

# 2024 CONSOLIDATED SUSTAINABILITY STATEMENT

# General information

## General basis for preparation of the consolidated sustainability statement

[BP-1]

Webuild Group's (the "Group") Consolidated Sustainability Statement (the "Sustainability statement" or the "statement") for 2024 (from 1 January to 31 December 2024) is included in a dedicated section of the Directors' report (in the Annual Report). It has been prepared on a consolidated basis pursuant to the requirements of article 4 of Legislative decree no. 125 of 6 September 2024 (the "Decree")<sup>10</sup> and the European Sustainability Reporting Standards ("ESRS"). In addition, the Sustainability statement includes the disclosures required by article 8 of Regulation (EU) 2020/852 on the EU taxonomy for sustainable activities.

The Sustainability statement includes the data and information necessary to understand the Group's impact on sustainability matters, and the information necessary to understand how sustainability matters affect its performance, results and position<sup>11</sup>, as per the double materiality assessment.

As part of the double materiality assessment, Webuild S.p.A. ("Wbuild" or the "parent") considered its upstream value chain (in particular, the planning, design and commissioning activities performed before it is awarded a project as well as those related to the entire life cycle of the goods and services supplied by the Group) and its downstream value chain (the operation, maintenance and demolition of the works it builds).<sup>12</sup>

In line with ESRS 1, this Sustainability statement is structured in four parts, and specifically: 1) general information, 2) environmental information (including disclosures pursuant to Regulation (EU) 2020/852), 3) social information and 4) governance information. Each section in turn contains subsections for the topics identified as material by the double materiality assessment and presents the measures implemented or planned by Webuild to address them in terms of the policies, actions, targets and metrics. To facilitate the identification of the information in this statement, it contains a content index, which provides a list of the ESRS disclosure requirements linked to the sustainability matters assessed as material for Webuild, the paragraph of this statement where the relevant information can be found, details of any phase-in provisions used by Webuild for the 2024 reporting and reference to the disclosures required by other EU regulations. More information is available in the "Disclosure requirements in ESRS covered by the undertaking's sustainability statement" chapter in this section.

With respect to the reporting period, no information is omitted because it is the subject of intellectual property, know-how or classified as sensitive.

Wbuild's board of directors approved this Sustainability statement on 13 March 2025, after its review by the control, risk and sustainability committee.

The Sustainability statement has been subjected to a limited assurance engagement by the independent auditors in accordance with the procedures indicated in the "Independent auditors' report" included herein.

### Reporting boundary

The reporting boundary is the same as the consolidation scope used for the Group's consolidated financial statements and includes the data of the parent (Wbuild) and its fully consolidated subsidiaries. More information is provided in notes 1 and 2.7 to the consolidated financial statements<sup>13</sup>.

For the purposes of providing both a comprehensive presentation of the Group's performance and the inclusion of all the entities within the Group's scope, Webuild defined two different reporting methods depending on the entity's operations. The sustainability information of entities classified as operating is

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<sup>10</sup> This transposed the EU Corporate Sustainability Reporting Directive (CSRD) into Italian law.

<sup>11</sup> See article 4.1 of Legislative decree no. 125 of 6 September 2024.

<sup>12</sup> More information about the double materiality assessment and the value chain map is available in the "Description of the processes to identify and assess material impacts, risks and opportunities" and "Strategy, business model and value chain" chapters later in this section.

<sup>13</sup> Webuild did not avail of the exemption from disclosure of impending developments or matters in the course of negotiation in this Sustainability statement.

reported considering all the material indicators while for entities with reduced or no operational activity<sup>14</sup>, information is provided about any significant events affecting relevant ESG matters recorded in the reporting period.

In addition, in order to comply with the value chain guidance<sup>15</sup> published by EFRAG with respect to joint operations, Webuild defined two reporting criteria depending on the type of information for this type of entity.

The first criterion for the environmental topics envisaged by the ESRS involves reporting the joint operations' data on a proportionate basis, using the same percentage applied for their consolidation in the consolidated financial statements. This is a prudent approach which extends a reporting method that the guidance seems to solely require for the reporting of GHG emissions to all the environmental indicators. Accordingly, Webuild reserves the right to modify this approach if, in subsequent reporting periods, the regulator or market practice were to widely adopt different methods of implementing the standard. In this case, Webuild will adapt its reporting approach and align the comparative data.

The second criterion relates to social and governance topics for which there is no specific guidance or application guidelines.

With respect to its own workforce (S1), Webuild has defined and applied an approach that guarantees a faithful representation of its commitment to topics related to its own workforce, the consistency of the related reporting flow and overall quality of the output. Specifically, Webuild decided to consider all the data required by the standards for the workforce of the joint operations, for which it has taken on responsibility under contract for the health and safety management system and to exclude data for those joint operations for which the health and safety management system is managed by another partner.

The same considerations made for Standard S1 can be applied to the workers in the value chain, in particular, for the subcontractors (S2) of joint operations with respect to health and safety, in line with the impacts identified by the double materiality assessment performed in 2024.

As the criterion applied to record the joint operations' data defined for the own workforce and the workers of subcontractors is not relevant for the other topics dealt with by the other social and governance standards, the entity-specific metrics presented for these areas refer solely to the entities included in the consolidated accounting group and do not include the joint operations' data.

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<sup>14</sup> Entities with reduced or no operational activity are inactive entities that do not generate revenue as their projects have been "blocked" or "completed". Blocked projects are those that do not generate revenue in the short term due to particular situations while completed projects are those with a backlog less than or equal to €5 million or that are 98% or more completed. Projects with higher backlog thresholds are also considered to be completed when they are affected by claims or guarantees that have to be released, etc. (for operating activities that have been completed).

<sup>15</sup> IG2 Value Chain Implementation Guidance

## Disclosures in relation to specific circumstances

[BP-2]

### Time horizons

The medium- and long-term horizons defined by Webuild, considered in the assessment of impacts, risks and opportunities, differ from those established by the ESRS and match those adopted for the Group's strategic planning purposes, as shown below:

- Short-term: <1 year;
- Medium-term: 1-3 years;
- Long-term: >3 years.

### Value chain estimation

As noted earlier, the assessment of impacts, risks and opportunities considered the upstream and downstream value chain activities. As this is the first time the new regulations are applied, the assessments were mainly of a qualitative nature based on publicly available information, where available, or in-house analysis and knowledge, mostly based on the parties with which the Group does business. With respect to the reporting of the metrics linked to the value chain and when they were not already mapped by internal processes<sup>16</sup>, the parent states that it has availed of the transitional provision allowed by the ESRS for 2024 (omission of the value chain information for the first three years of sustainability reporting). Over the next two years, Webuild will design procedures to integrate the disclosures with data and information provided by the actors in the value chain, when appropriate.

Webuild uses data from reliable sources and methodologies that comply with the GHG Protocol to ensure a proper level of adequacy in the quantitative information about its Scope GHG emissions. However, these data could be subject to uncertainty. Webuild is committed to improving the disclosure accuracy of its Scope 3 GHG emissions by involving and raising the awareness of its suppliers, as well as by improving the data monitoring and collection systems. More information is available in the "Climate change - Metrics - Gross Scopes 1, 2 and 3 and Total GHG emissions" chapter in the "Environmental information" section.

### Sources of estimation and outcome uncertainty

Over time, Webuild has equipped itself with a centralised data collection system which covers all the entities included in the reporting boundary (as defined earlier).

This system provides the Group with extensive and granular data collection able to identify the specific characteristics of each contract. Work sites are required to provide precise information based on measurements using the metering and weighing devices installed on-site.

When measurement is not possible, estimates can be used. These are prepared directly by work site personnel who can decide the most appropriate estimation method based on their knowledge of the project, their in-depth contextual understanding of the data and its accuracy.

The process is moreover supported by peripheral and central checks to ensure the best possible accuracy and reliability of the data. In addition, the Group regularly assesses its increasingly accurate data collection systems to ensure their continuous improvement.

Therefore, Webuild believes that there is not a high degree of measurement uncertainty about the reported metrics, although there are some estimates involved<sup>17</sup>.

Finally, there is inherent uncertainty in reporting prospective information (such as future targets and objectives) which could thus be subject to change.

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<sup>16</sup> Specifically, reference is made to the metrics related to QHSE training for subcontractors and injury rates for subcontractors.

<sup>17</sup> Specifically as regards environmental metrics, hours worked, pay gap and investments in clean technology innovation.

## Changes in preparation or presentation of sustainability information and reporting errors in prior periods

As this is the first year of application of the ESRS, the request for information about changes in the preparation or presentation of sustainability information or reporting prior period errors is not applicable.

## List of datapoints in cross-cutting and topical standards that derive from other EU legislation

The table below lists all the datapoints deriving from other EU legislation, as set out in Appendix B to ESRS 2. The reference to the relevant part of this Sustainability statement is indicated for each datapoint.

Disclosure Requirement and related datapoint	SFDR reference <sup>18</sup>	Pillar 3 reference <sup>19</sup>	Benchmark Regulation reference <sup>20</sup>	EU Climate Law reference <sup>21</sup>	Chapter in 2024 Sustainability statement
<b>ESRS 2 GOV-1 Paragraph 21 (d)</b> Board's gender diversity	x		x <sup>22</sup>		<ul style="list-style-type: none"> <li>The role of the administrative, management and supervisory bodies and Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</li> </ul>
<b>ESRS 2 GOV-1 Paragraph 21 (e)</b> Percentage of board members who are independent			x		
<b>ESRS 2 GOV-4 paragraph 30</b> Statement on due diligence	x				<ul style="list-style-type: none"> <li>Statement on due diligence</li> </ul>
<b>ESRS 2 SBM-1 paragraph 40 (d) i</b> Involvement in activities related to fossil fuel activities	x	x <sup>23</sup>	x		Irrelevant
<b>ESRS 2 SBM-1 paragraph 40 (d) ii</b> Involvement in activities related to chemical production	x		x		Irrelevant
<b>ESRS 2 SBM-1 paragraph 40 (d) iii</b> Involvement in activities related to controversial weapons	x		x <sup>24</sup>		Irrelevant
<b>ESRS 2 SBM-1 paragraph 40 (d) iv</b> Involvement in activities related to cultivation and production of tobacco			x		Irrelevant

<sup>18</sup> Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR) (OJ L 317, 9.12.2019, p. 1).

