SUSTAINABILITY REPORT 2025

TURN ON THE FUTURE

city green light

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Message to stakeholders

Dear Stakeholders,

for City Green Light Group, 2025 was a year of industrial consolidation and strengthening of our role as a partner in the country energy, digital and urban transition. Against a backdrop of ongoing macroeconomic and energy challenges, we continued to invest with a long-term vision, reaffirming our belief that sustainability is a key driver for generating lasting value for the people, communities and territories in which we operate.

The past year also marks the Group's first financial year in which it reported on a consolidated basis. This section reflects the evolution of our corporate and operational scope and enables us to provide a more comprehensive overview of City Green Light Group's activities, impacts and responsibilities across the entire value chain.

Over the course of the year, we strengthened our position in the fields of public lighting, smart cities and energy efficiency, while continuing to manage complex infrastructure projects and develop integrated solutions to support Public Administrations and private customers. The Group ended 2025 with a revenue of Euro 202.8 million, an EBITDA of Euro 68.2 million and an order book of Euro 1,011 million, thus confirming the strength of its growth trajectory.

A significant milestone in this evolution is the arrival of Igneo Infrastructure Partners as the new controlling shareholder. The launch of this new industrial phase strengthens the Group's financial and strategic sound position and reinforces a vision focused on creating sustainable long-term value, based on responsible investment, proactive asset management and the progressive integration of ESG principles into decision-making processes.

Environmental sustainability remains at the core of our strategy. Through investments in energy efficiency, smart lighting, the modernisation of systems and infrastructure, and the digitalisation of urban services, we support reduction of energy consumption and climate-changing emissions, in accordance with the calculation methods set out in the environmental sections of this Report. The measures implemented between 2011 and 2025 generated estimated annual savings of approximately 419,000 MWh and 125,000 tonnes of CO_2 avoided, calculated in comparison with the baseline scenarios adopted for measuring energy efficiency measures. In 2025 alone, investment in energy efficiency processes totalled Euro 22.4 million.

Our local presence is one of the key drivers of value creation. As at 31 December 2025, the Group operates in 18 regions, manages 997,498 lighting points and serves a catchment area of approximately 6 million inhabitants. Every initiative stems from dialogue with local authorities and from listening to the needs of territories, with the aim of helping create more efficient, safe, resilient and inclusive cities.

At the same time, we expanded and consolidated our expertise in the fields of plant engineering, technical construction, energy efficiency, smart mobility and the digital management of urban services. This approach now enables the Group to operate as an increasingly comprehensive industrial partner, capable of supporting public and private customers throughout the entire infrastructure lifecycle: from design to construction, and from management to the continuous monitoring of performance.
Digitalisation continues to represent one of the main drivers of our development. Through the For-

Think platform and advanced monitoring, IoT and video analytics solutions, we collect, integrate and analyse data from urban services and plants, providing local authorities with data-driven tools for more effective planning and the continuous improvement of citizens' quality of life.

On a social level, we keep investing in the people who work at City Green Light Group, the real driving force behind our growth. We strengthened our training, health and safety programmes and promoted policies on inclusion, gender equality and organisational well-being, in the belief that a Group's sustainable growth depends on recognising the value of every individual and engaging the younger generations.

The Group's commitment to sustainability is underpinned by a system of governance and control involving the Board of Directors, the Sustainability Committee, the relevant corporate functions and the management systems adopted by the parent company and progressively rolled out across the Group. In 2025, we also updated our materiality analysis, taking into account changes to the scope of consolidation, the value chain, as well as the actual and potential impacts on the economy, the environment and people.

Looking to the future, we will continue to reinforce City Green Light Group's role in the energy and digital transition of cities, developing increasingly integrated, innovative and inclusive solutions. We will also continue to update the Sustainability Plan, which will be finalised in line with the new Business Plan, which is due to be approved by the end of the year. This initiative will aim to further strengthen the integration between industrial strategy, ESG priorities and value creation for stakeholders.

With this vision we look ahead to creating value for the communities we serve, being aware that every project delivered is a concrete step towards more sustainable, efficient territories focused on people.

Alessandro Visentin
CEO/General Manager

Highlights

202.8 Euro million of Revenue

68.2 Euro million of EBITDA

78% Distributed economic value

1,011 Euro million of Order book as at 31 December 2025

0 Cases of corruption

3+++ Legality rating

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

18 Regions served

6 Million inhabitants served

Cultural and social initiatives throughout the country +25

13 Quality certifications obtained

125,000 tCO_2 per year saved thanks to energy efficiency investments in the period 2011-2025

419,000 MWh per year saved thanks to energy efficiency investments in the period 2011-2025

997,498 Lighting points under management

78% Energy from renewable sources to power the municipalities under management

MWh of energy generated from renewable sources **771**

22.4 Euro million of investments in 2025 in energy-efficiency processes

7 AFFORDABLE AND CLEAN ENERGY

3 GOOD HEALTH AND WELL-BEING

383 Group employees

97% Permanent contracts

15% Incoming turnover rate in 2025

26% Women in the company's workforce

37% New hires under 30 years of age

14,694 Training hours provided

Injury rate **1.5%**

Awards and accolades

During 2025, City Green Light S.p.A. received a number of awards in relation to specific projects and areas of activity, including urban innovation, sustainability, legality, economic and financial performance, and inclusion.

These awards are included for information purposes and highlight specific initiatives, projects and controls developed by the Company and the Group during the financial year.

Awards and accolades received in 2025

Accolade	Scope	Project / Feature highlighted	Added value for the Group and its stakeholders
Legality and Profit Award	Ethics, legality and financial soundness	City Green Light S.p.A. was included amongst the Italian companies recognised for their ability to combine compliance with regulations, integrity and financial soundness.	It strengthens the Group's position as a reliable and responsible operator, emphasising its commitment to legality, transparency, compliance and good governance.
Sustainability Award 2025	ESG and sustainability	Recognised as one of Italy's leading examples of sustainability for the integration of environmental, social and governance factors into corporate strategies and the projects developed.	It reaffirms the Group's commitment to integrating sustainability into its business model and highlights the Group's contribution to energy transition, emissions reduction and the creation of shared value.
SMAU Innovation Award 2025	Innovation, digital technology and citizen engagement	"Insieme verso Parma Climate Neutral 2030" (Together Towards Parma Climate Neutral 2030), a project developed as part of the Municipality of Parma's journey towards climate neutrality, with the active involvement of citizens through digital tools and awareness-raising initiatives.	It recognises the Group's ability to integrate technology, sustainability and civic engagement, promoting sustainable behaviour and strengthening dialogue between Public Administration, citizens and the territory.
Herconomy Award	Gender equality, inclusion and enhancement of people	Recognition of City Green Light S.p.A.'s commitment to gender equality, diversity & inclusion, the development of skills and support for an inclusive culture, in line with the UNI/PdR 125:2022 and ISO 30415:2021 certifications.	It promotes the Group's initiatives aimed at fostering an inclusive, fair and people-growth centred working environment, while strengthening its focus on social issues and the responsible management of human capital.
Industria Felix Award	Economic-financial performance and business growth	An award given to Italian companies with sound economic-financial results and a positive growth trajectory.	It highlights the Group's ability to combine growth, sound management, technological innovation and sustainability, thereby strengthening the confidence of financial stakeholders, customers and industrial partners.

These awards provide further confirmation of the Group's development strategy, which is focused on creating value through technological innovation, energy efficiency, integrity, inclusion and a commitment to the territories.

Methodological note to the report

This Sustainability Report sets out economic, environmental and social information relating to City Green Light Group (hereinafter also referred to as the "Group"), including issues concerning people, respect for human rights and the fight against corruption, with a view to providing an understanding of the Group's activities, performance, results and impacts.

From the 2025 financial year onwards, City Green Light Group's Sustainability Report is prepared on a consolidated basis and includes all companies within the reporting scope as at the reference date, in line with the scope of the Group's Consolidated Financial Statements. Therefore, 2025 marks the first financial year in which reporting is carried out on a consolidated basis, moving away from the stand-alone approach adopted in previous financial years.

Environmental, social and economic data and information thus include the following entities: **City Green Light S.p.A.**, Italy's leading independent operator in the sectors of public lighting, smart city services and energy efficiency; **Lumagest S.r.l.**, specialising in the operational management and maintenance of public lighting systems; **Energy Green S.r.l.**, providing consultancy on energy resource management, renewable energy and energy efficiency; **Efferre Energia S.r.l.**, active in the development of renewable energy plants and energy efficiency services; **Palermo in Luce S.c.a.r.l.**, dedicated to the management and refurbishment of public lighting systems; **CityMetrics S.r.l.**, specialising in the development of IoT platforms, monitoring and data-driven analysis for smart cities and urban efficiency; **Smart Parking System S.r.l.**, active in digital parking management and smart parking and intelligent mobility solutions; **City Green Light RSM S.r.l.**, operating in the field of smart lighting and energy services; **Domodossola Parking S.r.l.**, dedicated to car park management and urban mobility services.

The data within the document refer to the 2025 reporting year (1 January 2025 to 31 December 2025).

As specified in GRI 2-1 and 2-4, where necessary – for example, in the event of changes to the length of the reporting period, the measurement methods or definitions used, as well as in case of disposals, mergers or acquisitions – the organisation should present current disclosures alongside recalculated and restated data for previous periods, in order to ensure comparability over time.

With regard to the extension of the reporting scope, the figures for the 2024 financial year solely relating to City Green Light S.p.A. (hereinafter also referred to as "the Company") were not restated. Consequently, they are not fully comparable with those for the 2025 financial year. Comparisons between the 2025 and 2024 figures are therefore presented and interpreted taking this difference in the scope of consolidation into account. Any significant changes are also influenced by the inclusion of City Green Light S.p.A.'s subsidiaries within the reporting scope. In order to report information in a consistent manner and enable an analysis of impacts over time, the Group, in accordance with the "comparability" requirement set out in GRI 1, also included 2023 comparative figures relating to City Green Light S.p.A. for all information, unless otherwise stated.

With regard to changes in methodology, during 2025 the scoping of workers who are not employees (GRI 2-8) was updated following a more detailed analysis of the level of control exercised igneo Infrastructure Partners

city green light

lumagest

Operational management and maintenance of public lighting systems

Energy Green S.r.l.

Consultancy on energy resource management, renewable energy and energy efficiency

Efferre Energia S.r.l.

Development of renewable energy plants and energy efficiency services

Palermo in Luce S.c.a.r.l.

Management and refurbishment of public lighting systems

CITYMETRICS

Development of IoT platforms, monitoring and data-driven analysis for smart cities and urban efficiency

smartparking SYSTEMS

CITY GREEN LIGHT GROUP

Digital parking management and smart parking and intelligent mobility solutions

City Green Light RSM S.r.l.

Smart lighting and energy services

Domodossola Parking S.r.l.

Management of car parks and urban transport services by the organisation over the various types of workers potentially falling within the definition of "non-employee". It should be noted that the figure for the 2024 financial year was restated for the total number of non-employees (GRI 2-8 Workers who are not employees), whilst the figure for accidents involving non-employees (GRI 403-9 – Accidents at work) was not restated due to the unavailability of data. For further details, please refer to the sections "Our People" and "Health and Safety of workers", respectively.

The process of preparing the Sustainability Report provided for the involvement of the corporate departments responsible for the data and information reported. The information collected is subject to internal checks and is subsequently submitted to the Sustainability Committee for review.

The Sustainability Report is submitted to the Sustainability Committee for review. The latter may make comments and proposals regarding the content and structure of the document, after which it is submitted to the Board of Directors (BoD) for final approval. The Board of Directors annually approves the Sustainability Report, including material topics and the Group's impact on the economy, the environment and people.

This version of the Sustainability Report was approved by the Board of Directors of City Green Light S.p.A. on July 8, 2026.

The Sustainability Report was drawn up in accordance with the Sustainability Reporting Standards published by the Global Reporting Initiative (GRI) (hereinafter also referred to as "GRI Standards"). The section entitled "GRI content index" lists the indicators reported, specifying their location within the document and noting any omissions.
The preparation of this Sustainability Report in accordance with the GRI Standards implies the illustration of performance according to:

- The set of "Universal standards", which includes: reporting requirements and principles (GRI 1: Foundation 2021), the 30 disclosures under "General standards" (GRI 2: General disclosures 2021) and the methodology for identifying and managing material topics (disclosures required by GRI 3: Material topics 2021);

- The individual disclosures of the "Thematic standards" (related to economic, governance, social and environmental topics) correlated to the highly relevant City Green Light Group material topics, selected from the 85 overall disclosures included in the 31 Specific standards by virtue of this correlation and in order to best represent the organisation's main impacts.

GRI 1 Foundation 2021, in particular, defines the general principles of sustainability reporting (so-called Reporting principles): accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

The aspects reported within the document were identified on the basis of the materiality analysis process, as detailed in paragraph"Materiality analysis", aimed at identifying the main economic, governance, social and environmental topics (so-called "material topics") related to the activities by City Green Light Group and to prioritise them in view of their associated impacts.

The reported data relate primarily to the operational activities directly controlled by the Group.

Any extensions to the value chain or to third parties (such as contractors or suppliers) are explicitly indicated in the individual sections.

The Group voluntarily seeks external assurance on its sustainability reporting in order to enhance the reliability and verifiability of the information reported. The assurance engagement is defined in consultation with the relevant departments and submitted to the corporate bodies responsible for approving the Sustainability Report. For the 2025 financial year, the financial statements were subject to a limited review by PricewaterhouseCoopers Business Services S.r.l. in accordance with ISAE 3000 (Revised).

For further information, please contact the Company at info@citygreenlight.com.

01

City Green Light: The business model

This chapter describes City Green Light Group's profile, its business model, its main areas of activity, its value chain, its ownership structure, the Group's evolution and its presence in the territories it serves. In 2025, the business model reflects the expansion of the scope of consolidation and the strengthening of the Group's role as an industrial partner for the energy, digital and urban transitions, through integrated solutions in public lighting, energy efficiency, smart cities, sustainable mobility and intelligent infrastructure management.

About us

City Green Light Group is Italy's leading independent operator in the public lighting, smart city services and energy efficiency sectors. The Group operates as an Energy Service Company (E.S. Co.) and as an industrial partner capable of managing complex infrastructure projects, primarily supporting public bodies and large private organisations in their energy and digital transitions.

The Group's core business focuses on the development of integrated solutions for energy efficiency, urban regeneration and smart city management. Using advanced systems for monitoring, controlling and analysing energy consumption, City Green Light Group implements technological and digital solutions designed to optimise the use of resources, reduce environmental impact and improve safety and quality of life in urban areas.

The Group's main business lines relating to its own operations include:

Public & Smart Lighting

Management, refurbishment and maintenance of public, urban and monument lighting, traffic light systems, smart road infrastructure, CCTV and digital services for smart cities.

Buildings & Efficiency

Energy efficiency and integrated management of public and private real estate assets, smart building, facility management, technological systems and integration of renewable energy sources.

Smart Cities & Sustainable Mobility

Smart parking systems, charging infrastructure for electric vehicles, sustainable mobility services and digital solutions for urban mobility management.

City Green Light Group's value chain spans the entire life cycle of the services it offers and comprises:

City Green Light Group's value chain

Phase	Description	Stakeholders Involved
Upstream activities (supply and partners)	Procurement of energy, materials, technologies and digital infrastructure; specialist services, design and manufacturing carried out by qualified suppliers, partners and subcontractors.	Suppliers, Subcontractors
Core business	Design, implementation, management and maintenance of integrated solutions for street lighting, energy efficiency, smart cities, sustainable mobility, smart parking, IoT systems and building management.	Our people
Downstream activities (delivery and relations)	Provision of services to Public Administrations, local authorities, public and private customers, local communities and end users in the territories served.	Public Administrations, Customers, Communities

For further details, please refer to the following sections: "The territory we serve" and "Responsible procurement".

Our Mission

From innovation to a sustainable future
We support cities and businesses in their sustainable development, offering solutions that improve people's quality of life and care for the environment. We promote the efficient use of energy and contribute to the creation of increasingly innovative urban centres and companies oriented towards collective well-being.

Ownership structure

City Green Light S.p.A. is a subsidiary of Igneo Infrastructure Partners, a global manager specialised in infrastructure, which invests in high-quality, mature and mid-market infrastructure companies in the renewable energy, digital infrastructure, waste management, water services, transport and logistics sectors across Europe, the United Kingdom, Australia, New Zealand and North America.

Igneo has been an active investor in the infrastructure sector since 1994 and has consistently pursued an investment strategy that enables it to work closely with the companies in its portfolio and with other stakeholders, with a view to creating sustainable long-term value through proactive asset management, with a focus on innovation and responsible investment.

Our history

2017

Establishment of City Green Light

Establishment of the company as an autonomous business from incorporation of the public lighting and Gallerie Lombardia business units of a historical facility management company from Vicenza.

2018

Arrival of the first investors

Acquisition of a stake in the company by FIEE SGR and the pan-European Marguerite II fund.
Launch of a strategy for growth and consolidation in the public lighting market.

2019

National expansion

Award of four lots under the Servizio Luce 4 Consip Agreement.
Launch of major third-party financing agreements with various Italian municipalities.

2019-2023

Growth in the customer portfolio

Expansion of operations across the whole country.
Launch of energy-efficiency refurbishment projects and plant management in cities such as Lecce, Pisa, Parma, Avellino, Viterbo, Varese and Domodossola.
Joined the FBF Group (2023).

2024

Smart cities and renewable energy

Acquisition of strategic companies:

Termotecnica Sebina
Smart Parking Systems
City Metrics
Energy Green
Efferre Energia

Development of integrated solutions for smart cities, remote control and energy management.

Innovation and sustainability

Introduction of smart solutions for energy monitoring and remote management of systems.
Implementation of Video Analytics and AI technologies.
Strengthening of circular economy policies and the management of WEEE.

2025

Establishment of Construction Solutions

Establishment of the business unit specialising in construction, technical installations and energy efficiency.
Strengthening of the role as an integral partner for energy transition.

New industrial phase

Acquisition by Igneo Infrastructure Partners of 100% of the company.
Start of a new phase of international and infrastructure growth.

The story continues

The territory we serve

City Green Light Group operates extensively across the country, offering integrated services in energy efficiency, technological innovation and urban management for the benefit of residents, Public Administrations and local communities. As at 31 December 2025, the Group manages around 997,498 lighting points in more than 350 municipalities, serving approximately 6 million inhabitants and confirming its position as the leading private operator in the Italian public-lighting sector.

In recent years, the Group has gradually expanded its scope of activity, extending its operations to include the sectors of energy efficiency in buildings, construction and facility management. This development was possible thanks to the acquisition of specialist expertise and the signing of the first contracts in the Buildings sector. Today, the Group can support local governments as a strategic partner in the sustainable refurbishment of schools, public offices, sports facilities, and healthcare structures, offering solutions for integrated property management, energy consumption monitoring, as well as improved comfort and safety.

At the same time, in order to support sustainable urban mobility, City Green Light Group developed innovative systems for smart parking management. By introducing smart technologies for managing parking lots, automating payments and optimising the use of public spaces, the Group works with municipal authorities to make urban mobility more efficient and accessible.

Projects of excellence at UNESCO sites: technology and culture for local regions

In light of the experience gained over the years, and also through the initiatives carried out in 2024 to promote significant UNESCO sites – including Sassi di Matera, Portici di Bologna, Basilica Palladiana and Palazzo Chiericati in Vicenza, the historic centre of Genoa, the Cathedral and Baptistery of Parma, Castello Ursino in Catania and the historic centre of Modica – City Green Light's commitment to the protection and enhancement of the country historical and artistic heritage continued and was further consolidated in 2025.

Building on this approach, the Group carried out a new series of architectural and urban lighting projects, the most significant of which are those in the historic centres of Brindisi and Arnesano, in the heart of Salento, at the Parco Ducale in Parma and the National Archaeological Museum in Reggio Calabria, as well as other projects across the country.

These projects represent a best-practice model of integration between technological innovation, energy efficiency and aesthetic enhancement. As a matter of fact, the use of state-of-the-art LED solutions and intelligent control systems enables significant energy savings compared with traditional systems, whilst also helping reduce CO_2 emissions and light pollution.

Each project was developed in close cooperation with local authorities and superintendence bodies, in full respect of the historical, cultural and architectural value of the sites involved. The lighting design solutions adopted ensure high standards of uniformity and visual comfort, highlighting architectural details and offering a new night perspective on the spaces, thereby promoting the safe, sustainable and inclusive enjoyment of heritage assets.

Creating a shared value

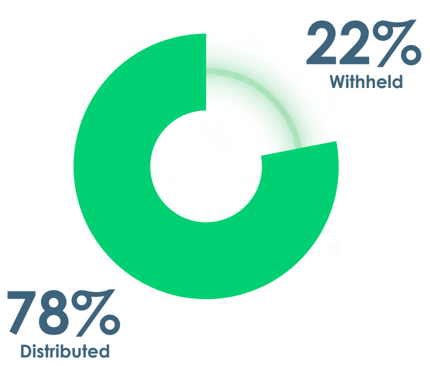
The economic value generated represents the wealth produced by City Green Light Group, whilst the economic value distributed measures the Group's economic impact and serves as an indicator of its commitment to all stakeholders.

In 2025, the economic value generated amounted to Euro 176.3 million, compared with Euro 150.7 million in 2024 (this figure relates solely to City Green Light S.p.A.). Of this value, Euro 159.5 million was distributed to the different Group's stakeholders.

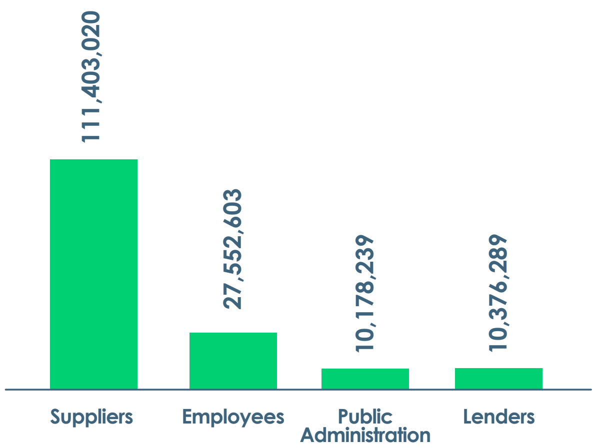
In particular, the largest share went to suppliers (70%) for the purchase of raw materials and services; this was followed by employees (17%), in the form of wages and salaries, social security charges, provisions for severance indemnity pay and other personnel costs; the Public Administration (6%) through the payment of taxes and duties; and finally, Lenders (7%), in the form of interest and other financial charges.

GRI 201-1 Direct economic value generated and distributed

Breakdown of the economic value generated in 2025



Breakdown of the distributed economic value - Euro



02

Sustainability and social responsibility

This chapter describes City Green Light Group's approach to sustainability, its key commitments, its management and control systems, its Sustainability Plan, the stakeholder identification process and the materiality analysis, in line with the reporting principles of GRI Standards.

Sustainability policies and commitments

For City Green Light Group, sustainable development is a key strategic driver that guides investment and growth decisions across all the businesses it manages. This approach requires constant attention to the quality of the services provided, to the economic, environmental and social impacts generated by the activities carried out, and to the ongoing dialogue with relevant stakeholders as well as with the communities and territories served.

Environmental sustainability is a key driver of the Group's innovation and is structured along two converging strands:

- Continuously improving the energy efficiency of the solutions provided;
- Contributing to the energy transition through increasingly smart, digital and interconnected technologies.

