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Business sustainability

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Plenitude manages its activities with respect for all stakeholders, from suppliers to customers, and works to use natural resources responsibly, pursuing a sustainable business model that integrates ESG aspects throughout the value chain.

50 - Net Promoter Score (NPS), an indicator that measures the probability that a customer would recommend Plenitude to a friend or a colleague, which helps assess customers' satisfaction with the Company.

51 - It includes Italy, France, Spain and Portugal, and Greece considering only the type of signature by contract (it does not include potential printed copies sent to the customer).

52 - Includes Italy, France, Spain and Portugal, and Greece and Slovenia.

2022 PERFORMANCE

MATERIAL TOPIC	KPI	RESULTS 2022
SERVICE QUALITY AND CUSTOMER SATISFACTION	Satisfaction with the customer telephone service - Retail Italy	86.7% (+0.8pp vs 2021)
	Net Promoter Score ⁵⁰	2.7x Net Promoter Score in Italy in 2022 compared to 2018
INNOVATION AND DIGITALISATION	New contracts signed digitally	88% ⁵¹ (+4 pp vs 2021)
	% of digital bills	40% ⁵² (+4pp vs 2021)
ENVIRONMENTAL MANAGEMENT	Acquisition of LEED (Leadership in Energy and Environmental Design) certification	Start of energy audits for building certification purposes (three Plenitude offices and five Flagship stores)
SUSTAINABLE SUPPLY CHAIN	% of suppliers assessed using social criteria	100% (in line with 2021)
	Strategic sustainable procurement schemes	Proceedings with ESG ratings equal to 82% of the Italian procurement
	Implementation of the Sustainability by design strategy involving supplier selection through tenders and processes featuring ESG criteria	Achieved the goal of implementing the Sustainability by design strategy

FUTURE TARGETS

MATERIAL TOPIC	OBJECTIVE	ESG TARGET
SERVICE QUALITY AND CUSTOMER SATISFACTION	Customer centricity and satisfaction	• 3.5x Net Promoter Score in Italy 2025 vs 2018
INNOVATION AND DIGITALISATION	Development of digital solutions to reduce environmental impacts	• 90% of new contracts digitally signed in Europe in 2025
SUSTAINABLE SUPPLY CHAIN	Strategic sustainable procurement schemes	• Retention of 100% new suppliers assessed using social criteria
	Strategic sustainable procurement schemes	• Processes with ESG assessment of 85% of Italian procurement by 2023
ENVIRONMENTAL MANAGEMENT	Promoting sustainable operations	• 3 Plenitude offices (Milan Ripamonti, Milan Lorenzini, Pozzuoli) and 5 Flagship stores with LEED certification by 2023 • BREEAM certification in the HQ in France in 2023

POLICY AND REGULATORY TOOLS

- Eni Code of Ethics
- Supplier Code of Conduct
- Eni's statement on respect for human rights
- Eni's policy on biodiversity and ecosystem services
- Eni's Slavery and Human Trafficking Statement
- Eni's Position on Conflict Minerals
- Environmental management system certified according to the standard ISO 14001:2015; Quality management system certified according to the standard ISO 9001:2015

3.1

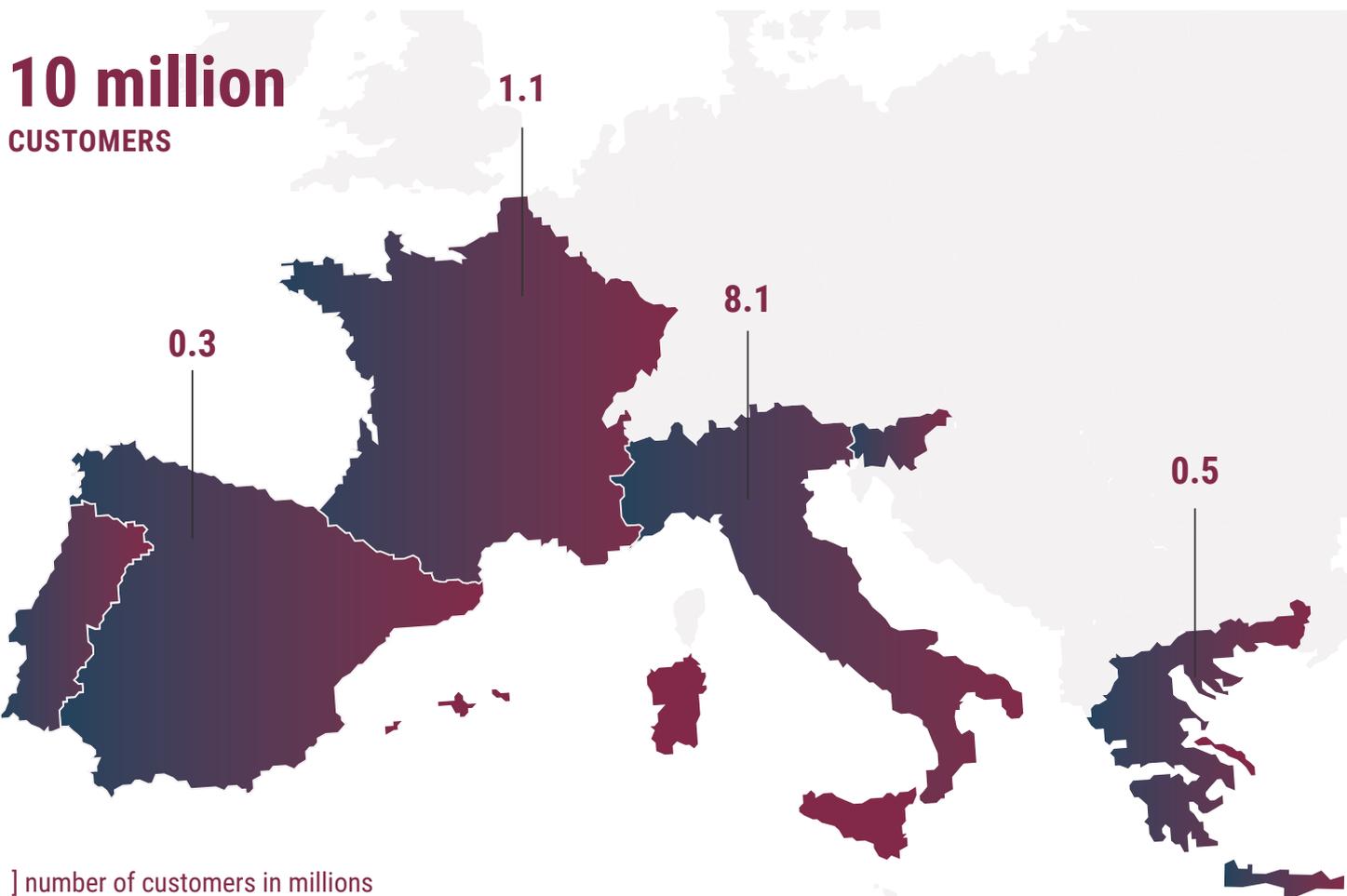
Operational excellence supporting customer centricity



