



STAKEHOLDER ENGAGEMENT POLICY

Context

The A2A Group operates in markets that are the object of significant public attention, as it provides services that are essential (eg waste management) and highly regulated (eg electricity distribution). As a Life Company, A2A considers the creation of shared value for all stakeholders at the core of its activities and, for this reason, constantly dialogues with various stakeholders, such as legislative bodies, regulatory bodies, local institutions and communities, which can influence the Group's ability to operate on the various business lines and the framework within which the activities are carried out. In order to maximize the value created for each stakeholder, including A2A, the company involves the various interlocutors, listening to them, inviting them to share their points of view and committing to identify the solutions that best suit the needs and wishes of each.

This document defines the guidelines through which A2A involves its stakeholders, in order to: promote sustainable growth and the creation of shared value; increase the company's competitive advantage; better understand the environment in which it operates and the risks and opportunities that derive from it; inform, educate and influence stakeholders to improve decision-making processes that impact the company (eg. authorizations, permits to operate); build a climate of trust.

Guidelines

A2A stakeholder engagement process is founded and committed on the following principles:

- Inclusivity, considering all relevant perspectives of stakeholders in identifying material themes and their impact;
- Materiality, identifying and prioritizing the most relevant topics impacting A2A and its stakeholders;
- Responsiveness, considering in A2A decisions and activities material themes and their impact;
- Impact, monitoring, measuring and evaluating outcomes of A2A activities.

Goals

A2A, in line with the international best practices, identify as stakeholder any individual/group of individuals/organisation that can be impacted or that can impact A2A activities, products (goods and services) and associated performance.

Due to the different businesses A2A operates in and the significant geographic extension of its activities, a large array of different stakeholders must be considered. Hence, the following criteria have been highlighted to be considered for a correct prioritization:

- Stakeholders' needs and concerns



- The level of impact that A2A activities may have on the stakeholders and vice-versa

As the evaluation of stakeholders on these two criteria may vary in time, A2A commits to regularly update its stakeholders prioritization at the Group level, Business Unit level and local level.

This policy applies to all stakeholders engagement activities carried out by A2A both at a national and at a local level and in any geography.

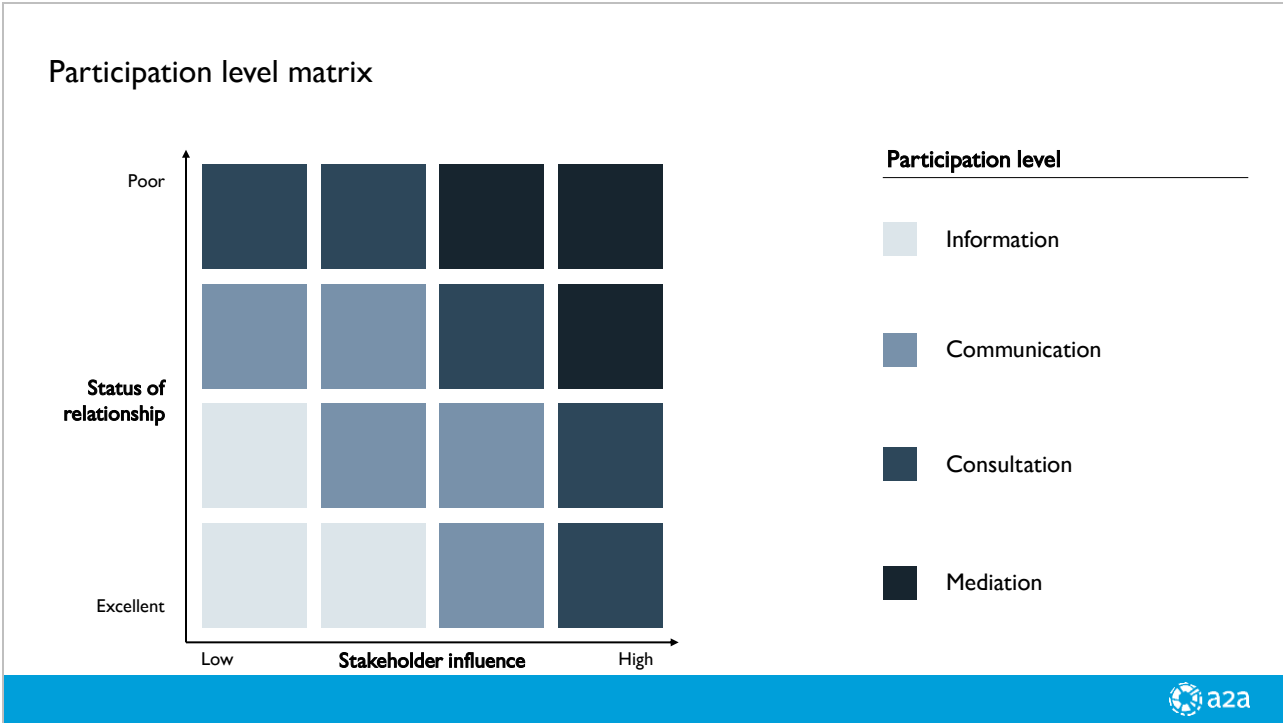
The main objectives pursued by A2A in carrying out stakeholders engagement activities are:

- Early identification and management of risks;
- Identification of potential business opportunities, including cross-fertilization of best practices;
- Gathering of feedbacks and input on Group's activities, strategy and plans;
- Boosting of A2A reputation and brand awareness;
- Creation of shared value in line with its purpose as a Life Company.

Framework

A2A, to develop its stakeholder engagement activities, defined a framework that ensures the most effective results are reached for both A2A and its stakeholders.

- Identification of Participation level of each stakeholders. The Participation level is determined based on two axes:
 - Influence of the stakeholder on A2A and its activities;
 - Status of the relationship linking the stakeholder and A2A.
- Definition of the best engagement mechanism based on the Participation level
 - Information: unidirectional contact from A2A toward the stakeholder;
 - Communication: bidirectional communication on a specific topic;
 - Consultation: structured debate preparatory to a specific business decision A2A will have to make;
 - Mediation: involvement of the stakeholders in the decision-making process.



In defining the best engagement mechanisms for the stakeholders, it is necessary to first identify potential risks that may hinder the engagement. Among these, particular attention must be paid to participation fatigue, unwillingness to be engaged, disruptive stakeholders and conflicts of interests. A2A analyses and defines mitigating actions for each risk identified, on an ad hoc basis, to account for specificities of stakeholder, context, past relations and other factors.

In case critical stakeholders have insufficient capacity to engage with A2A (e.g. financial constraints, language barriers, time), the Group may enact actions to facilitate the engagement process paying attention at avoiding conflicts of interests. Examples of these actions include language and/or travel support.

Based on dedicated activities conducted every year (e.g. analysis of business priorities, dialogues with stakeholders also through specific surveys) and using the outcome of the stakeholders needs, A2A develops the materiality matrix identifying the most relevant topics to focus on. This materiality matrix is integrated into the risk assessment process and used as starting point for the definition of the Sustainability Plan.

Ownership and Accountability

A2A organization includes dedicated structures with a clear governance, based on the geographic level of the stakeholder, that are responsible, for stakeholders engagement, to:

- Define the overarching stakeholder engagement strategy;
- Regularly and timely update stakeholders prioritization;
- Define, set up and update a specific process for the management of day-by-day activities, among which are included:
 - Definition of the Participation Level for each stakeholder;
 - Identification of key topics to be communicated;
 - Detailing of best engagement mechanisms;
 - Identify and timely activate the enabling factors needed to carry out activities and to measure their impact with the highest possible efficiency (e.g. systems, data);
 - Timely carry out activities of stakeholders engagement based on the defined process;
 - Monitor, measure and evaluate the impacts of the activities conducted to boost their effectiveness in creating shared value.

To effectively build valuable relationships based on mutual trust, A2A carries out its stakeholder engagement activities with both a “content” transparency, in terms of truth of decisions, data and other elements discussed and a “methodological” transparency, in terms of possibility to verify that decisions have been taken through the highest diligence and competence.

Results reporting

A2A commits to timely publicly disclose the initiatives of stakeholder engagement conducted and their results and impacts on A2A and its stakeholders in a suitable report (e.g. Integrated Report). Communication is made in line with recognized international standards in order to improve transparency.