Commitments regarding responsible business conduct are set out in the key documents adopted by City Green Light S.p.A. and, where applicable, are progressively promoted or referred to at Group level, including the Code of Ethics, the Corporate Policy, the Social Responsibility Policy, and the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001, the Anti-Corruption Policy and the relevant company procedures.

These commitments are based, amongst other things, on the fundamental Conventions of the International Labour Organisation, the International Charter of Human Rights and the other international standards referred to in corporate policies. In accordance with the provisions of the respective documents, they apply to the Group's activities and to its relations with employees, contractors, suppliers, consultants, business partners and other relevant stakeholders.

The Code of Ethics adopted by City Green Light S.p.A. applies to the top management, Statutory Auditors, department heads, employees, suppliers, consultants, and anyone else who for any reason establishes a relationship of collaboration with the Company. These principles are also promoted, where applicable, in dealings with Group companies and relevant stakeholders.

Policies and reference documents are communicated via the available corporate channels, including the website, onboarding, training activities, documentation relating to the Integrated Management System, contractual clauses, as well as supplier qualification and management tools.

Integrated Management System and adopted standards

City Green Light S.p.A. implemented an Integrated Management System aimed at the continuous improvement of the company performance and the monitoring of key areas of sustainability. At Group level, City Green Light S.p.A. promotes the gradual alignment of its subsidiaries with the principles, procedures and controls of the Management System, in accordance with the applicable corporate scopes and as shown in the table below.

The Integrated Management System supports the Company and, where applicable, the Group companies in ensuring safe and healthy working conditions, high quality standards in the services provided, the reduction of environmental impacts, the improvement of energy performance, the protection of human rights and labour, as well as relationships with customers, suppliers, partners and institutional stakeholders that are characterised by collaboration, legality and transparency.

The system of standards, certifications and controls adopted by the Group companies, with specific reference to the applicable corporate scopes, is summarised in the table below.

Standards, certifications and safeguards adopted by the Group companies

Standard	City Green Light	Smart Parking	Lumagest
Regulation (EU) 2015/2067	X		
ISO 50001	X		X
ESCO - 11352	X		X
ISO 14001	X		X
ISO 9001	X	X	X
ISO 45001	X		X
ISO 27001 (27017 - 27018)	X	X	
ISO 37001	X		
SA8000	X		
UNI PdR 125	X		
ISO 30415	X		
ISO 1090	X		
ISO 3834	X		

In the area of anti-corruption, City Green Light S.p.A. adopted an Anti-Bribery Management System compliant with the ISO 37001:2016 standard. The corruption risk assessment is carried out by taking into account, amongst other things, factors relating to the context, the business nature and complexity, the interactions with public officials, the business partners and the relevant corporate processes. The assessment methodology takes into account the probability and impact of risk events and enables the identification of treatment priorities and the most appropriate preventive measures.

In the area of social responsibility, City Green Light S.p.A. adopted a system compliant with the SA8000 standard, designed to ensure compliance with human and labour rights, with particular reference to child labour, forced labour, health and safety, freedom of association and collective bargaining, discrimination, disciplinary practices, working hours and remuneration. The SA8000 Social Report is drawn up annually and includes qualitative and quantitative indicators relating to the reference period.

In 2023, City Green Light S.p.A. also consolidated its commitment to diversity, inclusion and equal opportunities by aligning itself with the guidelines of the ISO 30415:2021 standard and obtaining UNI/PdR 125:2022 certification on gender equality.

Integrating sustainability into the management model

City Green Light Group is progressively integrating sustainability into its decision-making and operational processes through its Sustainability Plan, corporate procedures and internal control mechanisms, and by gradually aligning the Group companies with the systems and policies adopted by City Green Light S.p.A. In line with the commitments it has undertaken, the Group carries out regular assessments of the risks associated with its activities, with a view to identifying and mitigating economic, environmental, social and human rights impacts.

The Group promotes the well-being of its employees and the communities in which it operates, in compliance with national and international legislation on labour protection, health and safety, human rights, the environment and legality. This approach also involves promoting dialogue and ongoing discussion with internal and external stakeholders, and engaging the supply chain on key ethical, social and environmental requirements.

Roles, responsibilities and control systems

The implementation of commitments relating to sustainability and social responsibility is overseen through a system of roles, responsibilities and internal controls involving the relevant corporate functions, the Integrated Management System, Internal Audit, the Supervisory Bodies of the companies adopting the 231 Model, the Social Performance Team and the Sustainability Committee.

Within the Group's organisational structure, City Green Light S.p.A. plays a coordinating and supporting role in relation to its subsidiaries, including through intra-group service agreements. These contracts include, among others, legal and administrative services, procurement and logistics, administration, finance and control, general services, human resources, management systems, IT and business development, thereby contributing to the gradual alignment of the subsidiaries with the Group's processes, procedures and governance, control and sustainability frameworks. Operational responsibilities relating to the management of ESG impacts are assigned to the relevant corporate functions, in accordance with the organisational chart, job descriptions, company procedures and the system of delegated powers. Operational coordination is overseen by the General Manager, with the support of the Sustainability Committee for matters relating to the implementation, monitoring and updating of the initiatives set out in the Sustainability Plan.

The Integrated Management System is one of the key measures adopted by City Green Light S.p.A. and, where applicable, by the Group companies, for the implementation and monitoring of the commitments undertaken in the areas of quality, the environment, energy, health and safety, social responsibility, information security and the prevention of corruption. The department responsible for the Management System carries out periodic audits in accordance with the adopted standards, monitors any non-conformities and coordinates corrective and improvement actions.

Details regarding governance arrangements, internal control, the 231 Model, anti-corruption, taxation and whistleblowing are set out in the chapter entitled "Governance and business ethics".

Training, communication and internal engagement

The Group promotes training and internal communication initiatives aimed at fostering the corporate culture, ethics and sustainability. These initiatives include both compulsory training – for example, on health and safety – and programmes designed to develop professional skills and foster an understanding of the principles, values and rules of conduct adopted by the organisation.

Every new recruit is offered an induction programme designed to help them gradually familiarise themselves with the organisation, its key corporate safeguards and the responsibilities associated with their assigned role. For further details on the training activities delivered during the reporting period, please refer to the chapter entitled "Centrality of people".

Management of reports and whistleblowing

Reporting and whistleblowing channels are one of the mechanisms through which employees, contractors, suppliers, partners and other stakeholders can report any breaches of the Code of Ethics, the 231 Model, corporate procedures, applicable legislation or the ESG principles promoted by the Group. For further details on the whistleblowing system, authorised parties, the procedures for handling reports and the figures for the reporting period, please refer to the section entitled "Whistleblowing channel" in the chapter "Governance and business ethics".

Sustainability Plan and strategic guidelines

The 2023–2026 Sustainability Plan (hereinafter also referred to as "Sustainability Pan"), which was drawn up before the recent changes to the scope of consolidation, serves as the strategic framework for guiding the ESG initiatives already underway. Throughout 2025, partly in light of the new corporate structure and the launch of a new industrial phase, City Green Light Group continued to update its Sustainability Plan, which will be finalised in line with the Group's new Business Plan, due to be approved by the end of 2026.

This process is designed to strengthen the integration between industrial strategy, ESG priorities and environmental, social and economic objectives, ensuring that the companies included in the consolidated scope are progressively aligned with the Group's sustainability guidelines.

The Plan defines four Macro-Pillars:

- Fighting climate change;
- Presence in the territory and the local community;
- Governance and business ethics;
- Our people.

As shown in the image below, the pillars are divided into 14 Areas of Commitment and are linked to the relevant United Nations Sustainable Development Goals (SDGs), to which City Green Light Group aligns its mission, policies and operational actions. These Areas of Commitment are consistent with the material topics identified in the 2025 Materiality Analysis and represent the main guidelines through which the Group defines its sustainability priorities, objectives and initiatives. For further details on the process for identifying material topics and prioritising them, please refer to the relevant section, "Materiality analysis".

Priorities	Fighting climate change	Presence in the territory and the local community	Governance and business ethics	Our people
Areas of Commitment	Offering of energy efficiency services	Quality of service	Corporate process improvement	Attracting qualified personnel
	Green technologies serving the community	Responsible investments		Employee training and development
	Renewable energy consumption	Community involvement	Environmental and social assessment of suppliers	Health and safety protection
	Management of natural resources and waste	Accessibility and savings		Diversity and inclusion

Sustainable activities according to the European Taxonomy

The EU Taxonomy for sustainable activities is a classification system introduced by EU Regulation 2020/852 with the aim of identifying economic activities that can be considered environmentally sustainable. This instrument, set out as part of the Action Plan on Sustainable Finance, is designed to encourage the channelling of capital towards sustainable investments and to support the achievement of the European Green Deal objectives.

Article 9 of EU Regulation 2020/852 defines six environmental objectives:

- Climate change mitigation (ccm);
- Climate change adaptation (cca);
- The sustainable use and protection of water and marine resources (wtr);
- The transition to a circular economy (ce);
- Pollution prevention and control (ppc);
- The protection and restoration of biodiversity and ecosystems (bio).

The European legislation sets out specific reporting obligations for companies falling within its scope of application, with regard to the proportion of revenue, CapEx and OpEx associated with eligible activities and, where compliance with the applicable technical criteria has been verified, aligned with the EU Taxonomy. Although City Green Light S.p.A. is not among the companies subject to these reporting obligations, in the previous financial years it undertook a process aimed at assessing the extent to which its business and investments align with the criteria of the EU Taxonomy, not least in view of the Group's role in public lighting services, energy efficiency, building facility management and smart solutions for the sustainable development of territories.

In this context, the Group's projects and activities are primarily geared towards the objective of mitigating climate change, with particular reference to CCM 7.3 "Installation, maintenance and repair of energy-efficiency equipment", in line with the refurbishment, management and maintenance of plant and infrastructure aimed at improving energy performance.
During 2025, City Green Light S.p.A. repaid early the Green Loan it had previously taken out in 2023, with a nominal value of Euro 90 million. The transaction was partly funded by a shareholder loan with a nominal value of Euro 46 million. The Group continues to focus its growth strategy on investments and solutions aimed at improving energy efficiency, digitising infrastructure and supporting the sustainable transition of the territories it serves.

In light of changes to the scope of consolidation and the process of updating the Sustainability Plan in line with the Group's new Business Plan, City Green Light Group will assess the need to progressively update its internal analyses relating to the EU Taxonomy, also with a view to strengthening its monitoring of information concerning the environmental sustainability of its activities and investments.

Our stakeholders

Developing synergies with stakeholders, whether internal or external, is an essential factor for the Group. Indeed, dialogue and constant interaction with all stakeholders are key for incorporating their expectations and needs into all the activities carried out, not least with a view to creating shared value.

In 2025, as part of the update to its materiality analysis and the transition to a consolidated Group reporting scope, City Green Light Group updated its stakeholder mapping, taking into account developments in the value chain, the expansion of its operational activities, key business relationships, and the actual and potential impacts on the economy, the environment and people.

The stakeholder mapping exercise was developed by taking into account the categories of stakeholders directly or indirectly affected by the Group's activities, services, decisions and impacts, also in light of the value chain and relevant business relationships.

Compared with the stakeholder mapping previously adopted, a number of stakeholder categories were strengthened or introduced in 2025, including Shareholders, Local Communities, the Environment and Future Generations. The Environment is regarded as a "silent" stakeholder, as ecosystems, natural resources and the environmental context may be affected by the impacts generated by the Group's activities. Future Generations are taken into account in view of the long-term effects associated with the energy transition, the use of resources and the quality of the territories served.

The main categories of stakeholders identified by the Group are:

Shareholders
They represent the Group's ownership benchmark and contribute to its long-term strategic direction, with a focus on creating sustainable value and the responsible management of assets.

Customers
These include Public Administrations, local authorities and public and private customers. The relationship is developed through commercial activities, technical meetings, opportunities for operational discussion, contract management, monitoring of service quality and customer satisfaction.

People in the Company
These include employees and contractors. Engagement is fostered through internal communication, training, welfare initiatives, health and safety management systems, feedback mechanisms, reporting channels and initiatives relating to corporate culture.

Suppliers and Subcontractors
They are a key component of the value chain. The Group engages them through qualification processes, contracts, audits, site visits, document monitoring and ESG questionnaires.

Public Institutions
These include authorities, regulatory bodies, public administrations and institutional bodies.
The Group maintains relationships characterised by transparency, cooperation and respect for institutional roles.

Map of the Stakeholders

Financial community
It includes banks, investors and financial stakeholders. The dialogue focuses on transparency, economic and financial stability, and the promotion of sustainable growth strategies.

Local communities
These include citizens, territories and local organisations affected by the Group's activities. Engagement takes place through our relationship with Public Administrations, reporting channels, local initiatives and the monitoring of service quality.

Trade unions
They are key partners in social dialogue and in discussions on issues relating to work, protection, organisation and people's well-being.

Research centres and Universities
They support the development of innovation, technology transfer, specialist expertise and pilot projects in the fields of smart cities, energy efficiency, digitalisation and sustainability.

Trade associations and standardisation bodies
They enable the Group to take part in sector-wide discussions, monitor regulatory and technical developments, and contribute to the dissemination of standards and best practice.

Certification bodies
They help ensure compliance with the standards adopted by the Group and support the continuous improvement of management systems.

Environment
Regarded as a silent stakeholder, it represents ecosystems, natural resources, the climate and the territory, which may be affected by the environmental impacts of the Group's activities.

Future Generations
They represent the stakeholders who may be affected by the long-term effects of the Group's decisions regarding energy, climate, natural resources, innovation and the quality of territories.

For the purposes of the 2025 materiality analysis, the Group took into account evidence arising from its regular dialogue with key stakeholder groups, including operational relations with Public Administrations, customer satisfaction surveys, reporting and whistleblowing channels, discussions with suppliers and subcontractors, audit activities, consultations with corporate functions and management, participation in trade associations, and collaborations with universities and research centres.

In 2025, no structured stakeholder engagement process dedicated exclusively to materiality analysis was carried out. However, the information gathered through regular consultation and dialogue was utilised to support the identification and assessment of impacts, in particular: exchange with corporate functions and management, customer satisfaction surveys, reporting channels and whistleblowing systems. Other stakeholders with whom the Group maintains a dialogue include: Public Administrations, suppliers and subcontractors, universities and research centres.

Materiality analysis

The identification of the aspects reported in this document was carried out through a process geared towards defining material topics based on an impact analysis, in line with the provisions of the GRI Standards published in 2021 (GRI 3: Material topics) which sets out guidelines for identifying impacts using the inside-out approach.

For the purposes of preparing the 2025 Sustainability Report, the analysis was updated to take account of changes to the reporting scope, which now covers City Green Light Group, and consequently the expansion of its operational activities (hereinafter also referred to as the "2025 Materiality analysis"). The scope includes: City Green Light S.p.A.; City Green Light RSM S.r.l.; Citymetrics S.r.l.; Domodossola Parking S.r.l.; Efferre Energia S.r.l.; Energy Green S.r.l.; Lumagest S.r.l.; Smart Parking System S.r.l.; Palermo in Luce S.c.a.r.l., as specified in the "Methodological note" section.

The main phases of the 2025 Materiality Analysis process are set out below.

Understanding the internal and external context

The first phase of the process involved gaining an understanding of:

- Internal context: which takes into account discussions held with representatives of the main corporate functions and the mapping of the value chain (identifying "upstream" activities, at the level of "own operations", and "downstream" activities) in order to identify business relationships and any related impacts; and
- External context: through a benchmark analysis carried out on a panel of industry peers and competitors, and other external sources, such as frameworks, ratings and other reporting standards

as explained in more detail below.

For the purposes of a preliminary assessment of the impacts, the following external sources were taken into account:

- The wwf water risk filter and the wwf biodiversity risk filter, to identify any sensitive areas in which the Group's operations are located and to assess whether these could have potential negative impacts on the external environment in terms of water stress and biodiversity;
- A comparative analysis of the publicly available sustainability reports of a selected panel of peers/competitors, examining relevant issues and impacts, key stakeholders, and the existence of any sustainability plans;
- Internationally recognised frameworks and reference databases (including the Sustainability Accounting Standards Board - SASB, Morgan Stanley Capital International - MSCI and ENCORE); and
- Changes in legislation and regulations that may apply to the sectors in which City Green Light operates.

The analysis of the internal context also took into account the corporate strategy, by analysing the main objectives set out in the Business Plans adopted by the Group and their subsequent developments, as well as considering the corporate policies and codes of conduct.

In July 2024, the Board of Directors of City Green Light S.p.A. approved an update to the Business Plan then in force, extending its time horizon to 2050 and reinforcing the long-term strategic vision. During 2025, partly in light of changes to the Group's scope and the launch of a new industrial phase, City Green Light Group continued its preparatory work on updating the Sustainability Plan, which will be finalised in line with the new Business Plan, due to be approved by the end of the year.

As part of its analysis of the context and the evolution of the reporting scope, the Group took into account the updated mapping of relevant stakeholders, as described in the section "Our stakeholders", in order to support the identification of the actual and potential impacts generated by the Group's activities and business relationships.

This preliminary understanding made it possible to identify a series of topics, relating to the Environmental, Social and Governance (ESG) pillars, from which we have then identified the potentially significant impacts generated by City Green Light on the economy, the environment and people, including human rights.

For the purposes of determining material topics, although the Group did not implement a structured stakeholder engagement process in 2025 dedicated exclusively to materiality analysis, the Group valued the evidence from reports and existing channels of dialogue with key stakeholder groups, including operational relationships with Public Administrations and customers, customer satisfaction surveys, reporting channels, discussions with suppliers and subcontractors, dialogue with corporate functions and management, participation in trade associations, and collaborations with universities and research centres.

It should also be noted that there are no Sector-related GRI Standards applicable to the sector in which City Green Light Group operates.

Identification of impacts relating to sustainability issues

The second phase involved identifying a long list of potentially significant impacts arising from the potentially significant topics identified in the previous phase, taking into account the direct and indirect implications of the organisation's own operations, as well as those arising from the upstream and downstream value chain. Indeed, in accordance with GRI 3 – Material topics, City Green Light Group took into account the impacts it causes directly or to which it contributes through its activities, as well as those directly attributable to its processes, products or services through its business relationships.

An impact mapping exercise was in fact carried out, indicating the location of the impact (upstream, own operations, downstream or along the entire value chain), with the aim of identifying where material impacts are most likely to arise, depending on the nature of the activities and commercial relationships.

Each impact was classified as positive or negative, actual or potential. The time horizon for each event was defined (short term: within 1 year; medium term: between 2 and 5 years; long term: more than 5 years), and the stakeholders affected were identified for each impact.

Identification of material impacts

Following the identification of the long list of impacts, these were assessed by the Group's management in terms of their significance. The significance of the identified impacts makes it possible to prioritise them and to determine the material topics to be reported on.

The assessment of the significance of each identified impact was carried out by taking into account:

- The "severity" (for negative impacts) and the "scope" (for positive impacts): the difference lies in the fact that the characteristic of irreversibility applies to negative impacts only; and
- The probability of occurrence.

The severity/scope, in turn, is broken down into the following characteristics:

- Scale: how serious the impact is, taking into account the external context in which it occurs, including geographical, social and regulatory factors, as well as any breach of human rights, fundamental labour rights or authoritative international standards and agreements;

- Field: how widespread the impact is, taking into account the number of people affected, the geographical extent or the proportion of ecosystems involved along the Group's value chain; and

- Characteristics of irreversibility: the degree of difficulty in preventing, mitigating or compensating for the damage resulting from the impact (considered only in the case of negative impacts).

Each characteristic was given a score on a scale of 1 (the lowest) to 5 (the highest). The maximum rating of 5 was assigned to the probability of the actual impacts occurring.

The overall materiality score for the impact was determined by combining the severity/scope with the probability of occurrence. With regard to potential adverse impacts on human rights, in line with GRI Standards, the assessment gives greater weight to severity than to probability of occurrence.

Following the assessment and application of the identified materiality threshold, the total number of material impacts roughly doubled, rising from 13 to 28, of which 9 are positive and 19 are negative, whilst 5 impacts were found to be non-material. The increase is mainly due to the identification of new impacts relating to the environmental area. Specifically, the material impacts are distributed across the three ESG areas as follows: 11 environmental impacts, accounting for approximately 39% of the total material impacts; 9 social impacts, accounting for approximately 32%; and 8 governance-related impacts, accounting for approximately 29%.

The identification of material impacts led to an update of City Green Light Group's material topics for the 2025 financial year. Compared with the materiality analysis published in the 2024 Sustainability Report, the update confirmed the materiality of the topics already addressed and identified the following additional material topics:

- Circular economy and waste management: relating to the negative impacts arising, on the one hand, from the inflow of primary material resources used in the Company's own operations (in particular during the refurbishment, replacement and maintenance of plants) and, on the other hand, from the associated waste generated; and
- Relationship with the community and the territory: linked, on the one hand, to positive impacts on the socio-economic development of the territory – including in terms of road and pedestrian safety – thanks to the installation and management of public lighting systems; and, on the other hand, to potential negative impacts arising from interference with vehicle and pedestrian mobility, noise or other temporary restrictions in urban settings, which may arise primarily during the implementation of public lighting refurbishment works.

These additions reflect the expansion of the reporting scope at Group level and the increasing complexity of the operating model.

List of material topics: cross-reference table

In accordance with the provisions of GRI 3 – Material topics, Disclosure 3-2: List of Material topics, the table below sets out the list of material topics, stating the indicators (GRI Thematic Standards) used for reporting on these material topics. To understand the changes made to material topics, please refer to the above.

GRI 3-2 – Material topics and relevant GRI Standards

Material topic	Relevant GRI Standards
Energy, energy efficiency and fight against climate change	GRI 302 – Energy GRI 305 – Emissions
Circular economy and waste management	GRI 301 – Materials GRI 306 – Waste
Enhancing human capital	GRI 401 – Employment GRI 404 – Training and education GRI 405 – Diversity and Equal Opportunity
Occupational health and safety	GRI 403 – Occupational health and safety
Relationship with the community and the territory	GRI 413 – Local communities
Service quality, efficiency and reliability	GRI 416 – Customer health and safety
Responsible procurement	GRI 204 – Procurement practices GRI 205 – Anti-corruption GRI 308 – Supplier environmental assessment GRI 414 – Supplier social assessment
Business ethics and integrity	GRI 205 – Anti-corruption GRI 207 – Tax
Economic performance	GRI 201 – Economic performance
Development of innovative products	GRI 203 – Indirect economic impacts

It should be noted that the management of each material topic is described in the relevant thematic sections of the Sustainability Report. Please refer to these for the purposes of GRI Disclosures 3-3: Management of material topics.

