



EU Taxonomy Reporting Assessment

Caesar Energia

Electricity generation from fossil gaseous fuels

REFERENCE	CENS-2026-39557
DATE OF ASSESSMENT	9 August 2026
DATE OF ISSUE	9 August 2026
CRITERIA BASIS	Delegated Acts as amended, in force July 2026
PREPARED BY	Censatim · censatim.com

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SUBJECT

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INFORMATION REVIEWED

- Business area description and dialogue responses provided by user. No financial figures calculated; alignment stated per criterion for client allocation.
- Matched EU Taxonomy activity: Electricity generation from fossil gaseous fuels (CCM 4.29).
- Applicable generic DNSH appendices referenced.
- Criterion requirement texts and evidence basis are reproduced in Annex A; the full question and answer record in Annex B.

SUMMARY OF ASSESSMENT

EU Taxonomy alignment

Not aligned

the Substantial Contribution criteria are not met

DIMENSION		ALIGNMENT	CONFIDENCE
Substantial Contribution - Climate Mitigation	TRANSITIONAL	Not aligned	High
Do No Significant Harm		Not aligned	High
Climate Adaptation		Not aligned	High
Water & Marine		Not aligned	High
Pollution Prevention		In-line	Moderate
Biodiversity		In-line	Moderate
Circular Economy		N/A	
Minimum Social Safeguards		In-line	Moderate

RATING SCALE ● Not aligned ● Partial ● In-line ● Undetermined

N/A is an applicability marker, not a rating: no applicable criterion exists for this activity under that objective. Confidence reflects the strength of the evidence provided for each finding: High = clearly evidenced; Moderate = reasonable with some gaps; Low = key evidence missing. DNSH is met only when every applicable objective is met. This is a transitional activity: its substantial contribution thresholds decline over time and alignment must avoid carbon lock-in.

ACTIVITY IDENTIFICATION

ACTIVITY	Electricity generation from fossil gaseous fuels
NACE CODE	D35.11, F42.22
ACTIVITY ID	CCM 4.29
ELIGIBILITY	Confirmed listed in the EU Taxonomy

ASSESSMENT OPINION

Scope of this assessment

This report assesses the **420 MW gas-fired combined cycle power plant in Lombardy** operated by Caesar Energia, under EU Taxonomy activity **CCM 4.29** (electricity generation from fossil gaseous fuels). Caesar Energia also operates onshore wind farms in Puglia and solar parks in Sicily; those generation activities are Taxonomy-eligible under separate CCM activities and are **not covered here**. A separate assessment is recommended for each of those activities.

Headline

The plant does not achieve substantial contribution under either available route, and two DNSH objectives are not aligned, meaning EU Taxonomy alignment is not achievable for this asset on current evidence.

Documentation reviewed

Censatim reviewed no documents for this assessment. Findings rest on 5 rounds of questioning, recorded in full in Annex B, taken at face value and in the spirit of accurate inputs and good faith. Documents requested during the assessment and not provided are listed under Information gaps.

Substantial Contribution to Climate Change Mitigation

ROUTE 1: LIFE-CYCLE EMISSIONS BELOW 100 G CO₂E/KWH

No life-cycle GHG figure has ever been calculated for the plant under any recognised methodology, no upstream supply-chain data is held, and no independent third-party verification of a life-cycle figure exists. Route 1 cannot be assessed and is not met. (based on A1, A2)

ROUTE 2: CONSTRUCTION PERMIT BY 31 DECEMBER 2030, WITH CUMULATIVE CONDITIONS

The permit was granted in October 2006, which falls inside the 31 December 2030 window. However, Route 2 imposes several cumulative conditions, all of which must be satisfied simultaneously.

Direct emissions intensity (270 g CO₂e/kWh or 20-year average of 550 kg CO₂e/kW). ETS-verified direct emissions for 2025 stand at 372 g CO₂/kWh, well above the 270 g CO₂e/kWh per-year limit. Whether the 20-year average cap of 550 kg CO₂e/kW could be met depends on a trajectory calculation across the full 20-year window, but no such trajectory exists and no reduction pathway is in place. On the data available, this pillar is not met. (based on A3, A5)

Replacement of a solid or liquid fossil fuel facility. The plant is a greenfield combined cycle unit, not a replacement for an existing coal or oil plant. This mandatory condition is not met. (based on A1, A4)

Comparative assessment against renewables, published with stakeholder consultation. No such assessment has been carried out or published. (based on A1)

Capacity constraint (not exceeding replaced facility by more than 15%). Inapplicable: no facility is being replaced.

