of Verona, and the "Questo non è amore" and "Orange the world" campaigns in collaboration with the Verona Police Headquarters.

"La Grande Sfida International - Abbiamo bisogno di noi" (The Great International Challenge - We need us)

The initiative, now in its thirtieth edition, aims to bring people together through their common passions for sport, art, culture, the spiritual dimension and work. The event is a meeting point between the world of disability and the associative, cultural, educational, institutional, administrative, religious and economic realities of the territory, fostering relationships of mutual understanding and respect.

"Questo non è amore"

The Magis Group supported the Italian State Police's institutional campaign "Questo non è amore," a project promoting concrete actions and initiatives locally to combat all forms of violence against women.

Cultural Initiatives

The Magis Group was among the main partners and supporters of numerous cultural initiatives and associations, including "èVRgreen Week" 2025, "Believe Film Festival", "Cinelà – 44° Festival di Cinema Africano e Oltre", the "21' Edizione del Festival Biblico", Fiera del Riso, "Una Basilica di libri" and Tocatì.

Tocatì - International festival of street games

The Magis Group supported and actively participated in the twenty-third edition of Tocatì – International Festival of Street Games.

The Festival, organised by the Associazione Giochi Antichi (AGA), adopts a sustainable management system certified in accordance with the ISO 20121 international standard "Sustainable event management", which defines the sustainability requirements for the event and all related activities.

Magis staff welcomed children to their stand, offering sustainability-themed games and activities. Hundreds of children, and not only children, enjoyed "VOLTami", the memory game that introduced them to the Group's power generation plants, as well as "Play with AGSM AIM", a booklet featuring crosswords, mazes and many other activities focused on the world of energy and the environment. These were followed by "AGSM AIM Goals", an interactive game designed to explore the Sustainable Development Goals to which Magis contributes.

Fiera del Riso - Rice Festival

In 2025, Fiera del Riso was able to count on Magis' support as green energy partner. The event was powered entirely by energy from certified renewable sources, a choice that made it possible to achieve a tangible reduction in the event's environmental impact.

Musical Events

The Magis Group supported numerous musical associations and initiatives, including the "Festival Vicenza in Lirica", "Verona Piano Festival 2025", "Società del Quartetto di Vicenza ETS", "Incontro sulla Tastiera" and "Spazio e Musica".

Sporting Events

Magis, long committed to supporting sport as an expression of clean energy values, provided support throughout 2025 to several sports clubs in the Verona and Vicenza regions, including amateur organisations and associations for people with disabilities. Among the main sponsorships in 2025 are Scaligera Basket, Giro del Veneto, Sport Expo, StraVerona, StraVicenza.

Scaligera Basket

Magis and Scaligera Basket, linked by a partnership launched in 2024 and continued in 2025, jointly developed numerous social projects, including "Diventa un Gigante", to introduce the ethics of sport and basketball to primary and lower secondary school children, and "We Want Some Basket", which involved boys and girls in vulnerable situations, who were offered a shared space to grow together, overcome differences and develop new skills.

AGSM AIM Educational

Magis' educational programme, ranging from guided tours of facilities to classroom lessons, focuses in particular on renewable energy, energy saving and the importance of safeguarding the natural ecosystem, covering all student age groups.

Teaching Day

The Magis Group took part, in September 2025, in the "Teaching Day" event, now in its 23rd edition, organised by the Municipality of Verona. It was an opportunity to provide teachers and families with information and materials about guided tours organised by Magis to its energy production plants and the educational lessons conducted directly in the classroom.

Guided Tours of Production Facilities and Educational Sessions

Again in 2025, Magis opened its energy production plants, including the Rivoli wind farm, the Borgo Trento cogeneration plant, the Chievo dam and the Tombetta hydroelectric facility, to local schools. The students were welcomed by Magis staff who illustrated, following a didactic path, the peculiarities and characteristics of the various systems. A kit of eco-sustainable gadgets was designed for all the visitors and handed out at the end of the visits.

In addition, Magis organised educational workshops in classrooms aimed at exploring topics such as recycling raw materials, energy processes and how the energy that reaches homes every day is generated. During the laboratories only waste materials were used to make small useful products.

Overall, around 3,000 pupils participated in the "AGSM AIM Educational" learning project during the 2024–2025 academic year.

Green Day

On 20 December 2025, the Group organised Green Day at the Risorgive del Bacchiglione park in Dueville (VI), an occasion dedicated to employees and their families to experience first-hand a natural environment of great value. The initiative brought together nature, creativity and sharing, strengthening the bond between people and the local area. A simple but meaningful experience, which highlighted the importance of living in and respecting natural spaces.

Awards and Recognitions

Credit Reputation Award and Felix Industry Award

The Magis Group confirmed its position among the most solid and reliable players in the Italian industrial landscape, winning, in 2025 and for the second year in a row, two important awards: the Felix Industry Award and the Credit Reputation Award.

The Industria Felix award, presented by the economic and financial magazine "Industria Felix Magazine" as a supplement to "Il Sole 24 Ore," honours the most competitive companies in terms of management and finance. The Group's sales company, Magis Energia, received this award for being "among the best companies in the energy and utilities sectors for managerial performance and Cerved financial reliability, with registered office in the Veneto region".

The Credit Reputation Award, assigned by MF Centrale Risk – a company specialised in credit analysis – recognises businesses that stand out for punctuality, reliability, transparency and consistency in their dealings with banks and financial intermediaries. The award was given to Magis S.p.A. based on a specific evaluation model that analysed the periodic reports submitted to the Central Credit Register of the Bank of Italy.

"Emergency Response 2025" Award

The project "Il GIS della Protezione Civile di ANA", created through collaboration between Magis and the Verona Section of the Associazione Nazionale Alpini, won the "Emergency Response 2025" award, presented as part of the Esri Italia Conference 2025, the leading national event dedicated to geospatial technologies and geographic information systems (GIS). The project stood out as the most innovative and effective solution in emergency management using GIS systems.

HR Innovation IMPACT Award and the "PA Aumentata" Award

The ON-VOLT onboarding project developed by Magis to support new hires during their first months of employment received two national awards, establishing itself as a best practice in the field of HR innovation and organisational transformation. The project combines digital tools with in-person sessions, with the aim of facilitating the integration of new people, conveying the Group's values and promoting an advanced organisational culture focused on participation and shared growth.

Events

Green Energy Day

Magis took part in Green Energy Day 2025, the national event dedicated to the energy transition, renewable energy and energy efficiency, organised by the FREE Coordination (Renewable Sources and Energy Efficiency) in collaboration with the leading industry associations.

The event, held in April 2025 and open to citizens, institutions and businesses throughout Italy, aimed to raise awareness of the importance of clean energy and its crucial role in combating climate change. On this occasion, Magis offered the public the opportunity to discover the Rivoli Veronese (VR) wind farm.

"Wind power and biodiversity" Conference

On the occasion of the twelfth year of operation of the Rivoli Veronese wind farm, Magis and Legambiente organised the conference "Wind Power and Biodiversity". Twelve years of successful coexistence". During the event, topics concerning coexistence between wind power and biodiversity were explored in depth, highlighting how environmental sustainability and clean energy production can coexist harmoniously with the local area.

How a wind farm is born

Presentation of the 2025-2030 Business Plan

The Magis Group organised two public events in Verona and Vicenza to engage citizens, stakeholders, associations and local organisations during the final phase of the process leading to the definition of the new 2025–2030 Business Plan. The meetings aimed to share with the community the content and visions that emerged during the months of discussion, gather insights and reflections on the key themes of the plan – ranging from the energy transition to innovation, from social impact to the role of utilities in the future development of local areas – and involve people in the project that will guide the Group in the coming years.

Energy Convention

At the end of the year, Magis Energia organised two conventions to provide an opportunity for discussion and exchange with its business partners and resellers. These events provided an opportunity to explore the future of the energy sector, present the digital transformation journey undertaken by the Group's commercial company and strengthen relationships with its partners, who are essential in ensuring widespread customer support.

Magis

During the 2025 Christmas party, which brought together over seven hundred Group employees, the new "Magis" brand was officially presented. Developed through a complex process lasting more than one year, the new brand completed a reflection on the Company's identity, redefining its mission, vision and purpose. Magis, created by recombining the letters of the previous name AGSM AIM, in Latin means "more", but also "beyond", "towards the best", and evokes progress, ambition and transformation. It guides and accompanies stakeholders into a new brand story built upon more than a century of history.

External Communication

2025 was a year of particular strategic importance for the Group, marked first by the launch of the 2025-2030 Business Plan and then by the presentation of the new "Magis" brand. In this context of evolution, the Strategic Communication and Marketing Department supported the entire journey from the outset, with the aim of clarifying the strategic drivers of the new Business Plan, enhancing the development directions and strengthening the link between the Group's long-term vision and its new identity.

The main external communication initiatives during the year included:

- the communication campaign "District heating. Heat that respects Verona and Vicenza" to inform the citizens of the cities of Verona and Vicenza about the environmental, energy and social benefits of the service.
- the communication campaign "Another hundred years and beyond", a central element of the Group's institutional narrative, which highlighted its history and presence in its areas of origin, while at the same time projecting them into the future.

During 2025, supported by intense internal and external stakeholder engagement work, the Group's new identity was defined, with the development of values, mission, vision and purpose, providing a shared framework of reference for communication activities and future strategic actions.

The identity evolution journey culminated in the presentation of the new "Magis" brand, accompanied by extensive external communication activities, which will continue and reach their peak during the 2026 financial year.

AGSM AIM becomes Magis
Wellcome Transition

Throughout 2025, communication activities supporting the initiatives and projects developed by the Group and its Business Units continued, together with the management of events, educational programmes, websites and social media, as well as sponsorship and donation activities.

In 2025, around 71 press releases were produced, generating an AVE (Advertising Value Equivalency) of Euro 10.6 million. In 2024, 85 press releases were issued and generated an AVE value of Euro 6.9 million.

3.3.3 Metrics and targets

[ESRS_2, MDR-T, DP 81]

Social issues lie at the heart of the Magis Group's sustainability strategy, which not only commits to respecting the rights of local communities involved but also aims to create a positive impact on people, communities, and the territories in which it operates. This commitment will be further strengthened through the definition, in future reporting periods, of specific quantitative targets relating to the topic.

3.4. Consumers and end users – ESRS S4

[ESRS_2, DR SBM-2, DP 8]

[ESRS_2, DR SBM-3, DP 9a, 9b]

[ESRS_2, DR SBM-3, DP 48a]

The table below presents the impacts, risks and opportunities concerning consumers and end users that the Magis Group identified and deemed material as a result of the Double Materiality Analysis (DMA) conducted and updated in 2025, as outlined in section 1.4 "Material Sustainability Topics".

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group's primary internal and external stakeholders. For further details, please refer to the section "1.3 Our commitment to stakeholders".

The analysis of the matters raised through the various channels of dialogue with stakeholders made it possible to collect and consolidate the expectations of the different stakeholder categories, with particular attention to the topic under consideration.

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S4	Confidentiality	Impact related to the loss of sensitive data and information of customers and commercial partners, and the breach of their confidentiality.	Potential negative impact	S-M	☒	✓	✓
S4	Access to (quality) information	The adoption of smart applications, enabling real-time monitoring of consumption, and the implementation of home automation solutions can have a positive impact by educating customers towards more conscious and sustainable consumption, improving energy efficiency, and reducing waste.	Potential negative impact	S-M	☒	✓	✓

Risultati dell'analisi di rilevanza finanziaria

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
S4	Access to (quality) information	Opportunity linked to the development and implementation of digital solutions to enhance operational efficiency (for example, through network digitisation) and the customer experience, improving customer satisfaction and loyalty, and promoting the development of new services and offers aligned with evolving consumer needs and behaviours.	Opportunity	S-M-L	☒	✓	☒

[ESRS_2, DR SBM-3, DP 10a, 10b, 10c, 10d, 11, 12]

The significant negative impact identified concerns users of Magis's services, who may be exposed to potential risks related to the confidentiality and protection of personal data. These are isolated, non-systemic events that fall within incident scenarios and are managed through appropriate control measures.