List of impacts and material topics

In line with the provisions of GRI 3 – Material topics, the identified impacts were linked to specific topics. The table below sets out the material topics for each ESG area, highlighting the type of impacts and their location within the value chain.
In line with the methodology adopted in 2024 and reconfirmed for 2025, the material topics resulting from this analysis are shared with the Group management and the corporate representatives involved in preparing the Sustainability Report.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GRI 3-3 – Material impacts by ESG area, type and location in the value chain

Scope	Impact description	Type of impact	Value chain	Material Topic
Environmental	The purchase of lighting fixtures, electronic components, building materials, metal structures, HVAC systems, photovoltaic components, installation services, civil engineering works and transport generates a negative climate impact along the upstream value chain, as it incorporates emissions resulting from extraction, manufacturing, logistics and suppliers' activities.	Negative, Actual	Upstream	Energy, energy efficiency and fight against climate change
	The use of company vehicles, service vehicles and operational equipment powered by fossil fuels for site inspections, maintenance, construction sites and territorial coordination has a direct negative impact on climate change, as it contributes to an increase in the atmospheric concentration of greenhouse gases and thus to the worsening of climate phenomena that affect communities, ecosystems and infrastructure.	Negative, Actual	Own operations	
	Electricity purchased to power the Group's premises, infrastructure and services under its management, including public lighting, has a negative impact on the climate when the energy mix is not entirely renewable, as consumption under the Group's operational control results in indirect emissions that affect the emissions trajectory of the territories served.	Negative, Actual	Own operations	
	The Group's activities in the fields of energy efficiency, plant management and optimisation, building management and the development of photovoltaic solutions have a positive impact by helping reduce energy consumption and wastage, increase the use of renewable energy, improve the environmental and functional performance of buildings, and provide tangible support for the energy transition in territories.	Positive, Actual	Downstream	
	The development of companies and projects dedicated to photovoltaic power generation has a positive impact because it increases the availability of renewable energy within the system, replaces a generation share that would otherwise come from fossil fuels, and strengthens the Group's ability to contribute more directly to energy transition in the territories.	Positive, Actual	Own operations	
	The Group generates waste in the course of its operations, including residues from electrical, construction and plant engineering works, electronic components, packaging materials, digital devices and replaced plant parts. This has a negative impact because these waste streams require transport, treatment and recovery or disposal, thereby consuming additional resources and generating further environmental pressures.	Negative, Actual	Own operations	Circular economy and waste management
	A high inflow of primary material resources along the supply chain, linked to the refurbishment, replacement and maintenance of plants (e.g. lighting fixtures, protective glass, optical lenses, electrical and electronic materials, etc.), which involves the use of components, construction materials and packaging, resulting in an increase in the consumption of virgin raw materials and resources in general.	Negative, Actual	Own operations	
	The expansion of business lines into plant engineering, smart car parks and photovoltaic manufacturing has an additional negative impact in terms of the variety and volume of waste generated, including thermal-mechanical components, sensors, digital devices, support structures and, in the long term, end-of-life photovoltaic components.	Negative, Potential	Own operations	

	The share of waste generated by the Group's operational, plant and construction activities that is sent for final disposal (for example, landfill or incineration without recovery) has a negative impact on the environment, as it involves the use of disposal capacity, associated potential emissions and a loss of material value compared with recovery or recycling solutions.	Negative, Potential	Downstream	
	A more advanced, data-driven approach to the maintenance of plant, buildings and digital devices has a positive impact because it extends the useful life of some assets, reducing the frequency of replacements and thus the amount of waste generated over the life cycle of the services provided.	Positive, Potential	Downstream	
Social	Impact on workers' health and safety in the Group's own operations, linked to the nature of the operational activities carried out directly by the Group, which may result in accidents, damage to health and compromised safety conditions during electrical work, the manual handling of loads, the use of aerial work platforms, interference with urban traffic, exposure to adverse weather conditions and the performance of repetitive or physically demanding tasks.	Negative, Actual	Own operations	Occupational health and safety
	Impact on the health and safety of workers in the supply chain, arising from activities entrusted to suppliers, including subcontractors, which may result in accidents, health problems and a deterioration in working conditions associated with electrical work, manual handling, the use of lifting equipment, operational interference and complex site environments, particularly in case of subcontracting, multiple work sites and structured operational coordination.	Negative, Potential	Upstream	
	The provision of employee benefits (such as corporate welfare schemes, supplementary health cover, work-life balance measures and other support mechanisms) has a positive impact on people's well-being, helping improve the quality of work, job satisfaction and job security. These measures enhance the organisation's appeal, help retain talent and have a positive impact on the organisational climate and overall productivity.	Positive, Actual	Own operations	Enhancing human capital
	The provision of training in project management, energy efficiency, plant engineering, digitalisation, smart cities, compliance and people management has a positive impact on workers, as it enhances their skills, employability, quality of work and ability to contribute to more sustainable models of territorial development.	Positive, Actual	Own operations	
	In a context characterised by rapid innovation and convergence between the energy, digital and infrastructure sectors, the lack of adequate upskilling and reskilling programmes can have a negative impact on people, leading to fewer opportunities for development, greater job insecurity and a less equitable distribution of opportunities for growth.	Negative, Potential	Own operations	
	Instances of gender-based violence and racial discrimination can have a negative impact on the organisational climate and working conditions, affecting people's well-being. Such behaviour can undermine motivation and work performance, as well as have adverse effects on employees' mental health.	Negative, Potential	Own operations	
	The design, installation and management of public and architectural lighting systems can have a positive impact on local communities, contributing to the socio-economic development of territories, improving road and pedestrian safety, and making urban public spaces more accessible at night, with positive effects on the quality of life and the attractiveness of cities.	Positive, Actual	Downstream	Relationship with the community and the territory

	The design, installation, technical upgrading and maintenance activities carried out by the Group and its operational partners may have negative impacts on local communities in terms of congestion, disruption to vehicle and pedestrian traffic, noise, dust, temporary access restrictions and disruption to public services, particularly in high-density urban areas or where work is being carried out simultaneously on multiple infrastructure projects.	Negative, Actual	Downstream	
	The provision of digital services relating to remote monitoring, smart parking, apps, payment systems, access to services and urban data management may have a negative impact on individuals in the event of unauthorised access, improper processing or security breaches, as the loss of control over personal and mobility data may result in adverse effects for data subjects.	Negative, Potential	Downstream	Service quality, efficiency and relia-bility
Governance	In the context of a Group that is growing through external expansion, any lack of integrity in the processes of acquisition, corporate integration or the outsourcing of specialist services may have a negative impact, manifesting itself in a loss of trust among public authorities, citizens and economic operators, thereby undermining the social value of the energy and digital transition that the Group states it wishes to support.	Negative, Potential	Own operations	Respon-sible pro-curement
	Should third parties involved in plant installation, logistics, civil engineering works, maintenance or specialist consultancy fail to fully embrace the principles of integrity defined by the company, this may result in a negative impact that is passed on to the territories served through less transparent processes, reduced reliability of execution and a weakening of the supply chain's overall credibility.	Negative, Potential	Upstream	
	Any anti-competitive or collusive practices could have a negative impact on public administrations, end users and territories, as they would reduce market competition, hinder innovation and limit the scope for selecting the most efficient solutions from an environmental, economic and social standpoint.	Negative, Potential	Own operations	Business ethics and integrity Business ethics and integrity
	A negative impact on the community resulting from a failure to meet tax obligations, which may affect public revenue in the territories where City Green Light operates and, consequently, the availability of resources for services and investments in the public interest for the benefit of the community.	Negative, Potential	Own operations	
	Should any established cases of corruption come to light, this would have a negative impact that goes beyond the Company's reputation, as it could affect the cost and effectiveness of public and private investment and undermine the confidence of citizens and public administrations in the market ability to support the energy transition in a fair and transparent manner.	Negative, Potential	Own operations	
	Should any confirmed cases of corruption come to light in connection with the Group's participation in public tenders, project financing operations and partnerships with local authorities in the sectors of lighting, building refurbishment, smart parking and photovoltaic systems, this could have a negative impact on the community. Such incidents can, in fact, undermine the fairness and impartiality of decision-making processes, leading to a sub-optimal allocation of public resources and infrastructure investment, favouring solutions that are less equitable and efficient and potentially less sustainable from an environmental and social perspective.	Negative, Potential	Own operations	
	The Group's activities have a positive impact on the economic performance of the territories in which it operates, helping create direct and indirect jobs and generating tax revenue and social security contributions that bolster local and national public finances.	Positive, Actual	Downstream	Economic perfor-mance

	Initiatives aimed at improving energy efficiency, digitalisation and the development of integrated solutions for lighting, mobility, public buildings and energy services can have a positive impact on technological development and the green transition of cities, promoting more efficient, digitalised and sustainable urban models.	Positive, Actual	Downstream	Develop-ment of innovative products

03

Governance and business ethics

The Group carries out its operations according to principles of ethics, integrity and transparency, with the aim of managing operational complexity responsibly and fostering sustainable development that respects the environment, people and communities.

This chapter describes the measures adopted by the Group to manage material topics relating to business ethics and integrity, responsible sourcing, anti-corruption, taxation, the protection of human rights and the protection of personal data, with the aim of ensuring conduct characterised by legality, transparency and accountability throughout its operational activities and value chain.

Governance

This section describes the governance structure of City Green Light S.p.A., the parent company of City Green Light Group. Where applicable, the safeguards, policies and procedures adopted by the parent company are progressively extended to, or brought into line with, the structure of the subsidiaries, including through coordination functions, intra-group services and shared processes.

The Company adopted a traditional governance model, based on the existence of the Shareholders' Meeting, the Board of Directors and the Board of Statutory Auditors, as well as the firm appointed to carry out the statutory audit. This structure is governed by the applicable legislation and the Articles of Association.

The Shareholders' Meeting, whether ordinary or extraordinary, decides on the matters reserved for it by law and by the Articles of Association. In particular, the Ordinary Shareholder's Meeting approves the financial statements, determines the number of Directors and the term of their office, appoints and removes Directors, appoints the Statutory Auditors and the Chairman of the Board of Statutory Auditors, appoints the firm responsible for the statutory audit, and determines the remuneration of the Directors and Statutory Auditors.

The members of the Board of Directors are appointed by the Shareholders' Meeting, in accordance with the law and the Articles of Association. At the date of preparation of these Financial Statements, no formalised procedures beyond those required by the Articles of Association were adopted for the selection of members of the highest governing body. The composition of the Board takes into account the skills and roles necessary for the governance of the Company and the Group.

The Board of Directors is the Company's highest governing body. Within the limits laid down by law and the Articles of Association, the Board is vested with all powers relating to the day-to-day and extraordinary management of the Company, with the exception of those reserved for the Shareholder's Meeting. The Board of Directors oversees, within the scope of its remit, the Group's impact on the economy, the environment and people, progressively integrating ESG factors into decision-making processes, the formulation of corporate strategies and the monitoring of sustainability goals.

In accordance with the Articles of Association, the Company may be managed by a Sole Director or by a Board of Directors comprising between 2 and 15 members, as determined by the shareholders at the time of appointment. Directors need not be shareholders. They remain in office for the period specified in the Shareholders' Meeting resolution appointing them, up to a maximum of three financial years, and may be re-elected.

As at the date of approval of this Sustainability Report, the Board of Directors comprises five members. The updated composition of the Board reflects the appointment of the new Chairman of the Board of Directors, which took place after the end of the 2025 financial year. It should be noted that this event took place after the end of the financial year and before the Board of Directors approved this Sustainability Report. The information is provided in accordance with the principle of timeliness set out in GRI 1 and taking into account the materiality of the information for stakeholders.

GRI 2-9: Governance structure and composition/ GRI 405-1: Diversity in governance bodies

Current composition of the Board of Directors as at the date of approval of the Sustainability Report	Number	%
No. of Directors	5	100%
Executives	1	20%
Non-executives	4	80%
(of which independent)	1	20%
Women	1	20%
Men	4	80%
<30 years old	0	0%
30-50 years old	3	60%
> 50 years old	2	40%

The Board of Directors comprises executive and non-executive members. The Chief Executive Officer is the executive member of the Board, whilst the other members hold non-executive positions. The composition of the Board is presented in terms of executive and non-executive members, independence, gender and age groups, in line with the information required by the applicable GRI Standards.

The Chair of the Board of Directors is authorised to represent the Company in dealings with third parties and in legal proceedings, without any restrictions, in accordance with the provisions of the Articles of Association. The Chair convenes and chairs the Board of Directors and the Shareholder's Meeting, in accordance with the procedures and times set out in the Articles of Association. The Chair of the Board of Directors does not hold the position of senior executive within the organisation.

The Board of Directors may delegate all or part of its powers to one or more CEOs and/or to an executive committee, defining the relevant powers within the limits set out in Article 2381 of the Italian Civil Code. On the basis of the powers delegated to him/her and the available corporate documentation, the Chief Executive Officer is entrusted with the day-to-day management of the Company, within the limits laid down by law, the Articles of Association and the powers delegated to him/her. Throughout 2025, the Chief Executive Officer, who also held the position of General Manager, reported quarterly to the Board of Directors on the main operational developments during the period, commercial initiatives and, where relevant, economic and financial performance, human resources management, and environmental and energy indicators.

Based on the information available at the date of preparation of these Financial Statements, no significant issues came to light in 2025 that were brought to the attention of the Board of Directors in accordance with GRI 2-16.

To support the management of ESG issues, the Board of Directors established the Sustainability Committee (hereinafter also referred to as the "Committee") by resolution dated 31 July 2023. The Committee carries out investigative, advisory and policy-making functions, in coordination with the General Manager, with regard to the implementation, oversight and monitoring of the initiatives set out in the Sustainability Plan.

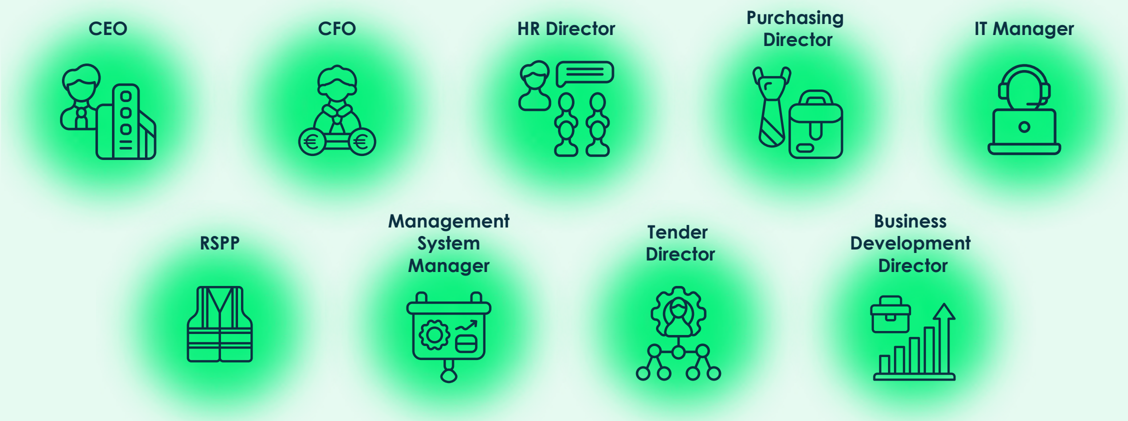
Operational responsibilities relating to the management of ESG impacts are assigned to the relevant corporate functions, under the coordination of the General Manager and with the support of the Sustainability Committee, which reports to the Board of Directors at least once a year. The minutes of the Committee's meetings are also made available to the Board of Directors and the Board of Statutory Auditors upon request.

Within the Group's organisational structure, City Green Light S.p.A. also plays a coordinating and supporting role in relation to its subsidiaries, including through intra-group service agreements. These contracts may cover legal and administrative services, procurement and logistics, administration, finance and control, general services, human resources, management systems, IT and business development, thereby contributing to the gradual alignment of the subsidiaries with the Group's processes, procedures and governance, control and sustainability frameworks, without prejudice to the responsibility of individual companies for the activities falling within their remit.

Sustainability Committee

The Sustainability Committee comprises a limited number of internal staff members who hold key roles in the management of the Company and possess the appropriate expertise for the tasks assigned to them. The members are appointed by the General Manager, authorised by the Board of Directors, and remain in office until their appointment is revoked. The Committee may also invite other individuals, whether from within or outside the Company, to attend its meetings, where this is useful for the performance of its duties.

Roles represented in the Sustainability Committee



The Committee meets as often as is necessary to carry out its duties and, in any event, at least once every two months. Meetings are quorate if a majority of the current members are present.

The Committee’s proceedings are recorded in minutes signed by the Chair of the meeting and the Secretary. The minutes are approved at the next meeting, once the draft has been shared with the participants and any comments have been taken on board. These minutes are made available, on request, to the Board of Directors and the Board of Statutory Auditors.

The Sustainability Committee helps define, implement and update the Sustainability Plan, promotes the integration of ESG principles into business processes, and monitors progress against sustainability targets and performance indicators. Specifically, the Committee has the following tasks:

- Monitoring progress towards achieving the ESG performance goals set out in the Sustainability Plan, as approved by the Board of Directors;
- Promoting and coordinating proposals for updating the Sustainability Plan, to be submitted to the Board of Directors for approval;

- Encouraging the integration of sustainability into corporate strategies and culture, promoting its adoption at all levels;
- Promoting and overseeing sustainability initiatives;
- Issuing, at the request of the Board of Directors, opinions on specific sustainability issues;
- Reporting to the Board of Directors at least once a year on the activities carried out;
- Examining the structure and content of the Sustainability Report and making any comments or proposals before it is submitted to the Board of Directors for approval.

The Committee is entitled to access the information and corporate functions necessary for the performance of its duties and makes use of the Company's resources or, where deemed necessary, external advisers. The Committee may also set up technical, thematic and, where necessary, cross-functional working groups, coordinated by Committee members and comprising sustainability experts from various business functions.

The Committee periodically reviews the adequacy of its Rules of Procedure and submits any proposals for amendments or additions to the Board of Directors.

At least once a year, drawing on the analyses and proposals of the Sustainability Committee, the Board of Directors reviews the outcomes of the processes for identifying, assessing and managing the Group's impacts on the economy, the environment and people. In this context, the Board assesses the effectiveness of the safeguards put in place, progress towards ESG goals, and whether there is a need to update tools, processes or organisational responsibilities. This flow of information enables the Board to provide guidance and exercise oversight in a manner consistent with its role as the highest governing body and with the responsibilities set out in the GRI Standards on impact monitoring.

The Board of Directors approves the Sustainability Report, including material topics and information relating to the Group's impacts on the economy, the environment and people.

During the reporting period, the Company did not adopt any specific procedures to assess the performance of its highest governing body with regard to the oversight of the management of its impacts on the economy, the environment and people. Furthermore, during 2025, no specific measures were taken to enhance the collective knowledge, skills and experience of the highest governing body in the field of sustainable development.

The Board of Statutory Auditors oversees the proper management of the Company and ensures the adequacy of its organisational, administrative and accounting structure. It consists of five members: a Chair, two standing Auditors and two alternate Auditors. Following the expiry of the previous term of office, the Shareholders' Meeting held on 30 April 2024 re-elected the members of the Board of Statutory Auditors, who will remain in office until the approval of the financial statements for the financial year ending 31 December 2026.

The governance system is supported by a range of internal instruments and safeguards, including:

- **The Articles of Association**, which, in compliance with the provisions of the law in force, include provisions on corporate governance aimed at ensuring the proper performance of management activities;
- **The Corporate Policy**, which sets out the course of action that guides the organisation towards agreed and accepted strategies and objectives, ensuring consistency between the organisation's vision and its operational activities;
- **Organisational arrangements**, which aim to ensure a better understanding of the Company's structure, the allocation of key responsibilities and the identification of the individuals to whom those responsibilities are entrusted;
- **The system of delegated powers and powers of attorney**, which sets out, through the granting of specific powers of attorney, the powers to represent or bind the Company and, through the system of delegated powers, the responsibilities relating to the environment, health and safety;
- **The system of procedures, policies and guidelines**, which clearly and effectively governs the Company's relevant processes;
- **The Integrated Management System**, covering quality, the environment, energy, health and safety, information security and anti-corruption, in accordance with the applicable UNI EN ISO standards.

The risk of conflicts of interest is managed through the 231 Model, the Code of Ethics, the Anti-Corruption Policy and the applicable governance procedures. These instruments set out principles of conduct, reporting obligations and mechanisms for abstention in the event of situations – including potential ones – that could compromise the impartiality of decisions, with regard both to persons acting on behalf of the Company and, where applicable, to members of the corporate bodies.

Sustainability ratings and assessments

City Green Light S.p.A. was awarded the Silver medal in EcoVadis' Sustainability Rating 2025, confirming its progress in strengthening corporate sustainability practices in the areas of Environment, Labour and Human Rights, Ethics and Sustainable Procurement.
During 2025, the Company launched a structured assessment process aimed at obtaining the "Get It Fair" ESG certification and rating. As the process was initiated but has not yet been completed as at the report-

ing date, this initiative is presented as a work in progress rather than as an achievement already made.

Code of Ethics

City Green Light Group bases all its internal and external operations and relationships on compliance with the principles, values and rules of conduct set out in the Code of Ethics. The Code serves as a binding reference for the entire organisation and for all those who interact with it, defining the fundamental ethical values, expected conduct and shared responsibilities.

The Code of Ethics applies to Top Management, the Board of Directors, Statutory Auditors, function managers, all employees, as well as suppliers, consultants and anyone who engages in a collaborative relationship with the Group in any capacity. The Group promotes its dissemination through all available corporate channels, including publication on its institutional website.

The Code sets out the key principles that guide the conduct of City Green Light Group, including compliance with the law, equality and impartiality, responsibility and honesty, diligence in the performance of duties and contracts, transparency and completeness of information, protection of competition, confidentiality, quality of services, fairness in the exercise of authority, integrity and respect for the individual, attention to relations with the community and protection of the environment.

The Code also includes references to sustainability and corporate social responsibility, highlighting the Company's commitment to integrating these principles into its strategic objectives, operational processes and the responsible management of its supply chain.

Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/01

On 24 July 2018, City Green Light S.p.A. adopted an Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001, subsequently updated in 2021, 2023 and 2024 to reflect changes in legislation, case law and organisational structure.

Lumagest S.r.l. also adopted its own Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001 and its own Supervisory Body, in accordance with the respective scope of application within the company.

The Model is a central element of the Company's governance and internal control system and reflects City Green Light S.p.A.'s commitment to promoting conduct based on legality, fairness and transparency, in order to protect the Company's reputation and the interests of its stakeholders.

Through the Model, the Company established a structured system of procedures, organisational safeguards, information flows and monitoring activities designed to prevent the commission of the offences set out in Italian Legislative Decree No. 231/2001. The system is based on identifying areas of the organisation that are potentially at risk and on implementing specific prevention and control measures.

To ensure the effective implementation of their respective Models, City Green Light S.p.A. and Lumagest S.r.l. established their own Supervisory Bodies (SB), which are autonomous and independent. The Supervisory Bodies monitor the effectiveness and compliance of the Models and ensure that they are kept up to date in accordance with their respective corporate scopes.

The Company also organises information and training initiatives for employees and contractors, aimed at raising awareness of the principles of the Code and strengthening a culture of legality and compliance within the organisation.

Whistleblowing channel

In line with its governance framework and the provisions of 231 Model, City Green Light S.p.A. adopted a whistleblowing system in accordance with Italian Legislative Decree No. 24/2023, which transposes (EU) Directive 2019/1937 on the protection of whistleblowers.

The Company provides a dedicated digital platform, accessible via its official website, which enables users to submit reports securely and confidentially. The system is equipped with encryption mechanisms and specific organisational measures designed to ensure the confidentiality of the whistleblower's identity, of any other individuals involved, and of the information contained in the report.

The whistleblowing channel is available to the Company's employees and to a wide range of external parties who have dealings with the organisation, including collaborators, consultants, suppliers, contractors, business partners, shareholders and individuals who perform administrative, managerial, control, supervisory or representation functions, even *de facto*. Reports may concern behaviours or situations that constitute breaches of the Code of Ethics, the 231 Model, national or European Union regulations, as well as internal procedures and rules.