Design for renewable/low-carbon gas use, with switch by 31 December 2035, approved by management. The plant has no hydrogen or biogas blending, no abatement project, and no management-approved plan to switch to low-carbon gases. (based on A4)

55% lifetime GHG reduction vs. replaced facility. Inapplicable: no facility is being replaced.

Coal phase-out commitment (where applicable). Italy uses coal for power generation; whether a compliant phase-out commitment exists in Italy's NECP is a factual matter of public record, but it is moot given the other failures.

Route 2 fails on multiple independent cumulative conditions: the 270 g threshold is exceeded, no solid/liquid fossil fuel facility is being replaced, no comparative renewable assessment has been published, and no management-approved low-carbon gas transition plan exists.

Neither route is met. Substantial contribution to climate change mitigation is NOT ALIGNED. (based on A3, A4, A5)

Do No Significant Harm

CLIMATE CHANGE ADAPTATION

No climate risk and vulnerability assessment has ever been carried out for the site, across any time horizon, and there is no plan to commission one. The 2022 drought event that caused actual output curtailment demonstrates that material physical climate hazards are present, yet no formal screening, materiality analysis, or adaptation plan exists. This objective is not met. (based on A7, A13)

SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES

The plant withdraws approximately 6 million m³ per year from a consortium-managed canal fed by a river system and discharges around 1.5 million m³ of blowdown to the same canal, within permit temperature and quality limits with no recorded exceedances. However, Caesar Energia has confirmed that no water management plan has ever been prepared for the site. The 2006 EIA addressed water impacts and ongoing monitoring stays within permit conditions, but the Appendix B requirement for a documented water use and protection management plan is a standalone obligation that the EIA does not discharge. The confirmed absence of this plan means this objective is not met. (based on A8, A9, A10)

TRANSITION TO A CIRCULAR ECONOMY

N/A

POLLUTION PREVENTION AND CONTROL

The plant operates under the Lombardy AIA integrated environmental permit, last renewed in 2019, with continuous stack monitoring for NO_x and CO. Three years of monitoring data show full compliance with no exceedances or enforcement actions. SO₂ and particulates are negligible for a gas-fired unit. As a large combustion plant, emissions must also be benchmarked against BAT-AEL ranges from the relevant BAT conclusions (large combustion plants); the permit compliance data supplied is consistent with this, and no cross-media effects have been identified or raised by the permitting authority. This objective is in line on the evidence provided, noting that the BAT-AEL benchmarking rests on attested permit compliance rather than an uploaded BAT comparison document. (based on A14)

PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS

The 2006 EIA included an ecological screening that found no habitats of conservation value on the industrial-zoned site. The nearest Natura 2000 site is approximately 7 km away along the river corridor, and no Appropriate Assessment has been triggered. Ongoing permit renewals, including the 2019 AIA, have raised no ecological concerns, and the site footprint is unchanged. The 2006 EIA is now nearly two decades old and no updated ecological baseline exists, which is a weakness; however, the site is unchanged industrial land, no expansion has occurred, and no authority has raised concerns in intervening permit cycles. On balance, the objective is in line at reduced confidence. (based on A10, A11, A15)

DNSH OVERALL

DNSH is NOT ALIGNED. Climate change adaptation and water are each individually not aligned, and both must be met for an overall DNSH finding. Pollution prevention and biodiversity are in line on the available evidence.

Minimum Social Safeguards (Article 18)

Human rights and labour. A board-approved code of conduct covers human rights and labour standards group-wide. The entire workforce is covered by the national electricity sector collective agreement, and no disputes or proceedings are active. In line. (based on A12)

Anti-corruption and bribery. An Italian Legislative Decree 231 compliance model is in place, with a dedicated supervisory body and a whistleblowing channel. No investigations or proceedings are active. In line. (based on A12)

Taxation. The group is tax-resident in Milan, filings are current, and a 2023 revenue agency audit concluded cleanly. In line. (based on A12)

Fair competition. An antitrust compliance policy with mandatory commercial-staff training is in place, and no proceedings are active. In line. (based on A12)

All four pillars are attested and in line. MSS is IN-LINE at moderate confidence, pending upload of the underlying policy documents. (based on A12)

Information gaps

HIGH IMPACT **Life-cycle GHG emissions calculation and third-party verification.** No life-cycle figure has been calculated under any recognised methodology, no upstream gas supply-chain data is held, and no independent verification exists; without this, Route 1 cannot be assessed and remains closed. This information was requested during the assessment.