The positive impact, on the other hand, affects the entire customer base and is evident in improved service accessibility as well as support for the sustainable transition. This impact is closely linked to the opportunity to increase operational efficiency and optimise the user experience, also thanks to the growing digitisation of processes.

The projects initiated by the Group, described in the following paragraphs, have enabled these aspects to be managed in a comprehensive manner, benefiting all customer categories.

3.4.1 Strategy

The Magis Group pays close attention to the needs of its customers, consistently striving to provide high-quality, safe and reliable services, acting with flexibility and responsiveness to meet customer expectations, and adopting professional, fair and transparent communication practices.

Through the activities carried out in its Business Units, the Magis Group guarantees its customers equal rights, equal treatment and non-discrimination. The Group is highly committed to rendering information about its services simple and readily available. These are the key underlying principles that the Group follows in order to ensure that customer relations are long-lasting, through the adoption of a variety of channels of communication with customers.

The Group has undertaken to comply with general and specific quality standards, and to constantly improve the services provided through technological, organisational and procedural solutions designed to further the effectiveness and efficiency of its operations.

3.4.2 Impacts, risks and opportunities management

[ESRS_S4, DR S4-1, DP 15]

Although the Group does not currently have formalised policies dedicated to the management of impacts, risks and opportunities related to customers, a structured set of operational practices aimed at their protection has long been in place, including enhancing support channels, reducing waiting times, digitisation of services and strengthening local presence. The initiatives described in the following paragraphs demonstrate a widespread approach to customer care and management.

The Group's retail services for the supply of electricity, gas and heat

The commercial companies of the Magis Group's Market Business Unit carry out sales and after-sales activities for the supply of electricity, natural gas and heat (district heating service) for different types of customers.

In addition to Magis Energia and CogasPiù Energie, from 10 November 2025, thanks to the acquisition of the Global Power Group, comprising Global Power S.p.A. and Global Power Plus S.r.l., the Magis Group expanded the number of commercial companies within the Market Business Unit dedicated to the sale and post sale of electricity and natural gas, strengthening its presence in the utilities market.

During the 2025 financial year, the Market Business Unit supplied electricity, natural gas and heat to a total of approximately 937 thousand customers, distributed proportionally among the Group's commercial companies as shown in the following figure. The total number of customers as at 31 December 2025 also includes 55 thousand "new" customers served by the recently acquired subsidiaries Global Power and Global Power Plus.

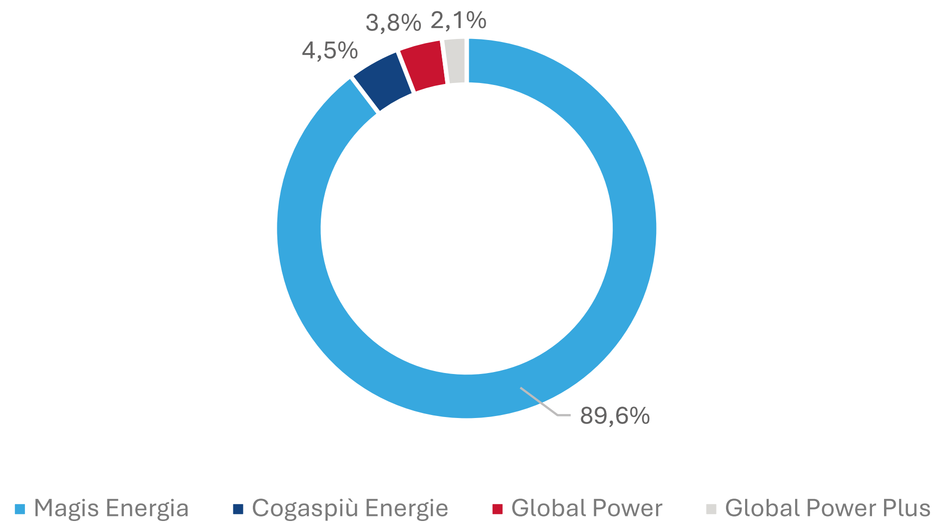


Figure 31 – Distribution of customers served by the Group's commercial companies (%)

The focus on the local area and the community is confirmed by the type of customers served, which is predominantly residential in terms of the supply of electricity (66.2%), gas (84.9%) and the district heating service (66.5%). The remaining components of the customer portfolio are variously distributed among Large Account (i.e. energy-intensive customers such as commercial businesses, industries, etc.), Public Administration bodies and the so-called Reseller (i.e. energy and gas resellers).

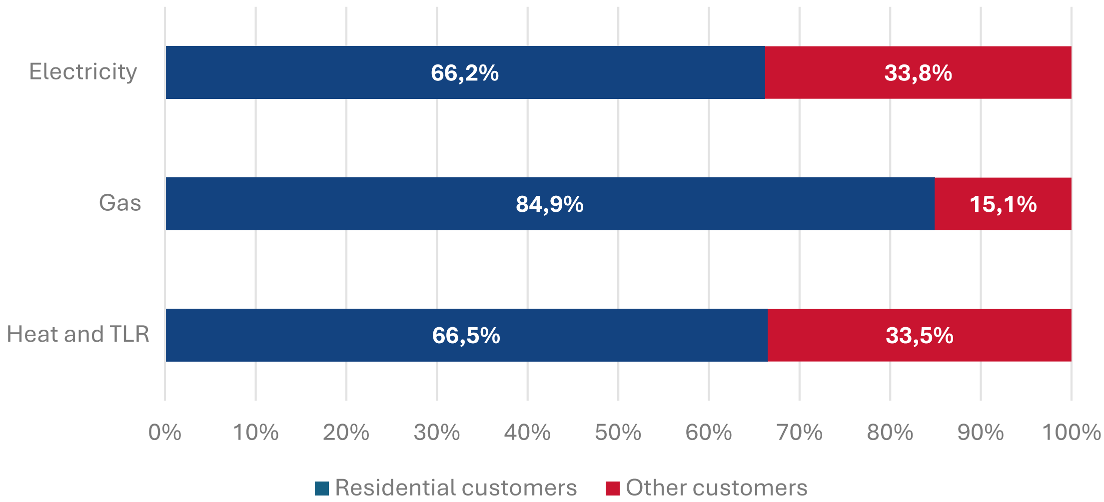


Figure 32 – Distribution of residential customers as a percentage of the total (%)

Table 62 – Distribution of customers by type of supply (no.)

Energy customers	2025	2024
Electricity	597.156	563.348
Gas	336.734	326.312
Heat (*)	2.931	2.944
Total	**936.821**	**892.604**

(*) Customers of the district heating service

The commercial campaign of the Group companies is aimed at strengthening their identity within their reference territories (Veneto and Abruzzo), while also further expanding their presence in other Italian regions through sales agencies and partnerships with trade associations operating throughout Italy. The geographical spread of customers clearly highlights the strong local link with the inhabitants of the Veneto Region, where the Group originated and where the customer base is concentrated (41.4%).

Table 63 – Geographical distribution of customers (%)

	Electricity		Natural gas	
Geographical distribution of customers (*)	2025	2024	2025	2024
Veneto	41,4%	44,2%	63,3%	67,9%
Abruzzo	1,8%	1,8%	4,3%	4,0%
Other (to be specified)	56,7%	54,1%	32,4%	28,0%

(*) Net of district heating customers

ESRS_S4, DR S4-2, DP 20a, 20b, 20c, 21]

[ESRS_S4, DR S4-3, DP 25a, 25b, 25c]

The Group is present locally with 20 commercial desks, distributed between Veneto (18), Abruzzo (1) and Lazio (1). In support of the network of desks, the Market Business Unit also relies on the support of 136 sales agencies operating nationwide: 74 for Magis Energia, 18 for CogasPiù Energie, 15 for Global Power and 29 for Global Power Plus.

In order to ensure a widespread presence in the area, thanks to the partnership with local businesses, Magis Energia makes 8 indirect stores (Magis Shop) available to its customers where it is possible to request advice on bills or sign up to the commercial offers proposed by the Group.

In addition, in the 20 commercial desks, numerous information leaflets are available concerning the self-reading service, digital services, consumer education campaigns and a host of promotions active in the electricity and natural gas market.

In support of information and assistance activities, the Group developed the “Magis al Volante” campaign aimed at providing assistance to Magis customers – and not only – for everything related to the world of electricity and gas thanks to the camper used as a real “mobile office”. The mobile desk visits in several locations in the province of Verona, covering the most important markets in the area, according to a dense and constantly updated calendar.

Access to the commercial desks located in Vicenza and Treviso is allowed only by appointment to be made through the website or by calling the toll-free number 800 226 226. This makes it possible to eliminate customer waiting times for handling the relevant files. On the other hand, in the desks located in Verona and the province, an appointment is not required. In any case, for urgent requests or for elderly or disabled people, "traditional" handling is always guaranteed, allowing access to the desk without booking.

During the reporting period, the Magis Group's commercial desks served 67,899 customers, recording a reduction of -14% compared to the previous year. This decrease is mainly due to two factors:

- the phase-out, as from September 2025, of the queue of users related to water services at the Verona Desk, customers of Acque Veronesi, served by the Magis Group under a service agreement that has now ended;
- the failure to record, in the first quarter of 2025, the customers who visited the CogasPiù Energie desks following the change in the case management software application, which was activated at the beginning of April.

From September 2025 onwards, the Verona, Vicenza and Treviso customer service offices adopted the new Qmatic queue management application, which also allows the measurement of average waiting times at the Vicenza and Treviso branches, a functionality not provided by the former system.

The subsidiary CogasPiù Energie has also eliminated waiting times at the desk thanks to adopting a system of customised appointments exclusively for the desk dedicated to bill payments.

The average waiting time at the desks recorded during the current financial year is shown in the table below.

Table 64 – Average waiting time at desks without an appointment

Average waiting time (Min)	U.M.	2025	2024
Verona desk - Single queue	Minuti primi	08:38	05:36
CogasPiù Energie desk - Payment queue	Minuti primi	02:26	02:50

Through the digital Customer Area and dedicated applications, customers can access the online service desk through which, during the reporting year, 146,458 requests were managed (equal to a -91 % decrease compared with the previous year), representing 44.4% of all requests handled by the sales companies.

The decrease in the number of cases compared to the previous financial year is attributable to the procedural change introduced in the management of signed contracts. Until September 2024, in fact, each new request generated a case in the IT system, whereas with the adoption of the new procedure, the entire data verification and entry process is managed directly in the Customer Relationship Management (CRM) system, without generating individual cases.

In addition to desks, the Magis Group companies provide customers with the call centre service, which in the 2025 financial year received 412 thousand calls (95% of which were successful), with an average waiting time of 151.2 seconds.

The volumes of calls received and the average waiting times are presented in the table below.

Table 65 – Call centre service performance

Call centre service	Number of calls (no.)	Average response time (min.)
Magis Energia S.p.A.	364.926	02:44
COGASPIU' Energie	18.350	02:09
Global Power S.p.A.	4.165	00:00
Global Power Plus S.p.A.	24.576	00:00

Furthermore, in 2025, 234 video calls were handled through InFace, the video call assistant service that allows the execution of all contractual transactions, using face-to-face assistance with an operator.