Report management is entrusted to the Reporting Committee, a collegial body comprising the Chair of the Supervisory Body pursuant to Italian Legislative Decree No. 231/2001, by the Compliance Manager and the Internal Audit Manager & Risk Lead. The Reporting Committee operates autonomously and independently, ensuring compliance with the principles of confidentiality, the protection of the whistleblower from any retaliation or discrimination, and a response within the timeframes set out in current legislation, as well as the assessment of any resulting corrective actions.

During 2025, no reports were received via the whistleblowing systems of the Group companies included within the reporting scope.

City Green Light S.p.A. also organises regular information and training sessions for employees – with a particular focus on new recruits – aimed at raising awareness of the whistleblowing mechanisms and strengthening a culture of legality, integrity and accountability within the organisation.

Internal Audit and Risk Management

The Internal Audit & Risk Function plays an independent role in assessing the effectiveness of the Company's internal control system, risk management and governance processes. The Function reports functionally to the Board of Directors and operates in accordance with the Institute of Internal Auditors' Global Internal Audit Standards (GIAS), as well as in line with the COSO – Internal Control Integrated Framework.

During 2025, City Green Light Group further strengthened its risk management system by introducing a Group-wide Enterprise Risk Management (ERM) framework and updating the Risk Audit Universe. Such tools provide a structured and integrated overview of the Company's key risks.

On the basis of these tools, the Internal Audit Function carried out the activities set out in the 2025 Audit Plan, approved by the Board of Directors, with the aim of assessing the adequacy and effectiveness of the control safeguards over the main business processes and of promoting the continuous improvement of the internal control system and risk management.

Through its activities, the Function helps strengthen transparency and compliance safeguards and foster a corporate culture focused on informed risk management and the creation of sustainable value over the long term. These activities are carried out in coordination with the other Company departments involved in risk control and management processes.

Anti-corruption

City Green Light Group regards the prevention of corruption as an essential element of its governance and responsible conduct system. The Group implements preventive measures in accordance with national legislation and its corporate ethical principles, based on the segregation of duties, the management of conflicts of interest, the separation of decision-making and operational processes, the formalisation of procedures and the traceability of controls.

The corruption prevention system is structured around the Code of Ethics, the 231 Model, the Anti-Corruption Policy and the Corruption Prevention Management System, which complies with the ISO 37001:2016 standard, and are applicable as described above.

During the reporting period, there were no confirmed cases of corruption.

In 2024, City Green Light S.p.A. retained the highest Legality Rating awarded by the Italian Competition and Market Authority, which remains valid in 2025, confirming the Company's commitment to legality, transparency and social responsibility.

Protection of privacy and Personal Data

City Green Light S.p.A. recognises the protection of personal data as a fundamental aspect of its responsibility towards its stakeholders and is committed to ensuring full compliance with (EU) Regulation 2016/679 (GDPR) and Italian Legislative Decree No. 196/2003, as amended, as well as the provisions of the Italian Data Protection Authority and the Guidelines of the European Data Protection Board.

In support of this commitment, on 11 May 2018 the Company adopted a Privacy & Information Technology Policy. It is a reference document for all employees and contractors, which sets out the obligations and conduct required to ensure that personal data is processed lawfully, fairly and transparently. In accordance with Article 37 of the GDPR, the Company also appointed a Data Protection Officer (DPO), an independent figure tasked with monitoring compliance with the legislation, providing expert advice to the Company's departments and acting as the institutional point of contact with the Data Protection Authority.

The DPO plays an active role in managing privacy risks. He/she supports the main business units in assessing the risks associated with data processing and in drafting Data Protection Impact Assessments (DPIAs), coordinates the management of any data breaches, and promotes a culture of data protection through ongoing staff training. Regular reports on the work carried out are submitted to the Company management.

City Green Light S.p.A. is progressively integrating compliance with its obligations regarding the proper processing of personal data into all its processes and activities, in line with the principles of privacy by design and by default.

Approach to taxation

City Green Light Group adopts a responsible, transparent approach to taxation, consistent with the principles set out in the Code of Ethics, particularly those of honesty, legality, transparency and compliance with current regulations. The Group is committed to applying the principle of substance over form, avoiding evasive practices and favouring conduct based on good faith in dealings with tax authorities and all stakeholders.

The management of tax obligations is entrusted to the Administration, Finance and Control Department, which, where necessary, seeks assistance from qualified external professionals with a view to ongoing regulatory updates and effective oversight of tax risk.

Decisions related to tax matters are based on criteria of:

- Correct, complete and timely determination and settlement of taxes due by law.
- Prior assessment of the tax impacts of corporate transactions, with the aim of ensuring that they are consistent with laws and with the Company's ethical and strategic principles.

The Group's tax approach is integrated into its broader internal control system aimed at ensuring integrity, legality and sustainability of the business model. The Group does not have offices in low-tax jurisdictions nor does it adopt aggressive tax-planning strategies, in line with international governance best practices.

Taxation system management is also a key area for the purposes of the controls provided for under Italian Legislative Decree No. 231/2001. In particular, tax offences are considered to be among the relevant offences under the 231 Models adopted by City Green Light S.p.A. and Lumagest S.r.l., each within its respective corporate scope.

Consequently, any suspicious behaviour in tax matters may be reported through the channels provided under the 231 Organisation, Management and Control Model, helping prevent unlawful conduct and fostering a corporate environment based on legality and transparency.

No significant new tax disputes were initiated in 2025. Tax compliance matters were managed by the relevant departments, with the support of qualified external advisers where necessary.

Protection of human rights

City Green Light S.p.A. adopts a structured approach to the protection of human rights, integrating its ethical values and social responsibility into the corporate management system. To this end, the Company has implemented a Social Responsibility Management System compliant with the SA8000 standard, consistent with the principles set out in the Code of Ethics and key international human-rights references. The principles of corporate social responsibility are also being progressively promoted at Group level, in line with changes to the scope of consolidation.

The system is based on the following sources:

- The core conventions of the International Labour Organization (ILO)
- The Universal Declaration of Human Rights
- The UN Convention on the Rights of the Child
- The UN Convention on the elimination of all forms of discrimination

Every year, City Green Light S.p.A. prepares the SA8000 Social Report, which includes qualitative and quantitative information regarding the protection of human rights along the entire value chain, reporting the Company's commitment to all its stakeholders, whether they be employees, customers, suppliers or local communities.

The SA8000 Report is based on fundamental principles that guide all corporate activities:

- Repudiation of all forms of discrimination
- Quality of working conditions and attention to workers' well-being
- Protection of occupational health and safety
- Promotion of people, skills and corporate culture
- Freedom of association and the right to collective bargaining
- Combating child and forced labour
- Promotion of inclusion and accessibility
- Support for the social and economic development of the territories it operates in

To ensure the effective implementation of these principles, City Green Light S.p.A. established a Social Performance Team, tasked with:

- Monitoring the development and maintenance of the SA8000 system
- Assessing risks of non-compliance
- Identifying any actual or potential non-compliance
- Proposing corrective or preventive actions to Management depending on the severity of the risk

Responsible procurement and supply chain management

Procurement practices are a key priority for City Green Light Group, both to ensure the quality and continuity of its operations and to manage environmental, social and governance impacts throughout the value chain.

The Group operates through an extensive network of suppliers, subcontractors and service providers, who are involved in the installation, maintenance and refurbishment of plants, the supply of electricity, the procurement of materials and technological components, and the provision of professional and specialist services.

Procurement activities are managed in accordance with the principles set out in the Code of Ethics and the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001, the Anti-Corruption Policy and the internal procedures for the qualification, selection and monitoring of suppliers. All purchases must be made in accordance with the principles of fairness, integrity, confidentiality, diligence, transparency and competition, ensuring compliance with applicable legislation and company procedures.

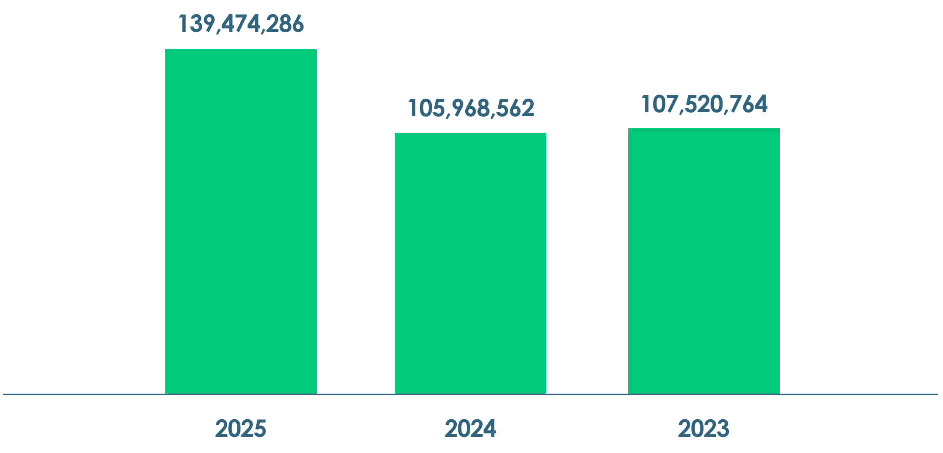
Suppliers are selected on the basis of technical and professional suitability, reliability, quality of service, compliance with regulatory requirements and alignment with the Group's ethical and sustainability principles. Any deviations from the standard selection procedures must be justified and authorised by management. These practices, along with those described below, enable the Group to address potential negative impacts arising from a lack of integrity in its growth processes – which could in turn undermine the confidence of public authorities and other economic operators – and help enhance the transparency of its procurement decisions.

During the reporting period, the Group had **1,305 active suppliers**, falling mainly into the following categories:

- **Processing**, including subcontractors and providers of operational services, such as the installation and maintenance of technological systems, energy efficiency refurbishment works and building works on public and private properties;
- **Electricity suppliers,** involved in providing the energy required to deliver the services managed;
- **Suppliers of materials,** including suppliers of lighting fixtures, poles, supports, electrical cables, plumbing equipment, pipework, valves, refrigeration units, heat pumps and building materials;
- **Service providers**, including employment consultants, designers, certifying experts, legal advisers, IT providers and other professional service providers.

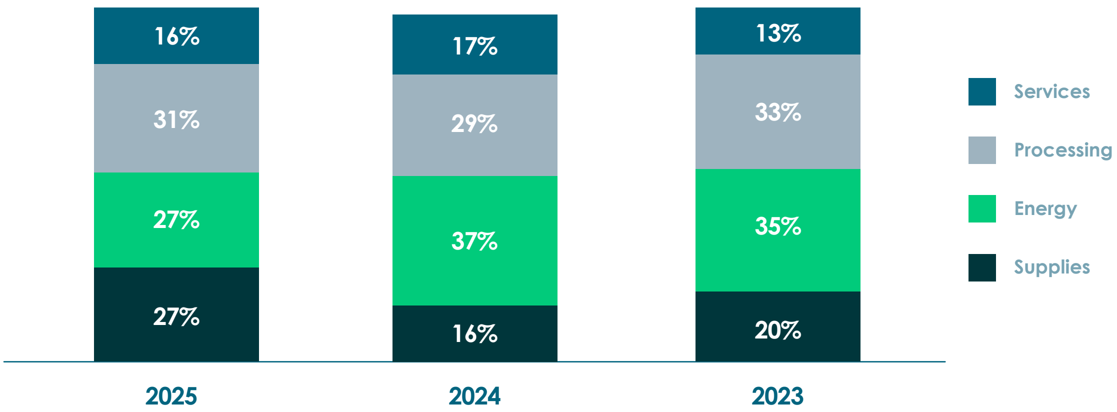
In 2025, the Group's total procurement amounted to approximately **Euro 139.5 million.**

Value of purchases



The expenditure relates mainly to processing, energy, supplies and services, as shown in the table below.

GRI 204-1 – Procurement expenditure by category



In 2025, manufacturing accounted for approximately 31% of total expenditure, electricity for approximately 27%, supplies around 27% and services around 16%.

GRI 204-1 Proportion of spending on local suppliers

Procurement expenditures 2025-2023	2025	2024	2023
	€	€	€
Supplies	37,046,746	17,340,371	21,243,081
Energy	37,672,449	39,372,611	37,138,971
Processing	42,647,993	31,134,189	35,408,638
Services	22,107,098	18,121,391	13,730,074
Total	**139,474,286**	**105,968,562**	**107,520,764**

Procurement expenditures by geographical area	2025		2024		2023	
	€	%	€	%	€	%
Italy	138,183,249	99.1%	105,459,905	99.5%	107,217,801	99.7%
Abroad	1,291,037	0.9%	508,657	0.5%	302,963	0.3%
Total	**139,474,286**	**100%**	**105,968,562**	**100%**	**107,520,764**	**100%**

Expenditures on procurement consist almost exclusively of local suppliers[1]. This figure reflects the nature of the Group's operational activities, which require a widespread territorial presence and the ability to respond promptly at the Municipalities and the sites it manages.

The geographical distribution of subcontractors and service providers is a key factor for the Group, as it enables it to respond more promptly in the territories it serves and, at the same time, helps support the local economy and businesses operating in those areas.

In 2025, the estimated number of jobs linked to operational activities is 1,285, compared with 875 in 2024 and 515 in 2023. This figure represents an estimate of the average number of subcontractor workers employed on a continuous basis throughout the period, which varies depending on the number and complexity of the municipalities managed and the activities set out in the timetables.

1 Local suppliers are defined as suppliers located in the same geographical area where the Company operates, i.e. Italy.

Supplier qualification, selection and monitoring

The Group employs a structured system for the qualification and monitoring of suppliers, designed to assess their technical and professional suitability, reliability and expertise, and to ensure their compliance with the required standards in the areas of quality, health and safety, the environment, social responsibility, anti-corruption and risk management.
The qualification process, governed by internal procedures, is designed to establish business relationships with suppliers who demonstrate that they meet the appropriate technical, organisational and regulatory compliance requirements. In particular, for the purposes of admission and qualification, the following may be required, amongst others:

- General requirements laid down in the public contracts code;
- Conditions of professional suitability;
- Economic-financial capacity requirements;
- Organisational and technical-professional requirements;
- Relevant certifications or accreditations, including UNI EN ISO 9001, ISO 14001, ISO 45001, ISO 37001, ISO 30415, SOA accreditations, inclusion on the White List, SA8000 and other standards relevant to the activities carried out.

Qualification may take place either through spontaneous application or by invitation from the Purchasing Department, via the company's Procurement Portal. Suppliers are classified by product category, including public works contractors, suppliers of goods, logistics service providers, design engineers and similar professionals, IT service providers and other categories.

The Procurement Portal enables you to gather the information required for evaluation, assign a score and assist in drawing up a ranking list. Suppliers who exceed the specified thresholds are required to demonstrate their technical and professional suitability, including by providing evidence of similar contracts, the availability of suitable resources and equipment, their organisational structure, staff training and their ability to ensure the safety, continuity and quality of the service.

The qualification system also enables the Group's suppliers to be assessed and monitored once a year. To support this monitoring, inspections and investigations are conducted at construction sites to verify compliance with contractual provisions, occupational health and safety at work and environmental regulations. In the event of any irregularities, site managers are required to take the appropriate remedial action without delay. In the event of serious breaches, the termination clauses provided for in the contract may be invoked.

In accordance with the qualification procedures and contractual documentation adopted by the Company, and where applicable, by Group companies, suppliers are required to comply with specific obligations relating to occupational health and safety, confidentiality and privacy protection, information security, traceability of financial flows, compliance with social security contributions, corporate social responsibility, gender equality, intellectual property, as well as the principles set out in the Code of Ethics and the 231 Model of City Green Light S.p.A., where applicable to contractual relationships. The Group also uses the Procurement Portal to support the qualification, monitoring and document verification of suppliers and subcontractors, including checks on tax and social security compliance.

ESG assessment of the supply chain

In line with the objectives of the 2023–2026 Sustainability Plan, during 2025 the Group updated the application and qualification questionnaire sent to existing and new suppliers, thereby strengthening the collection of environmental, social and governance information.

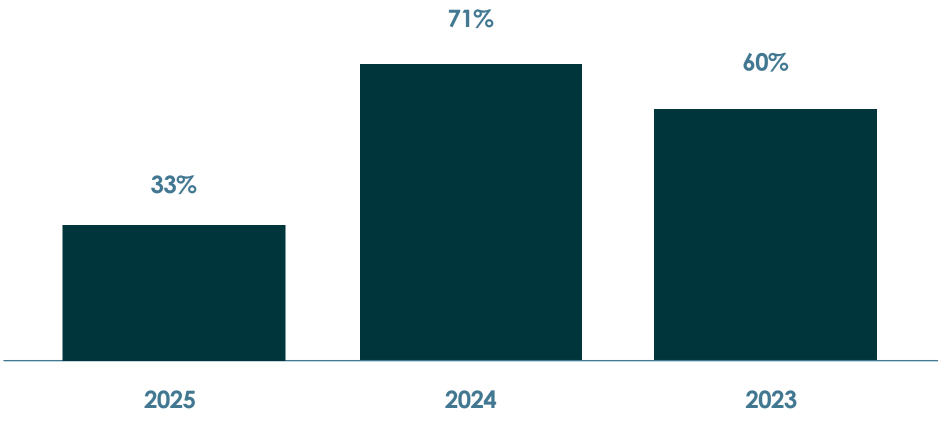
The questionnaire is particularly addressed to:

- Subcontractors;
- Suppliers of materials, including wholesalers and manufacturers;
- Suppliers of logistics services;
- Designers;
- Additional categories of suppliers, in order to identify candidates not yet fully covered by the qualification system.

The questionnaire also collects environmental and social information, such as the presence of hybrid or electric vehicles in logistics suppliers' fleets, the use of energy from renewable sources, the use of renewable and recyclable materials, the holding of relevant certifications, health and safety management, and compliance with the principles of social responsibility.

In 2025, the updated questionnaire was completed by 552 active suppliers.

GRI 308-1 New suppliers that were screened using environmental criteria/ GRI 414-1 New suppliers that were screened using social criteria



During 2025, the Group registered 782 new suppliers. Of these, 256 were screened against environmental and social criteria, representing 33% of the total number of new suppliers for the financial year.

Strengthening the ESG assessment and monitoring process across the supply chain helps prevent and mitigate potential negative impacts arising from breaches of integrity, regulatory non-compliance, and issues relating to health and safety, the environment and social responsibility. These measures also promote transparency in procurement decisions and the gradual alignment of third parties with the Group's ethical, sustainability and governance principles.

04

The Environment

City Green Light Group is committed to managing its environmental impact responsibly and to helping combat climate change through higher energy efficiency, technological innovation and the promotion of more sustainable management models in the delivery of its services.
This chapter sets out the management approach and performance in relation to the material topics of "Energy, energy efficiency and fight against climate change" and "Circular economy and waste management", in accordance with GRI Disclosure 3-3 and GRI Standards 302, 305 and 306.

The management of the environment for City Green Light Group

The Group's activities have an impact on the economic and social development of the territories it serves, on the quality of life of local communities and on the environment. For this reason, City Green Light Group structures its model to enhance positive impacts and to prevent, mitigate and manage actual and potential negative impacts associated with the Group's activities and its value chain.

In line with its mission and the United Nations Sustainable Development Goals, the Group plays an active role in the energy transition across the territories through energy efficiency projects, technological solutions for the smart management of infrastructure, the promotion of renewable energy, and initiatives aimed at improving the resilience and efficiency of the infrastructure it manages.

The strategy for climate change mitigation and adaptation is incorporated into the 2023–2026 Sustainability Plan, which identifies four main areas of environmental commitment:

- **Offering energy efficiency services;**
- **Green Technologies serving the community;**
- **Renewable energy consumption;**
- **Management of natural resources and waste.**

Throughout 2025, the Group continued to implement its 2023–2026 Sustainability Plan, achieving, consolidating or taking forward the key environmental actions set out in the targets dashboard. Specifically:

- Inclusion of the provision of electricity from renewable sources in all Project Financing and Third-Party Financing proposals.
- Integration of the value proposition with the installation of photovoltaic systems.
- Improvement of the quality of waste separation at company offices through the installation of smart bins capable of recognising the waste deposited and providing users with feedback on the correctness of their choices, based on the waste-separation policies of the relevant municipality.
- Strengthening and expansion of supplier monitoring regarding performance in ESG areas.

The Group's commitment to the continuous improvement of its environmental and energy performance is underpinned by the management systems adopted by the companies included within the relevant certification scopes. In particular, City Green Light S.p.A. adopted an Integrated Management System compliant with, amongst others, the UNI EN ISO 9001:2015 standard for quality, ISO 14001:2015 for environmental management and ISO 50001:2018 for energy management. Lumagest S.r.l. falls within the scope of the environmental and energy certifications as indicated in the table of adopted standards.

The Group ensures that its working procedures and plant configurations are constantly updated, in accordance with the applicable corporate scope, to keep pace with the ongoing evolution of national and EU environmental regulations, through:

- Environmental monitoring actions to confirm alignment with the provisions of the regulations and the prescriptions contained in the authorisation documents of the systems;
- Study and installation of advanced pollution control systems for maximum reduction of the risks of impact on the external environment;
- Constant analysis of processes for the development of preventive and corrective actions on procedures, infrastructures and means;
- Continuous research and adoption of the best available technologies to minimise negative interferences with the environment.

To support the management of environmental risks, the Group also maintains insurance cover against potential environmental liabilities. These tools complement, rather than replace, the preventive, operational control and regulatory compliance measures adopted as part of the Integrated Management System and, in the case of City Green Light S.p.A., the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001.

Energy and energy efficiency

In recent years, the increasing volatility of energy prices and the challenges relating to energy security and independence have reinforced the strategic role of energy efficiency, making it essential for achieving the Sustainable Development Goals and meeting European decarbonisation targets.

Against this backdrop, the Group is implementing measures to improve energy efficiency in the management of public buildings and, in particular, in public lighting services. City Green Light S.p.A., as the parent company and main operating entity, acts as service manager under the relevant contracts, directly financing the refurbishment of plants, with the costs recouped through the energy savings generated.

In addition to these activities, the Group develops and manages plants for generating energy from renewable sources, in particular photovoltaic plants, as part of specific contracts. Under this model, City Green Light Group is responsible for the construction, operation and maintenance of the plants, as well as the subsequent sale of the electricity generated, thereby contributing to the wider adoption of renewable energy and reducing dependence on traditional sources.

The work carried out ensures high levels of energy efficiency and reduced maintenance requirements.

In the case of street lighting, they also ensure:

- Reduction of environmental impacts and light pollution;
- Greater safety for motorists and pedestrians;
- Improved usability of urban spaces at night.

For each contract, the Group sets specific energy-saving targets, tailored to the characteristics of the facilities (size, historical consumption and technological status), and establishes precise timelines for achieving them.

In the case of street lighting, during the operational phase, energy consumption is continuously monitored via remote control systems for the electrical switchboards, which enable any faults to be detected promptly and corrective action to be taken. The system enables energy data from Points of Delivery (PODs) to be collected and analysed in real time, ensuring that consumption is monitored and savings achieved are verified.

The adoption of these technologies ensures service continuity and helps reduce energy waste, including that resulting from improper or unauthorised use.

All new installations are also fitted with fixtures that comply with light pollution regulations, preventing light from being emitted upwards.