<sup>19</sup> Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR") (OJ L 176, 27.6.2013, p. 1)

<sup>20</sup> Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

<sup>21</sup> Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law") (OJ L 243, 9.7.2021, p. 1).

<sup>22</sup> Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published (OJ L 406, 3.12.2020, p. 1).

<sup>23</sup> Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks (OJ L 324, 19.12.2022, p.1).

<sup>24</sup> Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17).

Disclosure Requirement and related datapoint	SFDR reference <sup>18</sup>	Pillar 3 reference <sup>19</sup>	Benchmark Regulation reference <sup>20</sup>	EU Climate Law reference <sup>21</sup>	Chapter in 2024 Sustainability statement
<b>ESRS E1-1 paragraph 14</b> Transition plan to reach climate neutrality by 2050				x	<ul style="list-style-type: none"> <li>Climate change - Transition plan for climate change mitigation</li> </ul>
<b>ESRS E1-1 paragraph 16 (g)</b> Undertakings excluded from Paris-aligned Benchmarks		x	x		
<b>ESRS E1-4 paragraph 34</b> GHG emission reduction targets	x	x	x		<ul style="list-style-type: none"> <li>Climate change - Targets</li> </ul>
<b>ESRS E1-5 paragraph 38</b> Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				<ul style="list-style-type: none"> <li>Climate change - Metrics</li> </ul>
<b>ESRS E1-5 paragraph 37</b> Energy consumption and mix	x				
<b>ESRS E1-5 paragraphs 40 to 43</b> Energy intensity associated with activities in high climate impact sectors	x				
<b>ESRS E1-6 paragraph 44</b> Gross Scope 1, 2, 3 and Total GHG emissions	x	x	x		<ul style="list-style-type: none"> <li>Climate change - Metrics</li> </ul>
<b>ESRS E1-6 paragraphs 53 to 55</b> Gross GHG emissions intensity	x	x	x		
<b>ESRS E1-7 paragraph 56</b> GHG removals and carbon credits				x	Irrelevant
<b>ESRS E1-9 paragraph 66</b> Exposure of the benchmark portfolio to climate-related physical risks			x		Phase-in
<b>ESRS E1-9 paragraph 66 (a) and (c)</b> Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk		x			Phase-in
<b>ESRS E1-9 paragraph 67 (c)</b> Breakdown of the carrying amount of its real estate assets by energy-efficiency classes		x			Phase-in
<b>ESRS E1-9 paragraph 69</b> Degree of exposure of the portfolio to climate-related opportunities			x		Phase-in
<b>ESRS E2-4 paragraph 28</b> Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x				Irrelevant
<b>ESRS E3-1 paragraph 9</b> Water and marine resources	x				<ul style="list-style-type: none"> <li>Water - Policies</li> </ul>
<b>ESRS E3-1 paragraph 13</b>	x				

Disclosure Requirement and related datapoint	SFDR reference <sup>18</sup>	Pillar 3 reference <sup>19</sup>	Benchmark Regulation reference <sup>20</sup>	EU Climate Law reference <sup>21</sup>	Chapter in 2024 Sustainability statement
Dedicated policy					
<b>ESRS E3-1 paragraph 14</b> Sustainable oceans and seas	x				<i>Irrelevant</i>
<b>ESRS E3-4 paragraph 28 (c)</b> Total water recycled and reused	x				<ul style="list-style-type: none"> <li>Water - Metrics</li> </ul>
<b>ESRS E3-4 paragraph 29</b> Total water consumption in m3 per net revenue on own operations	x				
<b>ESRS 2 IRO-1 E4 paragraph 16 (a) i</b>	x				<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Material impacts, risks and opportunities</li> </ul>
<b>ESRS 2 IRO-1 E4 paragraph 16 (b)</b>	x				
<b>ESRS 2 IRO-1 E4 paragraph 16 (c)</b>	x				
<b>ESRS E4-2 paragraph 24 (b)</b> Sustainable land/agriculture practices or policies	x				<i>Irrelevant</i>
<b>ESRS E4-2 paragraph 24 (c)</b> Sustainable oceans/seas practices or policies	x				<i>Irrelevant</i>
<b>ESRS E4-2 paragraph 24 (d)</b> Policies to address deforestation	x				<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Policies</li> </ul>
<b>ESRS E5-5 paragraph 37 (d)</b> Non-recycled waste	x				<ul style="list-style-type: none"> <li>Resource use and circular economy: <ul style="list-style-type: none"> <li>Waste - Metrics</li> </ul> </li> </ul>
<b>ESRS E5-5 paragraph 39</b> Hazardous waste and radioactive waste	x				
<b>ESRS 2 SBM-3 – S1 paragraph 14 (f)</b> Risk of incidents of forced labour	x				<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Own workforce: <ul style="list-style-type: none"> <li>Human rights - Policies</li> </ul> </li> </ul>
<b>ESRS 2 SBM-3 – S1 paragraph 14 (g)</b> Risk of incidents of child labour	x				
<b>ESRS S1-1 paragraph 20</b> Human rights policy commitments	x				
<b>ESRS S1-1 paragraph 21</b> Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions			x		
<b>ESRS S1-1 paragraph 22</b> Processes and measures for preventing trafficking in human beings	x				<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Policies</li> </ul> </li> </ul>
<b>ESRS S1-1 paragraph 23</b> Workplace accident prevention policy or management system	x				
<b>ESRS S1-3 paragraph 32 (c)</b> Grievance/complaints handling mechanisms	x				<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Processes to remediate negative impacts and channels for own workforce to raise concerns</li> <li>Diversity and inclusion - Processes to remediate negative impacts and channels for own workforce to raise concerns</li> </ul> </li> </ul>

Disclosure Requirement and related datapoint	SFDR reference <sup>18</sup>	Pillar 3 reference <sup>19</sup>	Benchmark Regulation reference <sup>20</sup>	EU Climate Law reference <sup>21</sup>	Chapter in 2024 Sustainability statement
<b>ESRS S1-14 paragraphs 88 (b) and (c)</b> Number of fatalities and number and rate of work-related accidents	x		x		<ul style="list-style-type: none"> <li>• Own workforce:</li> <li>• Health and safety - Metrics</li> </ul> <i>Phase-in for letter (b) of paragraph 88 ESRS S1-14</i>
<b>ESRS S1-14 paragraph 88 (e)</b> Number of days lost to injuries, accidents, fatalities or illness	x				<i>Phase-in</i>
<b>ESRS S1-16 paragraph 97 (a)</b> Unadjusted gender pay gap	x		x		<ul style="list-style-type: none"> <li>• Own workforce:</li> <li>• Diversity and inclusion - Metrics</li> </ul>
<b>ESRS S-16 paragraph 97 (b)</b> Excessive CEO pay ratio	x				<i>Irrelevant</i>
<b>ESRS S1-17 paragraph 103 (a)</b> Incidents of discrimination	x				<ul style="list-style-type: none"> <li>• Own workforce:</li> <li>• Human rights - Metrics</li> </ul>
<b>ESRS S-17 paragraph 104 (a)</b> Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	x		x		
<b>ESRS 2 SBM-3 – S2 paragraph 11 (b)</b> Significant risk of child labour or forced labour in the value chain	x				<ul style="list-style-type: none"> <li>• Material impacts, risks and opportunities and their interaction with strategy and business model</li> <li>• Value chain workers: <ul style="list-style-type: none"> <li>• Human rights – Material impacts, risks and opportunities</li> </ul> </li> </ul>
<b>ESRS S2-1 paragraph 17</b> Human rights policy commitments	x				<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Value chain workers: <ul style="list-style-type: none"> <li>• Human rights – Policies</li> <li>• Health and safety – Policies</li> <li>• Training and skills development – Policies</li> </ul> </li> </ul>
<b>ESRS S2-1 paragraph 18</b> Policies related to value chain workers	x				
<b>ESRS S2-1 paragraph 19</b> Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	x		x		
<b>ESRS S2-1 paragraph 19</b> Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8			x		
<b>ESRS S2-4 paragraph 36</b> Human rights issues and incidents in the upstream and downstream value chain	x				<ul style="list-style-type: none"> <li>• Value chain workers: <ul style="list-style-type: none"> <li>• Human rights - Actions</li> </ul> </li> </ul>
<b>ESRS S3-1 paragraph 16</b> Human rights policy commitments	x				<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Affected communities - Policies</li> </ul>
<b>ESRS S3-1 paragraph 17</b> Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	x		x		
<b>ESRS S3-4 paragraph 36</b> Human rights issues and incidents	x				<ul style="list-style-type: none"> <li>• Affected communities - Actions</li> </ul>
<b>ESRS S4-1 paragraph 16</b> Policies related to consumers and end-users	x				<i>Irrelevant</i>
<b>ESRS S4-1 paragraph 17</b> Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		<i>Irrelevant</i>
<b>ESRS S4-4 paragraph 35</b> Human rights issues and incidents	x				<i>Irrelevant</i>



Disclosure Requirement and related datapoint	SFDR reference <sup>18</sup>	Pillar 3 reference <sup>19</sup>	Benchmark Regulation reference <sup>20</sup>	EU Climate Law reference <sup>21</sup>	Chapter in 2024 Sustainability statement
<b>ESRS G1-1 paragraph 10 (b)</b> United Nations Convention against Corruption	x				<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Business conduct: <ul style="list-style-type: none"> <li>• Business conduct - Policies</li> </ul> </li> <li>• Management of relationships with suppliers - Policies</li> </ul>
<b>ESRS G1-1 paragraph 10 (d)</b> Protection of whistle-blowers	x				
<b>ESRS G1-4 paragraph 24 (a)</b> Fines for violation of anti-corruption and anti-bribery laws	x		x		Irrelevant
<b>ESRS G1-4 paragraph 24 (b)</b> Standards of anti-corruption and anti-bribery	x				Irrelevant

### Incorporation by reference

The disclosures required by Legislative decree no. 125/2024 are provided in this Sustainability statement. There are no references to other documents that are part of Webuild's corporate reports, if not required by the reporting standards, especially as regards certain items presented in the consolidated financial statements. If references are made, this is disclosed.