By accessing the Customer Area and the "Magis Energia" application, both renewed during the previous financial year, customers can independently manage contractual procedures, activate direct debit payments, request invoice delivery by e-mail, and update their contact details and addresses.

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68e]

[ESRS_S4, DR S4-4, DP 31c]

Through the app dedicated to Magis Energia customers, it is possible to carry out operations such as monitoring consumption through special graphs and self-reading of the gas meter so as to reduce consumption estimates in bills.

From the Customer Area it is also possible to access the historical archive of one's own bills containing the main summary data such as amount, date of issue and due date. Customers may also pay their bills securely by using the Nexi, PayPal and MyBank platforms, ensuring maximum security for all transactions. By activating notifications within one's own account, it is also possible to receive due notices.

Finally, a special section dedicated entirely to condominium administrators has been implemented in the new digital channels in order to help them when consulting the contracts they manage.

With reference to the subsidiary CogasPiù Energie, by accessing the Customer Area of the website www.cogaspiu.it, customers can independently send multiple requests for contract management by filling out and sending the prepared forms, self-read their consumption, consult the history of their bills and switch from sending paper bills to digital ones.

With reference to the recently acquired companies, Global Power S.p.A. and Global Power Plus, it should be noted that by accessing the Customer Area of their respective websites (www.globalpower.it and www.globalpowerplus.it), it is possible to carry out numerous operations independently.

In particular, the platforms enable the management of the main contractual and administrative aspects, including consultation of invoice and consumption history, entry of self-readings, changes to personal details, payment methods and bill receipt, as well as the submission of requests or complaints.

Although there are some functional differences, the Customer Areas of the two sales companies are overall aimed at ensuring complete, efficient and transparent management of the contractual relationship, helping to provide their customers with a smooth and accessible experience.

Table 66 – Customers served at the desk[40]

Customer served at the desk	U.M.	2025	2024
Customers served at the desk (Ticket)	Number	67.899	78.979
Average number of customers served per desk	Number	3.395	4.936
Cases submitted via the online desk	Number	146.458	280.387
Desk files percentage	Percentage	37,7%	66,1%

Table 67 – Call centre calls

Call centre calls	U.M.	2025	2024
Calls received by the company call center	Number	18.350	477.028
Average time to answer received calls	Seconds	129	119

For natural gas and electricity supplies, the Magis Group's sales companies issued a total of approximately 4.7 million invoices, of which around 2.7 million were in electronic format, representing 57.4% of the total invoices issued by the Group (excluding the recently acquired Global Power Group).

The service for sending invoices in electronic format, called Bollettaelettronic@ and Vi@Mail, eliminates paper invoices, giving customers the advantage of always having their invoices available in digital format.

The electronic invoices sent to customers by email during 2025 made it possible to save a total of 80.5 tonnes of paper, with a significant environmental benefit.

Table 68 – Invoices issued

Invoices issued	U.M.	2025	2024
Total invoices issued	Number	4.680.395	4.501.539
Electronic invoices issued	Number	2.684.258	2.437.817
Percentage of electronic invoices issued	Percentage	57,4%	54,2%

Every invoice, including previous invoices, is always available to customers through a convenient digital archive accessible via the App and the Customer Area of each commercial company within the Market Business Unit.

Via the Customer Area of the websites and the dedicated apps, the Magis Group also gives its customers the possibility of paying invoices by credit card or activating payment via SEPA (Single Euro Payments Area) direct debit, facilitating the customer, reducing the movement and printing of documentation, with consequent saving of paper and mailing services.

During 2025, 160 thousand invoices were paid through websites and smartphone apps, up by 3.5% compared to the previous year.

40 It should be noted that the data relating to customers served at the desk for FY 2024 were recalculated in order to ensure methodological consistency and correct comparability with FY 2025.

Table 69 – Invoice payment methods

Payment methods used (%)	U.M.	2025	2024
SEPA direct debit	Percentage	57,6%	58,5%
Pre-Printed Postal Payment Slips	Percentage	23,0%	25,4%
Collection Orders, Bank Transfers	Percentage	16,1%	12,8%
Cbill - PagoPA	Percentage	1,7%	1,9%
Payment by credit card / debit card	Percentage	1,6%	1,4%

[ESRS_S4, DR S4-3, DP 20d]

With the aim of monitoring the effectiveness of the above-mentioned measures and improving service quality, Magis provides its customers with a Customer Relations Department responsible for handling requests carefully and promptly, including those classified as complaints in accordance with ARERA regulations.

The objective of the continuous monitoring of complaints by the Magis Group is to identify critical issues promptly, defining and implementing appropriate corrective actions, with a view to continuous improvement.

In particular, through a specific system, the Customer Relations department manages written requests from customers that are received through various channels, and automatically sends information on the response methods and timing.

[ESRS_S4, DR S4-3, DP 25d]

The reports received through the various channels of the Magis Group, relating to the energy services offered, amounted to 5,925 and are broken down as follows:

- 49.5% were requests for information;
- 47.8% were complaints;
- 2.8% were billing adjustment requests.

[ESRS_S4, DR S4-3, DP26]

Currently, Magis has no way of checking whether all customers are actually aware of the existence of these channels. However, it ensures their accessibility through appropriate communications and by making all necessary information readily available for their use and for submitting reports. Specifically, a dedicated form for submitting complaints or other written reports is available and can be easily found at the desks or on the websites. Alternatively, customers may directly submit the request from the relevant sections of the websites.

Commercial offers of renewable electricity and measures to protect customers

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68e]

[ESRS_S4, DR S4-4, DP 31a, 31b, 31d, 32b]

The Group’s commercial companies provide diversified energy offers and tariff plans to meet the needs of the various types of customers.

With reference to the supply of electricity, the sales companies of the Market Business Unit have for years promoted the choice to serve end customers in the free market with electricity produced from renewable energy sources, providing the GO (Guarantee of Origin) certification that proves the green source of production.

In this context, during the year Magis Energia launched specific commercial campaigns aimed at domestic customers, in particular:

- MIA FIX LUCE: fixed-price offer for the first 24 months from subscription. The energy supplied is certified as being generated from renewable sources through the Guarantees of Origin system, which ensures that an amount of electricity equivalent to that consumed by the customer has been produced by renewable energy plants.
- MIA LUCE: variable-price offer indexed to the PUN INDEX GME established on the wholesale market. In this case too, the energy is certified as produced from renewable sources through the Guarantees of Origin system.
- PROXIMA LUCE: an offer dedicated to business customers, in the EXTRASMALL, SMALL, MEDIUM and LARGE versions, which provides for the application of a variable price aligned with the PUN INDEX GME and the supply of energy certified as produced from renewable sources through the Guarantees of Origin system.

For electricity, alongside the new offers launched in 2025, the following offers also remain active for households:

- PURA LUCE: fixed-price offer for one year, with electricity certified as generated from renewable sources during the first 12 months.
- SCUDO CASA: which combines transparent energy tariffs and a package of services dedicated to home maintenance, in which the energy is certified as produced from renewable sources;
- ECO LUCE: dedicated to customers coming from the safeguarded market.

For business customers holding a VAT number, offers such as PROXIMA LUCE are available in the EXTRASMALL/SMALL/MEDIUM/LARGE BUSINESS versions, providing for the application of an energy component indexed either to the average PUN price established on the Italian Power Exchange or to the hourly PUN, depending on the customer's requirements. In this case too, the energy is certified as produced from renewable sources through the Guarantees of Origin system.

The number of contracts signed during the year that include the sale of renewable electricity is 61,639, which corresponds to approximately 22.0% of the total contracts executed and is broken down as follows:

- Magis Energia: 39,525, corresponding to 17.9% of the total contracts executed;
- Global Power Plus S.r.l.: 21,894, corresponding to 100% of the total contracts executed.

In July 2024, following the introduction of the Gradual Protection Service for non-vulnerable customers, Magis Energia, under the "Bolletta Elettrica Transitoria" brand, continues to provide the vulnerability protection service for electricity customers who fall into the following cases (Vulnerable Customers):

- the customer is in economically disadvantaged conditions or suffers from serious health conditions pursuant to Article 1, paragraph 75, of Law No. 124/17;
- the customer falls within the category of persons with disabilities pursuant to Article 3 of Law No. 104 of 5 February 1992;
- the utilities are located on small, non-interconnected islands;
- the utilities are located in emergency housing facilities following a disaster;
- the customer is over 75 years of age.

Commercial natural gas offers with carbon emissions offsetting

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68e]

[ESRS_S4, DR S4-4, DP 31a, 31b, 31d, 32b]

[ESRS_E1, DR E1-7, DP 56b]

Also in 2025, Magis includes in its natural gas product catalogue offers aimed at sustainability and commitment to the environment. In particular, some offers include carbon offsetting mechanisms that enable organisations and individuals to voluntarily offset the CO2 emissions generated by their consumption. Carbon offsetting is carried out through the purchase of carbon credits on the relevant voluntary market, intended to support projects that contribute to the reduction, absorption or prevention of CO2 emissions.

[ESRS_E1, DR E1-7, DP 59a]

During 2025, Magis Energia launched the MIA GAS and MIA GAS FIX offers, which include the offsetting of CO_2 emissions associated with the gas supplied to customers. In 2025, this offsetting amounted to 24,048 tCO_2, carried out through the purchase of certified carbon credits on behalf of the customer. These credits are generated by projects located outside Magis's value chain, with different offsetting methods depending on the characteristics of the individual projects. The carbon credits used are generated by third-party bodies (including Verra and ANREU), registered and cancelled (retired) in official registries.

The list of projects backed is available on the website page: https://www.magisenergia.it/it/chi-siamo/impegno-ambientale.

Specifically:

- with MIA GAS, the price of the commodity is aligned with the PSV-DA, a reference index for Italy's wholesale gas market;
- with MIA GAS FIX, the gas charge (commodity price) is fixed for the first 24 months from subscription.

For natural gas, the number of contracts including CO2 compensation signed in 2025 was 20,124.

For the sale of natural gas, the following offers are also active:

- PURA GAS, with the gas price fixed for one year and including CO2 compensation for emissions during the first 12 months;
- PROXIMA GAS, in the EXTRASMALL/SMALL/MEDIUM/LARGE versions, which provides for the application of a gas component indexed to the PSV-DA price.

[ESRS_E1, DR E1-7, DP 60]

The carbon credits purchased and cancelled by Magis during the period are used exclusively to support voluntary offsetting mechanisms for the benefit of end customers subscribing to the dedicated offers and are not used to offset the Group's direct or indirect emissions.

[ESRS_E1, DR E1-7, DP 59b]

As at the reference date of this report, Magis expects to purchase carbon credits also for the next financial year; however, the exact quantity is defined year by year based on customer demand and the consequent acquisition of the related carbon credits.

Protection of Confidentiality

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68e]

[ESRS_S4, DR S4-4, DP 31a, 31d, 32b]

In order to protect the personal data and privacy of all individuals the Group interacts with, and in accordance with the provisions of the General Data Protection Regulation ("EU Regulation 2016/679" or "GDPR"), the Magis Group has adopted a system of privacy governance, which also applies to those who operate, directly or indirectly, on behalf of the Group. This system, which includes, among other things, compliance with the following obligations:

- the definition of roles and responsibilities within the Group, including the identification of the Data Protection Officer ("DPO") and the persons authorised for the processing (employees of the Group);
- the identification and appointment of data processors, i.e. providers that process personal data on behalf of the Data Controller;
- the collection of consent in an explicit and free manner, combined with the use of information provided in a concise, transparent, intelligible and easily accessible form;
- keeping of the records of processing activities pursuant to Article 30 of the GDPR;
- collection and keeping of the list of System Administrators.