Between 2011 and 2025, the energy efficiency projects implemented by the Group generated an estimated annual saving of 419,000 MWh, corresponding to an estimated reduction of 71% compared with the pre-project situation, and estimated avoided[2] emissions of approximately 125,000 tonnes of CO_2 per year. These values are calculated in relation to the reference scenarios adopted for measuring the energy efficiency actions taken.

2 It should be noted that the Group developed an in-house indicator not provided for in GRI Standards, but which is considered to be more representative of the specific characteristics of its core business. This indicator is used to supplement other GRI disclosures, in accordance with the provisions of Requirement 5 of GRI 1 – Foundation 2021. The methodology was developed in-house by the company's own experts, and the following value was calculated as the sum of the total energy consumption recorded as at 31/12/2025 for current contracts – based on actual consumption figures or adjusted figures where consumption is estimated rather than measured – and the consumption recorded during the final contract year for contracts that have expired. This figure was then compared with the initial consumption figures for each contract under review, whether current or terminated. During 2025 new energy-efficiency projects generated an incremental annual saving of approximately 10,000 MWh, in addition to the 387,000 MWh already recorded at the end of 2024. Applying the standard conversion factor of 0.236 tCO_2/MWh, source: ISPRA 2024, the energy savings achieved in 2025 correspond to an estimated reduction of approximately 2,350 tonnes of CO_2. The total value of emissions avoided during the period 2011–2025 amounts to 125,000 tonnes of CO_2. This figure was obtained by applying the ISPRA coefficient for the year in which the energy savings were achieved to the historical results.

In 2025, the total energy consumption within the Group was 3,959 MWh, corresponding to 14,253 GJ. Total energy consumption outside the Group, on the other hand, amounted to 156,515 MWh, corresponding to 563,455 GJ[3].

The following table summarises energy consumption over the last three years of reporting, broken down by type of consumption:

GRI 302-1 & GRI 302-2 - Energy consumption within and outside the organisation

Energy consumption[4]	2025		2024		2023	
	GJ	MWh	GJ	MWh	GJ	MWh
Energy consumed within the organisation						
Electrical energy (offices)	1,033	287	445	124	460	128
of which renewable	664	184	326	91	271	75
Vehicles (Diesel)	8,856	2,460	6,459	1,794	4,502	1,251
Vehicles (Petrol)	3,909	1,085	1,760	489	1,634	454
Vehicles (Methane)	0	0	-	-	-	-
Boilers (Diesel)	345	96	-	-	-	-
Boilers (Natural gas)	109	30	-	-	-	-
Total internal energy consumption	**14,253**	**3,960**	**8,663**	**2,406**	**6,596**	**1,832**
Energy consumed outside the organisation						
Electrical energy	563,455	156,515	590,783	164,106	546,528	151,813
of which renewable	438,622	121,839	477,967	132,769	397,327	110,369
Total external energy consumption	563,455	156,515	591,037	164,177	546,528	151,813
Total energy consumption	**577,708**	**160,475**	**599,700**	**166,583**	**553,124**	**153,646**
of which renewable	**439,286**	**122,023**	**478,293**	**132,859**	**397,598**	**110,444**

As shown in the table, electricity consumption outside the organisation accounts for the largest

3 The conversion factors used to calculate energy consumption for diesel, natural gas and methane are taken from the DESNZ (UK Department for Energy Security and Net Zero) database, which is updated annually, for the years 2025, 2024 and 2023. Where not available, energy data have been estimated.

4 The published 2024 Sustainability Report also includes data on the consumption of the boiler and pump being charged back, as the scope of reporting was limited to the parent company alone and it was deemed relevant to include this consumption, in accordance with GRI 302-2. This was made to provide a more comprehensive picture of energy performance. In the 2025 financial year, given the change in scope, these figures were no longer significant. Indeed, the GRI 302-2 guidelines stipulate that an organisation may include consumption figures where this “contributes significantly to the organisation’s total anticipated energy consumption outside of the organisation”.

share of total energy consumption, as it includes the electricity associated with the services managed on behalf of customers and Municipalities.

In 2025, despite the expansion of the scope of consolidation, external electricity consumption fell by 7,662 MWh (-4.6% compared with 2024). This reduction is attributable to the energy efficiency measures implemented on the systems under management, which led to a decrease in overall energy consumption across the operational scope, despite the increase in the number of lighting points managed. The total number of lighting points in fact increased, rising from 975,000 in 2024 to around 998,000 by the end of 2025 (+2%), of which 940,000 relating to City Green Light S.p.A. and 58,000 to Lumagest S.r.l.

With regard to direct energy consumption, however, there was an increase compared with 2024 (+65%), mainly attributable to the rise in consumption linked to road haulage and electricity for internal use. This change is mainly attributable to the widening of the scope of consolidation.

The share of electricity from renewable sources in external consumption stood at around 78% in 2025, down from 81% in 2024. This change is primarily attributable to the inclusion of Lumagest S.r.l. within the scope of consolidation. Its energy mix for the electricity purchased for the public lighting systems it manages comprises a higher proportion of non-renewable sources, which has a dilutive effect on the Group's overall share of renewable sources.

To supplement the consumption figures, in 2025 the Group generated a total of 771 MWh of electricity from photovoltaic systems, corresponding to approximately 0.5% of the Group's total energy consumption. The energy produced is sold in its entirety and therefore does not contribute to the Group's internal energy consumption or to the share of renewable energy used for its operational activities. However, this generation indirectly contributes to the uptake of energy from renewable sources within the overall energy system.

The table below summarises the Group's energy production from photovoltaic systems during the reporting period.

Renewable energy generated by photovoltaic systems	Unit of measurement	2025
Self-generated renewable energy from photovoltaic systems	MWh	771
Of which: self-generated electricity consumed	MWh	0
Of which: self-generated electricity sold	MWh	771

Based on the energy consumption data, energy intensity indices were calculated for the three years, broken down by type of consumption[5].

5 For calculating the energy intensity as the denominator, the Value of Production from the Financial Statements expressed in thousands of Euro was used, which is Euro 202,759 thousand for 2025, Euro 149,910 thousand for 2024 and Euro 152,353 thousand for 2023.

GRI 302-3: Energy intensity

Energy intensity index (GJ/k€)	2025		2024		2023	
	GJ	MWh	GJ	MWh	GJ	MWh
Total direct consumption	0.0703	0.0033	0.0578	0.0161	0.0433	0.0120
Total indirect consumption	2.7789	0.7719	3.9426	1.0952	3.5873	0.9965

Energy intensity ratios enable the Group to monitor changes in its energy efficiency in relation to the economic scale of its operations. The denominator used in the calculation is the Group's consolidated revenue. The numerator includes, respectively, energy consumption within and outside the organisation.

Each year, the Group obtains Energy Efficiency Certificates (Titoli di Efficienza Energetica - TEE), or "White Certificates", issued by the Energy Services Operator (Gestore dei Servizi Energetici - GSE), in recognition of the energy savings achieved through specific efficiency measures.

In 2025, the number of recognised TEEs stood at 7,641, resulting from projects carried out in various regions.

White Certificates	2025	2024	2023
Municipality	**No. of certificates**	**No. of certificates**	**No. of certificates**
Genoa (GE)	3,465	-	-
Reggio Emilia (RE)	486	-	-
Lamezia Terme (CZ)	386	-	-
Vicenza	329	-	-
Campofelice Roccella (PA)	-	19	53
Santa Flavia (PA)	-	53	123
Contessa Entellina (PA)	-	14	35
Lecce (LE)	-	299	883
Reggio Emilia (RE)	-	446	-
Gioia del Colle (BA)	-	103	-
Bondeno (FE)	-	74	-
Others	2,975	-	-
Total EECs	**7,641**	**1,008**	**1,094**

GHG emissions

According to the Greenhouse Gas ("GHG") Protocol, GHG[6] emissions are reported as follows:

- Scope 1 - Direct emissions from the use of fossil fuels for energy production, heating and automotive (vehicle fleet and cars);
- Scope 2 – Indirect emissions deriving from purchased electricity consumed for plants operation and facilities. Reporting considers both the location-based and market-based methods, in line with the updated GHG Protocol guidelines.
- Scope 3 – Other indirect emissions deriving from activities not directly owned or controlled by the Group. The 2025 report includes the relevant and quantifiable Scope 3 categories based on the available data, in accordance with the GHG Protocol classification.

In 2025, City Green Light Group's total direct and indirect greenhouse gas emissions, calculated using the location-based methodology, amounted to 44,350 tCO_2eq, compared with 50,350 tCO_2eq in 2024. This change, amounting to -6,000 tCO_2eq, should be interpreted in the light of changes to the reporting scope: in fact, 2025 the first financial year reported on a Group consolidated basis, whilst the comparative figures for 2024 relate to City Green Light S.p.A.

The reduction in location-based emissions is mainly attributable to the decrease in indirect emissions from electricity, which fall from 35,996 tCO_2eq in 2024 to 31,204 tCO_2eq in 2025. This trend is consistent with the reduction in electricity consumption associated with the plants and facilities managed, partly as a result of the energy efficiency measures implemented within the operational scope.

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6 GHG emissions were calculated as: GHG emissions = activity data * corresponding emission factor. The emission factors used for calculating GHG emissions are drawn from official and internationally recognised sources, as specified below:

- Scope 1: the emission factors for diesel and natural gas are taken from the DESNZ 2025 database (Department for Energy Security and Net Zero – formerly "DEFRA"; during the 2025 financial year, the name of the institution responsible for compiling the emission factors was changed);
- Scope 2: emission factors are taken from ISPRA 2025 for location-based calculations and Ecoinvent v3.12 for market-based calculations:
  - Location-based, based on the national energy mix;
  - Market-based: (attribution through energy contracts); broken down into "fossil black carbon" and "green (zero emissions)"
- Scope 3: hybrid approach was adopted combining internal data and emission factors from official sources:
  - For the purchase of goods and services, a mixed approach was applied based on DESNZ 2025, EPD/LCA and Ecoinvent v3.12, depending on the nature of the materials;
  - Emissions relating to upstream transport, operational waste, business travel, commuting and leased assets were calculated using DESNZ 2025 emission factors, differentiated by type of activity.

Where not available, the energy data used to calculate GHG emissions were estimated.

Emissions calculated using a market-based methodology – including Scope 1, market-based Scope 2 and Scope 3 – amount to 26,745 tCO_2eq, compared with 27,605 tCO_2eq in 2024. The total reduction amounts to -860 tCO_2eq. The difference between the total location-based figure and the total market-based figure reflects the effect of contractual choices regarding electricity procurement, including supplies covered by Guarantees of Origin.

Scope 1 direct emissions rose from 569 tCO_2eq to 921 tCO_2eq, an increase of 352 tCO_2eq. This change is mainly attributable to the increase in fuel consumption by the company's fleet, linked to the expansion of its operational scope and the intensification of activities across the territory.

Other Scope 3 indirect emissions stood at 12,225 tCO_2eq, down from 13,785 tCO_2eq in 2024. The reduction, amounting to -1,560 tCO_2eq, is mainly attributable to the reduction in emissions associated with upstream transport and distribution, which fell from 3,449 tCO_2eq to 972 tCO_2eq. This trend reflects both the streamlining of logistics operations and the updating of the emission factors applied to heavy goods vehicles. As a matter of fact, methodology was refined by applying the GLEC (Global Logistics Emissions Council) database, the benchmark standard for accounting for emissions from logistics and transport. Similarly, the reduction in emissions associated with purchased goods and services (Category 1), amounting to -2,466 tCO_2eq, is attributable to the update of the dataset used for emission factors (from Ecoinvent 3.11 to Ecoinvent 3.12). Therefore, this reflects the new release issued in the last quarter of 2025.

The reduction in Scope 3 emissions is partially offset by the increase in emissions relating to purchased goods and services, leased assets and employees' commutes. These changes are influenced by the expansion of the reporting scope, developments in operational activities and the gradual improvement in the completeness and granularity of the data collected.

GRI 305-1, 305-2 and 305-3 - GHG emissions by Scope

GHG emissions (tonnes of CO_2eq)[7]	2025	2024	2023
GHG direct emissions (Scope 1)			
Vehicles (Diesel)	639	456	335
Vehicles (Petrol)	251	113	116
Vehicles (Natural gas)	3	-	-
Boilers (Natural gas)	6	-	-
Boilers (Diesel)	26	-	-
Total Scope 1 emissions	**925**	**569**	**451**
GHG indirect emissions (Scope 2)			
Electrical energy - Location Based	**31,204**	**35,996**	**40**
Electrical energy - Market Based	**11,765**	**13,251**	**26**
Other GHG indirect emissions (Scope 3)			
Electrical energy - Location Based	**12,225**	**13,785**	**47,821**
Electrical energy - Market Based[8]	-	-	**20,746**
Total Location Based emissions (Scope 1 + 2 + 3)	**44,354**	**50,350**	**48,312**
Total Market Based emissions (Scope 1 + 2 + 3)	**24,915**	**27,605**	**21,223**

7 The distinction between location-based and market-based methodologies applies exclusively to Scope 2 emissions associated with purchased electricity. Scope 3 emissions are reported as other indirect emissions and are included, with the same value, in both the location-based total and the market-based total.

8 It should be noted that during the 2024 comparative financial year, the Group reviewed the classification of emissions deriving from the energy consumption of municipalities relating to the services it manages (public lighting and other outsourced services), previously reported under Scope 3. Following a methodological analysis based on operational control criteria and management responsibility, and in accordance with the GHG Protocol and GRI Standards (GRI 305), such emissions were reclassified under Scope 2. This decision was justified by the fact that the Company, being the holder of the supply points, exercises direct operational control over energy consumption through the technical and contractual management of services, taking responsibility for the relative environmental performance. However, it was not possible to apply this reclassification retroactively to figures from previous financial years (2023), as the information available does not meet the traceability, granularity and verifiability requirements needed for GRI-standard compliant reporting. Accordingly, 2024 represents the baseline year for the new emission classification methodology and will serve as the reference point for analyses of trends and environmental performance in future years.

Below is a breakdown of Scope 3 indirect GHG emissions divided by category according to the GHG Protocol classification.

Other indirect emissions (Scope 3) by GHG Protocol category	2025	2024
Source of greenhouse gas emissions	**tCO_2eq**	**tCO_2eq**
1. Purchased goods and services	7,707	10,173
2. Capital goods	3,238	
4. Upstream transportation and distribution	972	3,449
5. Waste generated	11	19
6. Business travel	61	79
7. Employee commuting	133	40
8. Upstream leased goods	102	25
Total	**12,225**	**13,785**

Based on emissions data, emissions intensity indices were calculated – taking into account GHG emissions calculated using a location-based methodology. The indices are presented for the three-year period, it being understood that the 2025 figure relates to the Group's consolidated scope, whilst the 2024 and 2023 figures relate to City Green Light S.p.A.[9]

GRI 305-4: GHG emissions intensity

Emission intensity index (tCO_2e/€k)	2025	2024	2023
GHG direct emissions (Scope 1) + indirect emissions (Scope 2)	0.1584	0.2439	0.0032
Other GHG indirect emissions (Scope 3)	0.0603	0.0920	0.3139

Commitment to sustainability and protection of the night sky

City Green Light S.p.A. continued its commitment to reducing light pollution, following up on the protocol signed at the end of 2023 with Unione Astrofili Italiani (the Italian Amateur Astronomers' Union) and the International Dark Sky Association – Italian Section. These initiatives help manage the environmental impacts associated with public lighting, with particular emphasis on reducing light pollution and protecting the night sky and local ecosystems.

In 2025, during the international "Going Dark" event, case studies from Matera and Asiago were presented, showcasing significant examples of public lighting refurbishment projects carried out by the Company.

9 For calculating the emission intensity as the denominator, the Value of Production from the Financial Statements expressed in thousands of Euro was used, being Euro 202,759 thousand for 2025, Euro 149,910 thousand for 2024 and, Euro 152,353 thousand for 2023.

In both contexts, which are characterised by the presence of astronomical observatories, the design was developed with a view to reducing light pollution and minimising interference with the night sky and local ecosystems.

Circular economy and waste management

In the course of its operations, City Green Light Group generates two main categories of waste: industrial waste, arising from its core business activities, such as the installation, refurbishment and maintenance of plant and infrastructure; and non-industrial waste, arising from office activities and its operational sites. Waste management is carried out in accordance with the European waste hierarchy, prioritising prevention, reuse, recovery and recycling over final disposal wherever technically possible.

The Group prioritises channelling waste into recovery operations, classifying waste streams according to the categories set out in GRI 306-4 and distinguishing between preparation for reuse, recycling and other recovery operations, where such information is available.

Industrial waste

Waste generation is directly linked to the Group's main business lines:

- **Public & Smart Lighting:** the main source of waste arising from the replacement, upgrading and maintenance of public and monument lighting systems. The main types include waste electrical and electronic equipment (WEEE), metal components (iron, steel, copper), cables and materials coming from construction and demolition work.
- **Buildings and Efficiency:** waste generated by energy efficiency measures and plant maintenance work on public and private buildings, including discarded electrical and electronic equipment, parts of plumbing and heating systems such as pipes, valves and boiler units, and construction and demolition materials such as bricks, concrete and insulation materials.
- **Smart Cities and Sustainable Mobility:** waste from the installation and maintenance of smart infrastructure (smart parking, road systems and sensors), such as electronic devices, digital components and materials from construction site activities.

During operational activities, waste is systematically sorted by type and classified according to EER (European Waste Catalogue) codes, in order to ensure its traceability and correct channelling for recovery or disposal. The Group also works with specialist consortia (including EcoLamp and ERION Professional) to manage waste from electrical and electronic equipment.

Logistics management is organised on the basis of geographical proximity, giving priority to the use of destination facilities located near the operational sites. This approach is also supported by framework agreements with local transport operators and is aimed at reducing emissions associated with transport activities, as well as optimising the economic efficiency of the supply chain.

The Group has local units and temporary storage facilities for waste generated by its operational activities, including the sites in Vicenza, Santa Maria di Sala, Costa Volpino and Cavenago for City Green Light S.p.A., and the site in Verona for Smart Parking Systems S.r.l. Waste management and disposal activities are also carried out by specialist companies that hold the necessary qualifications and certifications.
Waste management forms part of the Group's Environmental Management System. Production volumes are monitored and recorded in internal systems and in RENTRI (Registro Elettronico Nazionale sulla Tracciabilità dei Rifiuti - Italian electronic register for waste traceability), ensuring full flow traceability.

In 2025, the Group generated a total of **567 tonnes of waste**, of which:

- **561.4 tonnes of non-hazardous waste (98.9%)**
- **6.3 tonnes of hazardous waste (1.1%)**

99.7% of the waste was sent for recovery (R13 – Other recovery operations), whilst 0.3% was sent for disposal (D15 – Other disposal operations). The figure confirms that a marginal proportion of waste is sent for disposal, amounting to 0.3% of the total, and is classified as D15 for reporting purposes.

The quantities shown in the table below represent the total amount of waste generated during the 2025 financial year, broken down by EER code, type, management method (recovery or disposal) and final destination.

Please note that comparative figures are not provided, as this matter is relevant from the current reporting period onwards, following the update of the Materiality analysis. For further details, please refer to the relevant section.

GRI 306-3 – Waste generated by type, EER code and destination

Waste description	EER	Waste destination	R/D	[ton]	%
Mixed construction and demolition waste, other than those in items 17 09 01, 17 09 02 and 17 09 03	17 09 04	Other recovery operations	R13	279.2	49.2%
Iron and steel	17 04 05	Other recovery operations	R13	120.4	21.2%
Packaging made from mixed materials	15 01 06	Other recovery operations	R13	119.9	21.1%
Cement mixtures or waste, bricks, tiles and ceramics, other than those in item 17 01 06	17 01 07	Other recovery operations	R13	18.7	3.3%
Discarded equipment, other than that in items 16 02 09 to 16 02 13	16 02 14	Other recovery operations	R13	4.3	0.8%
Plastic	17 02 03	Other recovery operations	R13	4.2	0.7%
Discarded equipment containing chlorofluorocarbons, HCFCs and HFCs	16 02 11 *	Other recovery operations	R13	3.6	0.6%

Cables, other than those referred to in item 17 04 10	17 04 11	Other recovery operations	R13	3.1	0.5%
Components removed from discarded equipment, other than those in item 16 02 15	16 02 16	Other recovery operations	R13	3.0	0.5%
Bricks	17 01 02	Other recovery operations	R13	2.8	0.5%
Plant tissue waste	02 01 03	Other recovery operations	R13	2.7	0.5%
Other insulating materials containing or consisting of hazardous substances	17 06 03 *	Disposal	D15	1.5	0.3%
Copper, bronze, brass	17 04 01	Other recovery operations	R13	1.1	0.2%
Gypsum-based construction materials other than those in item 17 08 01	17 08 02	Other recovery operations	R13	0.9	0.2%
Other construction and demolition waste (including mixed waste) containing hazardous substances	17 09 03 *	Other recovery operations	R13	0.5	0.1%
End-of-life vehicles containing neither liquids nor other hazardous components	16 01 06	Other recovery operations	R13	0.4	0.1%
Inorganic waste, other than that in item 16 03 03	16 03 04	Other recovery operations	R13	0.3	0.0%
Discarded equipment, other than that in items 16 02 09 to 16 02 13	20 01 21 *	Other recovery operations	R13	0.2	0.0%
Lead-acid batteries	16 06 01 *	Other recovery operations	R13	0.2	0.0%
Insulation materials other than those in items 17 06 01 and 17 06 03	17 06 04	Other recovery operations	R13	0.2	0.0%
Chlorofluorocarbons, HCFCs, HFCs	14 06 01 *	Other recovery operations	R13	0.2	0.0%
Other batteries and accumulators	16 06 05	Other recovery operations	R13	0.1	0.0%
Nickel-cadmium batteries	16 06 02 *	Other recovery operations	R13	0.0	0.0%
Discarded equipment containing hazardous components other than those in items 16 02 09 and 16 02 12	16 02 13 *	Other recovery operations	R13	0.0	0.0%
Used printer toner cartridges, other than those in item 08 03 17	08 03 18	Other recovery operations	R13	0.0	0.0%
Metal packaging containing hazardous porous solid materials (e.g. asbestos), including empty pressure vessels	15 01 11 *	Other recovery operations	R13	0.0	0.0%
Total waste generated				**567**	**100.0%**
Of which, total non-hazardous				**561**	**98.9%**
Of which, total hazardous				**6**	**1.1%**

GRI 306-4 – Waste not sent to landfill

	[Ton]
Total waste sent to landfill – Other disposal operations	1.5
Of which, non-hazardous	0
Of which, hazardous	1.5

GRI 306-5 – Waste sent to landfill

	[Ton]
Total waste not sent to landfill – Other recovery operations	566.1
Of which, non-hazardous	561.4
Of which, hazardous	4.8

Quantitative evidence confirms that the Group's waste generation is predominantly linked to operational activities on construction sites and the maintenance of the plants it manages.

The main types of waste generated can be categorised as follows:

- Mixed construction and demolition waste (EER 17 09 04), accounting for approximately 49% of the total, consisting mainly of fragments of bricks and concrete, construction debris, plastics from building sites and metal residues;
- Iron and steel (EER 17 04 05), accounting for approximately 21%, deriving mainly from structural components and metal parts of replaced or refurbished plant;
- Packaging made from mixed materials (EER 15 01 06), accounting for approximately 21%, attributable to the supply chain and transport of lighting fixtures and installed equipment.