### Use of phase-in provisions in accordance with Appendix C of ESRS 1

Webuild has availed of the phase-in provisions which allow it not to disclose comparative prior year information in the first year of application of the ESRS. Any other phase-in provisions the parent has availed of are disclosed in accordance with the disclosure requirements in the Content Index set out in the "Disclosure requirements in ESRS covered by the undertaking's sustainability statement" chapter of this section.

## The role of the administrative, management and supervisory bodies and Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

[GOV-1; GOV-2]

Webuild's corporate governance model is a traditional model and complies with international best practices.

At the date of this Sustainability statement, the parent's board of directors has 15 members. Eleven out of the 15 directors have stated that they meet the independence requirements as established by the law and regulations (73.3%) while there are 14 non-executive directors (93.3%). In addition, 40% of the directors are women (six out of 15). The board's gender diversity is calculated as the ratio of female to male board members (0.67).

Webuild's governance system does not envisage direct representation for employees or other workers in the administrative (board of directors) or control (board of statutory auditors) bodies, which is entrusted to the trade unions and other forms of consultation<sup>25</sup>.

The primary role of the board of directors - whose committees include the control, risk and sustainability committee, the compensation and nominating committee and the committee for related-party transactions - is to ensure the Group's sustainable success. Specifically, it reviews and/or approves the sustainability strategy and plan, the short- and long-term incentive plan, the Sustainability statement, the relevant projects and initiatives and their status as proposed by the chief executive officer and after the competent board committees have reviewed them. It also promotes engagement with shareholders and other relevant stakeholders using the most appropriate channels.

With respect to ESG matters, the board of directors is assisted by the control, risk and sustainability committee and the compensation and nominating committee.

The former committee, whose members are six independent directors, regularly reviews the parent's ESG matters, including in relation to climate change, and the related plans and projects. It also oversees the internal control and risk management system. The committee's duties include checking the Sustainability Report for its subsequent approval by the board of directors.

The compensation and nominating committee contributes to the monitoring of sustainability policies by focusing on aspects linked to incentives and the parent's ESG performance.

Other parties involved in sustainability matters and their duties are presented in the "Webuild sustainability governance" chart provided later in this chapter.

### **Main sustainability matters addressed by the board of directors with the support of the control, risk and sustainability committee**

The board of directors usually examines sustainability matters twice a year, unless there is a need to examine them more frequently due to operating requirements. As part of its advisory role, the control, risk and sustainability committee examines the sustainability matters with the same frequency as the board of directors. It also reports to the board once every six months on the main activities it has carried out in the period and its assessments of the adequacy of the internal control and risk management system.

In 2024 and up to the date of this Sustainability statement, the board of directors examined the 2023 Non-financial Statement (after it had been reviewed by the control, risk and sustainability committee) prepared in accordance with Legislative decree no. 254/2016 and monitored the main new requirements for sustainability reporting introduced by the Corporate Sustainability Reporting Directive (CSRD), Legislative decree no. 125/2024 and the ESRS. During the year, it analysed certain specific aspects, including the reporting boundary, the role of the governance bodies in the sustainability reporting process, and other aspects related to the double materiality assessment, considering the recommendations made by the

<sup>25</sup> More information is available in the subsections on "Own workforce" in the "Social information" section.

competent European authorities. It also continued to monitor all possible changes in the regulations. In addition, the control, risk and sustainability committee considered all the more material impacts, risks and opportunities (“IRO”) related to environmental, social and governance topics identified in the double materiality assessment. In early 2025, the committee acknowledged this statement which provides the information (mostly qualitative) required by the regulations for each material IRO, presented as policies, actions, targets and metrics.

Webuild has internal units that oversee individual sustainability matters such as HR, Organisation and System for social and environmental aspects and the chief financial officer for financial matters. With respect to the overarching vision of sustainability matters, the parent set up a corporate social responsibility department in 2016 to promote, coordinate and develop sustainability matters at global level. Together with all relevant internal units, management regularly informs the control, risk and sustainability committee of all processes, activities and aspects pertinent to sustainability matters. These briefings also cover all the procedures in place to ensure the parent correctly conducts its sustainability due diligence process.

This system of information flows means the administration and supervisory bodies can duly consider the outcome of due diligence processes and integrate it into Webuild’s strategies and governance, balancing sustainability matters (including in relation to material impacts, risks and opportunities) with its long-term financial and strategic objectives, in compliance with national and international regulations and best practices for responsible business development.

The directors have a broad range of professional experience, sector expertise and cultural backgrounds. The 2024 board evaluation found that all the directors have the necessary professional skills and expertise to carry out their duties.

The board members’ professional expertise is assessed before the board of directors is renewed in order to prepare guidance for the shareholders (on a voluntary basis to date as the parent is a large company with concentrated ownership), in accordance with folder 23 of the Corporate Governance Code, about managers and professionals whose inclusion in the board is deemed opportune. This guidance is drawn up using the results of the board evaluation.

The parent encourages the ongoing training of the directors and statutory auditors by providing them with dedicated work or induction sessions. These sessions are designed to provide them with an adequate understanding of the issues most important to the Group and affecting its operations, its sectors, internal dynamics and their evolution (including in the light of more important regulatory changes), correct risk management principles and the regulatory and self-regulatory framework.

To this end, the parent provides all the directors and statutory auditors with refresher and specialist courses on sustainability so they can address this in an informed, diligent and conscientious manner and consider the main sustainability aspects when taking decisions.

Therefore, Webuild has designed and provided induction sessions focused on, inter alia:

- the main content of the CSRD and Legislative decree no. 125/2024, which transposed the Directive into Italian law, and the reporting boundary;
- the double materiality assessment process;
- the structure of the disclosures required by and an in-depth overview of the ESRS, focusing on the key performance indicators and the reporting approach.

These sessions were designed with the assistance of sector experts and specialists in order to ensure the information was properly communicated and clear.

The familiarity gained by the directors and statutory auditors with the issue of sustainability means they can enact a sustainable management strategy that positively affects the parent’s financial performance, minimises the risks arising from sustainability matters and seizes the related opportunities, which include technological innovation, the energy transition and the sustainable management of natural resources.

The effectiveness of these training and information sessions is checked during the board evaluation, in order to verify their utility.

#### Sustainability governance

Body	Role, responsibilities and duties
Board of directors	<ul style="list-style-type: none"> <li>• definition of the governance and internal control and risk management system for sustainability matters;</li> <li>• appointment of a sustainability manager or allocation of the related duties to the relevant manager;</li> <li>• approval of the sustainability plan;</li> <li>• approval of the material topics arising from the double materiality assessment (impact and financial materiality);</li> <li>• approval of the parent's sustainability policies;</li> <li>• approval of the sustainability report;</li> <li>• assessment and regular monitoring of ESG risks as part of the group risk assessment;</li> <li>• definition of remuneration policies that include sustainability performance.</li> </ul>
Control, risk and sustainability committee	<ul style="list-style-type: none"> <li>• assessment of the governance and internal control and risk management system for sustainability matters and preparation of a non-binding opinion thereon for the board of directors;</li> <li>• assessment of the sustainability plan and preparation of a non-binding opinion thereon for the board of directors;</li> <li>• review of the double materiality assessment process and results and preparation of a non-binding opinion thereon for the board of directors;</li> <li>• assessment of the parent's sustainability policies and preparation of a non-binding opinion thereon for the board of directors;</li> <li>• review of the Sustainability statement and check of its compliance with the ESRS, Regulation (EU) 2020/852 on the EU taxonomy and the use of the electronic reporting format. Preparation of a non-binding opinion thereon for the board of directors;</li> <li>• review and regular monitoring of ESG risks as part of the group risk assessment. Preparation of a non-binding opinion thereon for the board of directors;</li> <li>• assessment of the sustainability targets included in the remuneration policies.</li> </ul>
Chief executive officer	<ul style="list-style-type: none"> <li>• preparation of a proposal for the board of directors on the internal control and risk management system for sustainability matters;</li> <li>• identification and management of sustainability risks;</li> <li>• statement on the compliance of the Sustainability statement with the applicable standards and compliance with the disclosure requirements of the Taxonomy regulation;</li> <li>• definition of a system to share sustainability information with the workers' representatives.</li> </ul>
Competent manager/Sustainability manager	<ul style="list-style-type: none"> <li>• definition of suitable procedures for the preparation of the Sustainability statement;</li> <li>• statement on the compliance of the Sustainability statement with the applicable standards and compliance with the disclosure requirements of the Taxonomy regulation;</li> </ul>

	<ul style="list-style-type: none"> <li>award of a mandate to the internal audit department for assistance with the issue of the statement.</li> </ul>
<b>Board of statutory auditors</b>	<ul style="list-style-type: none"> <li>oversight of compliance with the provisions of Legislative decree no. 125/2024 with respect to its mandatory duties. Specifically, it monitors (i) the adequacy of the procedures, processes and structures used to prepare the Sustainability statement and (ii) compliance with the relevant regulations;</li> <li>preparation of a reasoned proposal, if a sustainability auditor is appointed;</li> <li>check and monitoring of the independence of the sustainability auditors.</li> </ul>
<b>Compensation and nominating committee</b>	<ul style="list-style-type: none"> <li>preparation of draft remuneration policies that include sustainability performances.</li> </ul>
<b>Sustainability auditor</b>	<ul style="list-style-type: none"> <li>formulation of its conclusions in an assurance report about the conformity of the sustainability report with the Decree's guidelines covering its basis of preparation, the tagging obligation and compliance with the disclosure requirements of the Taxonomy regulation.</li> </ul>
<b>Shareholders</b>	<ul style="list-style-type: none"> <li>approval of the separate financial statements and acknowledgement of the Sustainability statement, included in the Directors' report and having an informational value for shareholders that are also entitled to ask questions about non-financial information;</li> <li>approval of the remuneration policies which include sustainability performance.</li> </ul>
<b>Management committee</b>	<ul style="list-style-type: none"> <li>monitor changes in regulations and market practices about sustainability reporting in order to continuously develop and update the related processes.</li> </ul>

## Integration of sustainability-related performance in incentives schemes

[GOV-3]

The 2023-2025 remuneration policy, approved by the Webuild's shareholders on 27 April 2023, is inspired by principles of transparency, sustainability, meritocracy, competitiveness, proportionality and equity.