HIGH IMPACT **Water use and protection management plan.** Caesar Energia confirmed no such plan has ever been prepared for the site; a documented plan tailored to the affected water body is a standalone Appendix B requirement that the 2006 EIA does not substitute. This information was requested during the assessment.

HIGH IMPACT **Climate risk and vulnerability assessment.** No CRVA has been carried out for any time horizon, and no plan to commission one is in place; the 2022 drought curtailment confirms material physical hazard exposure that remains unassessed. This information was requested during the assessment.

MATERIAL **BAT-AEL benchmarking documentation.** Permit compliance with the 2019 AIA is attested and consistent with large combustion plant BAT conclusions, but no comparative BAT-AEL document or analysis has been provided; uploading this would raise confidence on the pollution objective to high.



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METHODOLOGY

This assessment maps the entity's stated business areas to the economic activities defined under the EU Taxonomy (Regulation (EU) 2020/852) and its Delegated Acts. Each identified business area is assessed first for eligibility, then, where in scope, against the applicable Substantial Contribution and Do No Significant Harm criteria, with reference to the generic appendices where invoked. Alignment findings are expressed per business area and per environmental objective. Censatim does not calculate or report financial figures; the mapping is provided to enable the entity to allocate turnover, capital expenditure, and operating expenditure itself.

RATING SCALE

In-line

The criterion appears met on the evidence provided.

Partial

Overall conclusion only: the Substantial Contribution criteria are met, but DNSH and/or Minimum Social Safeguards fall short. Individual criteria and objectives are rated In-line, Not aligned, or Undetermined.

Not aligned

The criterion appears not to be met on the evidence provided, including where the dialogue establishes that a required assessment, document or process does not exist.

Undetermined

Insufficient evidence was provided to reach a view. A confirmed absence of a required element is rated Not aligned, not Undetermined.

N/A

No applicable criterion exists for this activity under the relevant objective. N/A expresses applicability, not a rating and not a confidence level.

The overall EU Taxonomy alignment verdict is computed directly from the three dimensions, with Substantial Contribution as the entry gate: In-line when all three dimensions are in line; Partial when Substantial Contribution is in line but DNSH and/or Minimum Social Safeguards are not aligned; Not aligned whenever Substantial Contribution is not aligned; Undetermined where the evidence provided does not support a conclusion.

CONFIDENCE LEVELS

HIGH

The finding is clearly evidenced by specific documents or data provided.

MODERATE

The finding is reasonably supported but some evidence remains outstanding.

LOW

Key evidence is missing; the finding rests substantially on unverified statements.

INFORMATION GAP PRIORITY

Gap priorities use a separate blue scale so they are never confused with the alignment ratings above.

High impact

Prevents a determination or alignment on a criterion until resolved.

Material

Materially affects a rating or the confidence attached to it.

Minor

A documentary improvement; does not change the current findings.

The Censatim team can advise on how identified gaps are typically closed and, where deeper remediation work is needed, can recommend specialist consultants suited to the particular gap. Contact consult@censatim.com quoting the report reference.

ASSUMPTIONS

- Information provided by the user is taken at face value and has not been independently verified or audited.
- Where required data was not provided, the relevant criterion is marked as undetermined rather than assumed to be met or unmet.
- The assessment reflects the EU Taxonomy Delegated Acts in force at the date of issue; subsequent amendments are not retrospectively applied.
- Qualitative criteria requiring specialist judgement may be flagged for expert review rather than concluded automatically.
- Each issued report is stored under its reference and can be retrieved as issued. Reports are AI-assisted: wording may vary if identical inputs were re-run; the criteria applied remain those stated under Criteria basis.

DISCLAIMER

This document is an AI-assisted analysis referenced against the EU Taxonomy Delegated Acts. It does not constitute professional regulatory advice, a formal audit opinion, legal advice, or a guarantee of regulatory compliance, and should not be the sole basis for regulatory disclosure, investor reporting, or financing decisions. All findings should be reviewed by a qualified EU Taxonomy practitioner before use; Censatim accepts no liability for decisions taken in reliance on this document. To discuss the findings or commission a practitioner-reviewed assessment, contact consult@censatim.com.