For Plenitude, **customer centricity** is a core value and is consequently included among the common benefit purposes declared in the Company Bylaws. The constant, transparent dialogue and building of strong, trustworthy re-

lationships with customers represent critical drivers for development, aimed at deeply understanding the expectations and the needs of a customer base which pays increasing attention to business sustainability.

In 2022, the Company offered its services to **10 million customers**, mainly located in Italy (81%) but also in France (11%), Greece (5%), Spain and Portugal (3%) and Slovenia.



3.1.1

Quality of service

Correctness, transparency of the offer and accessibility to services and products are key elements to **ensure high quality**, not only to respond to customers' needs efficiently and innovatively, but also to establish a strong and long-lasting relation of trust with them. The quality of the solutions offered is the fundamental prerequisite for customer satisfaction.

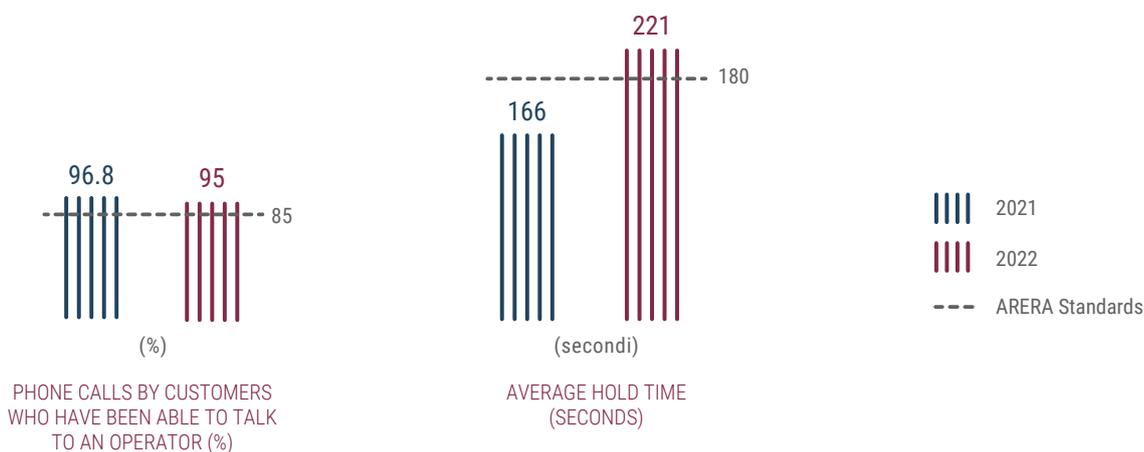
In 2022, the **new WeCare operating model** was consolidated, guaranteeing exclusivity, efficiency and immediate response to different customer needs, from telephone support requests to complaints⁵³. This model is based on the **customer-centricity** concept, in which the customers interact with a customer support **reference person**,

who remains permanent. Also in 2022, in line with what was established in 2021, the "Tellis" customer care service using Italian Sign Language (LIS) became fully operational. Using remotely connected qualified interpreters, the service allows deaf people to communicate with Plenitude, thus ensuring equal opportunities for all customers.

In order to **monitor the level of quality of the call centre service**, Plenitude measures the trend of several indicators based on the commercial quality standards established by the Italian Regulatory Authority for Energy, Networks and the Environment (**ARERA**). 2022 has been marked by rising energy prices, increasing customers uncertainty and the resulting need to handle

more service requests. Given the creation of a management model that puts the customer experience and thus the quality of service at the center, as confirmed by the qualitative performance indicators that measure service level and call center waiting times were, compared to 2021, only moderately affected by the scenario.

In fact, the **percentage of customers who were able to talk to an operator (service level)** has only slightly decreased compared to 2021 being equal to **95%**⁵⁴, a result that is still much higher than the minimum target set by ARERA (85%). The **average waiting time**, at 221 seconds, was slightly up over 2021.