This breakdown highlights the close correlation between waste generation and the Group's core activities, in particular efficiency-enhancing measures, technological upgrades and infrastructure maintenance.

There are no waste treatment operations at the Group's sites. All waste is sent to authorised external facilities, meaning it is managed exclusively off-site.
This result demonstrates that the operating model is fully consistent with the principles of the circular economy and with the objective of progressively reducing the need for final disposal.

Non-industrial waste

The Group also generates non-industrial waste, which originates from its administrative headquarters and offices.

During the financial year, the management of this waste was supported by the introduction of digital systems and technological solutions for separate collection, with particular emphasis on the correct sorting of municipal waste streams.

Among the initiatives implemented, the NANDO system is particularly noteworthy. This is an IoT sensor integrated into waste collection bins which, through artificial intelligence-based analysis, monitors fill levels and helps ensure waste is disposed of correctly.

The system also allows you to:

- Identify any errors in the classification;
- Optimise the frequency with which the bins are emptied;
- Reduce the environmental impacts associated with waste logistics.

During the financial year, non-industrial waste consisted mainly of paper (32.3%), plastic and metals (31.9%) and unsorted waste (28.6%), whilst the remaining categories accounted for only a marginal proportion.

To complement its internal awareness-raising initiatives, the Group also implemented a programme to reduce single-use plastic, by installing water dispensers and distributing reusable water bottles to employees.

Measure circularity

The Group embarked on a structured path to measure the organisation's level of Circular Economy, with the aim of developing circularity indicators inspired by the principles of value creation and sharing, and resource availability and traceability.

Through a systemic approach, the Company aims to keep the flow of resources circular, conserving, regenerating or increasing their value while contributing to sustainable development.

To this end, the Company implemented a Material tool to collect and manage data from mass balances and suppliers' environmental declarations, drafted in accordance with UNI EN ISO 14021:2021 (Environmental product certification) and compliant with UNI/PdR 88:2020 (Verification of recycled and/or recovered content). This information may be made available to contracting authorities to ensure transparency and traceability.

The Company also participates in the UNI/CT 057 – Circular Economy Technical Committee, contributing to the development of methods and indicators for measuring circular processes in organisations.

From the experience gained, City Green Light S.p.A. developed Mass Balance Internal Procedural Technical Specifications, elaborated with the support of a specialised company, with the purpose of ensuring the implementation of a management and monitoring procedure consistent with UNI EN ISO 14021:2021 (Environmental product certification).

The specification focuses on "Recycled Content" (paragraph 7.8 of the aforementioned standard) which addresses the quantity and type of recycled materials (pre and/or post consumer) in the organisation's products purchased.

WHEN TRUST MATTERS

DNV

Dichiarazione di Assurance Independente

DNV Business Assurance Italy S.r.l. ("DNV") è stata incaricata dal City Green Light ("CGL") di condurre una verifica relativa alla asserzione ambientale autodichiarata «Bilancio Materico riferito agli interventi di riqualificazione di illuminazione pubblica nel Comune di San Pier D'Isonzo secondo la Norma UNI EN ISO 14021:2021» (di seguito «Asserzione»).

Scopo dell'Assurance

L'attività di verifica è stata pianificata e condotta nel rispetto del protocollo di verifica VeriSustain™ di DNV basato sulla nostra esperienza professionale e sulle *best practices* internazionali in materia di assurance, tra cui l'ISAE 3000 per la verifica delle informazioni non finanziarie. L'Asserzione è stata valutata rispetto a quanto previsto dai requisiti richiamati ai paragrafi §5, §6 e §7.8 della norma UNI EN ISO 14021:2021 per le asserzioni ambientali auto-dichiarate oltre che con riferimento a quanto previsto dal Disciplinare Tecnico Procedurale del Bilancio Materico per City Green Light del 20/12/2023 rev.01 (di seguito «Disciplinare»).

Basi della nostra opinione

Un team esperto in dichiarazioni ambientali ed assurance ha svolto le attività alla base della nostra opinione. Abbiamo svolto le seguenti attività:

- revisione del Disciplinare al fine di verificare l'adeguatezza, rilevanza, completezza, affidabilità, neutralità e comprensibilità dei criteri in esso richiamati per la definizione di un approccio sistematico all'applicazione della UNI EN ISO 14021:2021 ed in particolare alla definizione della Asserzione oggetto di Assurance
- Revisione delle informazioni fornite da CGL in relazione alla Asserzione ed in particolare:
  - revisione delle prove a sostegno delle informazioni quali-quantitative comprese nella Asserzione
  - verifica del processo di raccolta delle informazioni utili alla generazione dell'asserzione
  - verifica a campione dei calcoli effettuati a partire dalle informazioni raccolte

La nostra opinione

Sulla base dell'attività di verifica svolta, non sono pervenuti alla nostra attenzione elementi che ci facciano ritenere che l'asserzione ambientale autodichiarata «Bilancio Materico riferito agli interventi di riqualificazione di illuminazione pubblica nel Comune di San Pier D'Isonzo secondo la Norma UNI EN ISO 14021:2021» non sia stata redatta in conformità ai requisiti richiamati ai paragrafi §5, §6 e §7.8 della norma UNI EN ISO 14021:2021 per le asserzioni ambientali auto-dichiarate oltre che a quanto previsto dal Disciplinare Tecnico Procedurale del Bilancio Materico per City Green Light del 27/09/2023 rev.00

Marco Tagnesi
Lead Auditor

Riccardo Arena
Reviewer

Per DNV Business Assurance Italy S.r.l.
Vimercate (MB), Italy
24 Gennaio 2024

Responsabilità di CGL e dei provider di assurance

CGL è l'unico responsabile della redazione dell'Asserzione. Nello svolgimento del nostro lavoro di assurance, la nostra responsabilità è unicamente nei confronti del management di CGL; tuttavia, la nostra dichiarazione rappresenta la nostra opinione indipendente e ha lo scopo di informare tutte le parti interessate. DNV non è stata coinvolta nella predisposizione di dichiarazioni o dati inclusi nella Asserzione ad eccezione della presente Dichiarazione di Assurance Indipendente.

La verifica di DNV si basa sul presupposto che i dati e le informazioni forniti dal Cliente nell'ambito della nostra attività siano stati forniti in modo completo e siano autentici. DNV declina espressamente qualsiasi responsabilità o corresponsabilità per qualsiasi decisione che una persona o un'entità possa prendere sulla base della presente Dichiarazione di Assurance Indipendente.

Livello di assurance

Abbiamo pianificato ed eseguito il nostro lavoro per ottenere le prove necessarie per fornire una base per la nostra Opinione di Assurance secondo un livello limitato di garanzia.

Indipendenza

Le politiche e le procedure stabilite da DNV sono progettate per garantire che DNV, il suo personale e, ove applicabile, altri siano soggetti ai requisiti di indipendenza (inclusi i personale di altre entità di DNV) e mantengano l'indipendenza ove richiesto dai requisiti etici. Questo lavoro è stato svolto da un team indipendente di professionisti dell'assurance di sostenibilità.

DNV Business Assurance

DNV Business Assurance Italy S.r.l. è parte di DNV – Business Assurance, un provider globale di servizi di certificazione, verifica, assessment e formazione, che aiuta i clienti a rendere le performance aziendali sostenibili.
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Through an internal monitoring and auditing process, it is possible to ensure that City Green Light S.p.A.'s operations and products are aligned with the requirements of UNI EN ISO 14021:2021 and to guarantee that the content of recycled materials is adequate and complies with the established standards, thus helping promote environmental sustainability and meet the expectations of the company, stakeholders and the market, while improving the corporate environmental management.

City Green Light S.p.A.'s Mass Balance Internal Procedural Technical Specifications apply specifically to the assessment and control of the minimum content of recycled material as well as to the determination of the mass balance for the public lighting service provided by City Green Light S.p.A.
This involves an attentive analysis of the content of recycled material used within the service in order to promote sustainable practices that comply with environmental standards.

This process of analysis, evaluation and control is considered essential to demonstrate the Company's commitment to responsible resource management, reducing environmental impact and ensuring that contractually agreed minimum environmental criteria are met.

As a first tangible result, the Company developed a pilot project that led to the drafting of **"Bilancio Materico riferito agli interventi di riqualificazione di illuminazione pubblica nel Comune di San Pier D'Isonzo (GO) secondo la Norma UNI EN ISO 14021:2021" (Mass Balance referring to public lighting upgrades in the Municipality of San Pier D'Isonzo (GO) according to the UNI EN ISO 14021:2021 Standard)**. The result of the Mass Balance shows a high percentage of recycled content of the products installed during the upgrade of the municipality's lighting, specifically:

Total percentage by weight of recycled product - Pre-consumption	3.10%
Total percentage by weight of recycled product - Post consumption	68.87%
Total weight of recycled product (kg)	1,469.91 kg

The Mass Balance was verified by an international certification body, which confirmed its preparation according to the criteria of accuracy, adequacy, relevance, completeness, reliability, neutrality and understandability, in compliance with the requirements of UNI EN ISO 14021:2021. The Technical Procedural Guideline for the Mass Balance of City Green Light S.p.A. was also subject to verification and formal attestation.

Investments and innovation

Through research and the development of advanced technologies, City Green Light Group constantly pursues the most effective energy efficiency and energy savings possible for the public systems it manages, with the aim of supporting the energy and digital transition of Italian communities.

During 2025, the Group further consolidated its path of growth through a targeted strategy of investment, industrial integration and organisational development. With a revenue of Euro 202.8 million, an EBITDA of Euro 68.2 million and an order book of Euro 1,011 million as at 31 December 2025, City Green Light Group strengthened its leadership in the energy-efficiency and smart-city solutions sector.

During the financial year, the Group continued to integrate the expertise it has developed in recent years, expanding its capabilities in the sectors of plant engineering, technological construction, energy management and smart services.

Against this backdrop, the establishment of the Construction Solutions Business Unit and the introduction of the new governance structure by Igneo Infrastructure Partners further strengthened City Green Light Group's position as a single point of reference for the development of complex energy, digital and environmental transition projects, while ensuring sustainable returns for stakeholders.

Throughout 2025, City Green Light Group continued to develop energy efficiency and technological innovation initiatives on a national scale, operating in over 350 Italian municipalities and managing 997,498 lighting points, serving around 6 million residents. Work also continued on the refurbishment projects launched in previous financial years, helping consolidate the energy and environmental benefits in the territories it served.

The investments mainly concerned LED equipment, electrical panels and accessory installation charges aimed at improving the energy efficiency of public lighting, as well as plant upgrades for a total of Euro 22.4 million.

The remote monitoring systems used in the POD[10] facilities under management continue to be an essential tool for monitoring energy-saving targets. In addition to allowing georeferencing, these solutions make it possible to reduce network losses, minimise plant maintenance costs and identify any anomalies or fraud.

Technological innovation, development and network monitoring enabled an estimated overall energy saving of 71% compared with baseline consumption. Between 2011 and 2025, investments in energy efficiency also generated annual savings of 419,000 MWh and an estimated environmental benefit of around 125,000 tonnes of CO_2 avoided per year.

City Green Light Group stands out in the field of urban innovation thanks to a structured Open Innovation approach, collaborating with universities, research centres, start-ups and technology partners to develop sustainable, smart and data-driven solutions. In 2025, key developments included the launch and commencement of customer onboarding on the proprietary ForThink platform, the consolidation of the AiVS solution for video analytics and urban security, the launch of pilot projects with innovative start-ups, and the strengthening of partnerships with Seedble, ENEA and the University of Insubria, with the aim of supporting the digital evolution of urban services and improving the management of local infrastructure.

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10 The number of PODs under management as at 31 December 2025 within City Green Light Group stands at 17,674 (including the PODs managed by Lumagest S.r.l. for which we hold the energy supply contract).Technical and administrative characteristics for 823 of them prevent the installation of remote monitoring. Of the remaining amount (16,851 PODs), remote control systems were installed on 12,787, equal to 76%.

Innovative projects 2025

Throughout 2025, City Green Light Group further consolidated its role as an enabler of urban innovation through a structured Open Innovation approach, based on the collaboration with universities, research centres, start-ups and technology partners. This model allowed to drive the development of sustainable, smart and data-driven solutions to support the digital transformation of territories and urban services, while gradually involving the Group's subsidiaries in its key areas of innovation.

Among the key developments of the year was the launch and commencement of customer onboarding on ForThink platform, the proprietary solution for the analysis and enhancement of spatial data developed by City Green Light S.p.A. During the financial year, the platform was progressively integrated with corporate applications and infrastructure, expanding its functionality and strengthening its role as a digital hub for the advanced management of urban services.

This context also includes the consolidation of the AiVS solution, designed for video analysis and the management of urban security incidents, which was integrated with ForThink to enhance monitoring and decision-support capabilities.

At the same time, the Company launched and developed experimentation of pilot schemes with innovative start-ups, including the project carried out in Parma with the start-up **AWorld**, aimed at actively involving citizens in the ecological transition process and recognised with an award at **SMAU**.

Work also continued on testing artificial intelligence solutions for the rapid analysis of energy efficiency measures in buildings, as well as on the development of various AI-based application streams to optimise internal processes and the services provided.

The Group's innovation ecosystem was further strengthened by the launch of a partnership with **Seedble**, aimed at enhancing scouting and collaboration activities with technology start-ups, and by the continuation of the initiative launched with **ENEA** and **the University of Insubria** for the development of the**Urban Check-Up Model (UCUM)**. In this context, the project to digitise the tool developed for ENEA was launched in 2025, with the aim of supporting local authorities in mapping urban needs and planning smart services.

Overall, the initiatives developed over the course of the year confirm City Green Light Group's ability to turn its collaboration with the research and innovation ecosystem into concrete projects that promote sustainability, digitalisation and the quality of services for cities.

05

Centrality of people

People are at the heart of City Green Light Group's growth model and contribute to the development of innovation, the quality of the services provided and the Group's ability to meet the needs of the territories it serves.

The Group promotes a working environment based on health and safety, well-being, skills development, inclusion and equal opportunities.

The initiatives described in this chapter help manage the material impacts associated with the development of human capital, health and safety at work, and the promotion of fair and inclusive working conditions.

The management of personnel for City Green Light Group

In light of organisational and corporate developments, City Green Light Group strengthened its commitment to responsible people management, investing in training, digital tools, prevention, organisational well-being and skills development.

The 2023–2026 Sustainability Plan identifies people as one of the key priorities in the Group's sustainable development strategy. In this context, human resources management activities are geared towards promoting **the recruitment and development of skills, professional growth, health and safety, inclusion and people's well-being.**

Attracting talent is a strategic lever for supporting the Group's growth. The selection and onboarding process is designed to identify, engage and integrate professionals whose skills are aligned with the organisation's needs and the evolution of its business model. To support a transparent and consistent decision-making process, an assessment form is drawn up for each candidate following the interviews. Furthermore, following all first-round interviews, candidates are sent a dedicated survey, which is systematically administered to everyone, with the aim of gathering feedback on their experience and monitoring perceptions of a respectful, inclusive and non-discriminatory selection process. The results of the survey serve as a tool for monitoring and continuously improving the organisation's recruitment practices. The process ends with a coordination meeting between the People & Organisation function, the head of the relevant department and senior management, with a view to ensuring a shared and informed assessment.

Our people

2025 confirmed the continued growth of City Green Light Group's organisational and corporate structure: as at 31 December 2025, the Group had 383 employees, compared with 239 at City Green Light S.p.A. alone as at 31 December 2024, representing an overall increase of 144 employees. This change is attributable both to the effect of the expansion of the scope of consolidation, which resulted in an increase of 134 employees, and to the normal fluctuations in the Group's workforce, which saw 55 new hires and 45 terminations during 2025.

Of the total workforce, 97.1% are employed on permanent contracts and the remaining 2.9% on fixed-term contracts. The Group's workforce comprises 100 women and 283 men. Women account for 26% of the total, compared with 31% in 2024. This change is due to the expansion of the scope of consolidation and the different professional composition of the companies included in the Group.

Approximately 95% of the Group's workforce is employed full time. There are no employees under a zero-hour contract, i.e. workers who are not guaranteed a minimum or fixed number of hours to work per day, week or month but may have to make themselves available as needed.

The table below shows the number of employees, expressed in terms of headcount, as at 31 December of the reporting period, broken down by gender, contract type and working hours. All employees work in Italy.

GRI 2-7: Employees by gender, contract type and working hours

Number of employees as at 31 December	2025	2024	2023
Women	100	75	59
Men	283	164	129
Total	**383**	**239**	**188**
Permanent contract - Women	95	74	51
Permanent contract - Men	277	161	125
Permanent contract - Total	**372**	**235**	**176**
Temporary contract - Women	5	1	8
Temporary contract - Men	6	3	4
Temporary contract - Total	**11**	**4**	**12**
Full time - Women	86	64	51
Full time - Men	276	162	127
Full time - Total	**362**	**226**	**178**
Part time - Women	14	11	8
Part time - Men	7	2	2
Part time - Total	**21**	**13**	**10**

The organisational structure is set out in the table below, which complies with GRI Disclosure 405-1 regarding diversity amongst employees by gender, professional category and age group. The section on diversity in governing bodies is, however, covered in the chapter entitled "Governance and business ethics".

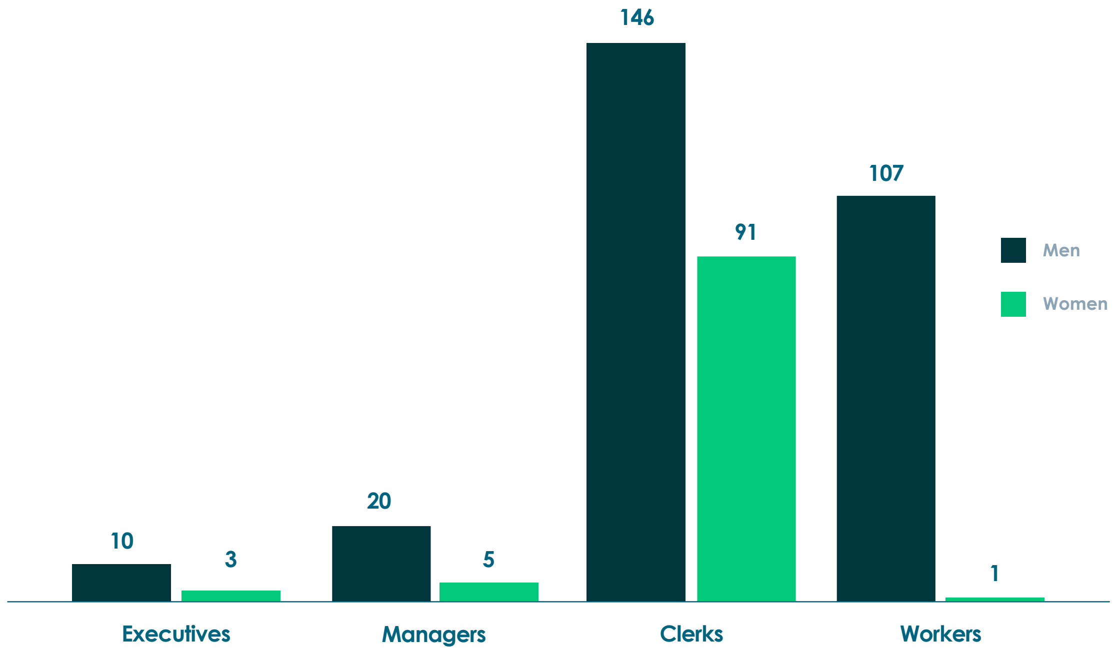
GRI 405-1: Diversity among employees by professional category, gender and age group

Employees by gender, professional categories and age groups	2025			2024			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives									
Under 30	0	0	0	0	0	0	0	0	0
30-50	7	1	8	7	1	8	6	0	6
Over 50	3	2	5	1	2	3	1	2	3
Total executives	**10**	**3**	**13**	**8**	**3**	**11**	**7**	**2**	**9**
Managers									
Under 30	0	0	0	0	0	0	0	0	0
30-50	16	5	21	14	3	17	9	1	10
Over 50	4	0	4	2	1	3	2	1	3
Total Managers	**20**	**5**	**25**	**16**	**4**	**20**	**11**	**2**	**13**
Clerks									
Under 30	25	28	53	16	18	34	13	15	28
30-50	89	56	145	67	46	113	63	37	100
Over 50	32	7	39	14	4	18	7	3	10
Total Clerks	**146**	**91**	**237**	**97**	**68**	**165**	**83**	**55**	**138**
Workers									
Under 30	19	0	19	6	0	6	5	0	5
30-50	54	0	54	25	0	25	18	0	18
Over 50	34	1	35	12	0	12	5	0	5
Total Workers	**107**	**1**	**108**	**43**	**0**	**43**	**28**	**0**	**28**
				,					
Total Under 30	44	28	72	22	18	40	18	15	33
Total 30-50	166	62	228	113	50	163	96	38	134
Total Over 50	73	10	83	29	7	36	15	6	21
Total employees	**283**	**100**	**383**	**164**	**75**	**239**	**129**	**59**	**188**

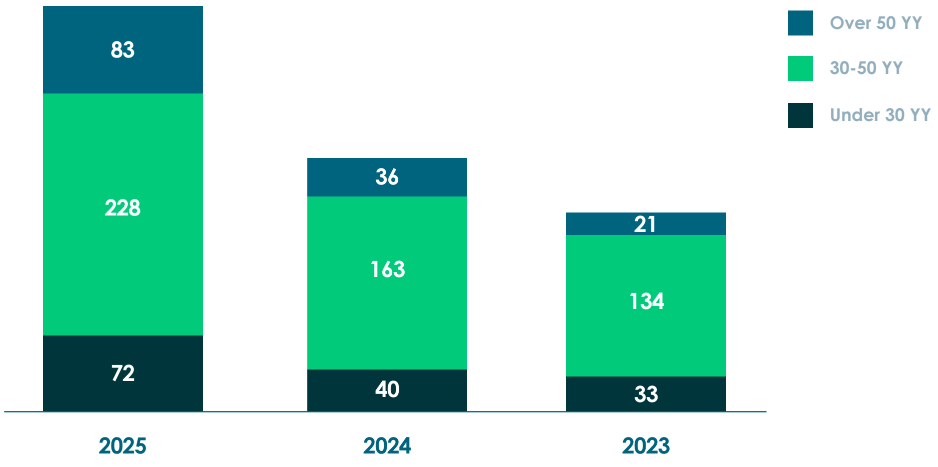
GRI 405-1 – Percentage breakdown of employees by gender, professional category and age group

Percentage of Employees by gender, professional categories and age groups	2025			2024			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives									
Under 30	0%	0%	0%	0%	0%	0%	0%	0%	0%
30-50	70%	33%	62%	88%	33%	73%	86%	0%	67%
Over 50	30%	67%	38%	13%	67%	27%	14%	100%	33%
Total executives	**77%**	**23%**	**100%**	**73%**	**27%**	**100%**	**78%**	**22%**	**100%**
Managers									
Under 30	0%	0%	0%	0%	0%	0%	0%	0%	0%
30-50	80%	100%	84%	88%	75%	85%	82%	50%	77%
Over 50	20%	0%	16%	13%	25%	15%	18%	50%	23%
Total Managers	**80%**	**20%**	**100%**	**80%**	**20%**	**100%**	**85%**	**15%**	**100%**
Clerks									
Under 30	17%	31%	22%	16%	26%	21%	16%	27%	20%
30-50	61%	62%	61%	69%	68%	68%	76%	67%	72%
Over 50	22%	8%	16%	14%	6%	11%	8%	5%	7%
Total Clerks	**62%**	**38%**	**100%**	**59%**	**41%**	**100%**	**60%**	**40%**	**100%**
Workers									
Under 30	18%	0%	18%	14%	0%	14%	18%	0%	18%
30-50	50%	0%	50%	58%	0%	58%	64%	0%	64%
Over 50	32%	100%	32%	28%	0%	28%	18%	0%	18%
Total Workers	**99%**	**1%**	**100%**	**100%**	**0%**	**100%**	**100%**	**0%**	**100%**
Total Under 30	16%	28%	19%	13%	24%	17%	14%	25%	18%
Total 30-50	59%	62%	60%	69%	67%	68%	74%	64%	71%
Total Over 50	26%	10%	22%	18%	9%	15%	12%	10%	11%
Total employees	**74%**	**26%**	**100%**	**69%**	**31%**	**100%**	**69%**	**31%**	**100%**

Professional categories by gender (2025)



Workforce evolution by age group



Within its workforce, City Green Light Group also includes workers who are not employees, mainly comprising external contractors and personnel employed in operational and specialist roles expressed in terms of headcount and calculated on the basis of active contracts as at 31 December 2025.