The incentive systems for the 2023-2025 three-year period include:

- a short-term incentive (STI) system which includes financial indicators and company objectives, in line with the market guidance published from time to time, as well as management objectives, in order to focus management's efforts on achieving targets that represent the Group's entire life cycle, business and day-to-day operations, going beyond the responsibilities of their role and enhancing their performance in the interests of the Group and its sustainability;
- a 2023-2025 long-term incentive (LTI) system, designed to go hand-in-hand with achievement of the 2023-2025 business plan objectives, thus guaranteeing greater alignment of the shareholders' interests with those of management in achieving the Group's strategic objectives, as well as an effective incentive and meritocracy mechanism to foster retention of key resources.

Variable remuneration components are linked to performance objectives that can be measured and are tied to the parent's medium- to long-term strategic objectives. They are usually calculated using financial indicators as well as non-financial measures.

More information about roles and the methods used to approve and refresh the incentive systems is provided in Webuild's report on the remuneration policy and compensation paid.

A portion of the annual incentive for operations managers (when possible) and a portion of the long-term incentive for c-suite managers (with a role relevant to the achievement of the 2023-2025 business plan objectives) are linked to the achievement of a sustainability-related target, measured considering internal and predetermined indicators of improvement of safety indices and, solely for the long-term incentive, a reduction in GHG emissions intensity.

The 2023-2025 LTI plan is based on two independent indicators, measured using the budget/business plan figures over the three-year period:

- (i) financial indicators
  - a. EBITDA/Financial expense (25%);
  - b. Cumulative EBIT (25%);
  - c. Overheads on revenues (30%).
- (ii) risk and sustainability indicators
  - a. Lost Time Injury Frequency Rate (10%);
  - b. reduction of GHG emissions intensity (10%).

The board of directors approves and updates the incentive system conditions after consulting the compensation and nominating committee and they are subsequently approved by the shareholders.

## Statement on due diligence

[GOV-4]

In line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, Webuild adopts due diligence processes with regard to social, environmental and governance matters to ensure its operations are carried out responsibly. These processes are embedded in the Group's policies, procedures and management systems, and actions and objectives, and in the related monitoring processes.

Specifically, the due diligence processes allow the Group to identify and manage the actual and potential negative impacts connected with its own operations and its upstream and downstream value chain, including through other business relationships. They are also embedded in its strategy and governance to ensure Webuild's activities are performed in compliance with applicable national and international regulations while concurrently promoting responsible practices in developing business. A mapping of the information provided in the Sustainability statement about the due diligence processes with regard to social, environmental and governance matters for 2024 is provided below.

Core elements of due diligence	
a)	Embedding due diligence in governance, strategy and business model
b)	Engaging with affected stakeholders in all key steps of the due diligence
c)	Identifying and assessing adverse impacts
d)	Taking actions to address those adverse impacts
e)	Tracking the effectiveness of these efforts and communicating

Core elements of due diligence					Paragraphs in the Sustainability statement
a)	b)	c)	d)	e)	
x	x				<ul style="list-style-type: none"> <li>The role of the administrative, management and supervisory bodies and information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies</li> </ul>
					<ul style="list-style-type: none"> <li>Integration of sustainability-related performance in incentive schemes</li> </ul>
	x				<ul style="list-style-type: none"> <li>Interests and views of stakeholders</li> </ul>
	x				<ul style="list-style-type: none"> <li>Processes for engaging with own workers and workers' representatives about impacts (chapter on Own workforce)</li> </ul>
	x				<ul style="list-style-type: none"> <li>Processes for engaging with value chain workers about impacts (chapter on Workers in the value chain)</li> </ul>
	x				<ul style="list-style-type: none"> <li>Processes for engaging with affected communities about impacts (chapter on Affected communities)</li> </ul>
x		x			<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model (General information section)</li> <li>Impacts, risks and opportunities (information in the Environmental information, Social information and Governance information sections)</li> </ul>
	x	x			<ul style="list-style-type: none"> <li>Description of the process to identify and assess material impacts, risks and opportunities (General information section)</li> <li>Impacts, risks and opportunities (chapters on Climate change, Biodiversity and ecosystems)</li> </ul>

Core elements of due diligence					Paragraphs in the Sustainability statement
a)	b)	c)	d)	e)	
x					<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters (General information section)</li> <li>• Policies (information in the Environmental information, Social information and Governance information sections)</li> </ul>
x	x	x	x	x	<ul style="list-style-type: none"> <li>• Integrated quality, environment, occupational health and safety, road traffic safety, social responsibility and protection of human rights, gender equity and diversity &amp; inclusion management system</li> </ul>
x	x	x	x	x	<ul style="list-style-type: none"> <li>• Environmental management system</li> </ul>
			x	x	<ul style="list-style-type: none"> <li>• Actions taken for material impacts, risks and opportunities (information in the Environmental information, Social information and Governance information sections)</li> <li>• Transition plan for climate change mitigation (Climate change chapter)</li> <li>• Transition plan and consideration of biodiversity and ecosystems in strategy and model (Biodiversity and ecosystems chapter)</li> </ul>
		x	x	x	<ul style="list-style-type: none"> <li>• Human rights risk assessment (chapters on Own workforce and Workers in the value chain)</li> </ul>
				x	<ul style="list-style-type: none"> <li>• Strategy, business model and value chain</li> <li>• Tracking the effectiveness of policies and actions through targets</li> <li>• Targets (information in the Environmental information, Social information and Governance information sections)</li> </ul>
				x	<ul style="list-style-type: none"> <li>• Metrics (information in the Environmental information, Social information and Governance information sections)</li> </ul>

## Risk management and internal controls over sustainability reporting

[GOV-5]

The system of risk management and internal controls over sustainability reporting is based on the COSO report<sup>26</sup> which was supplemented in March 2023 with guidance on sustainability reporting, Achieving Effective Internal Control of Sustainability Reporting.

The internal controls over sustainability reporting (SCIIS) are part of the wider internal control and risk management system (SCIIGR). Their main objective is to provide reasonable assurance that the Sustainability statement has been prepared in conformity with the applicable standards.

Given the recent developments in sustainability reporting regulations and as part of a more far-reaching journey to align its reporting process with the CSRD, Webuild launched a project to refresh its system of risk management and internal controls over sustainability reporting to ensure the reliability of the sustainability information and compliance with the reporting standards. In governance terms, the system is designed to support the chief executive officer and the corporate reporting officer with the issue of the statements to the market on the Sustainability statement's compliance with the ESRS and article 8.4 of Regulation (EU) 2020/852 (the EU taxonomy regulation).

The gradual implementation of the related control system entails the following interdependent macro-phases:

- a) the first macro-phase consists of the definition of the scope and roll-out of the control system and includes the scoping and risk & control assessment activities, performed to define the criteria to identify the key

<sup>26</sup> Framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (the "COSO Report").



indicators, i.e., that indicate controls need to be implemented, so that the sustainability information provided in conformity with the ESRS ensures compliance with the principles of relevance, faithful representation, comparability, verifiability and understandability;

- b) the second consists of testing the controls and includes the monitoring, assessment and reporting phases to test and assess the adequacy and effective working of the controls, and to report on the results.

The starting point for implementation of the system of internal controls over sustainability reporting was to define its scope of application by assessing the theoretical exposure of the datapoints to the risk of misstatement. To this end, the scoping process used a top-down, risk-based approach to identify and classify the data, information and most important group entities to be included in the control system.

The system is applied using a scalable approach with different levels of pervasiveness, depending on the complexity, materiality of the data/information produced and disclosed and the individual group entities<sup>27</sup>.

Webuild designed an entity level control system, based on the 17 principles into which the five components of the COSO report are divided. It comprises structural elements of the internal control system to ensure that the process activities are performed and checked in accordance with the principles and objectives set by management at group and entity level. The elements making up the internal control system include, for example, the adoption of ethical and conduct standards, regulatory tools, the fostering and dissemination of a risk management oriented culture, the definition of a system of roles and responsibilities and development of Webuild personnel's skills.

Webuild also defined a system of specific controls for the sustainability reporting process. The digitalisation of the data and information collection and consolidation activities facilitates an efficient process to check them using automated controls and dedicated reports. The parent provided for an attestation process by management and the representatives of the entities included in the reporting boundary confirming the accuracy and authenticity of the sustainability data and information managed by them. Finally, it prepared a plan for the gradual introduction of controls over this process.

In addition, the project to introduce and maintain internal controls over sustainability reporting included:

- the design of dedicated controls integrated into the internal processes and systems where the sustainability information is taken from in order to prevent, manage and mitigate errors in operating activities that could affect the sustainability reporting process;
- the implementation of regular, structured processes to monitor and assess the adequacy and working of the controls and information flows used to report results.

During 2024, tailored information flows were addressed to the administrative, management and supervisory bodies and the independent auditors to document the progress towards compliance with the CSRD, including development of the risk management and internal control system in relation to the sustainability reporting process.

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<sup>27</sup> And the following control components: Company/Entity Level Control (CELC), Process Level Control (PLC) and Information Technology General Control (ITGC).

## Strategy, business model and value chain

[SBM-1]

Webuild aims to consolidate its leadership role in the construction sector and has, accordingly, adopted a long-term sustainability strategy embedded in its business model and strategy on the basis of which its environmental, social and governance (ESG) objectives are integrated into all its activities.



### VISION

We envision, design and build a new world, bringing the present closer to the future, to improve peoples' lives today and tomorrow.