Telephone call centre performance - Retail Italy

In terms of the first call resolution rate (FCR), it recorded a performance improvement: **93%** compared to 92% in the previous year. 2022 also saw a further increase in Self-Care operations

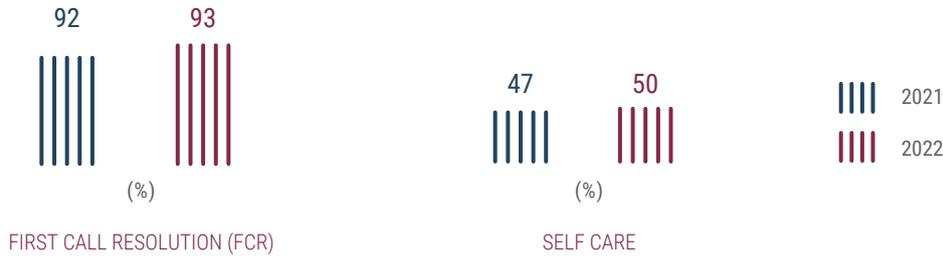
(relevant channels: Web/App/IVR-Virtual Assistant/Smart speaker-Alexa/Chatbot), which rose from 47% to **50%**, showing a significant increase in the degree of customer "digitalisation".

93% First Call Resolution in 2022

53 - Within the model, complaint handling is operated always following the guidelines and reference regulations issued by ARERA.

54 - For further information on telephone customer service performance, please refer to section "[Performance tables](#)".

Call centre service performance - Retail Italy



In compliance with the regulatory standards defined by ARERA relating to second-level protections, Plenitude not only adopted procedures carried out at the Single Purchaser Conciliation Service but also implemented a **Joint Conciliation** system (Conciliazione Paritetica), which is a non-judicial resolution procedure for disputes between the Company and customers, compliant with the Alternative Dispute Resolution method⁵⁵. The procedure can be activated via a simple online application on the site in reference to disputes arising from complaints relating to the sale and distribution of natural gas and electricity.

Further to dealing with customers, Plenitude maintains direct contact with consumer associations that are

guaranteed the possibility to report potential service failures and product malfunctions reported to them by Customers. Furthermore, there are various **protection mechanisms** through which the representatives of consumer associations can communicate their feedback to Plenitude, in relation to which the Company takes the responsibility to implement corrective and improvement measures. Among others, the **Protocol of unsolicited activations** is an agreement signed with the associations belonging to the CNCU⁵⁶ to strengthen the measures aimed at protecting consumers in the matter of unsolicited activations of electricity and natural gas and, more generally, in relation to conduct attributable to unfair commercial practices in the contract acquisition process.

In 2022, the 'Unsolicited Activations Observatory' recorded 133 reports, an increase compared to the two previous years, but still extremely small numbers compared to the volume of contracts signed. These values are, however, well below those recorded in the pre-pandemic period, and, in any case, 35% of them consist of cases of delayed reconsideration.



Maintenance in 2023 of the level of the key performance indicators of quality

55 - ADR is an Alternative Dispute Resolution (ADR) procedure that has the advantage of offering a quick, simple and out-of-court solution to disputes between consumers and businesses. The provision that introduces a new regulation of ADR procedures in Italy is the legislative decree of 6 August 2015, n. 130, which adopted the ADR directive for consumers 2013/11 / EU.

56 - National Council of Consumers and Users (i.e., Consiglio Nazionale dei Consumatori e degli Utenti, CNCU), a representative body of consumer and user associations at the national level, was established by Law No. 281 of 30 July 1998, merged into the Consumer Code (Legislative Decree No. 206/2005).

3.1.2

Customer satisfaction

The constant, transparent dialogue and building of strong, trustworthy relationships with customers represent critical drivers for development, aimed at deeply understanding the expectations of an increasingly demanding customer base. Through actively listening to

needs, Plenitude **constantly strives to improve the services it offers**. It has developed a **monitoring system** to capture the overall level of customer satisfaction, which gets stronger every year. In fact, further to the traditional periodic surveys to check customer service

satisfaction with the call centre, Plenitude carries out Customer Satisfaction surveys several times a year on a statistically representative sample of its entire customer base.

Satisfaction with telephone customer service - Retail Italy



The results confirm a general **growth in customer satisfaction** with telephone services in the Italian retail market. The telephone service customer satisfaction index is 86.7% (+0.8 compared to 2021)⁵⁷; the "resolvability" of practices carried out at the call centre has increased from 86.1% in 2021 to 87.1% in 2022 (+1.0).

The CES (Customer Effort Score) indicator, which summarises customer satisfaction in their interaction with Plenitude, also continues to grow, reaching 86.8 (+0.2) in 2022.

Monitoring customer satisfaction indicators on statistically representative samples of the entire Plenitude

customer base also shows an increase in 2022 compared to the previous year. Specifically, the percentage of residential customers who give Plenitude a rating of 7 to 10 is **82.6%** (+12.8 pp compared to 2021), while the **Relational NPS** stands at **+22.2**⁵⁸.

86.7% telephone customer service satisfaction rate (+0.8 pp vs 2021)

87.1% resolvability (+ 1 pp vs 2021)

86.8 Customer Effort Score (+ 0.8 pp vs 2021)

57 - For further information on customer satisfaction with telephone services, please refer to section "Performance tables".