In 2025, the scoping of workers who are not employees was updated following a more detailed analysis of the level of control exercised by the Group over the various types of workers potentially falling within the definition of "non-employee".

The 2024 figure for the total number of workers who are not employees was revised, while further details should be interpreted in the light of changes to the survey methodology described in the Methodological note.

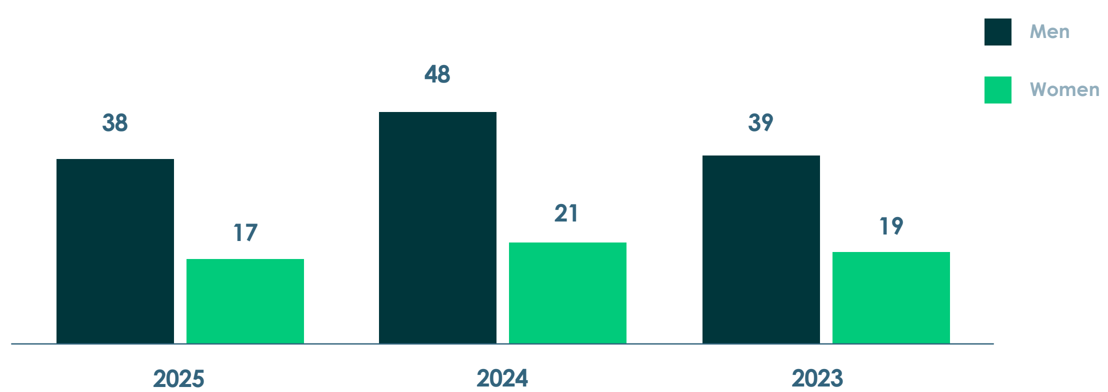
GRI 2-8: Workers who are not employees as at 31 December, by gender and type of contract

Number of administrations as at 31 December	2025	2024
Total	**4**	**2**

Hires and terminations

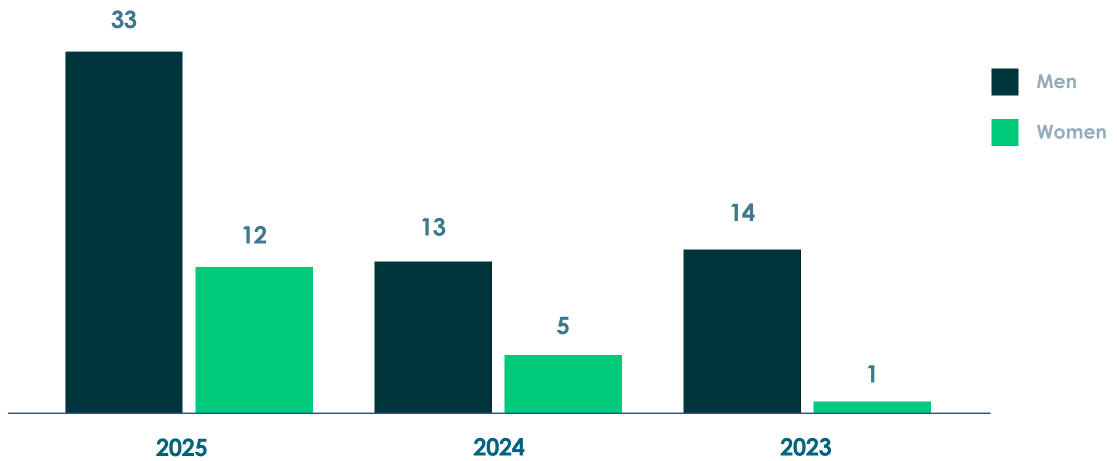
In 2025, the Group recorded **55 new hires**, of whom **17 were women and 38 were men**. **36%** of new hires were under 30, confirming the Group's focus on bringing in new skills and expertise. All reported new hires and terminations relate to staff based in Italy.

New hires in the three-year period 2023-2025 by gender



During the same period, there were **45 terminations**, of which **33 were men and 12 were women**. Terminations are mainly due to resignations and include **2 retirements**.

Terminations in the three-year period 2023-2025 by gender



GRI 401-1: Hires and terminations by gender and age group

Hires and terminations by gender and age group	2025			2024			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Hires									
Under 30	10	10	20	6	6	12	13	11	24
30-50	9	7	16	30	13	43	23	6	29
Over 50	19	0	19	12	2	14	3	2	5
Total Hires	**38**	**17**	**55**	**48**	**21**	**69**	**39**	**19**	**58**
Terminations									
Under 30	9	3	12	2	2	4	4	1	5
30-50	14	3	17	10	2	12	9	0	9
Over 50	10	6	16	1	1	2	1	0	1
Total Terminations	**33**	**12**	**45**	**13**	**5**	**18**	**14**	**1**	**15**

The **incoming turnover** rate[11] stands at **15%**, while the **outgoing turnover** rate[12] is **12%**. The 2025 figures should be interpreted in light of the expansion of the scope of consolidation and the resulting limited comparability with the 2024 figures.

11 Incoming turnover rate = (number of hires in the reporting year / total number of employees as at the beginning of the reporting year) x 100.

12 Outgoing turnover rate = (number of terminations in the reporting year / total number of employees as at the beginning of the reporting year) x 100.

GRI 401-1 – Hire and termination turnover rates by gender and age group

	2025	2024
Total Inbound turnover rate	**15%**	**37%**
Women	18%	36%
Men	14%	37%
Under 30	31%	38%
30-50	7%	33%
Over 50	24%	58%
Total Outbound turnover rate	12%	9%
Women	13%	8%
Men	12%	10%
Under 30	19%	13%
30-50	7%	9%
Over 50	20%	8%

Training and development

For City Green Light Group, training is a key tool for staff development and for supporting the organisation's growth. Investing in skills means supporting people throughout their career journey, recognising the value of their contribution and encouraging them to play an active and informed role in achieving corporate objectives, within a constantly evolving environment.

Training programmes are designed to support the professional and personal development of personnel and help strengthen their skills, foster a sense of belonging and build a cohesive and recognisable corporate community.

During 2025, the Group provided a total of 14,694 hours of training, comprising both compulsory and non-compulsory training activities, including, where applicable, training on health and safety at work. The increase in the total number of hours compared with the previous financial year is attributable to the expansion of the reporting scope and the strengthening of training programmes designed to support the Group's organisational, technical and managerial development.

Targeted training programmes were also developed on topics related to the Company's business, with the aim of strengthening the personnel's technical and specialist skills. In particular, training programmes were delivered in the areas of project management, the application of Codice degli Appalti (the Italian Public Procurement Code), the development of sales function skills and cyber security, to support the Group's organisational development and operational needs.

In line with the principles of accountability and transparency, training programmes were organised on compliance issues, including the Organisational Model pursuant to Italian Legislative Decree No. 231/2001, the Code of Ethics and the whistleblowing system, aimed at the entire workforce, with a particular focus on the ones being most exposed to risk.

Furthermore, in line with the principle of equal opportunities, **the Group provides its staff with an online training platform.** Monitoring training activities makes it possible to track attendance, course completion and progress through the programmes. Where applicable, the effectiveness of the initiatives is assessed through tests, participant feedback or learning assessments.
During 2025, the average number of training hours per capita was **38.36 hours**, calculated on the basis of the annual total of **383 employees.**

GRI 404-1 – Total training hours provided by gender

	2025			2024			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Total training hours provided	11,344	3,350	14,694	6,717	3,336	10,053	4,070	1,385	5,455

GRI 404-1: Average hours of training per year per employee

Hours provided per capita	2025			2024			2023		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	26.4	34.0	**28.1**	63.9	91.5	**71.4**	9.4	30.5	**14.1**
Managers	37.2	12.9	**32.3**	81.5	58.5	**76.9**	35.3	29.3	**34.4**
Clerks	43.6	35.0	**40.3**	43.4	41.6	**42.7**	33.8	31.2	**32.8**
Workers	37.1	0	**36.8**	16.0	0	**16.0**	28.8	0	**28.8**
Total	**40.1**	**33.5**	**38.4**	**41.0**	**44.5**	**42.1**	**31.6**	**31.1**	**31.4**

The total number of training hours also includes activities relating to occupational health and safety, which are reported in detail in the section "Health and Safety of workers"

Management remuneration

Remuneration policies are drawn up and periodically updated on the basis of clear and structured criteria, designed to recognise merit, skills and the contribution of individual professionals. These policies aim at ensuring fairness and internal consistency, while supporting professional growth and people retention as well as ensuring that the remuneration package remains competitive within the labour market, in line with the objectives of attracting and retaining talent.

City Green Light Group applies regulatory and remuneration conditions to its human resources that are not lower than those resulting from the relevant national labour contract (CCNL). In particular, 100% of the Group's employees included within the reporting scope are covered by national collective labour agreements applicable to their respective professional categories. The Group enforces the following contracts: CCNL for the Metalworking industry, CCNL for Executives in Industrial companies, CCNL for the Construction industry and CCNL for the Retail sector.

Remuneration may comprise fixed components and, where applicable, variable components, determined in accordance with the role held, the responsibilities assigned, the corporate objectives and the expected contribution to the Group's growth.

The remuneration of the highest governance body is determined by the Shareholders' Meeting. Any sign-on bonuses, appointment incentives, end-of-contract payments, claw-back mechanisms and pension benefits are governed by the applicable policies and, where not provided for, are deemed not to apply.

With regard to the components required by GRI 2-19, the Group's remuneration policies take into account: i) fixed remuneration and, where applicable, variable remuneration; ii) any bonuses awarded at the start of the appointment or incentives for the appointment; iii) any payments upon termination of the employment contract; iv) any claw-back mechanisms; v) pension benefits, in accordance with the provisions of collective agreements, company policies and applicable arrangements.

As at the reporting date, there are no formal mechanisms in place for consulting external stakeholders on remuneration policies, except as provided for in the governance framework and internal approval procedures.

There is no independent body responsible for overseeing the process of determining remuneration. However, as part of the UNI/PdR 125:2022 certification on gender equality, the adoption of a monitoring body is also planned with respect to gender pay equity.

The remuneration, including the variable component, of members of the highest governance body and senior managers does not currently include goals explicitly correlated to the Management of the impacts on the economy, the environment and people. The objectives currently set are primarily linked to operational and industrial outcomes which, indirectly, may also contribute to improved performance in the energy, digital, environmental and social spheres.

In 2025, the ratio between the total remuneration of the highest-paid person and the median annual total remuneration of all employees (excluding the person above) is 12.07 times, compared with 11 times in 2024.

The ratio of the percentage increase in the annual total remuneration of the highest-paid person to the percentage increase in the median annual total remuneration of all employees (excluding the person above) in 2025 compared with 2024 is 1.71, compared with 4.04 in 2024.

For the purposes of this calculation, the total annual remuneration includes salary, bonuses, stock awards, share option awards, non-equity incentive plan compensation, changes in pension value and gains from non-qualified deferred compensation paid during the year. It should also be noted that the highest-paid person in the organisation is the General Manager and that, for employees on part-time contracts, full-time equivalent pay rates are not used.

Company welfare

City Green Light S.p.A. and the Group companies promote welfare schemes designed to enhance people's well-being, support a healthy work-life balance and improve the quality of the working experience. Benefits are offered to employees in accordance with the applicable terms and conditions and may, where applicable, also extend to their immediate family.

The welfare system includes, amongst other things, schemes and services relating to leisure, education and training, social and health care, parenting support and family care services.

Benefits are granted in accordance with the conditions set out in the relevant regulations and policies.

The figures shown in the table indicate the number of employees covered by the relevant benefit as at 31 December of the financial year in question.

GRI 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees

Standard benefits typically provided (No.)	2025	2024	2023
Life insurance	13	11	9
Health care	383	239	188
Parental leave	12	6	3
Pension contributions	383	239	188

Confirming the path taken in the development of human capital, City Green Light S.p.A. once again obtained Great Place to Work® certification in 2025, a recognition that highlights the company's policies regarding employee engagement, organisational well-being and people experience. The principles underpinning this path are also being progressively promoted at Group level, in line with changes to the scope of consolidation.

Diversity, inclusion and equal opportunity

City Green Light Group regards people and their diversity as an essential part of its business approach. Inclusion, respect and participation are principles that guide our day-to-day decisions and are enshrined in the Code of Ethics, with the aim of creating a working environment in which everyone can feel welcome, listened to and valued.

The Group actively promotes equal opportunities and combats all forms of discrimination in the workplace, recognising that diversity is a source of personal and organisational enrichment. To underpin this commitment, dedicated reporting procedures were put in place, which guarantee confidentiality and the protection of individuals, helping foster a climate of trust and shared responsibility.

This initiative is underpinned by a structured approach to gender equality, diversity and inclusion, as well as social responsibility, as evidenced, in the case of City Green Light S.p.A., by UNI/PdR 125:2022 certification, compliance with the ISO 30415:2021 guidelines and SA8000 standard, which were achieved in 2023 and remain valid for the 2025 financial year. The principles underpinning these controls are being progressively promoted at Group level, in line with changes to the scope of consolidation.

The UNI/PdR 125:2022 certification attests to the adoption of a systemic approach aimed at promoting inclusive and equitable work environments, through the assessment of six areas: culture and strategy, governance, human resources processes, opportunities for growth and inclusion of women, pay equity, parenting protection and work-life balance.

At the same time, ISO 30415:2021 certification supports the upholding of the principles of diversity and inclusion through structured and measurable requirements, helping foster a working environment that respects differences and is focused on valuing people.

Confirming its intention to make this process structural, City Green Light S.p.A. established a Diversity & Inclusion Committee and appointed a Diversity Manager, being responsible for ensuring continuous oversight of gender equality and the promotion of diversity and inclusion.

The Group also promotes compliance with the principles of the Code of Ethics and the relevant company policies, encouraging behaviour based on collaboration, responsibility and mutual respect. For further details on governance arrangements, the Code of Ethics, 231 Model and reporting channels, please refer to the chapter entitled “Governance and business ethics”.

Health and Safety of workers

Protecting the health and safety of workers is a priority for City Green Light Group and is ensured through management systems, operational procedures, training, information and monitoring activities. The Group promotes a preventive approach aimed at identifying hazards, assessing risks and defining mitigation measures consistent with the activities carried out.

Health and safety management is supported by management systems certified to the ISO 45001:2018 standard for City Green Light S.p.A. and Lumagest S.r.l., in accordance with their respective scopes of application. The Company also promotes the gradual alignment of Group companies with the principles, procedures and safeguards adopted in the field of occupational health and safety.

The health and safety management system helps organise activities relating to the identification of hazards, risk assessment, the definition of prevention and protection measures, workers’ training, incident monitoring, the management of non-conformities and continuous improvement.

In accordance with current legislation, each Group company draws up and updates its own Risk Assessment Document (Documento di Valutazione dei Rischi - “DVR”). For operational contracts, Operational Safety Plans (Piani Operativi di Sicurezza - “POS”) are also drawn up, where applicable, in order to manage the specific risks associated with the activities carried out in the various operational contexts.

The prevention system is supported by regular inspection and monitoring activities, including evacuation drills at sites where required by law, health surveillance, regular medical check-ups, the appointment and training of first-aid officers and fire brigade members, the dissemination of safety information and updates, and inspections at operational sites.

Health surveillance is carried out with the support of the Occupational health doctor and the designated healthcare organisations, whilst respecting the confidentiality of the doctor-employee relationship and in accordance with the applicable legislation.
Workers' participation and consultation on health and safety matters is ensured through the channels provided for by the relevant legislation and applicable management systems, including the involvement of the relevant company representatives, the Health and Safety Service Managers, the Workers' Health and Safety Representatives and the designated supervisors.

With regard to activities entrusted to suppliers and subcontractors, the Group ensures health and safety by verifying technical and professional suitability during the qualification and selection phase and through periodic site inspections at operational sites, carried out by project managers and Health and Safety Service Managers (Responsabili del Servizio di Prevenzione e Protezione - "RSPP"), with the aim of verifying the effective implementation of health, safety and hygiene requirements.

During 2025, guidelines and best practices for staff were published on the company intranet, including specific instructions on how to carry out work activities in high temperatures. In the same year, a series of publications focusing on health and safety was also launched, with the aim of informing staff and raising their awareness of the organisational structure and company procedures relating to health and safety. This project will also continue into 2026.

With regard to occupational health and safety impacts, the Group provides training programmes tailored to the roles, duties and specific risks associated with the activities carried out. **In 2025, the average number of hours of training in occupational health and safety was 4.3 hours per employee**, with figures varying by professional category. The highest figure is recorded for the category of **manual workers, amounting to an average of 7.7 hours**, in line with this category's greater exposure to operational and site-related risks.

GRI 403-5 – Average number of hours of training in occupational health and safety, by professional category

Average Group's OSH training hours provided	2025	2024	2023
Executives	4.5	2.8	1.3
Managers	2.4	2.6	1.7
Clerks	2.5	3.9	4.1
Workers	7.7	7.0	16.6
Total	**4.3**	**3.6**	**5.7**

In 2025, there were 4 work-related injuries among the Group's employees that were reportable under GRI 403-9, all of which were minor. These incidents are mainly attributable to a road traffic accident that occurred while carrying out work duties, accidental contact with irritant substances or dust, and manual handling tasks. For information purposes, it should also be noted that during the period there was a further accident while commuting, which occurred whilst the employee was on their way to the workplace. This is not included within the scope of GRI reporting as it was not attributable to transport organised by the company.

There were no accidents resulting in serious injury or fatalities arising from occupational accidents amongst employees and those who are not employees working for the Group.

The rate of recordable workplace accidents among employees is 1.5, while among workers who are not employees it is zero. The rates are calculated in accordance with the methodology set out in GRI 403-9, as the ratio of the number of recordable occupational accidents to the number of hours worked, multiplied by 200,000.

With regard to workers who are not employees, there were no occupational accidents in 2025 that were reportable for the purposes of GRI 403-9. The figures for this category should be interpreted in the light of changes to the reporting scope and the data collection methodology adopted, as described in the Methodological note.

It should also be noted that there is an occupational disease recognised in previous financial years, originally relating to a subsidiary that was subsequently merged into City Green Light S.p.A. in 2025. In 2025, no new cases of recognised occupational disease were reported.

GRI 403-9: Occupational accidents

Occupational accidents	2025	2024	2023
Employees			
Number of hours worked	533,950	362,670	283,272
Number of recordable occupational accidents (including deaths)	4	-	-
Of which commuting (only if the organisation organised transport)	-	-	-
of which occupational accidents with serious consequences (excluding deaths)	-	-	-
of which deaths resulting from occupational accidents	-	-	-
Rate of recordable occupational accidents (including deaths)	1.5	-	-
Rate of occupational accidents with serious consequences (excluding deaths)	-	-	-
Rate of deaths resulting from occupational accidents	-	-	-
Workers who are not employees			
Number of hours worked	15,905	508,800[13]	493,440
Number of recordable occupational accidents (including deaths)	-	1	1
Of which commuting (only if the organisation organised transport)	-	-	-
of which occupational accidents with serious consequences (excluding deaths)	-	1	1
of which deaths resulting from occupational accidents	-	-	-
Rate of recordable occupational accidents (including deaths)	-	0.4	0.4
Rate of occupational accidents with serious consequences (excluding deaths)	-	0.4	0.4
Rate of deaths resulting from occupational accidents	-	-	-

13 It should be noted that, during 2025, the Group refined its analysis of the level of control exercised by the organisation over the various categories of workers who are potentially falling within the definition of "non-employee". "Subcontractors" are no longer classified as "non-employees", while interns and agency workers are classified as "non-employees". The figures for 2024 and 2023 were not revised due to the unavailability of data on interns and agency workers.


Bettella M.
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city green light

06

Customers and communities

Customers and communities are key stakeholders for City Green Light Group and form an essential part of the Group's value creation model. This chapter describes how the Group manages the impacts associated with its relationships with customers, communities and the territories it serves, with particular reference to the quality, continuity and reliability of the service, user safety and its contribution to the sustainable development of these areas.

Relationship with customers and local communities

City Green Light Group's activities are carried out in constant engagement with the local communities in the territories it serves, through structured channels for listening to, engaging in dialogue with and involving stakeholders.

The Company promotes a collaborative approach with Public Administrations and local stakeholders, which takes the form of regular meetings with mayors, RUP (sole project managers) and technical representatives, as well as ongoing interaction facilitated by the widespread presence of staff across the region, including area directors, project managers and site managers. Such opportunities for dialogue enable us to understand the specific needs of territories, guide service planning and management, as well as identify any issues or opportunities for improvement.

At the same time, the Company provides **operational channels for listening to local communities**, through which citizens can report service failures, issues or disruptions via call centres, dedicated email addresses, mobile apps and municipal platforms. These channels, which operate 24 hours a day, enable us to gather feedback from the local community, identify any issues promptly and take the necessary corrective action.

To promote transparency and collaboration with public stakeholders, the Company also developed the ForThink digital platform, which enables administrations to access data on facilities, projects and service performance in a simple and transparent manner, thereby fostering shared and informed management.

These feedback tools are supplemented by regular customer satisfaction surveys aimed at Public Administration customers, designed to monitor service quality and the ability to respond to local needs. With reference to the latest available survey, carried out in 2025 amongst representatives of public administrations and public sector clients managed as at 31 December 2024, the survey was sent to 100% of the 416 contacts identified at Group level and received 129 responses, corresponding to an aggregate response rate of 31.0%. The results show a high level of satisfaction, particularly with regard to the quality of communication, technical expertise and the personnel's proactiveness.

These engagement activities are carried out both during the initial planning and design phase of projects and during the day-to-day management of the service, with the aim of identifying needs, monitoring perceived quality and determining any necessary corrective actions.

Projects, services and impact on local communities

Through the design, implementation and management of public lighting solutions and smart services, the Group helps generate positive impacts on local communities.

In particular, the projects carried out help improve urban and road safety, increase the usability and accessibility of public spaces – including at night – enhance the territories, promote social inclusion, as well as reduce energy consumption and emissions.

Despite having a positive impact on local communities, the Group's design, installation, technical refurbishment and maintenance activities may also have potential temporary negative impacts on the areas affected by these projects. These impacts may include, in particular, disruption to vehicle and pedestrian traffic, noise, dust, temporary restrictions on access to certain public areas, and inconvenience to residents, businesses and other users of urban spaces.