### MISSION

We make sustainable development a reality in the areas in which we operate, applying the most innovative solutions to build major infrastructures.

### PURPOSE

Webuild, partner for a sustainable future

Webuild's sustainability strategy hinges on two fundamental pillars: its contribution to global challenges and its firm commitment to acting responsibly. Accordingly, Webuild undertakes to:

- develop and build construction projects that minimise their environmental impact, using sustainable materials, reducing the consumption of natural resources and improving the energy efficiency of buildings and infrastructure;
- integrate innovative solutions that promote climate resilience, such as the adoption of technologies to reduce CO<sub>2</sub> emissions and manage water resources sustainably;

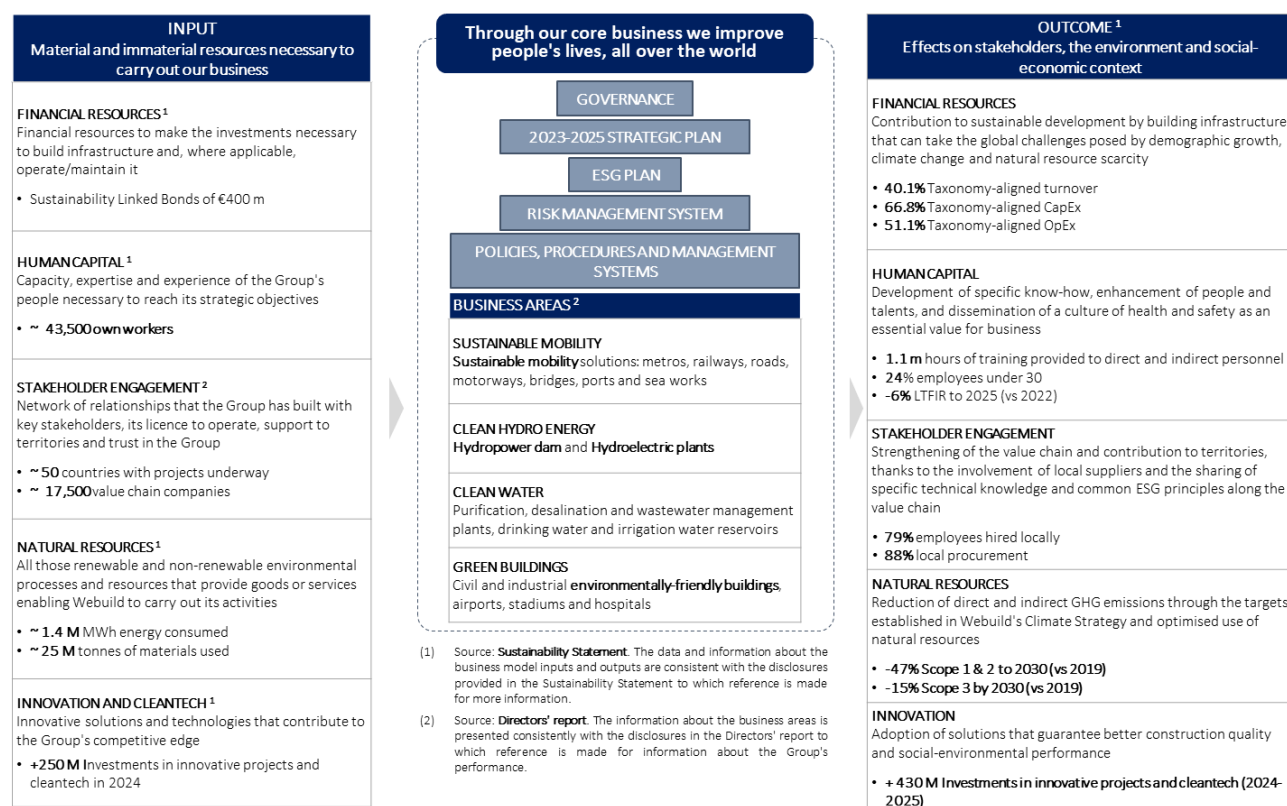
- attain and maintain high standards in terms of environmental certification for projects such as LEED or BREEAM, which attest to the sustainability of buildings, ENVISION or IS certification which guarantee the sustainability of infrastructure.

As signee of Global Compact, Webuild formalised its intention to provide a real contribution to the global effort to achieve the Sustainable Development Goals (SDGs) set by the United Nations' 2030 Agenda, including through its ESG Plan which identifies a number of projects to be developed to contribute to speeding up the climate transition towards a low carbon economy. This includes developing innovative solutions to improve the environmental sustainability of Webuild's projects and operations.

Webuild's Sustainability Manifesto is built on the fundamental pillars of the 5P (Planet, Prosperity, People, Partnership, Progress) and three sustainability "construction sites" (Green Builders, Safe & Inclusive Builders, Innovative & Smart Builders). This is reflected in the Group's business areas: specifically, the Sustainable mobility (railways and metros), Clean hydro energy and Green buildings business areas contribute significantly to reducing GHG emissions in the transport, energy and building sectors, the main culprits of global climate-altering emissions. In addition, the Group's projects in the Clean water and Sustainable mobility (roads, bridges and tunnels) business areas contribute to climate change adaptation, improving infrastructure's resilience to climate-related effects.

Webuild's business areas mainly serve the following markets: Europe (mostly Italy), Australia, North America and the Middle East (principally Saudi Arabia). There were no particular changes in the Group's core business, significant customer groups and/or significant markets in the reporting period. More information about the headcount of employees by geographical areas is provided in the "Metrics" paragraph of the "Own workforce - working conditions" chapter in the "Social information" section.

## Business model and contribution to global challenges



Webuild's business model is designed to assist its customers to build complex infrastructure able to efficiently take on the current megatrends and challenges posed by the wider social-economic contest through three strategic pillars: expertise and innovation, centralised governance and sustainability.

This model is based on the best possible use of all material and immaterial resources (inputs) available to the Group to build complex works (outputs), allowing it to contribute to sustainable development. This approach facilitates the generation of economic value for shareholders, investors, customers and partners, environmental value for the areas in which it works and social value for people and communities (outputs).

Specifically, specialist technical expertise and the experience of the Group's people are essential<sup>28</sup> for its business model, as are its partnerships and relations with stakeholders that ensure synergies during the development of projects and achievement of shared development objectives. The model also links the use of natural resources with advanced construction techniques to improve the work's sustainability during its construction and over the project's entire life cycle. Innovation is key to this process as it facilitates the search for competitive design solutions to the engineering and technical challenges posed by the works right from the tendering stage, while concurrently improving the infrastructure's environmental performance, in terms of its efficiency, and generating value for the workers and areas in which Webuild works.

In addition, the global scale and diversification of the Group's operations are other distinctive characteristics, which contribute to its resilience. Thanks to a deep long-term order backlog and a unique track record of large works built in more than 100 countries, the Group is able to manage large-scale projects in different contexts. These factors pave the way for opportunities, allowing Webuild to both develop infrastructure that can meet the specific requirements of a certain area and create tangible benefits for the local stakeholders and also build up its internal expertise and foster synergies with qualified partners, ensuring a constant exchange of ideas, innovative solutions and cutting-edge construction techniques.

The chapters on the various topics in this statement provide more information about the single components of Webuild's business model.

The corporate governance system supports the business model. This system is anchored in principles of ethics and integrity, the broader group strategy set out in its 2023-2025 strategic plan and ESG plan, essential to grow the business and ensure its continuity. The business model is also supported by the risk management system designed to facilitate knowledgeable decisions by assessing and analysing risks and opportunities as well as the regulatory and internal management system, comprising operating policies and procedures that ensure the Group acts in line with its internal principles and guidelines.

The Group's sustainability objectives also reflect the ESG requirements and commitments of its customers that are mostly public sector bodies, government institutions and private sector customers. Examples are the projects funded by the Italian National Recovery and Resilience Plan or the Multilateral Development Banks.

Webuild pursues a global approach to sustainability tailored to its local communities. It operates in many regions around the world and always commits to obeying local regulations and promoting initiatives that meet the specific environmental and social challenges of each context. This can include the use of local suppliers to reduce the environmental impact, preferring local workers to whom it guarantees responsible working practices thus creating development opportunities that last long after the construction of the individual project.

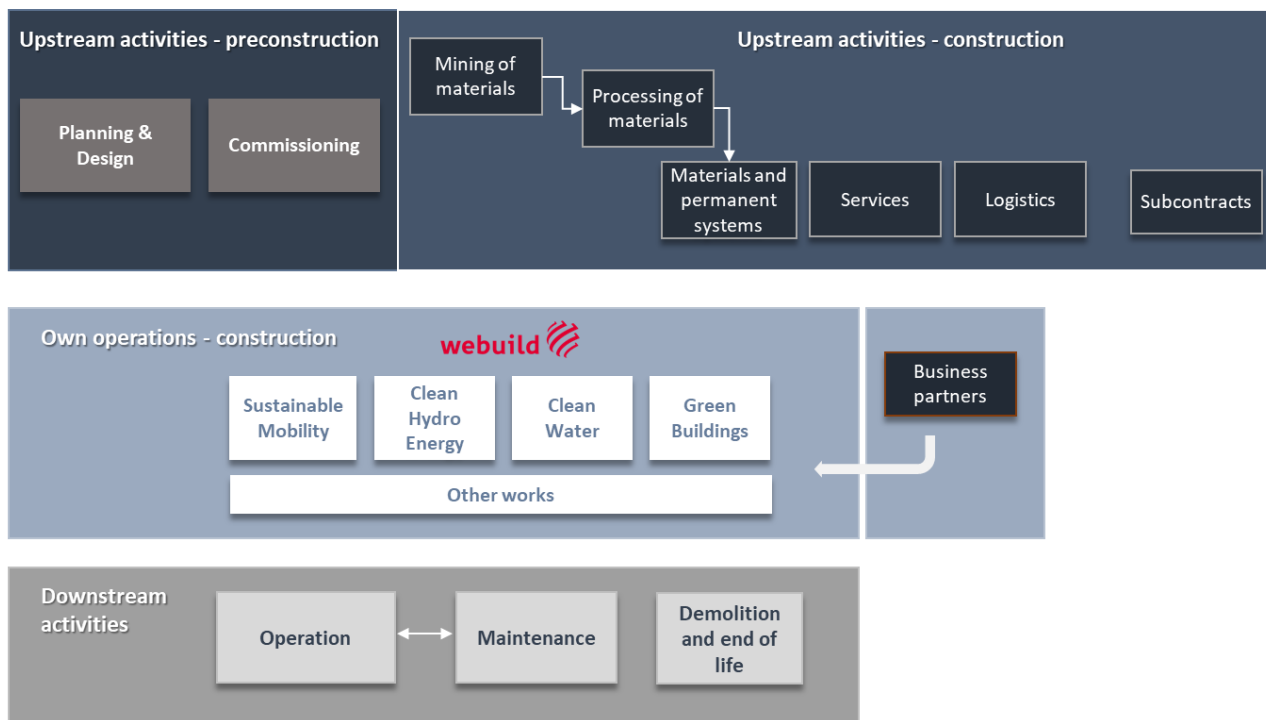
In addition, the Group is committed to ongoing engagement with the local communities to the extent of its actions and influence. It also liaises with non-government organisations (NGO), international and local institutions to ensure that all the most important issues are heard and dealt with transparently and harmoniously. Webuild pursues ongoing improvement in its ESG performance (confirmed by the independent ratings received) by adopting business practices designed for sustainable development.