58 - NPS Relational: Plenitude asks a representative sample of customers how likely they are to recommend their supplier to relatives, friends and colleagues based on their relationship. The ratings given are on a scale of 0 to 10, the value represented in the text being the difference between the percent of people giving a value between 9 and 10 (Promoters) and the percentage of people giving a value between 0 and 6 (Detractors). Neutral ratings are those between 7 and 8.



3.5x of the 2018 NPS in 2025

In line with the increase of the previous indicators in the Italian retail market, also the **Net Promoter Score (NPS)**, i.e. the percentage of customers who would recommend Plenitude as an operator, recorded a 15% increase over the previous year, despite the increase in the price of gas on the international market and the consequent increase in costs

on the bill. The performance of the NPS in 2022 (2.7x NPS compared to 2018) is in line with the 2025 target. This indicator is monitored through instant feedback surveys, asking the customer to rate the experience immediately.

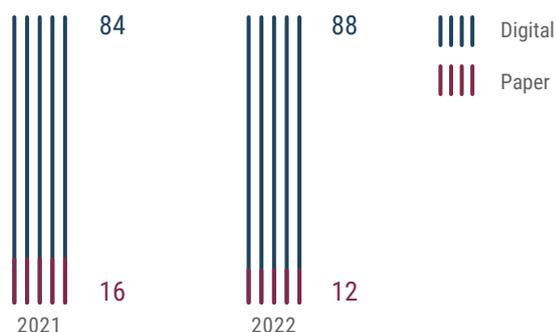
Over recent years, digitalisation has impacted the customer experience process. The percentage of **digital bills** rose from 36% in 2021 to approximately 40%⁵⁹ in 2022, achieving the target Plenitude set for itself last year. Since 2019, the **signing of new**

digitally managed contracts has also increased, reaching **88%** of 'paperless' sales⁶⁰ across Europe in 2022 (up compared to 84% in 2021).

**40% of digital bills
(+4 pp vs 2021)**

**88% paperless
contracts
(+4 pp vs 2021)**

Breakdown of new contracts by type (%)



**90% of new
contracts signed
on the digital
channel in Europe
in 2025**

Given the different contexts where the subsidiaries of the Retail business area operate, at 2022 a single system for monitoring customer satisfaction is yet to be defined. However, development paths for the evaluation systems have been launched, to implement tools to oversee the relationship with the customers in an efficient and improving way.

For example, Plenitude in Spain has developed a number of initiatives during 2022, including:

- the creation of a more modern and easily accessible website
- the redesign of the on-boarding experience with the introduction of a 'Welcome Video' to make the operator transition easier and to highlight the benefits of the selected product
- the design of an interactive bill called 'Smart Bill', which will be launched in early 2023 to simplify the understanding of consumption and provide news about the energy sector to its customers.

Furthermore, for the third year in a row, the subsidiary was awarded leader in customer service in the energy sector in Spain.

In France, external research institutes monitor customer satisfaction at all stages of the customer lifecycle (e.g. acquisition, transfer, renewal). The results are compared among all Plenitude retail entities in order to identify and implement concrete and feasible improvement plans.

59 - The percentages of digital bills reported are calculated at the European level and include Italy, France, Spain and Portugal, Greece and Slovenia.

60 - The percentages reported are calculated at the European level and include Italy, France, Spain and Portugal, and Greece considering only the type of signature per contract (does not include any printed copies sent to the customer).

Evolvere, the subsidiary that provides sales, installation, management and monitoring services for photovoltaic systems, has developed a **new customer area** with useful information and documents, interactive material

such as educational videos that make it easier to understand the product, and has launched a maintenance plan to improve after-sales service. In the e-mobility business area, Be Charge consolidated and further de-

veloped **tools for monitoring and evaluating customer satisfaction** concerning their experience using the charging stations, as shown in detail below.

BeCharge: developing new functions for customer engagement

Through the App, Be Charge offers e-drivers a simple, engaging, reliable and fully digital charging experience aimed at ensuring a high level of customer satisfaction. In 2022, continuous improvements were made to the application in order to refine the customer experience. In 2022, there was significant growth in app downloads

compared to 2021. Furthermore, Be Charge has further developed monitoring and assessment mechanisms for Customer satisfaction regarding the customer's experience using the re-charging stations. This process, based on the rating analysis and the reviews left by users on the platform, aims at precisely detecting the appreciation of

the services related to the infrastructure by specific areas and intervening widely with dedicated actions. The analysis revealed that the Be Charge charging station network has the highest approval rating in Italy to date and is recognised as the most reliable (Source: Nextcharge, a portal reporting the ratings of charging networks).



3.2

Innovation and digitalisation



Innovation is a strategic driver for value creation, enabling Plenitude's business to become increasingly integrated, efficient, and sustainable

For Plenitude, **innovation, digital technologies and the search for new solutions** are essential elements for business development.

To encourage its adoption, the Company has adopted the **agile approach** to stimulate business agility; that is, the ability of an organization to quick-

ly reconfigure its structure, strategy, skills, and technologies to seize business opportunities. This approach is based on three pivotal points:



**COLLABORATION OF THE
CROSS-FUNCTIONAL TEAMS
THAT LASTS OVER TIME**



**EXECUTION OF RAPID
WORKING CYCLES**



**CONTINUOUS INVOLVEMENT
OF STAKEHOLDERS**

The integration of the agile approach has brought multiple **benefits** to the organization, increasing the sense of responsibility of the teams, facilitating the alignment of operational aspects with business objectives, and stimulating the implementation of planning, monitoring and problem-solving systems.