During 2025, pursuant to Article 26 of the GDPR, joint controllership agreements were entered into between Magis S.p.A. and the first-tier subsidiaries, in order to jointly regulate the purposes and means of the processing of personal data. During the financial year, the most critical privacy notices of certain subsidiaries were also updated.

Throughout 2025, several targeted training sessions were organised and conducted, primarily aimed at the Group Compliance function, to deepen understanding of specific topics and ensure effective management of regulatory obligations. The training activities included:

- specialist training on the application of the GDPR;
- the management of records for data processing;
- the use of software tools for GDPR compliance management;
- the assessment and management of potential data breach (i.e., data losses or unauthorised access).

In September 2025, dedicated "privacy by design" training was provided, covering topics such as processing registers, privacy notices, consent management, risk assessment and impact evaluation in the field of AI (Artificial Intelligence).

Even during the 2025 fiscal year, the training programme that began in 2022 continued to raise awareness among those working for the Group on the topic of Cyber Security.

During the reporting period, a data breach incident occurred involving the subsidiary Magis Energia: the Compliance function promptly notified the Data Protection Authority of the breach. Having assessed, in collaboration with the DPO, that the risk to the rights and freedoms of individuals was low, it was not necessary to notify the data subjects.

No GDPR-related penalties were imposed on Group companies during 2025.

In the course of the reporting period, a total of 34 requests were received from data subjects for the exercise of rights under Articles 15–22 of the GDPR (including access to personal data and the right to erasure).

[ESRS_S4, DR S4-4, DP 35]

Finally, it should be noted that during the year no serious issues or incidents related to human rights connected to consumers and/or end users were reported.

Protection of Transparency

[ESRS_2, MDR-A, DP 68a, 68b, 68c, 68e]

[ESRS_S4, DR S4-4, DP 31c]

Magis's commitment to transparent management of relationships with customers and end consumers is outlined in the Group's Code of Ethics, which sets out the values and principles of fair professionalism for its commercial policies. The Code of Ethics also reiterates that communications with customers must be clear, simple, and expressed in language as close as possible to that of the customers, as well as compliant with current legislation and guidelines from regulatory and supervisory authorities.

SOCIAL BONUS

Magis always operates in the best interests of its customers: through the "Social Bonus", it promotes saving on electricity and gas expenditure for families in economic hardship and for large families. In particular, through targeted communication and assistance, Magis supports customers so they can benefit, in the easiest possible way, from the Gas Bonus and the Electricity Bonus: discounts on the bill, introduced by the Government and implemented by the Italian Regulatory Authority for Electricity, Gas and Water (ARERA) with the cooperation of the Municipalities, to guarantee a saving for those families who find themselves in specific difficult circumstances. Contracts eligible for the Electricity and Natural Gas Bonus amount to approximately Euro 25.3 million in 2025.

The Magis Group is careful to evaluate and accommodate requests for extended payment terms for bills where possible, also in those cases not provided for by the Authority.

For the municipalities of Vicenza and Verona, there is also an active partnership with Caritas Diocesana, through the creation of a dedicated fund managed by Diakonia Onlus and the San Zeno Charity Association Onlus, which serve as the operational arms of Caritas, to support families facing temporary financial hardship. The objective of the collaboration is to guarantee intervention to support individuals and households in difficulty in paying their electricity and gas bills, in a context of increasing adversity. In 2025, the Magis Group disbursed Euro 60,000.00 for local families in social and economic hardship via this fund.

For residents of the City of Vicenza, the Group has also introduced special repayment plans for families experiencing socio-economic hardship: each year, the Municipality of Vicenza enters into an agreement to support the instalment-based payment of electricity and gas bills.

Table 70 – Contracts eligible for the social bonus

Social Electricity bonuses (no.)	U.M.	2025	2024
Number of contracts eligible for the Electricity bonus	Number	86.614	70.018
Number of contracts eligible for the GAS bonus	Number	42.032	52.156
Total	**Number**	**128.646**	**122.174**

Table 71 – Social Bonuses Granted

Value of social bonuses (€)	U.M.	2025	2024
Electricity Bonus	Euro (€)	22.150.156	11.924.731
Gas Bonus	Euro (€)	3.140.195	2.981.141
Total	**Euro (€)**	**25.290.451**	**14.905.872**

3.4.3 Metrics and targets

[ESRS_2, MDR-A, DP 68 a, 68 b, 68 c]

[ESRS_2, MDR-T, DP 80 a, 80 b, 80 c, 80 d, 80 e]

[ESRS_S4, DR S4-5, DP 41a, 41b, 41c]

The constant focus on service quality and customer centrality guides the initiatives of the Magis Group, with a view to continuous improvement.

During 2025, as part of the development of the new Business Plan and ESG Plan, the Market Business Unit of the Magis Group launched a series of initiatives aimed at improving the experience of consumers and end users.

[ESRS_S4, DR S4-4, DP 33 a, 33 b]

[ESRS_S4, DR S4-5, DP 38 b, 38 c]

A first area of action concerns the development and roll-out of gas offers providing for the offsetting of CO_2 emissions associated with gas consumption, initially applied to 30% of new household contracts (2025 baseline) and set to grow over time, in order to reach the target of 20% green gas contracts across the entire household customer base by 2030.

Similarly, for the supply of electricity, all new household activations will be progressively associated exclusively with green offers from 2026, with the aim of increasing the overall share of green electricity contracts to 70% by 2030, compared with a 2024 baseline of 3.5%. Through these initiatives, the Group supports its customers in making more informed energy choices, contributing to the reduction of emissions associated with domestic energy use and promoting a more sustainable consumption model.

A second area of action concerns access to information and the simplification of the administrative relationship with the customer. In this direction, Magis Energia launched a process of digitisation of communications, with the aim of increasing the percentage of electronic bills from 54.2% in 2024 to 70% of total supplies. The digitisation of the bill makes it easier for users to access information, reduces the risk of delays and issues linked to postal delivery, and fosters greater transparency in monitoring their own consumption.

Improving the customer experience also involves enhancing support services and strengthening opportunities for contact with the company. To this end, the Market Business Unit has established a twofold objective: to maintain the average waiting time at customer service counters within eight minutes and to reduce the overall complaint rate to below 1%. To achieve these results, the Magis Group is investing both in expanding and optimising digital support channels and in renewing its internal processes for responding to and managing requests. In addition, the systematic collection of feedback from users, carried out after services have been provided, makes it possible to identify any issues more promptly and to steer continuous improvements in how the company interacts with customers.

A further pillar of the initiatives launched concerns strengthening the link with the territories in which the Group operates or intends to expand. For all new markets, Magis Energia has put in place a structured process of preliminary engagement, aimed at understanding the expectations, perceptions and needs of local communities before commercial activities begin. In the second half of 2025, this process involved carrying out a customer survey to assess perceived service quality, the Group's image and the priorities expressed by users. This will be complemented by a strategic plan for engaging with the territories considered a priority, such as Padova, Northern Lombardy and Emilia-Romagna, structured around specific objectives, discussion topics and ways of involving the various stakeholders, in order to build a solid and transparent relationship from the early stages.

4. Governance information

4.1. Business conduct – ESRS G1

[ESRS_2, DR IRO-1, DP 6]

[ESRS_2, DR SBM-3, DP 48a]

The following table sets out the impacts, risks and opportunities relating to business conduct that the Magis Group identified and assessed as material following the Double Materiality Analysis (DMA) carried out in 2024 and updated in 2025, as described in paragraph 1.4 “Material Sustainability Matters”.

As part of this initiative, the Magis Group adopted a structured stakeholder engagement approach that, over the course of 2025, promoted targeted meetings and workshops involving key opinion leaders and representatives of the Group’s primary internal and external stakeholders. For further details, please refer to the section “1.3 Our commitment to stakeholders”.

[ESRS_2, DR SBM-3, DP 48c]

Results of the impact materiality assessment

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
G1	Corporate culture	Negative impact on the community due to non-compliance with regulations and ethical standards, compromising business integrity, fair competition, and more.	Impact Negative Potential	S-M-L	✓	✓	✓
G1	Management of relationships with suppliers, including payment practices	Increased negative impacts on the environment, people, and the socio-economic system due to the failure to promote and adopt responsible and sustainable practices within the Magis Group’s supply chain.	Impact Negative Potential	S-M	✓	✓	☒
G1	Management of relationships with suppliers, including payment practices	Complex management of payment practices within the supply and subcontracting network, with potential delays in payments and/or the use of unlawful methods to speed up processes.	Impact Negative Potential	S-M	✓	✓	☒
G1	Corruption – Prevention and detection, including training	Impacts on the wider community resulting from misconduct such as corruption, fraud, extortion, collusion, and money laundering.	Impact Negative Potential	S-M	✓	✓	✓
G1	Incidents	In conducting its operational and business activities, individuals acting directly or indirectly on behalf of the Group may engage in behaviours that could potentially constitute criminal offences and/or improper conduct, with possible negative impacts on people, the environment, and the socio-economic system in which the organisation operates.	Impact Negative Potential	S-M-L	✓	✓	✓

Risultati dell'analisi di rilevanza finanziaria

ESRS	Sustainability topic	Description	IRO	Time Timeframe S=Short M=Medium L=Long term	Stage of the value chain		
					Upstream	Operations owned	Downstream
G1	Management of relationships with suppliers, including payment practices	Legal non-compliance by one or more suppliers due to insufficient or incomplete monitoring of the required supplier criteria, including in response to regulatory changes and/or shifts in supply parameters. This may lead to disputes with significant financial impact and operational costs associated with securing new supplies to avoid business interruption.	Risk	S-M-L	✓	✓	☒
G1	Management of relationships with suppliers, including payment practices	Non-compliance with purchasing procedures due to delayed or missed awarding/payment (e.g. procurement tenders), resulting in significant financial impact from moderately complex disputes and/or delays in the execution of works or acquisition of goods and services.	Risk	S-M-L	☒	✓	☒
G1	Whistleblower Protection	Risk of sanctions related to the failure or inadequate protection of whistleblowers.	Risk	S-M-L	✓	✓	✓
G1	Prevention and detection, including training	The absence of effective anti-corruption policies, inadequate employee training on ethical behaviour, and insufficient internal control systems can lead to undetected corrupt practices. The effects may include potential legal sanctions, reputational damage, and significant financial losses.	Risk	S-M-L	✓	✓	☒
G1	Incidents	Instances of both internal and external corruption and fraud could lead to negative reputational consequences (loss of trust from stakeholders) and significant financial damage (due to fines and penalties).	Risk	S-M-L	✓	✓	☒
G1	Management of relationships with suppliers, including payment practices	Growing military conflicts and market volatility constitute a substantial risk to worldwide economic stability. These events can cause volatility in financial and commodity markets, negatively impact supply chains, and increase economic uncertainty.	Risk	S-M-L	✓	✓	☒
G1	Corporate culture	Ineffective cybersecurity protection systems for plant infrastructure that could lead to loss of control of the facilities themselves following a cyberattack or ransomware demand. This could result in financial losses due to potential production downtime and operational costs incurred to manage the attack and upgrade the protection system.	Risk	S-M-L	✓	✓	✓

4.1.1 Governance

[ESRS_2, DR GOV-1, DP 5a, 5b]

The corporate bodies of the Gruppo Magis play a central role in defining strategic direction and promoting corporate conduct based on the principles of transparency, fairness, and responsibility. The Group's administrative and control bodies, each within their respective responsibilities, ensure careful oversight of legality, ethics, and consistency in corporate conduct, in accordance with the principles of good governance.