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<sup>28</sup> As defined by Legislative decree no. 125/2024, essential immaterial resources are resources without physical substance, are intrinsic to an entity's business model and a source of value for it.

With a view to continuous, extended improvement, Webuild is extremely careful of its value chain which is highly regulated and comprises a multitude of actors that participate in the planning, assessment, approval, development, construction and operation of infrastructure, depending on their roles and responsibilities assigned under the applicable regulations. Webuild's value chain is complex and includes both public and private sector operators, each of which play a part in the project's evolution.

The following figure is a simplified presentation of the value chain, showing the main phases of an infrastructure project's life cycle.



Planning a project involves a number of activities that include identifying the project locations, feasibility studies and completing social and environmental procedures. They include an assessment of potential impacts, consultations with affected parties and the identification of mitigation and compensation measures. The public authorities (usually ministries, state environmental protection agencies and local bodies of the area where the project is to take place) play a crucial role in this phase. They assess the adequacy of the social and environmental impact assessments, the consultation programmes and mitigation plans prepared by the project proponent, which can sometimes require compliance with specific measures to be adhered to by the project proponent during the project. Once the competent authorities have issued the appropriate permits and authorisations, contractors such as Webuild enter the process by participating in calls for tenders made by the public and private sector customers. These contracts may cover specific project activities (e.g., just construction), the entire Engineering, Procurement and Construction (EPC) cycle or also the subsequent Operation & Maintenance (O&M) activities.

Therefore, the contractor does not take part in any activities prior to the assigning of the contract or the prior assessment processes, including the assessment of the project's social and environmental impacts and consultation of stakeholders.

As described earlier, these assessments are the sole responsibility of the project proponent and of the public authorities, as they are required to meet the relevant obligations under the applicable regulations. They also have the decision-making powers about the findings of the assessment process. It follows that the potential social and environmental impacts of the work itself (e.g., loss of biodiversity due to the infrastructure's presence, expropriation of land) are the sole responsibility of the project proponent.

The contractor is obliged to comply with the social and environmental requirements of the applicable regulations, the contract and any provisions imposed by the competent authorities when they approve the social and environmental impact assessments. The social and environmental impacts attributable to the contractor arise solely from the contract activities and are mainly of a temporary nature (e.g., disruptions caused by the work site, occupational health and safety).

Despite this clear distinction, as part of its operations and responsibilities, Webuild considers the entire life cycle of the infrastructure as far as possible to promote its sustainability, generate value for the local area and provide a service to the community, contributing to the circular economy and decarbonisation. It asks that its business partners and designers take the same approach.

In addition to the planning and design phase, Webuild's upstream value chain includes all the suppliers of goods, services and materials necessary for construction activities. Some of the main players include:

- suppliers of raw materials to produce materials and other goods for construction;
- suppliers of materials such as cement, steel, aluminium, concrete and other construction materials;
- suppliers of technologies and equipment, like construction machinery and heavy equipment (diggers, cranes and concrete mixers) and advanced technologies such as software to design and manage projects;
- subcontractors and suppliers of specialist services such as logistics, installation of sundry systems, security systems, civil engineering works and geotechnical activities;
- financial partners like banks and financial institutions that provide the capital to finance large infrastructure projects, which are often of a long-term nature and are capital-intensive.

Once the construction phase has been completed and the infrastructure has been placed in service, the operation and maintenance phase begins. The final phase is when the infrastructure reaches the end of its useful life. These phase are usually the responsibility of other operators (i.e., not the contractor that is involved in the construction phase) but can in some limited cases involve the Group, especially when the construction activities are part of a longer term project which includes the operators of the working infrastructure. This is however a very small part of the Group's business model.

In order to correctly and comprehensively map all the impacts on its value chain during the reporting period, Webuild analysed the countries in which its tier 1 suppliers are based. It considered the orders placed for the first half of 2024, selecting the countries accounting for contracts equal to or greater than 1%. Webuild then used various sources<sup>29</sup> to identify the level of risk related to environmental, social and governance matters for the identified countries.

## Interests and views of stakeholders

[SBM-2]

Webuild firmly believes that integrity and transparency in stakeholder engagement is integral to responsible corporate conduct. Given the specific nature of its business and international footprint, the Group handles thousands of interactions with its stakeholders every day. It therefore regularly maps and analyses its main stakeholder categories, considering the level, frequency and length of engagement, the issues of greatest interest and potential areas of impact, the potential influence on decision-making processes and so on, also with a view to adopting the most appropriate communication channels and to promptly respond to requests.

The Group curates its dialogue and engagement approach in response to the various stakeholder characteristics and needs.

At corporate level, key stakeholders include investors, customers, current and potential employees, national and international trade unions, suppliers and partners, public administrations, the media and the general

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<sup>29</sup> Global Slavery Index 2023; WWF Biodiversity Risk Filter; Water Risk Atlas; Corruption Perception Index.

public. Dialogue with them mainly relates to development objectives and strategies, results, the acquisition of new contracts, the shareholder structure, career paths and professional development.

Stakeholder engagement activities include direct meetings with the main customers and suppliers to ensure the proposed solutions meet the contractually-defined requirements. They also include investor relation activities organised by the parent or to meet specific (current or potential) investor requests, surveys on various issues for employees and training programmes to involve them in the parent's growth and continuous improvement journey.

With respect to institutional relations and advocacy activities, the Group encourages engagement with public institutions, regulators and other stakeholders to ensure the legitimate representation and sharing of issues of interest to it. These issues include development plans for infrastructure, sustainable mobility, water and hydropower resource management, innovation for the development of efficient, resilient and low environmental impact works and the creation of jobs and value for the areas where the Group operates.

Webuild's Corporate Identity, Communication and Institutional Affairs Department carries out these activities in compliance with the relevant guidelines. This involves participation in events promoted by the sector associations and/or Italian embassies in the various countries where the Group operates, engagement with members of public institutions and monitoring of proposed legislation related to the sectors in which the Group operates in Italy and abroad. Institutional relations take place in full compliance with the principles of legitimacy, transparency and accountability by suitable employees with special proxies and in compliance with Webuild's guidelines for the management of potential conflicts of interest.

At operating level, the main engagement activities depend on the individual project's characteristics. The key stakeholders are partners, employees, local communities, suppliers, contractors and subcontractors, customers, local authorities and organisations like local trade unions and non-governmental organisations. Furthermore, Webuild holds that the Environment - taken to be the entire ecosystem in which it operates, is itself also a stakeholder.

Given that it mainly operates as a contractor on behalf of public and private customers, the Group is required to scrupulously adhere to the contractual provisions about engagement with local stakeholders. These provisions establish the roles and responsibilities each party is obliged to comply with. In line with these provisions, the Group defines procedures to handle engagement with local stakeholders (such as, for example, the grievance mechanisms) and the communication channels to be used at work sites.

As described in the previous chapter, the project proponents are responsible for the assessment of the social and environmental impacts and the (prior) consultation of the stakeholders. The Group is required to comply with the contract terms and to provide technical and operating assistance to deal with any issues that may arise. Matters discussed by contract personnel and local communities mainly relate to:

- employment and interaction between the work site and surrounding areas;
- the characteristics of the work under construction and its possible social and environmental implications.

It follows that the Group's customers have sole responsibility for handling relations with the stakeholders for the second category of topics mentioned earlier, while the Group provides assistance with management of the relationships covering the first category of topics. Moreover, the Group constantly monitors stakeholder expectations about the projects it is involved in so that it can build transparent relationships of mutual trust, also in order to monitor and mitigate any risks.

Should the Group receive requests for information or other communications from stakeholders, such as international non-profit organisations and SRI (Sustainable and Responsible Investment) analysts, it provides the requested information to guarantee complete transparency about its role, responsibilities and work as a contractor engaged to build the works provided for by the relevant contract.