3.2.1

Innovation and Research and Development

To guide change in a constantly evolving external context, Plenitude seeks **innovations** capable of **promoting the sustainable development** of new operational and technological solutions, also thanks to the creation of **partnerships with startups and reference companies** in the sector, to seize stimuli and integrate contaminations from the outside world.

With this purpose, Plenitude's **Open Innovation** function **monitors new trends** and **researches functional innovations** for all business areas on some specific topics, such as energy efficiency, energy from renewable sources generation and storage, electric mobility and energy aggregation and flexibility. The function **collects innovation needs and intercepts the development guidelines** for all of Plenitude's business areas, searches for solutions able to meet the needs identified or the opportunities of the new trends impacting the energy sector. This is done through its connections with innovation ecosystems at the Italian and European levels, and the creation of **synergies with internal stakeholders** (including Eni's Open Innovation functions or vehicles, such as Joule, Eni NEXT and the TECH area).

The ultimate goal is **feeding** a real **innovation ecosystem** that ensures scale-up and business resilience aligned with the attainment of Plenitude's strategic objectives.

In October 2022, Plenitude launched the **One to Zero Challenge**⁶¹, an ini-

tiative part of the Company's decarbonization strategy. This is a **Call For Innovation** addressed to start-ups and scale-ups, as well as innovative SMEs, university spin-offs and companies, to **find innovative solutions** that make the most of the **integration and synergies** of Plenitude's **three businesses while contributing to the reduction of Scope 3 emissions**. The Challenge was more successful than expected, exceeding target metrics, receiving **105 applications** (target 70+) from **29 Countries** (target 10+), including Italy, the UK, Germany, Ireland, Netherlands, Spain, USA, Australia, India, and Israel. Proposals that are deemed to be of the highest value will be the subject of possible collaborations. One of them will be selected to present its solution at the **Selection Day** of ZERO, the Cleantech Accelerator of the CDP National Accelerator Network, launched by CDP Venture Capital, Eni, LVenture Group and ELIS, skipping the first screening process.

Furthermore, through **Eni Joule**⁶², Plenitude has selected a start-up company that proposes a **variable-geometry micro-wind solution** with passive self-adaptation, capable of producing energy even in weak, intermittent and short-duration winds. Plenitude then initiated developments of the technology towards residential applications, which, being typically located at low altitudes, are often in such conditions.

In **preventive maintenance**, last year Plenitude entered into a partnership

with **M2D Technologies**, an artificial intelligence platform for predictive maintenance and anomaly detection that contributes to the efficiency of operational processes. The collaboration between the two companies led to the launch of **Evolvere's Hermes platform** in 2022, designed to **optimise operational processes** through **predictive maintenance**, a smart methodology that leverages data science and machine learning tools to monitor the status of physical assets in real-time, optimise maintenance and reduce reliability risks for plant and business operations. Since the start of the project, savings of €60,000 per year in personnel costs and €44,000 per year in the recovery of idle equipment are estimated thanks to this platform.

Research and development activities totalling some €300,000 were conducted in renewables in 2022.

In October 2022, Plenitude launched the One to Zero Challenge initiative

61 - For further information, please consult the following link [One to zero challenge](#).

62 - For further information, please consult the following link: [Eni Joule](#).

THERMOGRAPHIC DRONE INSPECTIONS OF PHOTOVOLTAIC ASSETS

Performing **thermographic inspections**⁶³ of the photovoltaic modules with the use of a **drone** which, compared to traditional thermographic analysis performed by an operator on the ground, allows the mapping of a greater number of modules in less time with a significant increase in the efficiency of operations as well as the safety of the operator. In 2022, this method tested in 2021 on a pilot plant was extended to another 12 plants spread across Italy and France.

FORECASTING EXTREME WEATHER EVENTS

Experimentation of an **early warning system** capable of signalling extreme weather events several days in advance to implement the most appropriate actions for the safety of people and the plant.

WATT (WIND ASSET TECHNOLOGICAL TRANSFORMATION)

Implementation of **innovative technology solutions to optimise Operation and Maintenance (O&M) activities** in Plenitude's wind power assets. In particular, the project is made up of these macro activities:

- **Inspection activities using drones** to identify and classify damage and **defects** on turbine blades more accurately; this also reduces the average time taken to perform the activity with a consequent benefit in terms of production;
- **Data Analytics solutions** to increase the **performance of wind power** plants through the analysis of technical operating parameters; this analysis is aimed at early detection of major component damage and possible underperformance from a predictive perspective.

During 2022, Be Charge focused its innovation activities on the trade-off between the power availability of the local distribution network operator and the charging speed at certain sites, pooling installed assets to optimise the use of charging infrastructure in urban areas. The amount invested during the year was €402,000.

During 2022, Evolvere focused on innovation activities such as:

- funded research (e.g. the closure of the Research and Innovation Operational Program project 'ComESto' and

the start of the Horizon Europe projects 'Flex4Fact' and 'InCube')

- the development of digital services and added value technology systems in the management of renewables (e.g. Eugenio, Aggregator Platform, control of electricity storage systems, flexibility services to the electricity grid)
- participation in testing with strategic projects (i.e. "EvoNaRse", described in section 2.1.3.2 Sale, installation, and management of photovoltaic systems)
- analysis of technology trends for the Energy Demand and IoT sectors and regulatory developments in the field of energy from renewable sources.