The boards of directors/single directors of the Group's companies exercise broad management and strategic guidance powers, drawing on technical and managerial expertise suited to the complexity of the operating environment, while the control bodies oversee compliance with the law and the effectiveness of the organisational, administrative, and accounting structures.

The multidisciplinary expertise of the administrative and control bodies helps strengthen the Group's ability to operate responsibly and in compliance with applicable regulations.

For further details regarding the Group's corporate governance, please refer to section "1.5 Sustainability Governance" of this document.

4.1.2 Impacts, risks and opportunities management

Organisation, Management and Control Model pursuant to Legislative Decree 231/2001

[ESRS_G1, DR G1-1, DP 7]

Italian Legislative Decree no. 231 of 8 June 2001 (hereinafter also referred to as "Decree 231"), with its subsequent amendments and extensions of applicability, introduced into the Italian legal system a special form of liability, qualified as "administrative liability for offences", for companies, associations and entities in general, following the commission, in their interest or to their advantage, by a person holding an executive or subordinate position within them, of a criminal offence.

In order to comply with the provisions of Decree 231 and to facilitate compliance with the principles of fairness and ethics in carrying out their businesses, the Parent Company Magis S.p.A. and the following subsidiaries defined and adopted their Organisation, Management and Control Model (hereinafter also "Model 231").

Magis S.p.A.	Cogaspiù Energie s.r.l.
Magis Ambiente s.r.l.	Consorzio Canale Industriale G. Camuzzoni di Verona S.c.a.r.l.
Magis Calore s.r.l.	Global Power S.p.A.
Magis Energia S.p.A.	SERIT s.r.l.
Magis Power s.r.l.	Valore Ambiente s.r.l.
Magis Smart s.r.l.	V-reti S.p.A.

Pursuant to Decree 231, when adopted by an organisation Model 231 constitutes a criminal defence against any offences committed or attempted by persons in a senior position and/or by employees (subject to management or supervision by senior positions), from which an interest or advantage for the organisation may derive.

For Model 231 to be considered suitable in pursuing the company's exemption from liability, it is constantly updated not only in the event of new regulations, but also due to corporate, organisational and operational developments.

[ESRS_G1, DR G1-1, DP 9]

During the 2025 financial year, projects to update the Model 231 of the subsidiaries Magis Calore and Magis Power continued.

Adopting Model 231 by each of the Group companies listed above has also improved the effectiveness and transparency of the functioning of those organisations and thus contributed to preventing lack of transparent information and potential improper conduct by senior management and subordinate personnel.

Pursuant to Legislative Decree 231, the Parent Company Magis S.p.A. and the above-mentioned companies appointed and/or renewed the appointment of their respective Supervisory Body (hereinafter also referred to as the "SB"), entrusted with overseeing the effectiveness and actual implementation of the adopted

Model 231 through the continuous monitoring of corporate conduct, as well as ensuring the ongoing adaptation of the functioning of Model 231, with periodic updates based on requirements arising from legislative measures or developments in the corporate and organisational structure.

In compliance with the provisions of Decree 231, an e-mail address was set up for each Supervisory Body to submit any requests for clarification on the interpretation of the indications contained in the Model 231 or reports of suspected violations thereof.

In order to facilitate the effective implementation of the adopted Models 231, the heads of corporate functions were made aware of the methods of periodic transmission of information flows to the SB.

Training on the administrative liability of entities under Legislative Decree 231/2001 is an essential tool for the effective implementation of the Organisation, Management and Control Model adopted by the companies of the Magis Group. The Gruppo Magis launched and completed a specific training programme for its staff.

Anti-Corruption Policy and Management System for Corruption Prevention

[ESRS_2, MDR-P, DP 65a, 65b, 65c]

Well aware that the fight against corruption is a fundamental value in the pursuit of its business activity, the Parent Company Magis S.p.A. defined and adopted a voluntary Group Anti-Corruption Policy which, in coordination with Model 231 and the Group's Code of Ethics, provides a systematic reference framework to combat corruption and aims to disseminate within the Company, as well as to all those who work in favour of or on behalf of companies belonging to the Group, the principles and rules to be followed to exclude any type of direct and indirect, active and passive corruption, including in the form of instigation.

The heads of the various corporate functions also have the task of supervising compliance with the Policy by their employees and adopting measures to prevent, identify and report potential violations.

In addition, the Corruption Prevention Compliance Function is tasked with overseeing the design and implementation of the corruption prevention system, providing advice and support to staff regarding anti-corruption measures and issues, as well as reporting to the Board of Directors (Governing Body) on the overall functioning of the system and any critical issues identified.

[ESRS_G1, DR G1-1, DP 10a]

[ESRS_G1, DR G1-3, DP 18a, 18c]

The recipients of the Anti-Corruption Policy are also required to report, including anonymously, any actual or suspected breach of the obligations established by the Group's internal anti-corruption regulations committed by Group employees, collaborators or third parties acting for or on behalf of Group companies. The reporting channels made available are those described in the "whistleblowing" paragraph.

During 2025, the Parent Company also implemented an Anti-Bribery Management System (ABMS) in accordance with ISO 37001:2016, obtaining the relevant certificate. In connection with this implementation, the assessment of corruption risks was reviewed by updating the risk assessment, attached to the Anti-Corruption Policy, which sets out the findings of the analysis carried out. In any case, the Gruppo Magis is committed to updating the periodic assessment of the documentation.

[ESRS_2, MDR-P, DP 65f]

[ESRS_G1, DR G1-3, DP 20]

Pursuant to the Management and Coordination Guidelines, the updated February 2025 version of the Anti-Corruption Policy has been progressively disseminated and adopted, through specific internal measures, also by all the Gruppo Magis subsidiaries included within the scope of the Consolidated Financial Statements. The Policy is made available both on the company intranet and on the institutional website, and all recipients are required to read it, understand its contents and comply with the requirements set out therein. In this regard, the companies shall ensure that it also becomes binding for all those who operate in any capacity in favour of them or on their behalf.

[ESRS_G1, DR G1-1, DP 10h]

[ESRS_G1, DR G1-3, DP 21a]

The corporate functions identified through the risk assessment activity as being most exposed to the risk of active and passive corruption are primarily those maintaining relations with supervisory and control authorities and/or with the Public Administration in general. Additional at-risk areas include, by way of example and not exhaustively, those relating to the award of contracts, the provision of sponsorships and staff selection. These processes are also overseen through the ABMS in accordance with ISO 37001:2016.

[ESRS_G1, DR G1-1, DP 10g]

[ESRS_G1, DR G1-3, DP 21a, 21c]

In order to promote adequate awareness of the content of the anti-corruption policy adopted, the Group requires all employees to complete a mandatory anti-corruption training programme with varying levels of depth — particularly for individuals belonging to functions most exposed to corruption risk - determined according to the recipients' roles and their different levels of involvement in sensitive activities.

During 2025, training on the Anti-Bribery Management System in accordance with ISO 37001:2016 was scheduled and delivered for the Parent Company's employees. In particular, 90% of staff holding a manager or function head position attended dedicated in-person training; this training included managers from the strategic subsidiaries.

Around 83% of the Parent Company's employees who do not hold a manager or function head position also received training through e-learning.

For 2026, the intention is to repeat the training for the Parent Company's employees and extend training on the Anti-Bribery Management System to all employees of the strategic subsidiaries.

The Gruppo Magis personnel are trained and informed at the time of hiring and through refresher courses to understand the responsibilities and risks they may face in performing their duties. New hires are provided with a copy of the Anti-Corruption Policy (as well as a copy of the Organisational Model pursuant to Legislative Decree 231/2001 and the Group's Code of Ethics).

[ESRS_G1, DR G1-3, DP 21b]

The training covers 100% of the corporate functions identified as being at risk of corruption.

[ESRS_G1, DR G1-1, DP 10 a]

Lastly, it should be noted that the Parent Company is assessing whether to extend the ABMS implemented in accordance with ISO 37001:2016 also to the first-tier subsidiaries.

Whistleblowing

[ESRS_G1, DR G1-1, DP 10 a, 10e]

In order to implement European Directive 2019/1937 and the related implementing Italian Legislative Decree (the so-called Whistleblowing Decree), the Board of Directors of the Parent Company adopted the Whistleblowing Policy, updated during 2025 by the Compliance function, containing the management system for receiving and managing the Company's reports. The same function also updated the information notice on the processing of personal data of individuals who submit reports via the Whistleblowing platform.

The Whistleblowing Policy aims to regulate the methods of making and managing reports of violations of national or European regulatory provisions that harm the public interest or the integrity of the company, as well as the measures to protect the people who make the reports.

This Policy is addressed to all subjects who operate in the company's working context as members of the corporate or control bodies (including persons with the function of Management, administration and control), employees (managers, office staff and workers) and - as a result of specific clauses – also in favour of third parties who have negotiating relations with the company itself.

[ESRS_G1, DR G1-3, DP 18b]

The specific internal channel for reporting illegal conduct and/or violations has been amended, and its management has been assigned to a third party, identified as the Supervisory Body of each Group Company (hereinafter also the "Manager").

With reference to the selection of the new platform, the Compliance function carefully examined various alternatives, identifying the platform most compliant with the needs and the current regulatory framework. The chosen service is certified by the National Cybersecurity Agency (ACN) and selected by ANAC for the setup of the external reporting channel.

Reports may be made in writing or orally, via the specific channel provided and available on the Company's institutional website on the whistleblowing page. In both cases, confidentiality of the reporting person's identity, the content of the report and any documentation is guaranteed. The option to submit an anonymous report has also been introduced.

[ESRS_G1, DR G1-1, DP 10c]

Gruppo Magis has adopted a Whistleblowing Policy aimed at regulating the methods for submitting and managing reports, as well as the measures to protect the people who make them.

The channel dedicated to reporting violations and/or illegal conduct complies with the provisions of Article 6, paragraph 2-bis of Legislative Decree 231/2001 and point 8.9 of UNI ISO 37001:2016. In line with the Parent Company's guidance, the subsidiaries have also activated their own internal channel for receiving reports and, by resolution of their respective governing bodies, have adopted the Parent Company's Whistleblowing Policy.

The Channel Manager is tasked with diligently following up on each report, carrying out a preliminary verification of the facts presented, ascertaining the existence of the reported circumstances, assessing the outcomes of the investigation activities and promoting any consequent measures.

The personal data processed are exclusively those provided by the reporting person and are used to carry out the activities necessary to verify whether the report is well founded and to adopt the consequent measures. Irrelevant or unnecessary data are not collected or, if acquired accidentally, are deleted immediately. Specific security measures are also adopted to prevent data loss, improper use or unauthorised access.

The reporting person may not be subject to any retaliation (any conduct, act or omission, even if only attempted or threatened) solely for having made the report.

During 2025, no reports were received with regard to potential offences, crimes or irregular conduct in violation of the Group's Code of Ethics, the Anti-Corruption Policy or the Models 231 adopted by Group companies.

4.1.3 Metrics and targets

[ESRS_2, MDR-M, DP 77a, 77b, 77c, 77d]

Payment terms

[ESRS_G1, DR G1-2, DP 14, 15a]

The Gruppo Magis manages supplier payments in accordance with uniform criteria and standardised procedures, regardless of contract type, supplier size, or geographical location. The Group sets a payment term of sixty days from receipt of the purchase order, subject to exceptions agreed with individual counterparties.