Like in previous years, in 2024, the Group ensured maximum transparency in its communications with internal and external stakeholders in Italy and abroad. It provided them with continuous communications during a

phase of great momentum in investments in infrastructure with an increasingly specialised audience. It engaged in numerous initiatives with stakeholders, the main ones of which are summarised below:

Corporate communications	<p>Centralised production of content and communication materials distributed through the Group's proprietary and third party channels:</p> <ul style="list-style-type: none"> <li>750 videos, infographic systems and podcasts;</li> <li>roughly 170 press releases/press notes.</li> </ul> <p>To extend and diversify its audience, the Group increased the production of the digital corporate magazine We Build Value. In 2024, it published around 1,100 editorial and multi-media content on topics of interest such as sustainability, innovation, sustainable mobility, AI, water, smart cities and more.</p>
Internal communication	<p>Webuild focused on strengthening the corporate identity and common shared culture given its significant growth:</p> <ul style="list-style-type: none"> <li>10,000 employees reached directly with newsletters and DEM;</li> <li>reach on internal digital communication channels: +24% for the Webe intranet (47 entities and work sites) and +66% for the employee app Webbuilders;</li> <li>extension of the community of Employee Advocacy Brand Builders (+21% vs 2023).</li> </ul> <p>2,500 employees involved directly in roughly 100 cascading/alignment meetings about the Group's results and objectives.</p>
Digital communication	<p>Company websites, magazines, webinars, surveys, social media:</p> <ul style="list-style-type: none"> <li>3 million visits to the Group's website;</li> <li>13.5 million interactions through the Group's social media;</li> <li>110 million impressions on the Group's digital touchpoints;</li> <li>490,000 direct audience contacts on the digital channels.</li> </ul> <p>The "Cantieri Trasparenti" digital communication project, launched in 2022, continued and has 33 live webcams through the <a href="http://www.cantieritrasparenti.com">www.cantieritrasparenti.com</a> platform allowing people to follow construction activities at seven Webuild work sites live.</p>
Face to face communication	<p>Meetings, presentations, focus groups, workshops, interviews, consultations, career days, public events:</p> <ul style="list-style-type: none"> <li>roughly 8.5 thousand people involved in more 900 meetings with the local communities and their representatives;</li> <li>around 13.9 thousand people visited the Group's projects in more than 300 open door events;</li> <li>approximately 620 information campaigns about the Group's projects, which reached more than an estimated 145 thousand people.</li> </ul>

In addition, in 2024, workshops were held with groups of employees and suppliers to make the double materiality assessment process more effective. They were asked to validate assessments about impacts relevant to them that emerged from discussions with subject matter experts and to express their opinions.

These tools and initiatives enable Webuild to grasp the main topics of interest to stakeholders and the impacts deemed most relevant to them. As a result, it can define strategies to engage with stakeholders in the areas



where it works, assessments of its reputation and risk assessment and monitoring activities. These processes are essential to ensure that stakeholders’ concerns are addressed during decision-making processes.

Should these interactions with stakeholders identify critical issues, the control, risk and sustainability committee informs the board of directors once every six months on the main engagement activities performed in the period and its assessments on the adequacy of the internal control and risk management system as required by Recommendation 35.h) of the Corporate Governance Code.

## Description of the process to identify and assess material impacts, risks and opportunities

[IRO-1]

In 2024, the Group performed a double materiality assessment to identify material impacts, risks and opportunities associated with sustainability matters. It did this in compliance with the provisions introduced by the CSRD, Legislative decree no. 125 of 10 September 2024 (“Legislative decree no. 122/2024) and the ESRS. It also considered the guidance issued by the European Financial Reporting Advisory Group (EFRAG)<sup>30</sup>.

As required, the Group considered both the impact materiality and financial materiality perspectives: the first led to the identification of actual and potential material positive and negative impacts in the short-, medium- and long-term; the second identified the risks and opportunities related to material sustainability matters.

Specifically, the process took place as follows:

<b>1. Analysis and understanding of the organisational context and business</b>	<p>This phase consists of an analysis of internal and external documentation, which may include, by way of example, Webuild’s policies, the results of the materiality assessment and the prior year Consolidated Non-financial statement, documents used for the due diligence on human rights, the Group’s 2024-2025 ESG Plan, sector studies and other reputable external sources.</p> <p>Webuild also extended its analysis of the broader context in which it works, encompassing the aspects covered by the ESRS, sustainability matters prioritised by the main ESG rating agencies for its sector and various tools and consolidated best practices. Finally, it performed a benchmark analysis on entities deemed comparable at least in part to Webuild.</p> <p>This analysis also included deep diving the Group’s value chain, again using external documentation related to the construction sector in particular and by interviewing the internal units relevant to the issue. This entire procedure allowed Webuild to identify and define the main business phases and relationships that could generate sustainability-related impacts, risks and opportunities both during the Group’s directly-operated activities and along its value chain.</p> <p>The outcome of this phase was the identification of sustainability matters of potential significance for the Group.</p>
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<sup>30</sup> IG1: Materiality Assessment Implementation Guidance, IG2: Value Chain Implementation Guidance

<b>2. Identification of sustainability-related impacts, risks and opportunities</b>	<b>Identifying impacts</b>	<p>Based on the results of the context analysis and considering the information provided by recognised public sources<sup>31</sup>, and the findings of the Group's 2023 Human Rights Risk Assessment, Webuild identified the positive or negative actual or current impacts generated directly or indirectly through short- and long-term business relationships as well as, when necessary and/or applicable, issues related to the geographical areas and/or own operations. Specifically, it considered the characteristics of the locations where the Group operates (when pertinent) and the viewpoint of the stakeholders that could be affected by the impacts.</p>
	<b>Identifying risks and opportunities</b>	<p>As part of the group risk assessment, Webuild identified the main sustainability-related risks and opportunities, and reliance on environmental and social resources, considering the findings of the context analysis and relevant internal documentation (such as, for example, the 2024-2025 ESG Plan). It also mapped the main actual and potential risks and impacts to check if risks could arise from and/or be closely related to the identified impacts.</p>
<b>3. Assessment of the materiality of impacts, risks and opportunities</b>	<b>Definition of an impact, risks and opportunities assessment model</b>	<p>The metrics used to assess impacts, risks and opportunities are those indicated by the ESRS<sup>32</sup>. The assessment model ranges from 1 (Low) to 4 (Critical and Very high for opportunities) for both perspectives.</p>
	<b>Assessment of impacts</b>	<p>Impacts are assessed by subject matter experts, i.e., competent employees through interviews to consider the ESRS metrics, depending on the assessment model identified, the characteristics and/or nature of the identified impacts. These impacts were assessed using a scale (irrelevant, of little relevance, relevant, very relevant) based on their materiality and likelihood of occurrence, considering the factors of scale, scope and irremediable character factors.</p>
	<b>Assessment of risks and opportunities</b>	<p>Webuild assessed risks as part of the group risk assessment, in line with the parameters and guidance set out in the assessment model designed by the Risk Management Department. This model has a scale (irrelevant, of little relevance, relevant, very relevant) based on the magnitude of the financial effects and the</p>

<sup>31</sup> Public sources include: the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) database developed by the Taskforce on Nature-related Financial Disclosures (TNFD), Corruption Perception Index 2023 published by Transparency International, Water Risk Atlas developed by World Resources Institute, WWW Biodiversity Risk Filter.

<sup>32</sup> In order to assess the impacts, materiality is expressed as a combination of the factors of scale, scope and irremediable character (for the negative impacts only) and the likelihood of occurrence (for the positive impacts only). Magnitude, measured using qualitative and quantitative parameters and the likelihood of occurrence, is used to assess risks and opportunities.

	<p>likelihood of occurrence. The process to identify opportunities available to the Group that could potentially generate financial and reputation benefits for it also considered the ESG Plan. The identified opportunities were in line with the Plan's objectives, a large part of which are also included in the LTI plan for top management. These opportunities were then assessed to confirm their materiality and their importance was confirmed by investors during meetings between them and the Investor Relations Department.</p> <p><b>Stakeholder engagement</b></p> <p>Webuild shared the findings of the subject matter experts' assessments with some of the main categories of internal and external stakeholders (employees, suppliers and investors - the latter also had access to information provided by the Investor Relations Department prepared specifically for them) in dedicated meetings in order to discuss the topic of most relevance for each group and obtain their feedback.</p>
4. Prioritisation and definition of material impacts, risks and opportunities	<p>Once the assessments of the impacts, risks and opportunities had been reviewed by the Corporate Social Responsibility and Risk Management Departments, respectively, Webuild identified a list of impacts, risks and opportunities identified as material for the Group. It prioritised these impacts, risks and opportunities using defined materiality thresholds using a risk-based approach, considering impacts, risks and opportunities assessed as relevant and very relevant (based on the scale defined in the previous phase) to be material.</p>
5. Sharing of results with the competent corporate bodies	<p>The findings of the double materiality assessment were firstly presented to the control, risk and sustainability committee and subsequently approved by the parent's board of directors.</p>

## Material impacts, risks and opportunities and their interaction with strategy and business model

[SBM-3]

With a business model centred on qualitative excellence, respect for costs and timing, sustainability and innovation, Webuild aims to create shared benefits and positive impacts on the environment, people and society, tackling global challenges such as demographic growth, urbanisation, resource scarcity and climate change. The infrastructure it builds is designed to be sustainable and resilient, generating benefits for everyone: social value for communities, environmental value for local areas and economic value for shareholders and investors.

The Group's strategic plan, set out in the 2023-2025 business plan, takes on the global megatrends through three main drivers: business growth, operating efficiency and cash generation. This approach is supported by strategic investments in safety, innovation and environmental protection in order to build an increasingly sustainable future that fully reflects Webuild's sustainability strategy.

Building on the success of the previous three-year plan, the 2024-2025 ESG Plan is even more ambitious in addressing global challenges and stakeholders' rising expectations.

The plan's strategic areas (Green, Safety & Inclusion, Innovation) have concrete goals, such as a 10% (2025 vs 2022) reduction in GHG (scope 1 & 2) emissions intensity, a reduction of 6% (2025 vs 2022) in the LTIFR, a 20% (2025 vs 2023) increase in women in management positions and €430 million invested in innovative and clean tech projects (2024-2025). Webuild's commitment to sustainable development is also shown through its ongoing measurement and management of environmental, social and economic impacts with a derisking strategy that has led it to concentrate approximately 89% of its order backlog in Italy, central and north Europe, the United States, the Middle East and Australia and focus on sustainable mobility projects, such as high-speed railway lines, metro lines, roads and motorways.

The ESG Plan objectives are aligned with the most significant impacts, risks and opportunities identified by the double materiality assessment performed in 2024.