The amount Evolvere invested in 2022 for these activities was €558 thousand.

Overall, in 2022, Plenitude invested more than €1.2 million in innovation and R&D (€700 thousand in 2021).

63 - Analysis technique based on the acquisition of infrared images.

3.2.2

Digitalisation

Innovation in the **agile** business process **management** is enabled and accelerated by a process of internal digitalisation of assets. Thanks to the **Digital Acceleration** project, Plenitude has outlined its digital transformation path, leveraging a defined **strategic direction** and a reference **technological roadmap**, to accelerate the digitalisation of internal assets and those addressed to the customer.

During 2022, the Company completed important steps in the **technological evolution of its digital assets** (internal and customer-facing), working on chosen applications and consolidating

them through structural interventions to improve performance. Structural work was carried out on the Company portals and tools available to customers (app and web portal) that led to performance gains both on the customer experience and on the internal management sides. Furthermore, as it set out to do at the end of 2021, the Company released new digital assets to improve the customer experience, including the new Plenitude app that offers navigation and, as a result, a totally updated experience. At the same time, Plenitude worked to accelerate the development of the **self-care framework**, designing features with

high-added value both for the internal management of processes and available to the customer.

Thanks to its Digital Acceleration strategy, Plenitude intends to exploit the opportunities of digitalisation, review post-acquisition processes and make its management more efficient.

In the coming years, Plenitude is committed to further strengthening its digital efforts, consolidating existing digital assets, expanding its digital presence, and enabling new customer capabilities planned for 2023.

The value of data for Plenitude in the digital transformation journey

The gathering, analysis, and management of data in the era of digital transformation are essential elements for a resilient business development, capable of responding to the challenges of an ever-changing external context. To do this, Plenitude has equipped itself with an integrated data management system led by a multifunctional team, based on four key pillars described below.

DATA GOVERNANCE

Data Governance processes are the foundations for controlled and correct access to data, facilitating and increasing confidence in their use thanks to a proactive management and control approach. It is also possible to assist stakeholders through effective data governance, thanks to a **clear assignment of ownership**, governance of the data life cycle and greater coordination of **data platform cloud tools**.

DATA SCIENCE

On a technological level, the path undertaken by Plenitude to convert traditional business intelligence tools into **Advanced Analytics** represents a key element of the Company's competitive advantage, allowing it to strengthen **the automation of the process, reducing costs and increasing its value**.

DATA ENGINEERING AND DATA PLATFORM

Plenitude's **Data Engineering** strategy focuses on three priority topics: the development of **automatic tests** to ensure greater planning quality, the promotion of **fast and continuous delivery** methods and, lastly, the consolidation and evolution of the corporate **data platforms**.

RESEARCH AND INSIGHT

Customer Research and Insight is the window for observing the customer and the market, thanks to which Plenitude develops scenario analysis (energy, mobility, for consumer sentiment), monitors branding and customer satisfaction, carries out ad hoc research and develops partnerships for innovation and development.



Olivadi plant - Italy

Corporate Membership with DAMA Italy

Since 2021 Plenitude has joined the Corporate Membership with DAMA Italy, the Italian correspondent of the Data Management Association International (DAMA), i.e. an international non-profit and no-vendor related association composed of volunteers (professionals, experts, academics, students)

and active for over 40 years with more than 71 national chapters and 100,000 members. In 2022, a research study led by DAMA Italy was conducted to explore the current level of attention and commitment to Data Management in the Italian Energy&Utility sector. The results were compared with

similar research conducted in the banking and insurance sectors in 2020 and 2021. Plenitude emerged as one of the best in its sector among the companies participating in the survey. It also scored highly when comparing its results with the banking and insurance sectors.

For further information, please consult the following link: [Dama Italy](#).

3.3

Sustainable supply chain



Plenitude is committed to integrating sustainability principles within its purchase strategy and in the relationships with suppliers, and in managing all aspects tied to **social, economic and environmental responsibility** along the **supply chain**. With this in mind, Plenitude has adopted a structured process

for managing its suppliers that aims to enhance commitment to the energy transition, rewarding innovation and continuous improvement capabilities in operating activities, as well as an aptitude for medium- to long-term collaboration, consistent with the Company's development and integration strategy.

The qualified supply chain is functional for Plenitude's main business lines, national and international retail, energy from renewable sources, and electric mobility. Plenitude **concludes and manages** contracts with **qualified suppliers**:

RENEWABLE POWER

for the purchase of goods (photovoltaic modules, inverters, trackers, wind turbines, storage batteries) and services (installation, operating activities, maintenance) for **renewable power** generation plants;

CHARGING STATIONS

for the purchase, installation and maintenance of **charging stations for electric vehicles**;

B2B AND B2C

for the purchase of **goods and services** for business development, in particular retail **B2B and B2C**, such as IT, marketing, administrative, communication, and call centre services.

Plenitude monitors and measures the ESG profile of suppliers at all stages, from selection and qualification of vendors, and tender processes to contract management and feedback,

to promote the generation of shared and lasting value in the supply chain.

Plenitude achieves this commitment by promoting its values to its suppli-

ers, involving them in development initiatives and including them in risk prevention activities.