[ESRS_G1, DR G1-6, DP 33a, 33b, 33c, 33d]

The contractual terms generally applied to suppliers of goods, services, and works (excluding energy and gas commodities) provide for payment within 60 days of the invoice date. For the current reporting period, the Group estimated an average payment time of 60 days, in line with the contractual terms agreed with counterparties and with no pending legal proceedings in Italy against Gruppo Magis companies regarding delays in payments to suppliers. The average payment times recorded during the 2025 financial year are consistent with the contractual terms agreed and signed with counterparties. The Group is consistently committed to meeting payment deadlines, particularly in support of small and medium-sized suppliers. It monitors any delays resulting from specific contingent situations (e.g. disputes or procedural anomalies) and works continuously to reduce the average number of payment days by anticipating due dates whenever possible.

During the reporting period, there were no legal proceedings pending in Italy against Gruppo Magis Group companies concerning delayed payments to their suppliers.

Anti-corruption

[ESRS_G1, DR G1-4, DP 24a, 24b, 25a, 25b, 25c, 25d]

It is also noted that during the 2025 financial year, the Group recorded no confirmed cases of corruption. For this reason, no actions were taken in response to violations of procedures or rules relating to the prevention of active and passive corruption.

Likewise, in 2025, the Group reported no verified cases of active or passive corruption and no contract terminations or non-renewals with business partners due to breaches linked to such corruption.

Authorities and institutions

[ESRS_G1, DR G1-5, DP 29b, 30]

The Institutions represent for the Gruppo Magis a privileged partner with whom to collaborate in the implementation of initiatives designed to generate positive effects on the social and economic fabric of the territory and on the citizens' quality of life, including by virtue of the essential nature of the services provided by the Group and their impact on the communities.

Relations with institutional parties, maintained in accordance with current legislation and the principles of the Code of Ethics, play a fundamental role both socially, with reference to relations with local institutions, sector authorities, trade associations, etc., and economically for the payment of taxes and duties.

Among the members of the Parent Company's administrative, management and control bodies, there are no individuals who, in the two years prior to that appointment, held comparable positions in the public administration, including regulatory authorities. During the 2025 financial year, two directors appointed within two Group subsidiaries also held positions within the Public Administration, serving respectively as mayor of a municipality in the Province of Verona and as a member of a district council of the Municipality of Verona. Some members of the control bodies (i.e. the Board of Statutory Auditors) hold similar positions with local authorities and/or other Italian publicly owned companies (so-called in-house companies). Finally, note the participation of the Deputy Mayor of the city of Tirana among the members of the management board of the subsidiary Eco Tirana, in which the municipality itself holds 51% of the share capital.

Magis regularly pays the contributions and registration fees due to public and private entities, such as Chambers of Commerce, independent administrative authorities, sector associations and representative bodies.

[ESRS_G1, DR G1-5, DP 29c]

The Gruppo Magis Group also maintains relations with some trade associations by participating and actively collaborating in benchmarking against other companies and to promote regulatory and technological updates, including:

- Utilitalia, a federation of companies operating in the water, environment, electricity and gas public services.
- AIRU (Associazione Italiana Riscaldamento Urbano), which aims to promote and disseminate the application and innovation of district heating and cooling systems.
- Confservizi Veneto, an association that coordinates and promotes the development of local service management companies and encourages the exchange of knowledge and experience, carries out studies, drafts regional law proposals, administrative measures, economic and statistical data and cooperates with other regional associations.
- ANEV (Associazione Nazionale Energia del Vento) whose aims include contributing to the promotion and use of wind energy in a balanced relationship between settlements and nature, as well as encouraging research and technological development aimed at using wind resources and the rational use of energy, and the dissemination of correct information based on real data.

The Gruppo Magis is attentive to compliance with rules and regulations and has no significant litigation proceedings against the Public Administration. Magis receives contributions from the Public Administration, in particular from CSEA (Cassa Servizi Energetici Ambientali).

Moreover, the Gruppo Magis does not contribute in any way to the financing of political parties or political and trade union movements, committees and organisations, as well as their representatives and candidates, except for the cases provided for by specific regulations, as set out in the Group's Code of Ethics.

Appendix 1 – Disclosure requirements index

[ESRS_2, IRO-2, DP 56]

Disclosure Requirement		Reference pages
ESRS 2 - GENERAL DISCLOSURES		
BP-1	Basic principles for sustainability statement reporting	1.1 - Basis for the preparation of the Report
BP-2	Disclosure related to specific circumstances	1.1 - Basis for the preparation of the Report
GOV-1	The role of the administrative, management and supervisory bodies	1.5 - Sustainability governance
GOV-2	Information provided to the undertaking's administrative, management and supervisory bodies and sustainability matters addressed by them	1.4 Material Sustainability Matters 1.4.1 Magis Group's commitments to sustainable growth 1.5 Sustainability governance 1.5 Sustainability governance 1.5.3 Internal Control and Risk Management System
GOV-3	Integration of sustainability-related performance in incentive schemes	4.1 - Business conduct – ESRS G1 4.1.1 Governance
GOV-4	Statement on due diligence	1.5 - Sustainability governance 1.5.2 Declaration of Due Diligence
GOV-5	Risk management and internal controls over sustainability reporting	1.5 - Sustainability governance 1.5.4 Risk management and internal controls relating to the Consolidated Sustainability Report
SBM-1	Strategy, business model and value chain	1.2 Business Model and Strategy 1.2.1 Our business model and value chain 1.2.2 Electricity Generation 1.2.3 Cogeneration Production for District Heating 1.2.4 Electricity and Natural Gas Distribution 1.2.5 Smart services 1.2.6 Environmental services
SBM-2	Interests and views of stakeholders	1.3 Our commitment to stakeholders
SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	1.4 Material Sustainability Matters 1.4 Material Sustainability Matters 1.4.1 Magis Group's commitments to sustainable growth
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.4 Material Sustainability Matters
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	1.4 Material Sustainability Matters A.1 - Appendix 1 – Disclosure requirements index A.2 - Appendix 2 - List of Information Requirements under Cross-Cutting and Thematic Standards Arising from Other EU Legislative Acts
E1 – CLIMATE CHANGE		
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	1.5 Sustainability governance 1.5.1 Sustainability performance linked to incentive schemes

Disclosure Requirement		Reference pages
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	2.1 Climate change – ESRS E1 2.1.1 Strategy
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities related to climate	2.1 Climate change – ESRS E1
E1-1	Transition plan for climate change mitigation	2.1 Climate change – ESRS E1 2.1.1 Strategy
E1-2	Policies related to climate change mitigation and adaptation	2.1 Climate change – ESRS E1 2.1.2 Impacts, risks and opportunities management
E1- 3	Actions and resources in relation to climate change policies	2.1 Climate change – ESRS E1 2.1.2 Impacts, risks and opportunities management
E1- 4	Targets related to climate change mitigation and adaptation	2.1 Climate change – ESRS E1 2.1.1 Strategy
E1- 5	Energy consumption and mix	2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
E1 -6	Gross Scope 1, 2 and 3 GHG Emissions and Total GHG Emissions	2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
E1-7	GHG Removals and GHG Emission Mitigation Projects Financed through Carbon Credits	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
E2 – POLLUTION		
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	2.2 Pollution - ESRS E2 2.2.1 Impacts, risks and opportunities management
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities related to pollution	2.2 Pollution - ESRS E2 2.2.1 Impacts, risks and opportunities management
E2-1	Pollution-related policies	2.2 Pollution - ESRS E2 2.2.1 Impacts, risks and opportunities management
E2-2	Actions and resources related to pollution	2.2 Pollution - ESRS E2 2.2.1 Impacts, risks and opportunities management
E2-4	Pollution of air, water and soil	2.2 Pollution - ESRS E2 2.2.1 Impacts, risks and opportunities management 2.2.2 Metrics and targets
E3 – WATER AND MARINE RESOURCES		
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	2.3 Water and marine resources – ESRS E3 2.3.1 Impacts, risks and opportunities management
ESRS 2 IRO-1	Description of the processes to identify and assess relevant impacts, risks, and opportunities related to water and marine resources	2.3 Water and marine resources – ESRS E3 2.3.1 Impacts, risks and opportunities management
E3-1	Policies related to water and marine resources	2.3 Water and marine resources – ESRS E3 2.3.1 Impacts, risks and opportunities management
E3-2	Actions and resources related to water and marine resources	2.3 Water and marine resources – ESRS E3 2.3.1 Impacts, risks and opportunities management
E3-4	Water consumption	2.3 Water and marine resources – ESRS E3 2.3.2 Metrics and targets
E4 – BIODIVERSITY AND ECOSYSTEMS		
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	2.4 Biodiversity and ecosystems – ESRS E4 2.4.1 Impacts, risks and opportunities management
ESRS 2 IRO-1	Description of the processes to identify and assess relevant impacts, risks, and opportunities related to biodiversity and ecosystems	2.4 Biodiversity and ecosystems – ESRS E4 2.4.1 Impacts, risks and opportunities management

Disclosure Requirement		Reference pages
E4-2	Policies related to biodiversity and ecosystems	2.4 Biodiversity and ecosystems – ESRS E4 2.4.1 Impacts, risks and opportunities management
E4-3	Actions and resources related to biodiversity and e cosystems	2.4 Biodiversity and ecosystems – ESRS E4 2.4.1 Impacts, risks and opportunities management
E4-5	Impact metrics related to changes in biodiversity and ecosystems	2.4 Biodiversity and ecosystems – ESRS E4 2.4.1 Impacts, risks and opportunities management
E5 – RESOURCE USE AND CIRCULAR ECONOMY		
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	2.5 Circular economy – ESRS E5 2.5.1 Impacts, risks and opportunities management
ESRS 2 IRO-1	Description of the processes to identify and assess relevant impacts, risks, and opportunities related to resource use and the circular economy	2.5 Circular economy – ESRS E5 2.5.1 Impacts, risks and opportunities management
E5-1	Policies related to resource use and the circular economy	2.5 Circular economy – ESRS E5 2.5.1 Impacts, risks and opportunities management
E5-2	Actions and resources related to resource use and the circular economy	2.5 Circular economy – ESRS E5 2.5.1 Impacts, risks and opportunities management
E5-4	Resource inflows	2.5 Circular economy – ESRS E5 2.5.2 Metrics and targets
E5-5	Resource outflows	2.5 Circular economy – ESRS E5 2.5.2 Metrics and targets
S1 – OWN WORKFORCE		
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	3.1 Own workforce – ESRS S1 3.1.1 Strategy 3.1.2 Impacts, risks and opportunities management
S1-1	Policies related to own workforce	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management 3.1.3 Metrics and targets
S1-2	Processes for engaging with own workers and workers' representatives about impacts	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
S1-5	Targets related to managing material impacts, advancing positive impacts, and material risks and opportunities	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
S1-6	Characteristics of the company's employees	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-7	Characteristics of non-employee workers in the undertaking’s own workforce	3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
S1-8	Collective bargaining coverage and social dialogue	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets

Disclosure Requirement		Reference pages
S1-9	Diversity metrics	1.5 Sustainability governance 3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management 3.1.3 Metrics and targets
S1-10	Adequate wages	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-12	People with disabilities	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-13	Training and skills development metrics	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-14	Health and safety metrics	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-15	Work-life balance metrics	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-16	Compensation metrics (pay gap and total compensation)	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S1-17	Incidents, complaints and severe human rights impacts	3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
S2 – WORKERS IN THE VALUE CHAIN		
ESRS 2 SBM-2	Interests and views of stakeholders	3.2 Workers in the value chain – ESRS S2 3.2.1 Strategy
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	3.2 Workers in the value chain – ESRS S2 3.2.1 Strategy
S2-1	Policies related to own workforce	3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management 3.2.3 Metrics and targets
S3 – AFFECTED COMMUNITIES		
ESRS 2 SBM-2	Interests and views of stakeholders	3.3 Affected Communities – ESRS S3 3.3.1 Strategy
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	3.3 Affected Communities – ESRS S3 3.3.1 Strategy
S3-1	Policies relating to affected communities	3.3 Affected Communities – ESRS S3 3.3.2 Impacts, risks and opportunities management
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	3.3 Affected Communities – ESRS S3 3.3.2 Impacts, risks and opportunities management
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	3.3 Affected Communities – ESRS S3 3.3.2 Impacts, risks and opportunities management

Disclosure Requirement		Reference pages
S4 – CONSUMERS AND END-USERS		
ESRS 2 SBM-2	Interests and views of stakeholders	3.4 Consumers and end users – ESRS S4
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	3.4 Consumers and end users – ESRS S4
S4-1	Policies related to consumers and end-users	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
S4-2	Processes for engaging with consumers and end users regarding impacts	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
S4-3	Consumer and end-user engagement processes	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management 3.4.3 Metrics and targets
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.4 Consumers and end users – ESRS S4 3.4.3 Metrics and targets
G1 – BUSINESS CONDUCT		
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies	4.1 Business conduct – ESRS G1 4.1.1 Governance
ESRS 2 SBM-3	Relevant impacts, risks and opportunities and their interaction with the strategy and business model	4.1 Business conduct – ESRS G1
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	4.1 Business conduct – ESRS G1
G1-1	Business conduct policies and corporate culture	4.1 Business conduct – ESRS G1 4.1.2 Impacts, risks and opportunities management
G1-2	Management of relationships with suppliers	3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management 4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets
G1-3	Prevention and detection of corruption and bribery	4.1 Business conduct – ESRS G1 4.1.2 Impacts, risks and opportunities management
G1-4	Proven cases of active and passive corruption	4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets
G1-5	Political influence and lobbying activities	4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets
G1-6	Payment practices	4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets

Appendix 2 - List of information requirements under cross-cutting and thematic standards arising from other EU legislative acts

[ESRS_2, DR IRO-2, DP 56]

Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS 2 GOV-1 Gender diversity on the board, DP 21, letter d)	X		X		1.5 Sustainability Governance
ESRS 2 GOV-1 Percentage of independent members of the Board of Directors, DP 21, letter e)			X		1.5 Sustainability Governance
ESRS 2 GOV-4 Duty of Diligence Statement, DP 30	X				1.5 Sustainability Governance 1.5.2 Declaration of Due Diligence
ESRS 2 SBM-1 Involvement in activities related to the fossil fuel sector, DP 40, letter d), point i)	X	X	X		1.2 Business Model and Strategy 1.2.4 Electricity and Natural Gas Distribution
ESRS 2 SBM-1 Involvement in activities related to chemical production, DP 40, letter d), point ii)	X		X		n.a.
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, DP 40, letter d), point iii)	X		X		n.a.
ESRS 2 SBM-1 Involvement in activities related to tobacco cultivation and production, DP 40, letter d), point iv)			X		n.a.
ESRS E1-1 Transition plan to reach climate neutrality by 2050 DP 14				X	n.a.
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks DP 16 (g)		X	X		n.a.

41 Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

42 Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27.6.2013, p. 1).

43 Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

44 Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS E1-4 GHG emission reduction tar-gets DP 34	X	X	X		n.a.
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) DP 38	X				2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
ESRS E1-5 Energy consumption and mix, DP 37	X				2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	X				2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, DP 44	X	X	X		2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	X	X	X		2.1 Climate change – ESRS E1 2.1.3 Metrics and targets
ESRS E1-7 GHG removals and carbon credits, DP 56				X	3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, DP 66			X		Phase-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk DP 66 (a) ESRS E1-9 Location of significant assets at material physical risk DP 66 (c)		X			Phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes DP 67 (c)		X			Phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities DP 69			X		Phase-in

Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PR-TR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, DP 28	X				2.2 Pollution - ESRS E2 2.2.2 Metrics and targets
ESRS E3-1 Water and marine resources, DP 9	X				2.3 Water and marine resources – ESRS E3 2.3.2 Metrics and targets
ESRS E3-1 Dedicated policy DP 13	X				2.3 Water and marine resources – ESRS E3 2.3.1 Impacts, risks and opportunities management
ESRS E3-1 Sustainable oceans and seas DP 14	X				n.a.
ESRS E3-4 Total water recycled and reused DP 28 (c)	X				2.3 Water and marine resources – ESRS E3 2.3.2 Metrics and targets
ESRS E3-4 Total water consumption in m3 relative to net revenue from own operations DP 29	X				2.3 Water and marine resources – ESRS E3 2.3.2 Metrics and targets
ESRS 2 SBM-3 – E4 DP 16 (a) (i)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS 2 SBM-3 – E4 DP 16, (b)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS 2 SBM-3 – E4 DP 16, letter c)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS E4-2 Sustainable land / agriculture practices or policies DP 24 (b)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS E4-2 Sustainable oceans / seas practices or policies DP 24 (c)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS E4-2 Policies to address deforestation DP 24 (d)	X				2.4 Biodiversity and ecosystems 2.4.1 Impacts, risks and opportunities management
ESRS E5-5 Unrecycled waste, DP 37, (d)	X				2.5 Circular economy – ESRS E5 2.5.2 Metrics and targets

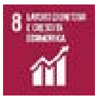
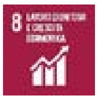
Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS E5-5 Hazardous Waste and Radioactive Waste, DP 39	X				2.5 Circular economy – ESRS E5 2.5.2 Metrics and targets
ESRS 2 – SBM3 – S1 Risk of incidents of forced labour DP 14 (f)	X				3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS 2 – SBM3 – S1 Risk of incidents of child labour DP 14 (g)	X				3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS S1-1 Human rights policy commitments DP 20	X				3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, DP 21			X		3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS S1-1 Processes and measures for preventing trafficking in human beings DP 22	X				3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS S1-1 Workplace accident prevention policy or management system DP 23	X				3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS S1-3 Grievance/complaints handling mechanisms DP 32 (c)	X				3.1 Own workforce – ESRS S1 3.1.2 Impacts, risks and opportunities management
ESRS S1-14 Number of fatalities and number and rate of work-related accidents DP 88 (b) and (c)	X		X		3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness DP 88 (e)	X				3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS S1-16 Unadjusted gender pay gap DP 97 (a)	X		X		3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS S1-16 Excessive CEO pay ratio DP 97 (b)	X				3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS S1-17 Incidents of discrimination DP 103 (a)	X				3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets

Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD DP 104 (a)	X		X		3.1 Own workforce – ESRS S1 3.1.3 Metrics and targets
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chain DP 11 (b)	X				3.2 Workers in the value chain – ESRS S2 3.2.1 Strategy
ESRS S2-1 Human rights policy commitments DP 17	X				3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
ESRS S2-1 Policies related to value chain workers DP 18	X				3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines DP 19	X		X		3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, DP 19			X		3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain DP 36	X				3.2 Workers in the value chain – ESRS S2 3.2.2 Impacts, risks and opportunities management
ESRS S3-1 Human rights policy commitments DP 16	X				n.a.
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines DP 17	X		X		n.a.
ESRS S3-4 Human rights issues and incidents DP 36	X				3.3 Affected Communities – ESRS S3 3.3.2 Impacts, risks and opportunities management
ESRS S4-1 Policies related to consumers and end-users DP 16	X				n.a.

Disclosure Requirement and related datapoint	SFDR Reference[41]	Reference to the Third Pillar[42]	Reference to the Benchmark Regulation[43]	Reference to the EU Climate Regulation[44]	Sections of the Sustainability Report
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines DP 17	X		X		n.a.
ESRS S4-4 Human rights issues and incidents DP 35	X				3.4 Consumers and end users – ESRS S4 3.4.2 Impacts, risks and opportunities management
ESRS G1-1 United Nations Convention against Corruption DP 10 (b	X				n.a.
ESRS G1-1 Whistleblower Protection, DP 10 (d)	X				n.a.
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws DP 24 (a)	X		X		4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets
ESRS G1-4 Standards of anti- corruption and anti- bribery DP 24 (b)	X				4.1 Business conduct – ESRS G1 4.1.3 Metrics and targets

Appendix 3 - Reconciliation Table between Material Topics and SDGs

MATERIAL TOPIC	GLOBAL GOALS	GROUP COMMITMENTS
Climate change	13	The Gruppo Magis promotes climate change mitigation strategies in order to reduce climate-changing emissions that have a direct impact on the quality of the environment in which we live. It pays great attention and makes important investments in developing renewable sources in order to create a more sustainable energy system, less dependent on fossil fuels and, therefore, less polluting.
Decarbonisation, energy efficiency and the use of renewable sources	13	The Magis Group is constantly committed to minimising its environmental impact, with particular regard to reducing CO2 emissions. In this regard, the Group is committed to implementing improvement plans aimed at containing and reducing its climate-changing emissions, through the continuous energy efficiency of its offices and plants and the progressive replacement of the company's fleet with new vehicles and cars with low environmental impact. To this end, it has implemented an effective energy management system in compliance with the international standard ISO 50001, which helps to ensure its commitment to improving the energy efficiency of our plants, reducing consumption and cutting costs.
Protection of the environment, biodiversity and ecosystems	13	The Magis Group is committed to safeguarding the natural value and biodiversity of the territories in which it operates and that are affected by the presence of its plants by implementing appropriate environmental safeguards and measures. While performing its activities, the Magis Group adopts a business model that is attentive to sustainable and environmentally responsible behaviour. It pays particular attention to the flora and fauna of the places where it operates, undertaking to carry out its activities by taking into account the needs of the surrounding ecosystem and to promptly correct any negative impacts that may occur as part of its business activities. In order to ensure maximum compliance with environmental regulations and relevant good practices, the Group has implemented an effective environmental management system in compliance with the international standard ISO 14001, which helps to ensure effective environmental risk management as well as preventing and reducing pollution.
Circular economy	12	Magis is committed to respecting the principles of sustainability and the circular economy through responsible use of natural resources and targeted use of new raw materials when carrying out its activities.
Smart cities and sustainable mobility	11	The Magis Group focuses on innovation and the green economy by providing robust development models for all the services offered with the aim of accompanying the public administration in the energy transition and digital transition and by supporting local communities with its effectiveness in managing energy efficiency projects and its expertise in managing complex projects such as the redevelopment of public buildings.
Development of distribution networks	9	The Gruppo Magis is committed to making its infrastructures increasingly resilient and able to remain available even in times of climate emergency, ensuring the continuous provision of essential services and helping to mitigate the effects of climate change in the territories where it is present with its assets.
Attention to customer needs and customer satisfaction	1	Magis promotes responsible management throughout the supply chain by adopting sustainable procurement policies in order to promote integrated and effective supply chain management capable of reducing the environmental and social impacts generated.
Corporate wellbeing, diversity and inclusion – protection of human rights	8 5 4	Attention to People is a central element of the Magis Group's growth project as they represent an essential factor for carrying out the activity and achieving the company objectives. Magis promotes an inclusive work environment that encourages work-life balance, values people, respects human dignity and individuality and is committed to ensuring that recruitment, development and career advancement are based on merit and free of any form of discrimination. In this context, the Group has implemented a gender equality management system in accordance with the PdR 125/2022 guidelines.