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The requirement texts below are reproduced verbatim from Censatim's criteria database (Delegated Acts as amended, in force July 2026), alongside the finding reached, its confidence, and the evidence basis for each dimension. Documented means the key facts came from uploaded evidence; User-stated means they rest on statements provided in the dialogue and reproduced in Annex B.

SUBSTANTIAL CONTRIBUTION

Not aligned

● High

USER-STATED

REQUIREMENT (VERBATIM)

1. The activity meets either of the following criteria: the life-cycle GHG emissions from the generation of electricity using fossil gaseous fuels are lower than 100 g CO₂e/kWh. Life-cycle GHG emissions are calculated based on project-specific data, where available, using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-1:2018. Quantified life-cycle GHG emissions are verified by an independent third party. Where facilities incorporate any form of abatement, including carbon capture or use of renewable or low-carbon gases, that abatement activity complies with the criteria set out in the relevant Section of this Annex, where applicable. Where the CO₂ that would otherwise be emitted from the electricity generation process is captured for the purpose of underground storage, the CO₂ is transported and stored underground, in accordance with the technical screening criteria set out in Sections 5.11 and 5.12 of this Annex. facilities for which the construction permit is granted by 31 December 2030 comply with all of the following: direct GHG emissions of the activity are lower than 270g CO₂e/kWh of the output energy, or annual direct GHG emissions of the activity do not exceed an average of 550kgCO₂e/kW of the facility's capacity over 20 years; the power to be replaced cannot be generated from renewable energy sources, based on a comparative assessment with the most cost-effective and technically feasible renewable alternative for the same capacity identified; the result of this comparative assessment is published and is subject to a stakeholder consultation; the activity replaces an existing high emitting electricity generation activity that uses solid or liquid fossil fuels; the newly installed production capacity does not exceed the capacity of the replaced facility by more than 15%; the facility is designed and constructed to use renewable and/or low-carbon gaseous fuels and the switch to full use of renewable and/or low-carbon gaseous fuels takes place by 31 December 2035, with a commitment and verifiable plan approved by the management body of the undertaking; the replacement leads to a reduction in emissions of at least 55% GHG over the lifetime of the newly installed production capacity; where the activity takes place on the territory of a Member State in which coal is used for energy generation, that Member State has committed to phase-out the use of energy generation from coal and has reported this in its integrated national energy and climate plan referred to in Article 3 of Regulation (EU) 2018/1999 of the European Parliament and of the Council(230)Regulation (eu) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the governance of the energy union and climate action, amending regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1). or in another instrument. Compliance with the criteria referred to in point 1(b) is verified by an independent third party. The independent third-party verifier has the necessary resources and expertise to perform such verification. The independent third party verifier does not have any conflict of interest with the owner or the funder, and is not involved in the development or operation of the activity. The independent third party verifier carries out diligently the verification of compliance with the technical screening criteria. In particular, every year the independent third party publishes and transmits to the Commission a report: certifying the level of direct GHG emissions referred to in point 1(b)(i); where applicable, assessing whether annual direct GHG emissions of the activity are on a credible trajectory to comply with the average threshold over 20 years referred to in point 1(b)(i); assessing whether the activity is on a credible trajectory to comply with point 1(b)(v). When undertaking the assessment referred to in point 1(b), the independent third party verifier takes into account in particular the planned annual direct GHG emissions for each year of the trajectory, realised annual direct GHG emissions, planned and realised operating hours, and planned and realised use of renewable or low carbon gases. On the basis of the reports transmitted to it, the Commission may address an opinion to the relevant operators. The Commission shall take those reports into account when performing the review referred to in Article 19(5) of Regulation (EU) 2020/852.

2. The activity meets either of the following criteria: at construction, measurement equipment for monitoring of physical emissions, such as those from methane leakage, is installed or a leak detection and repair programme is introduced; at operation, physical measurement of emissions are reported and leak is eliminated.

3. Where the activity blends fossil gaseous fuels with gaseous or liquid biofuels, the agricultural biomass used for the production of the biofuels complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001 while forest biomass complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive.

DO NO SIGNIFICANT HARM

DNSH ON WATER

Not aligned ● High

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix B to this Annex.

DNSH ON BIODIVERSITY

In-line ● Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix D to this Annex.