In particular, as part of the **Sustainable Procurement** process, Plenitude:

- subjects all suppliers to periodic **qualification and due diligence** processes to verify their ethical, reputational, economic, financial and technical-operational reliability and the application of health, safety, environmental, governance, cyber security and human rights safeguards, to minimise risks along the supply chain;
- requires all suppliers to **sign the Supplier Code of Conduct** as a mutual commitment to recognise and protect

the value of all people, to commit to tackling climate change and its effects, to operate with integrity, to protect the Company's resources, and to promote the adoption of these principles among their own people and supply chain;

- **considers the ESG characteristics relevant to the contractual object in the contract award logic**, periodically monitoring compliance with the supplier's commitments at the various stages of the procurement process;
- **if the audits reveal critical issues, requires the implementation of im-**

provement actions or, if the minimum standards of acceptability are not met where foreseen, restricts or inhibits the invitation of suppliers to tender.

To promote the sustainable development of supply chains, in 2022 Plenitude actively participated in Eni's **Sustainable Supply Chain** program, which includes initiatives to involve suppliers in a fair and sustainable energy transition, enhancing environmental protection, economic development and social growth.



Delmonte plant - Spain

The Sustainable Supply Chain Program focused on:

- **involvement of companies in the path of sustainable development.** In 2022, the systemic path was strengthened through the ever-widening dissemination of the platform powered by Eni, Open-es, a tool to involve and support all companies in the path of measurement and growth on the dimensions of sustainability. Thanks to the open and inclusive approach of the initiative and the adhesion of different actors (supply chain leaders, financial institutions, associations, etc.) and val-

ue-chain sectors, Open-es counts more than 10,000 companies, and allows them to create and update their ESG profile, share sustainability information with customers and other stakeholders, access sector benchmarks to compare themselves with similar realities, and identify priority actions to be implemented to improve their positioning. As part of the initiative, Plenitude promotes the participation of suppliers in 'Open-es ESG Competences', a series of free events to increase knowledge on ESG issues, an opportunity to discuss specific aspects (Carbon Neutrality, Social Sustainability and Governance,

Diversity & Inclusion, Responsibility in Vendor Management, Human Rights) with industry experts;

- **Supplier training.** Further to the Open-es training initiatives open to all companies, Plenitude organized sector-specific workshops on ESG issues;

- **Financial support to suppliers.** Plenitude promotes the 'Sustainable Energy - Basket Bond' initiative towards suppliers to support energy chains in the energy transition financially.

The protection of human rights along Plenitude's supply chain

Respect for human rights along supply chain is a fundamental requirement for Plenitude that safeguards human rights through a procurement process that entails the adoption of an evaluation model dedicated to human rights, as well as transparent, impartial, consistent and non-discriminatory behavior in the selection of suppliers, the evaluation of bids and the verification of activities provided explicated in the contract. To enshrine

and reinforce the commitment to core values and in particular to the respect for human rights, companies that collaborate with Plenitude are required to sign the "Supplier Code of Conduct," a pact that guides and defines relations with suppliers at all stages of the procurement process (from self-bidding to qualification, procurement processes to the execution phase) in light of the principles of social responsibility, including human rights. The assess-

ment and oversight on the respect of human rights is implemented in procurement processes through a risk-based model that allows analyzing and classifying suppliers according to a level of potential risk defined considering the Country context and the activities performed; in this way, Plenitude is able to apply control principles differentiated according to the level of risk.

In 2022, 100% of the new suppliers of Eni Plenitude Spa Società Benefit were assessed against social criteria⁶⁴.

100% new Plenitude suppliers assessed using social criteria in 2022

64 - The evaluation is carried out based on the information available from open and/or supplier-reported sources and/or key performance indicators and/or field audits through at least one of the following processes: reputational due diligence, qualification process, performance evaluation feedback on HSE or compliance areas, feedback process, and assessment on human rights issues (inspired by the SA8000 standard or similar certification).

3.4

Sustainable management of natural resources



Conducting business while respecting its environment is part of Plenitude's culture. Further to monitoring its environmental performance, the Company implements initiatives aimed at minimising impacts, also in collaboration

with nationally and internationally recognised bodies, such as the International Union for Conservation of Nature (IUCN)⁶⁵ and the National Agency for New Technologies, Energy and Sustainable Economic Development

(ENEA)⁶⁶. These synergies aim to identify new solutions for the increasingly sustainable management of natural resources.

3.4.1

Waste management

Proper waste management, based on the principle of prevention in production and maximisation of recycling/recovery, plays a fundamental role in the circular economy and the sustainable development of the business activities of each Company.

**7.9
thousands of
tonnes of waste
generated in 2022**

In compliance with the territories where it operates and with a view to **continuous improvement of environmental performance**, Plenitude manages the waste generated by the operational processes

of the various business areas through the planning of operating activities and the disposal of all excess substances and/or materials, reducing the impact on the environment where possible.

The waste produced by Plenitude is mainly generated by the installation and maintenance of energy production plants from renewable sources and during other construction site activities. Particular attention is paid to the waste generated by the latter activity, such as excavated rocks and soil, which are recovered from a circular economy perspective. It should be noted that the nature of Plenitude's operations generally implies that the waste produced by the everyday ac-

tivities carried out by contractors (i.e.: construction site activities or plant management, except for excavated land and rocks, with Engineering, Procurement and Construction contract -EPC-, with turnkey contract or Global maintenance service) are legally held by the contractors. Therefore such waste falls outside the scope of Plenitude's reporting.

**99.9%
of the total waste
produced is
non-hazardous**

65 - In 2022, Eni, with the participation of Plenitude, signed a two-year partnership with IUCN to identify good practices for mitigating biodiversity impacts associated with the development of renewable energy projects.