To prevent and mitigate these effects, City Green Light Group implements organisational and operational measures designed to ensure the responsible management of its activities across the territory. These include planning works in coordination with Public Administrations, liaising with local technical representatives, scheduling activities to minimise disruption to the use of public spaces, implementing safety measures on building sites, and promptly addressing any reports or complaints received from members of the public or client organisations.

The active communication channels – including call centres, dedicated email addresses, mobile apps and municipal platforms – enable the prompt collection of any reports regarding service disruptions, critical issues or impacts perceived by the community, and allow corrective action to be taken where necessary. Ongoing dialogue with Public Administrations, RUP (sole project managers), technical representatives and operational staff in the field also plays a vital role in monitoring the effectiveness of the measures adopted and promoting continuous improvement in the management of impacts on local communities.

Initiatives for the community, the territory and cultural enhancement

Throughout 2025, City Green Light Group promoted and supported initiatives aimed at engaging local communities and backing up the sustainable transition of local areas. These include the project developed by the Municipality of Parma as part of its path towards climate neutrality, with the signing of the Climate City Contract and "Insieme verso Parma Climate Neutral 2030" (Together Towards Parma Climate Neutral 2030), an initiative carried out in collaboration with the start-up AWorld. Through monthly missions and citizen engagement activities, residents were involved in initiatives relating to energy saving, sustainable mobility and the circular economy, helping promote sustainable behaviour and strengthen the sense of community.

City Green Light Group also promotes initiatives aimed at cultural enrichment and raising awareness of issues relating to sustainability, urban innovation and the quality of public spaces, through its participation in and organisation of events and projects in the territories it serves.

Throughout 2025, the Company organised and took part in forums focusing on ecological transition, digital transformation and the development of more resilient, inclusive and sustainable cities. This includes the conference entitled "La città che ascolta e risponde: tecnologie, persone e ambiente in dialogo" (The City that listens and responds: technologies, people and the environment into dialogue), organised during the 42nd ANCI Annual General Meeting in Bologna, which explored the Senseable City model and the role of public-private partnerships in implementing sustainable and innovative urban projects.

The Company also took part in KEY – The 2025 Energy Transition Expo in Rimini, promoting the theme of inclusive and safe cities and the contribution that urban planning and technology can make to reducing the urban gender gap. As part of the event, a number of practical initiatives were presented, including the "Lighting for Genova" project, which aims to enhance the city's heritage through dramatic LED lighting and improve the sense of safety, and the roll-out of smart parking systems in Treviso to enable safer, digital management of urban mobility.

Further awareness-raising activities included participation in Going Dark 2025, an international workshop dedicated to responsible lighting. During the workshop, some projects carried out in the Asiago and Matera areas to reduce energy consumption and light pollution were presented. Furthermore, thanks to PNRR (Italian recovery and resilience plan) funding, the Company carried out energy-efficiency improvements at the National Archaeological Museum of Reggio Calabria through the installation of LED systems and smart lighting management technologies, thereby helping improve energy efficiency and enhance visitors' experience.

Throughout 2025, City Green Light Group also supported local cultural, social and community-based initiatives in the municipalities it serves, with the aim of helping enhance these areas, strengthen the sense of community and promote initiatives consistent with its role as a partner to Public Administrations.

The initiatives supported mainly focused on four areas of action: urban and cultural enhancement, local and community-building events, raising awareness of sustainability issues, and social solidarity. In this context, the Company contributed – through sponsorship, technical support or charitable donations – to the implementation of initiatives promoted by local authorities, regional bodies and non-profit organisations.

GRI 413-1– Community and territory initiatives in 2025

Scope of the project	Examples of initiatives supported in 2025	Contribution made to the community
Urban and cultural enhancement	Lighting in the square Piazza Mazzini, Lecce; lighting at the Church of Madonna delle Grazie in Navelli; decorative lighting at the Church of Santa Maria di Loreto in Valenzano; Christmas illuminations in Riccione and Rutigliano.	Enhancement of public spaces, historical and architectural heritage, and urban life enjoyment.
Local and community events	New Year's Eve concert in Corato, summer events in Guardiagrele, Christmas event "Natale a Reggio", Briganti Film Festival, and "Vicoli Divini" in Vibo Valentia	Promoting community involvement, local culture and the appeal of territories
Urban innovation and sustainability	Genoa Smart Week; RENAEL series of events; "Going Dark" event in Monteriggioni.	Dissemination of best practice in the areas of smart cities, energy efficiency, responsible lighting and sustainable transition.
Social solidarity and inclusion	The Lions Club's "Musica per me" project; the City of Varese's Christmas initiative "Natale al Cinema"; a charitable donation to Fondazione Città della Speranza ONLUS.	Support for initiatives aimed at vulnerable people, children, local communities and paediatric research.

These initiatives underscore the Group's commitment to contributing to the social, cultural and civic development of the territories in which it operates, while strengthening dialogue with local communities and Public Administrations. Support for local events and projects forms part of a broader strategy to create shared value, aimed not only at providing efficient and innovative services, but also at promoting the quality of public spaces, inclusion and citizen participation.

Collaborations with universities and research centres

The Group regards collaboration with universities, research centres and technology partners as a key factor in the development of innovative solutions and the strengthening of in-house expertise. Throughout 2025, a number of partnerships continued in the fields of smart cities, smart parking, digitalisation, energy efficiency and low-energy technologies.

Notable collaborations include:

- **University of Insubria**, for project activities focused on smart parking and data enhancement via ForThink platform;
- **iSImob, a spin-off from the University of Naples Federico II**, specialising in the development of smart public lighting management solutions based on a Digital Twin of urban mobility;
- **Tor Vergata University of Rome**, as part of the DIPOLES project ("Dielectric Properties Of Layered Double Hydroxides, a promising resource for Energy Harvesting and Environmental Sciences"), aimed at exploring new technologies related to ultra-low energy consumption for monitoring environmental parameters;

- **Milan Polytechnic and Turin Polytechnic**, for the analysis of technological and market trends;
- **CUOA Business School**, through its participation in the relevant academic and professional network.

Membership of associations and standardisation bodies

For City Green Light Group, membership of trade associations and participation in standardisation bodies represent a key aspect of its ESG commitment and a strategic factor in contributing to the sector development. Active participation enables the Company to share expertise with other market players, monitor and anticipate regulatory and technological developments, contribute to the definition of technical standards, and promote the adoption of best practice in the areas of energy efficiency, innovation and sustainability.

In accordance with the provisions of GRI 2-28, the table below summarises the main trade associations and standardisation bodies of which City Green Light Group is a member or in which it participates, selected on the basis of their relevance to the Group's activities, the sector in question and the sustainability and innovation objectives it pursues.

GRI 2-28: Main associations and standardisation bodies

Association / body	Main area	City Green Light Group's participation / contribution
ASSISTAL	Trade association affiliated with Confindustria, representing enterprises specialised in the design, supply, installation, management and maintenance of technological systems, energy efficiency services, ESCos and facility management.	Participation in sectoral discussions and trade association initiatives relating to the development of the plant engineering, energy and services sectors.
AssoESCo	Trade association representing Energy Service Companies and operators in the fields of energy efficiency and energy transition.	Active participation in the association's network and technical working groups; a company representative was appointed as a member of the Association's Executive Committee.
Confindustria Vicenza	Local association within the Confindustria network, supporting the representation, protection and competitiveness of local businesses.	Participation in the local business network and in forums on growth, innovation and competitiveness.
Assonolo	National association representing companies specialised in the professional operational leasing of capital goods.	Participation in the industry exchange and update on best practices and operational solutions for professional hire.
AIDI – Associazione Italiana di Illuminazione (Italian Lighting Association)	Association that promotes the culture of light, the development of lighting design, the dissemination of technical and scientific knowledge, and dialogue between companies, professionals, designers, universities and research centres.	Active contribution to discussions within the light and lighting design sector; a company representative serves on the Association's Executive Committee as a director.

AIDI – Associazione Italiana di Illuminazione (Italian Lighting Association)	Association that promotes the culture of light, the development of lighting design, the dissemination of technical and scientific knowledge, and dialogue between companies, professionals, designers, universities and research centres.	Active contribution to discussions within the light and lighting design sector; a company representative serves on the Association's Executive Committee as a director.
UNI – Italian Standardisation body	National technical standardisation body which draws up and publishes voluntary standards in the industrial, commercial and services sectors, excluding the electrical and electronic sectors, which are CEI's responsibility.	Participation, through in-house representatives, in the work of committees and technical groups, including UNI/CT 023/GL 12 "Luce e illuminazione" (Light and Lighting), which focuses on lighting design and the applications of light; UNI/CT 058/GL 03 "Infrastrutture e servizi delle città e comunità intelligenti" (Infrastructure and Services for Smart Cities and Communities), focusing on criteria for the design of efficient and smart cities; and UNI/CT 057 "Economia Circolare" (Circular Economy), dedicated to the development of methods and indicators for measuring circular processes within organisations.
CEI – Comitato Elettrotecnico Italiano (Italian Electrotechnical Committee)	National technical standardisation body in the electrical engineering, electronics and telecommunications sectors, recognised by the Italian State and the European Union.	Participation, through in-house representatives, in CEI/CT 317 "Smart Cities", a committee that oversees international standardisation activities relating to smart cities, with a focus on the electrical engineering, electronics and ICT aspects of urban infrastructure.

Participation in these organisations enables the Group to contribute to sectoral and institutional dialogue and to strengthen the link between technical standards, innovation and sustainability.

Service quality, efficiency and reliability

Service quality, efficiency and reliability are key elements in our relationship with customers and the community. The management of these aspects is supported by the adoption of Management Systems certified by independent bodies, which ensure the existence of structured policies and procedures for identifying and managing the risks and opportunities associated with corporate activities.
Throughout 2025, the Company maintained its existing certifications through audits carried out by certification bodies and internal verification activities set out in the annual audit plan. These activities make it possible to assess not only the system compliance, but also its effectiveness and the continuous improvement of its performance.
Based on the information available at the time of preparing these Financial Statements, there were no instances of non-compliance with regulations or voluntary codes relating to the health and safety impacts of products and services during the reporting year, nor were there any cases that resulted in sanctions or warnings.

City Green Light Group also holds SOA certificates attesting to its qualification for the execution of public works, in accordance with the applicable regulations. The SOA categories in force as at 31 December 2025 include, amongst others, civil and industrial buildings, technical installations, public lighting systems, electrical, heating and air-conditioning systems, telecommunications systems, and works relating to the management of infrastructure and the services provided.

SOA certificates valid as at 31 December 2025

CATEGORY	DESCRIPTION
OG1	Civil and industrial buildings
OG6	Aqueducts, gas pipelines, oil pipelines, irrigation and drainage works
OG9	Electricity generation plants
OG10	High/medium voltage transformation plants and systems for the distribution of alternating and direct current electricity and public lighting systems
OG11	Technological systems
OS3	Water and sanitary systems, kitchens, laundries
OS5	Pneumatic and intrusion-prevention systems
OS7	Finishing works of a technical building nature
OS9	Systems for illuminated signage and traffic safety
OS18A	Structural steel components
OS19	Telecommunications network systems and transmission and processing systems
OS28	Heating and air-conditioning systems
OS30	Internal electrical, telephone, radiotelephone and television systems

07

GRI and NON GRI content index

GRI content index

Declaration of use	City Green Light Group performed the reporting pursuant to GRI Standards for the period 01/01/2025 to 31/12/2025
GRI 1 used	GRI 1 - Foundation - 2021 version
Industry standards Relevant GRI	No sector standard applicable

GRI standard / other source	Disclosures		Location: paragraph	Omission		
				Omitted requirements	Reason	Explanation
General disclosures						
GRI 2 - General disclosures - 2021 version	GRI 2-1	Organisational details	Methodological notes to City Green Light's financial statements: The business model About us Ownership structure			
	GRI 2-2	Entities included in the organisation's sustainability reporting	Methodological note to the report			
	GRI 2-3	Reporting period, frequency and contact point	Methodological note to the report			
	GRI 2-4	Restatements of information	Methodological note to the report			
	GRI 2-5	External assurance	Methodological note to the report			
	GRI 2-6	Activities, value chain and other business relationships	About Us City Green Light Group's value chain Responsible procurement and supply chain management			
	GRI 2-7	Employees	Our people			
	GRI 2-8	Workers who are not employees	Methodological notes to the financial statements Our people			
	GRI 2-9	Governance structure and composition	Governance			
	GRI 2-10	Nomination and selection of the highest governance body	Governance			
	GRI 2-11	Chair of the highest governance body	Governance			
	GRI 2-12	Role of the highest governance body in overseeing the management of impacts	Governance Focus on the Sustainability Committee			
	GRI 2-13	Delegation of responsibility for managing impacts	Governance Focus on the Sustainability Committee			
	GRI 2-14	Role of the highest governance body in sustainability reporting	Governance Focus on the Sustainability Committee			
	GRI 2-15	Conflicts of interest	Governance			
	GRI 2-16	Communication of critical concerns	Governance			
	GRI 2-17	Collective knowledge of the highest governance body	Governance			
	GRI 2-18	Evaluation of the performance of the highest governance body	Governance			
	GRI 2-19	Remuneration policies	Management remuneration			
	GRI 2-20	Process to determine remuneration	Management remuneration			
	GRI 2-21	Annual total compensation ratio	Management remuneration			
	GRI 2-22	Statement on sustainable development strategy	Message to stakeholders			
	GRI 2-23	Policy commitments	Sustainability policies and commitments			
	GRI 2-24	Embedding policy commitments	Sustainability policies and commitments Integrating sustainability into the management model			
	GRI 2-25	Processes to remediate negative impacts	Sustainability policies and commitments Management of reports and whistleblowing			
	GRI 2-26	Mechanisms for seeking advice and raising concerns	Management of reports and whistleblowing Governance			
	GRI 2-27	Compliance with laws and regulations	Sustainability policies and commitments			
	GRI 2-28	Membership of associations	Membership of associations and standardisation bodies			
	GRI 2-29	Approach to stakeholder engagement	Our stakeholders			
	GRI 2-30	Collective bargaining agreements	The management of personnel for City Green Light Group			

Material topics						
GRI 3 - Material topics - 2021 version	GRI 3-1	Process to determine material topics	Materiality analysis			
	GRI 3-2	List of material topics	Materiality analysis List of material topics: cross-reference table List of impacts and material topics			
Economic performance						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Creating a shared value			
GRI 201 - Economic performance 2016	GRI 201-1	Direct economic value generated and distributed	Creating a shared value			
Responsible procurement						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Responsible procurement and supply chain management Supplier qualification, selection and monitoring ESG assessment of the supply chain			
GRI 204 - Procurement practices 2016	GRI 204-1	Proportion of spending on local suppliers	Responsible procurement and supply chain management			
GRI 308 - Supplier environmental assessment 2016	GRI 308-1	New suppliers that were screened using environmental criteria	ESG assessment of the supply chain			
GRI 414 - Supplier social assessment 2016	GRI 414-1	New suppliers that were screened using social criteria	ESG assessment of the supply chain			
Energy, energy efficiency and fight against climate change						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Energy and energy efficiency GHG emissions			
GRI 302 - Energy 2016	GRI 302-1	Energy consumed within the organisation	Energy and energy efficiency			
	GRI 302-2	Energy consumed outside the organisation	Energy and energy efficiency			
	GRI 302-3	Energy intensity	Energy and energy efficiency			
GRI 305 - Emissions 2016	GRI 305-1	Direct (Scope 1) GHG emissions	GHG emissions			
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	GHG emissions			
	GRI 305-3	Other indirect (Scope 3) GHG emissions	GHG emissions			
	GRI 305-4	GHG emissions intensity	GHG emissions			

Circular economy and waste management						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Circular economy and waste management Measuring circularity			
GRI 301 - Materials 2016	GRI 301-1	Materials used by weight or volume			Information not available/ incomplete	The requested information is not currently available in a complete and reliable form, as the systems and processes for collecting data in this area are still under development and do not yet provide comprehensive coverage of the reporting scope. The Group is committed to launching initiatives to improve data quality and completeness, with the aim of ensuring full disclosure in future editions of the Sustainability Report.
	GRI 301-2	Recycled input materials used	Measure circularity		Information not available/ incomplete	The requested information is not currently available in a complete and reliable form, as the systems and processes for collecting data in this area are still under development and do not yet provide comprehensive coverage of the reporting scope. The Group is committed to launching initiatives to improve data quality and completeness, with the aim of ensuring full disclosure in future editions of the Sustainability Report.
GRI 306 - Waste 2020	GRI 306-1	Waste generation and significant impacts associated with waste				
	GRI 306-2	Management of significant impacts associated with waste				
	GRI 306-3	Waste generated	Circular economy and waste management Industrial waste			
	GRI 306-4	Waste diverted from disposal	Circular economy and waste management Industrial waste			
	GRI 306-5	Waste directed to disposal	Circular economy and waste management Industrial waste			

Enhancing human capital						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table The management of personnel for City Green Light Group Our people Training and development Management remuneration Company welfare Diversity, inclusion and equal opportunity			
GRI 401 - Employment 2016	GRI 401-1	New employee hires and employee turnover	Hires and terminations			
	GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Company welfare			
GRI 404 - Training and education 2016	GRI 404-1	Average hours of training per year per employee	Training and development			
GRI 405 - Diversity and equal opportunity 2016	GRI 405-1	Diversity of governance bodies and employees	Governance Our people Diversity, inclusion and equal opportunity			
Occupational health and safety						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Health and safety of workers			
GRI 403 - Occupational health and safety 2018	GRI 403-1	Occupational health and safety management system	Health and safety of workers			
	GRI 403-2	Hazard identification, risk assessment, and incident investigation	Health and safety of workers			
	GRI 403-3	Occupational health services	Health and safety of workers			
	GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	Health and safety of workers			
	GRI 403-5	Worker training on occupational health and safety	Health and safety of workers			
	GRI 403-6	Promotion of worker health	Health and safety of workers			
	GRI 403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health and safety of workers			
	GRI 403-9	Occupational accidents	Health and safety of workers			
Relationship with the community and the territory						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Relationships with customers and local communities Projects, services and impacts on local communities Initiatives for the community, the territory and cultural enhancement			
GRI 413 - Local communities 2016	GRI 413-1	Projects involving the local community, impact assessments and development programmes	Initiatives for the community, the territory and cultural enhancement			
	GRI 413-2	Operations with significant actual and potential impacts on local communities				
Service quality, efficiency and reliability						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Service quality, efficiency and reliability			

GRI 416 - Customer health and safety 2016	GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Service quality, efficiency and reliability			
Business ethics and integrity						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Code of Ethics Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/01 Anti-corruption Approach to taxation			
GRI 205 - Anti-corruption 2016	GRI 205-3	Confirmed incidents of corruption and actions taken	Anti-corruption			
GRI 207 - Tax 2019	GRI 207-1	Approach to taxation	Approach to taxation			
Development of innovative products						
GRI 3 - Material topics - 2021 version	GRI 3-3	Management of material topics	Materiality analysis List of material topics: cross-reference table Investments and innovation Innovative projects 2025			
GRI 203 - Indirect economic impacts 2016	GRI 203-1	Infrastructure investments and services supported	Investments and innovation Innovative projects 2025			

NON GRI content index

Material topic	Disclosures	Location: paragraph
Energy, energy efficiency and fight against climate change	Emissions avoided	Energy and energy efficiency

08

Report of the Independent Practitioner

Independent practitioner's report on the Sustainability Report 2025

To the board of directors of

City Green Light SpA

We have undertaken a limited assurance engagement on the Sustainability Report of City Green Light SpA and its subsidiaries (the "Group" or "City Green Light Group") for the year ended 31 December 2025.

Our review does not extend to the information set out in the sections titled: "Sustainable activities according to the European Taxonomy" of City Green Light SpA Sustainability Report, disclosed according to article 8 of Regulation (EU) 2020/852.

Responsibilities of the directors for the Sustainability Report

The directors of City Green Light SpA are responsible for the preparation of the Sustainability Report in accordance with the "Global Reporting Initiative Sustainability Reporting Standards" issued by GRI - Global Reporting Initiative (the "GRI Standards"), as illustrated in the "Methodological note" section of the Sustainability Report.

The directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Sustainability Report that is free from material misstatement, whether due to fraud or error.

The directors are also responsible for defining the sustainability performance targets of the Group as well as for identifying its stakeholders and material topics to be reported on.

PricewaterhouseCoopers Business Services Srl

Società a responsabilità limitata a socio unico
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Società soggetta all'attività di direzione e coordinamento della PricewaterhouseCoopers Italia Srl

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Our Independence and Quality Management

We are independent in accordance with the principles of ethics and independence set out in the Code of Ethics for Professional Accountants (including International Independence Standards) ("IESBA Code") issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM Italia 1), which requires the firm 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.

Our responsibility

Our responsibility is to express a limited assurance conclusion, based on the procedures we have performed, regarding the compliance of the Sustainability Report with the requirements of the GRI Standards. We conducted our work in accordance with the International Standard on Assurance Engagements 3000 (Revised) "Assurance Engagements other than Audits or Reviews of Historical Financial Information" issued by the International Auditing and Assurance Standards Board for limited assurance engagements. That standard requires that we plan and perform procedures to obtain limited assurance about whether the Sustainability Report is free from material misstatement.

Therefore, the procedures performed were less in extent than those performed in a reasonable assurance engagement conducted in accordance with ISAE 3000 (Revised) and consequently, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgement and included inquiries, mainly of personnel of the Group responsible for the preparation of the information presented in the Sustainability Report, inspection of documents, recalculations and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

- analysis of the process of definition of the material topics reported on in the Sustainability Report, with reference to the method applied in the analysis and understanding of the Group's environment, the identification and prioritisation of the actual and potential impacts, and the internal validation of the results of the process.
- understanding of the processes underlying the generation, collection and management of significant qualitative and quantitative information included in the Sustainability Report.

Moreover, we held meetings and interviews with the management personnel of City Green Light SpA and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, aggregation, processing and submission of non-financial data and information to the function responsible for the preparation of the Sustainability Report.

Lastly, for material information, considering the activities and characteristics of the Group,

- at headquarters' level: City Green Light SpA,
    a) with reference to the qualitative information presented in the Sustainability Report, we carried out interviews and obtained supporting documentation to verify its consistency with available evidence;
    b) with reference to quantitative information, we performed both analytical procedures and limited tests to verify, on a sample basis, the accuracy of data aggregation.
- for City Green Light SpA, with reference to Vicenza headquarter (Italy), which we selected on the basis of its contribution to performance indicators, we met the persons in charge and obtained documentary evidence, on a sample basis, regarding the correct application of the procedures and calculation methods applied for the indicators.

Inherent limitations in the preparation of the Sustainability Report

The disclosure about Scope 3 emissions is subject to greater inherent limitations compared with Scope 1 and 2 emissions, because of the poor availability and relative accuracy of the information used to define both qualitative and quantitative information on Scope 3 emissions related to the value chain.

Limited assurance conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the Sustainability Report of City Green Light Group for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with the requirements of the GRI Standards as illustrated in the "Methodological note to the Report" section of the Sustainability Report.

Padova, 9 July 2026

PricewaterhouseCoopers Business Services Srl

Signed by

Paolo Bersani

(Partner)

This report has been translated into English from the Italian original solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.

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