DNSH ON CIRCULAR ECONOMY

N/A · NO APPLICABLE CRITERION

REQUIREMENT (VERBATIM)

N/A

DNSH ON CLIMATE ADAPTATION

Not aligned ● High

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix A to this Annex.

DNSH ON POLLUTION PREVENTION

In-line ● Moderate

REQUIREMENT (VERBATIM)

The activity complies with the criteria set out in Appendix C to this Annex. Emissions are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges set out in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for large combustion plants. No significant cross-media effects occur. For combustion plants with thermal input greater than 1 MW but below the thresholds for the BAT conclusions for large combustion plants to apply, emissions are below the emission limit values set out in Annex II, part 2, to Directive (EU) 2015/2193.

MINIMUM SOCIAL SAFEGUARDS

In-line ● Moderate

USER-STATED

REQUIREMENT (ARTICLE 18, TAXONOMY REGULATION)

Article 18, Regulation (EU) 2020/852: the activity is carried out in alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the ILO core conventions and the International Bill of Human Rights. In assessment practice this spans four pillars: human rights and labour, anti-corruption, taxation, and fair competition.



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Verbatim record of the dialogue on which this assessment is based. Questions were generated by Censatim; answers were provided by the user and are reproduced unedited. The findings in this report derive from these answers and from any documents listed under Information reviewed.

SUBJECT DESCRIPTION (AS PROVIDED)

Caesar Energia is an Italian energy group headquartered in Milan with around 5,200 employees. We operate onshore wind farms in Puglia, solar parks in Sicily, and a 420 MW gas-fired combined cycle power plant in Lombardy, commissioned in 2009, running on natural gas. The business area I want to assess is the gas-fired plant, which sells electricity to the market and provides flexibility services to the grid.

QUESTIONS AND ANSWERS

Q1 What are the life-cycle GHG emissions from electricity generation at your gas plant, measured in g CO₂e/kWh? Please provide the figure and name the calculation method used (Recommendation 2013/179/EU, ISO 14067:2018, ISO 14064-1:2018, or other). If not yet calculated, what project-specific operational and upstream data do you have available?

A1 We have never calculated a life-cycle emissions figure for the plant, under any of those methods or otherwise. What we hold is the operational side: continuous stack monitoring data verified annually for the EU ETS, metered fuel input, and gas purchase volumes from our supplier. We have no data on upstream emissions from the gas supply chain and no project-specific study covering it.

Q2 Has an independent third party verified these life-cycle emissions figures? If yes, please name the verifier and the verification date.

A2 No. The only external verification we have is the annual ETS verification of the stack emissions. No life-cycle figure exists, so nothing of that kind has ever been verified.

Q3 What are the direct (Scope 1) operational GHG emissions from the plant, expressed as g CO₂e/kWh of electrical output? Please provide the most recent annual figure and the year it covers.

A3 372 g CO₂ per kWh of net electrical output for calendar year 2025, calculated from the ETS-verified stack emissions divided by net generation for the year.

Q4 Does the plant incorporate any form of abatement, carbon capture, use of renewable gases, or blending with low-carbon fuels? If yes, please describe what is abated and in what proportion.

A4 None. The plant runs on 100 percent pipeline natural gas. There is no carbon capture, no hydrogen or biogas blending, and no abatement project planned or funded.

Q5 When was the construction permit for the 420 MW gas plant granted? Please provide the date.

A5 The construction permit was granted in October 2006.

Q6 The plant was commissioned in 2009. Has it undergone any major reconstruction, modernization, or permit renewal since commissioning that involved a new construction permit application?

A6 No. The plant has had routine maintenance and turbine overhauls but no major reconstruction or modernisation, and no new construction permit application since the original one. The only permit activity since commissioning was the renewal of the environmental operating authorisation in 2019, which is an operating permit, not a construction permit.

Q7 Has a climate risk and vulnerability assessment been carried out for the plant site, identifying physical climate hazards (flooding, drought, heat stress, storms) that could affect operations in the next 10, 30 years?

A7 No. A climate risk and vulnerability assessment has never been carried out for the site, not for any time horizon. We have no forward-looking analysis of flooding, drought, heat stress or storms, and no plan to commission one at present. The only related fact I can offer is operational experience: output was restricted on several days during the 2022 drought because of cooling water limits.