66 - As part of the Eni-Enea Framework Agreement, an R&D project was launched in 2022 with the participation of Plenitude entitled 'Decommissioning Scenarios for Renewable Energy Sources Plants', which will end in 2024.

The waste produced in 2022 was caused by production activities and amounted to approximately **7.9 thousand tonnes** (4.1 thousand tonnes in 2021), of which **99.9%** were **non-hazardous**. The increase of 91% compared to 2021 is caused by the significant increase in waste production due to the excavation work of the subsidiaries Eni New Energy and Adriaplin.

Concerning destination, the share of **recovered waste** in the total amount of waste recovered and disposed of in 2022 is **75.5%**, essentially in line with the percentage recorded in 2021, which was 76.7%⁶⁷.

75.5% share of waste for recovery (-1.2pp vs 2021)

Total waste (thousands of tonnes)



Aleria plant - France

3.4.2 Water resource management

Plenitude pays attention to the water sources used to achieve the efficiency and water resilience of its business activities. Given the activities carried out, water consumption is not very significant. Water is mainly used for cleaning the photovoltaic panels and for some

construction site-related activities in the Renewables business area (for example, the suppression of dust in compliance with regulatory requirements), while, within the Retail area, water consumption is essentially attributable to toilet facilities located in the offices.

Therefore, given the insignificance of the data, the information relating to Plenitude water withdrawals and consumptions is not included in the 2022 reporting.

67 - For further information on waste, please refer to section ["Performance tables"](#).

3.4.3 Biodiversity

Companies in the energy sector operating internationally, such as Plenitude, interact with different natural, marine, and terrestrial ecosystems, characterised by different regulatory frameworks and ecological sensitivities. There is a **strong interdependence between the environment and organizations** operating in the energy sector, due to the use of natural resources in the area where they operate and the influence they exert on habitats and species during the life cycle of a project. Large **renewable energy** installations may, **directly and indirectly, impact the environment**, extending beyond the site's boundaries.

Managing interaction with the biodiversity of Company sites and activities affects the sustainability of the Company and, potentially, the industry's reputation. Therefore, **conserving biodiversity and ecosystem services is extremely important** for Plenitude and its stakeholders.

Plenitude's **exposure to biodiversity risk** is **periodically assessed** by map-

ping **operating sites** against their **geographical proximity to protected areas** and **Key Biodiversity Areas (KBAs)**, i.e. those areas that contribute significantly to the global persistence of biodiversity, whether on land, in fresh waters or in the seas.

The analysis of the mapping of Plenitude's operating sites in 2022 has shown that overlap (even partial) with protected areas or with KBAs concerns **9 sites**⁶⁸, while **23 additional sites** are adjacent to protected areas or KBAs, which means they are located at less than 1 km. It should be noted that **neither** in Italy nor abroad, operating activities overlap with natural sites belonging to the UNESCO World Heritage (WHS)⁶⁹ or sites covered by the Ramsar Convention.

Plenitude is committed to conserving biodiversity and ecosystem services by promoting **good risk reduction practices** in all energy from renewable sources installations by implementing specific strategies, conservation plans for target species and habitat

enhancement measures. The close relationship between **wind turbines and biodiversity**, particularly **birdlife**, has led Plenitude to proactively maximise efforts to protect and conserve habitats through specific and innovative approaches.

In particular, in 2022 a **comprehensive work plan** was carried out in close cooperation with the relevant authorities and other stakeholders at two wind farms in Spain (Raposeras and Cuevas). An '**adaptive biodiversity management**' approach has been adopted in these plants. Management actions are followed by targeted monitoring in order to improve knowledge of local birdlife and reduce the risk of collisions during wind farm operation. **Specific preventive measures** have been implemented for wind turbines to avoid bird collisions, and **monitoring studies** to support management decision-making process.

68 - For further information on biodiversity performance, please refer to section "[Performance tables](#)".

69 - WHS, World Heritage Site.

The Plenitude work plan for adaptive biodiversity management

Passive conservation measures at the Raposeras Wind Farm

Raposeras is a **40.5 MW wind farm of 26 wind turbines** located in La Rioja, Spain. It is located on a plain surrounded by mountainous reliefs with deep canyons. In order to prevent **birds of prey** from **colliding** with wind turbines such as large birds of prey (e.g. eagles, vultures) as well as the meadowlark and aquatic spe-

cies present in the area, the following measures were developed:

1. **Passive visual signals:** to increase the visibility of wind turbines and reduce bird mortality, one blade of each wind turbine was painted black and eye-shaped vinyl stickers were installed 9 metres above the ground in all wind turbines.

2. **Bird and bat collision mortality monitoring:** carried out annually to assess bird activity within the wind farm and its high-risk areas, to verify the effectiveness of the measures implemented.

Mitigation hierarchy in the Cuevas wind farm

The Cuevas wind farm is located in Cuenca, Spain and has 19 wind turbines for a total capacity of **104.5 MW**. The site is important for numerous bird species that require specific **conservation actions**.

In particular, **monitoring and deterrence systems** were installed to reduce the risk of birds colliding with wind turbines. **Specific programmes** have been conducted to **safeguard** certain species, such as the **hen har-**

rier and golden eagle, with actions to protect their nests and monitor their presence. Furthermore, measures were taken to **restore the forest habitat** and **conserve the native species** of Cabrera vole.



Cuevas plant - Spain