MATERIAL TOPIC	GLOBAL GOALS	GROUP COMMITMENTS
Occupational health and safety		Il Gruppo Magis considera la salute e sicurezza della persona un valore prioritario per il proprio modello di business. A tale proposito, ha implementato un efficace sistema di gestione conforme allo standard internazionale ISO 45001 che insieme all'attività di formazione e sensibilizzazione del personale svolge un ruolo fondamentale nella riduzione dei rischi inerenti alla salute e sicurezza del personale.
Commitment to local communities and protection of the territory		Magis sostiene lo sviluppo e la crescita economica delle persone che vivono nel territorio in cui opera il Gruppo, generando opportunità di lavoro e prediligendo la selezione di fornitori presenti a livello locale. Il Gruppo si impegna ad accrescere lo sviluppo e il benessere non solo economico, ma anche sociale e culturale delle comunità, grazie a sponsorizzazioni e liberalità, investendo in progetti in grado di generare un impatto positivo sulle persone.
Responsible supply chain management	 	The choice of suppliers is inspired by principles of impartiality, competence, competition and cost-effectiveness, as well as principles of transparency and excellence, in compliance with the highest quality standards. The supply relationships are based on compliance with the laws and regulations in force also in the field of labour, human rights, health and safety, environmental protection, the fight against corruption and illegality. Magis Group favours the selection of qualified and reliable suppliers and, wherever possible, suppliers located within its local area of operation. Support for local production is, in fact, an integral part of the Group's commitment to the communities where it operates, in order to foster the development of the local economy, promoting the creation of shared value. As evidence of its commitment to spreading its values and reference principles throughout its supply chain, Magis has adopted the Supplier Code of Conduct, which defines the rules of conduct that all suppliers and business partners must comply with in order to collaborate with the Group.
Technological innovation and digital transformation		The Magis Group is committed to adopting innovative technologies capable of ensuring cultural and social evolution, in an efficient business context, also with respect for the protection of personal data.
Governance geared towards sustainable success		The Magis Group organises its business activities in order to achieve sustainable success to benefit its stakeholders.
Business integrity and corporate reputation		The Magis Group carries out business activities inspired by high standards of fairness, loyalty, integrity and transparency and in compliance with current legislation. In this regard, the Group adopts policies aimed at spreading the culture of legality, protecting the company's reputation, thus ensuring value creation over time. Believing that the fight against corruption is a core value in the management of its business operations, Magis has voluntarily established and adopted its Group Code of Ethics di Gruppo, la Anti-Corruption Policy and, where considered appropriate, an Organisation, Management and Control Model in accordance with Legislative Decree 231/2001.

Appendix 4 – Index of tables

Ref. Chapter / Paragraph	Table
2.6.3 Results of the Group's Eco-Sustainable Activities	34 – Revenue from eligible and non-eligible activities
	35 – Proportion of revenue
	36 – Operating expenditure from eligible and non-eligible activities
	37 – Proportion of operating expenditure
	38 – Capital expenditure from eligible and non-eligible activities
2.6.4 Key performance indicators (KPIs) pursuant to the European Taxonomy	40 – Share of turnover deriving from products or services associated with economic activities aligned with the Taxonomy
	41 – Share of operating expenditure (OPEX) deriving from products or services associated with economic activities aligned with the Taxonomy
	42 – Share of capital expenditure (Capex) deriving from products or services associated with economic activities aligned with the Taxonomy
	43 – Nuclear energy-related activities
	44 – Fossil gas related activities
	45 – Economic activities related to nuclear and fossil gas that are eligible but not aligned with the taxonomy
3. Social information	
3.1.2 Impacts, risks and opportunities management	46 – Targets for reducing the frequency rate and severity rate
3.1.3 Metrics and targets	47 – Workforce distribution by gender and location (no.)
	48 – Workforce by contract type (permanent / fixed-term / variable hours) and gender (no.)
	49 – Workforce by contract type (full-time / part-time) and gender (no.)
	50 – Workforce by contract type (permanent/fixed-term/variable hours) and location (no.)
	51 – Workforce by contract type (full-time / part-time) and location (no.)
	52 – Recruitment broken down by gender, age, and location (no.)
	53 – Terminations broken down by gender, age, and location – environmental focus (no.)
	54 – Employee inflow and outflow turnover
	55 – Workforce distribution by gender and job level (no.)
	56 – Workforce distribution by age and job level (no.)
	57 – Remuneration metrics (pay gap and total compensation)
	58 – Average training hours per employee by gender and job level (no.)
	59 – Training hours by gender and job level (no.)
	60 – Health and safety metrics of the Group's own workforce
	61 – Health and safety metrics relating to value chain workers operating at the Group's sites
3.4.2 Impacts, risks and opportunities management	62 – Distribution of customers by type of supply (no.)
	63 – Geographical distribution of customers (%)
	64 – Average waiting time at desks without an appointment
	65 – Call centre service performance
	66 – Customers served at the desk
	67 – Call centre calls
	68 – Bills issued
	69 – Bill payment methods
	70 – Contracts eligible for the social bonus

Appendix 5 – Index of figures

Independent Auditor’s Report on the Consolidated Sustainability Report

MAGIS S.p.A. (formerly AGSM AIM S.p.A.)

Independent auditors' limited assurance report on the consolidated sustainability report pursuant to article 14-bis of Legislative decree no. 39 of 27 January 2010

Consolidated sustainability report at 31 december 2025

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Independent auditors' limited assurance report on the consolidated sustainability report pursuant to article 14-bis of Legislative decree no. 39 of 27 January 2010

To the shareholders of
MAGIS S.p.A. (formerly AGSM AIM S.p.A.)

Conclusion

Pursuant to articles 8 and 18.1 of Legislative decree no. 125 of 6 September 2024 (the "Decree"), we have been engaged to perform a limited assurance engagement on the 2025 consolidated sustainability report of the Magis Group (formerly AGSM AIM) (the "Group") prepared in accordance with article 4 of the Decree, presented in the specific section of the consolidated management report.

Based on the procedures performed, nothing has come to our attention that causes us to believe that:

- the group's 2025 consolidated sustainability report has not been prepared, in all material respects, in accordance with the reporting standards endorsed by the European Commission pursuant to Directive 2013/34/EU (the European Sustainability Reporting Standards, "ESRS");
- the information presented in the "European Taxonomy Disclosure" section required by article 8 of Regulation (EU) 2020/852 of 18 June 2020 (the "taxonomy regulation") of the consolidated sustainability report has not been prepared, in all material respects, in accordance with article 8 of the taxonomy regulation.

Basis for conclusion

We have performed the limited assurance engagement in accordance with the Standard on Sustainability Assurance Engagements - SSAE (Italia). The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement.

Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our responsibilities under that standard are further described in the "*Auditors' responsibilities for the consolidated sustainability assurance engagement*" section of our report.

We are independent in accordance with the ethics and independence rules and standards applicable in Italy to sustainability assurance engagements.

Our company applies International Standard on Quality Management (ISQM Italia) 1 and, accordingly, is required to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have acquired is sufficient and appropriate to provide a basis for our conclusion.

Responsibilities of the directors and audit committee of MAGIS S.p.A. (formerly AGSM AIM S.p.A.) for the consolidated sustainability report

The directors are responsible for designing and implementing the procedures to identify the information included in the consolidated sustainability report in accordance with the ESRS (the "materiality assessment process") and for the description of these procedures in the "Key sustainability issues" section of the consolidated sustainability report.

The directors are also responsible for the preparation of a consolidated sustainability report in accordance with article 4 of the Decree, which contains the information identified through the materiality assessment process, including:

- compliance with the ESRS;
- compliance of the information presented in the "European Taxonomy Disclosure" section with article 8 of the Taxonomy Regulation.

Moreover, the directors are responsible, within the terms established by the Italian law, for designing, implementing and maintaining such internal controls as they determine is necessary to enable the preparation of a consolidated sustainability report in accordance with article 4 of the Decree that is free from material misstatement, whether due to fraud or error. They are also responsible for selecting and applying appropriate methods to produce disclosures and formulating assumptions and estimates about specific information on sustainability matters that are reasonable in the circumstances.

The Board of Auditors is responsible for overseeing, within the terms established by the Italian law, compliance with the Decree's provisions.

Inherent limitations in preparing the consolidated sustainability report

For the purpose of disclosing forward-looking information in accordance with the ESRS, the Directors are required to prepare such information based on assumptions, described in the consolidated sustainability report, regarding future events and the group's actions that are not necessarily expected to occur. Actual results are likely to be different from the forecast sustainability information since anticipated events frequently do not occur as expected and the variation could be material.

The information disclosures by the Group about greenhouse gas Scope 3 emissions are subject to more inherent limitations than those on Scope 1 and Scope 2 emissions, given the lack of availability and relative precision of information used for determining both qualitative and quantitative Scope 3 information from value chain.

Auditors' responsibilities for the consolidated sustainability assurance engagement

Our objectives are to plan and perform procedures in order to obtain limited assurance about whether the consolidated sustainability report is free from material misstatement, whether due to fraud or error, and to issue an assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of intended users taken on the basis of the consolidated sustainability report.

As part of a limited assurance engagement in accordance with SSAE (Italia), we exercise professional judgement and maintain professional skepticism throughout the engagement.

Our responsibilities include:

- considering risks to identify disclosures where a material misstatement is likely to occur, whether due
- designing and performing procedures to address disclosures where a material misstatement is likely to occur. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- directing, supervising and performing the limited assurance engagement on the consolidated sustainability report and assuming full responsibility for the conclusion on the consolidated sustainability report.

Summary of the work performed

A limited assurance engagement involves carrying out procedures to obtain evidence as a basis for our conclusion.

The procedures performed are based on our professional judgement and include inquiries, primarily of the MAGIS S.p.A. (formerly AGSM AIM S.p.A.) personnel responsible for the preparation of the information presented in the consolidated sustainability report, documental analyses, recalculations and other evidence gathering procedures, as appropriate.

We have performed the following main procedures:

- we gained an understanding of the Group's business model, strategies and operating environment with regard to sustainability matters;
- we gained an understanding of the processes underlying the generation, recording and management of the qualitative and quantitative information disclosed in the consolidated sustainability report;
- we gained an understanding of the process adopted by the Group to identify and assess material sustainability-related impacts, risks and opportunities, based on the double materiality principle;
- identified disclosures where a material misstatement was likely to occur, whether due to fraud or error;
- we designed and performed procedures, based on our professional judgement, to respond to identified risks of material misstatement;
- we gained an understanding of the process adopted by the Group to determine taxonomy-eligible activities and whether they were aligned under the taxonomy regulation and checked the related disclosures presented in the consolidated sustainability report;
- we checked the consistency of the disclosures contained in the consolidated sustainability report with the those included in the consolidated financial statements pursuant to the applicable financial reporting framework, the underlying accounting records or the accounting management figures;
- we checked the structure and presentation of disclosures included in consolidated sustainability report in accordance with the ESRS;
- we obtained the representation letter.

Rome, 5 May 2026

BDO Audit Services S.r.l.

Signed in the original by

Alessandro Fabiano

Partner

This independent auditors' limited assurance report has been translated into English language from the original, which was prepared in Italian and represents the only authentic copy, solely for the convenience of international readers.

MAGIS S.p.A. (formerly AGSM AIM S.p.A.)

Independent auditors' limited assurance report on the consolidated sustainability report pursuant to article 14-bis of Legislative decree no. 39 of 27 January 2010

Consolidated sustainability report at 31 december 2025

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