Q8 What is the primary source of cooling water for the plant (river, lake, sea, recirculating system, or other), and what is the typical annual water withdrawal volume in cubic metres or percentage of available water in the catchment?

A8 Cooling water is withdrawn from a canal managed by a local consortium, fed from the river system. Typical annual withdrawal is around 6 million cubic metres. I do not know what percentage of the catchment that represents. The consortium can restrict abstraction in dry periods, which happened in 2022, and I should say plainly that the plant has no water management plan; nothing of that kind has ever been prepared for the site.

Q9 Does the plant discharge water back to surface water bodies? If yes, what is the typical discharge volume and temperature, and what environmental quality standards or permits govern that discharge?

A9 Yes, cooling tower blowdown is returned to the same canal, roughly 1.5 million cubic metres a year. The environmental operating permit sets a discharge temperature limit of 35 degrees and quality limits, discharge is monitored continuously, and we have had no exceedances or enforcement actions.

Q10 Has an environmental impact assessment or equivalent permitting study identified any potential impacts on water quality, aquatic ecosystems, or biodiversity from the plant's operations (thermal discharge, chemical discharge, noise, or land use)?

A10 The original environmental impact assessment from 2006 covered thermal and chemical discharge, noise and land use, and concluded no significant impacts subject to the permit conditions we still operate under. Ongoing monitoring under the permit has stayed within limits since commissioning.

Q11 What is the distance from the plant to the nearest protected natural area or biodiversity designation (Natura 2000, wetland, nature reserve, or equivalent), and has any ecological baseline or impact assessment been carried out for the site?

A11 The nearest Natura 2000 site is about 7 kilometres away along the river corridor. The 2006 EIA included an ecological screening which found no habitats of conservation value on the site, which is zoned industrial land. No further ecological assessment has been done since, as the footprint has not changed.

Q12 Does the plant have a board-level or senior management policy, or documented governance arrangements, that address human rights and labour standards, anti-corruption and bribery, tax compliance, and fair competition in its operations and supply chain?

A12 Yes. The group has a board-approved code of conduct covering human rights and labour standards, an anti-bribery and corruption policy under our Italian legislative decree 231 compliance model with a supervisory body and whistleblowing channel, a tax policy with the group tax resident in Milan and filings up to date after a clean revenue agency audit in 2023, and an antitrust compliance policy with mandatory training for commercial staff. These apply group-wide including this plant and its procurement. Essentially the whole workforce is covered by the national electricity sector collective agreement, and there are no ongoing disputes, investigations or proceedings in any of these areas.

Q13 Does the plant currently face any material physical constraint on cooling water availability that could reduce or halt output? You mentioned 2022 drought restrictions. Does the operator (yourself or the consortium) have plans to invest in water efficiency, alternative cooling, or supply-chain resilience to address this risk?

A13 Yes, the constraint is real. In prolonged dry periods the consortium can restrict abstraction from the canal, and in summer 2022 the plant had to reduce output on several days for that reason. On plans: no. There is no funded project or approved investment in water efficiency, alternative cooling or supply resilience, either by us or by the consortium as far as we are aware. It was looked at internally after 2022 but nothing was taken forward, and it is not in the current investment plan.

Q14 Does the plant hold an environmental operating permit that sets limits on air emissions (NOx, SO2, particulates, or other pollutants)? If yes, please name the permit authority, the year it was last renewed or reissued, and confirm whether continuous monitoring data shows compliance with those limits over the last three years.

A14 Yes. The plant operates under an integrated environmental authorisation, the Italian AIA permit, issued by the Lombardy regional authority and last renewed in 2019. It sets limits on NOx and CO, with SO2 and particulates negligible for a gas-fired unit. Continuous emissions monitoring runs on the stack and the last three years of data show full compliance, with results reported to the regional environment agency and no exceedances or enforcement actions.

Q15 You mentioned the 2006 EIA found no habitats of conservation value on the plant site itself. Has any baseline ecological survey or habitat classification been carried out on or immediately adjacent to the plant footprint since commissioning, or is the 2006 finding still the only record on file?

A15 The 2006 finding is the only record on file. No baseline survey or habitat classification has been carried out on or adjacent to the footprint since commissioning. The site itself is unchanged industrial land, there has been no expansion or new land take, and no concerns have been raised by the authorities in the permit renewals.

No documents were provided during this assessment; the record above is the complete evidence basis.