Its results showed substantial alignment with the material aspects of 2023 albeit with some changes mostly related to the expansion of the assessment to the value chain and the integration of the financial materiality perspective. Specifically:

- the pollution topic linked to pollutants in the air, water and soil, not considered material in 2023 became material in 2024 due to a negative impact and a material positive impact linked to the value chain's activities;
- the biodiversity topic was assessed as material given the activities performed by Webuild's value chain as decisions about the type, characteristics and location of works in biodiversity sensitive areas are solely taken by the customer. Once Webuild is awarded a contract, it implements all the regulatory and other measures to prevent any impact on the ecosystems and protect biodiversity, resources and the local community;
- the topic of value chain workers, which had been treated by focusing on subcontractors' workers in previous statements, became more significant this year due to the new requirements introduced by the CSRD;
- unlike the 2023 Consolidated Non-financial Statement, the topic of corruption was not assessed as material. Although it is inherently important, based on the 2024 analyses which considered the new requirements of the CSRD and ESRS and based on the best current knowledge and interpretations, corruption was found to be immaterial for Webuild compared to other topics, sub-topics and sub-sub-topics assessed.

Finally, considering the material risks and opportunities mapped in 2024, no events were identified that could have generated material financial effects on Webuild's financial position, financial performance and cash flows, or material risks and opportunities for which there is a significant risk of a material adjustments within the next annual reporting period to the carrying amount of assets and liabilities reported in the related financial statements. In this respect, it should be noted that the assessment of financial materiality considered over longer time horizons to those considered in the consolidated financial statements. Therefore, the financial effects of risks and opportunities, which are probable only in nature, may be seen in future years.

## Topics, impacts, risks and opportunities that are material for Webuild Group

Sustainability matters			Material IRO	
Topic	Sub-topic	Sub-sub-topic	Description of IRO	IRO
Climate change	Climate change adaptation	-	Building of infrastructure by Webuild that contributes to climate change adaptation	Actual positive impact
	Climate change mitigation	-	Contribution to the reduction of embodied carbon in works built by Webuild	Actual positive impact
	Climate change mitigation	-	Support for the energy transition of the countries where Webuild operates with infrastructure projects in the Sustainable Mobility, Clean Hydro Energy and Green Buildings areas that can provide customers and the market with a contribution to the global challenges posed by climate change	Potential positive impact
	Climate change mitigation	-	GHG emissions generated by Webuild as part of its own operations (Scope 1, Scope 2) mostly due to the use of fossil fuels (e.g., working of plants, use of vehicles and machinery, energy generation)	Actual negative impact
	Climate change mitigation	-	GHG emissions generated by Webuild's value chain (scope 3) that contribute to the effects of climate change	Actual negative impact
	Climate change adaptation	-	Extreme weather events and damage to people, plant and equipment, materials and workplaces	Risk
	Climate change mitigation	-	New processes and technologies that facilitate a reduction in emissions and consumption of energy and materials to generate financial savings	Opportunity
	Climate change adaptation Climate change mitigation	-	Know-how and experience in building infrastructure for climate change mitigation and adaptation to acquire more market share given the expected larger public and private investment plans	Opportunity
Pollution	Pollution of water	-	Improvement in the quality of water resources and receiving water bodies through purification plants and/or the building of sewerage infrastructure that reduces the presence of pollutants in water	Actual positive impact
	Pollution of air	-	Emission of pollutants into the air (e.g, NOx, SOx and PM10) by the value chain	Actual negative impact

Sustainability matters			Material IRO	
Topic	Sub-topic	Sub-sub-topic	Description of IRO	IRO
<i>Water and marine resources</i>	Water	Water consumption Water withdrawals Water discharges	Exploitation of water resources due to the withdrawal and consumption of water for the upstream value chain's operations, especially in water stressed areas	Actual negative impact
	Water	Water consumption Water withdrawals Water discharges	Exploitation of water resources due to the consumption of water for own operations, especially water stressed areas	Actual negative impact
<i>Biodiversity and ecosystems</i>	Direct impact drivers of biodiversity loss	Climate change Land-use change Fresh water-use change and sea-use change Direct exploitation	Impacts on biodiversity due to the construction of works, with related damage to the ecosystems and biodiversity, the cultural/landscape and archaeological heritage of the areas surrounding the operating sites	Actual negative impact
<i>Resource use and circular economy</i>	Resource inflows, including resource use	-	Exploitation of natural resources due to the use of raw materials, mostly not renewable (e.g., aggregates, iron, cement, earthworks) in own operations	Actual negative impact
	Waste	-	Negative environmental impacts of waste generated in operations damaging the territories and with negative consequences for human health if not properly disposed of	Actual negative impact
	Waste	-	Environmental impacts due to the generation of waste materials in the end-of-life phase of the work	Actual negative impact
	Resource inflows, including resource use	-	Unavailability or delays in the procurement of materials and machinery	Risk
<i>Own workforce</i>	Working conditions	Health and safety	Dissemination of a health and safety culture in the workplace to own workers is of fundamental importance	Actual positive impact
	Equal treatment and opportunities for all	Training and skills development	Upskilling and professional growth opportunities for own workers through adequate technical training plans and the development of managers and talents	Actual positive impact
	Working conditions	Health and safety	Work-related injuries and ill health and/or damage to the mental and physical health of own employees due to the inadequate management and monitoring of health and safety	Actual negative impact

Sustainability matters			Material IRO	
Topic	Sub-topic	Sub-sub-topic	Description of IRO	IRO
	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Negative impacts on gender equality within the workforce due to conduct that is not compliant with Webuild's policies and/or applicable laws, adversely affecting career development and fair remuneration	Potential negative impact
	Working conditions	Health and safety	Work-related incidents involving own workers	Risk
	Working conditions	-	Unavailability of workers	Risk
	Equal treatment and opportunities for all	Training and skills development	Insufficiently trained or untrained workers	Risk
	Working conditions Equal treatment and opportunities for all Other work-related rights	-	Non-compliance with human rights	Risk
	Working conditions	Health and safety	Processes and activities to protect health and safety can reduce the number of injuries and related costs. In addition, better work-related injury indexes improve Webuild's competitive edge in calls for tenders	Opportunity
	Equal treatment and opportunities for all	Training and skills development	Training activities and suitable career paths make Webuild more attractive, reducing turnover rates and related costs	Opportunity
<i>Workers in the value chain</i>	Equal treatment and opportunities for all	Training and skills development	Support to develop the skills of supply chain workers through initiatives to build up their technical skills necessary to carry out their jobs	Potential positive impact
	Working conditions	Health and safety	Work-related injuries and ill health and impacts on the health of value chain workers, specifically those of subcontractors, due to inadequate management and monitoring of suppliers' safety measures	Actual negative impact

Sustainability matters			Material IRO	
Topic	Sub-topic	Sub-sub-topic	Description of IRO	IRO
	Working conditions	Health and safety	Incidents involving workers (subcontractors)	Risk
	Working conditions Equal treatment and opportunities for all Other work-related rights		Non-compliance with human rights	Risk
<i>Affected communities</i>	Communities' economic, social and cultural rights		Direct and indirect contribution and initiatives that benefit local communities	Potential positive impact
	Adequate housing Water and sanitation		Differences of opinion or disputes with local stakeholders (trade unions, communities, local organisations, etc.)	Risk
<i>Business conduct</i>	Corporate culture		Dissemination of environmental, social and governance sustainability principles in own operations through responsible conduct when making business decisions and development of a corporate culture based on principles of ethics and integrity	Actual positive impact
	Corporate culture Management of relationships with suppliers, including payment practices		Dissemination of environmental, social and governance sustainability principles to suppliers and partners in the supply chain to foster a sustainable development culture	Actual positive impact
	Corporate culture		Tax risk - Non-compliance with local and international tax rules	Risk
	Management of relationships with suppliers, including payment practices		Inadequate or non-performing suppliers/subcontractors	Risk
<i>Innovation and digitalisation</i> <i>[Entity-specific]</i>	-	-	Adoption of innovation as a lever to improve the social and environmental performances of large infrastructure built by Webuild	Actual positive impact
	-	-	Inefficient, non-performing and/or obsolete applications and IT systems	Risk



Sustainability matters			Material IRO	
Topic	Sub-topic	Sub-sub-topic	Description of IRO	IRO
	-	-	Use of innovative solutions, including through collaboration with business partners, to achieve a competitive edge and greater market share	Opportunity

More information about the material impacts, risks and opportunities is provided in the “Material impacts, risks and opportunities” paragraph of each chapter.

## Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

[IRO-2]

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
ESRS 2 – GENERAL DISCLOSURES			
ESRS 2 BP-1 General basis for preparation of sustainability statements			<ul style="list-style-type: none"> <li>Reporting boundary</li> </ul>
ESRS 2 BP-2 Disclosures in relation to specific circumstances			<ul style="list-style-type: none"> <li>Disclosures in relation to specific circumstances</li> </ul>
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies			<ul style="list-style-type: none"> <li>The role of the administrative, management and supervisory bodies and information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies</li> </ul>
ESRS 2 GOV-2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies			<ul style="list-style-type: none"> <li>The role of the administrative, management and supervisory bodies and information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies</li> </ul>
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes			<ul style="list-style-type: none"> <li>Integration of sustainability-related performance in incentive schemes</li> </ul>
ESRS 2 GOV-4 Statement on due diligence			<ul style="list-style-type: none"> <li>Statement on due diligence</li> </ul>
ESRS 2 GOV-5 Risk management and internal controls over sustainability reporting			<ul style="list-style-type: none"> <li>Risk management and internal controls over sustainability reporting</li> </ul>
ESRS 2 SBM-1 Strategy, business model and value chain			<ul style="list-style-type: none"> <li>Strategy, business model and value chain</li> </ul>
ESRS 2 SBM-2 Interests and views of stakeholders			<ul style="list-style-type: none"> <li>Interests and views of stakeholders</li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	<b>Phase-in:</b> Webuild has omitted the information required by ESRS 2 SBM-3, paragraph 48 (e) for 2024 as provided for in Appendix C (ESRS 1) of Commission Delegated Regulation (EU) 2023/2772.		<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model</li> </ul>
ESRS 2 IRO-1 Description of the process to identify and assess material impacts, risks and opportunities			<ul style="list-style-type: none"> <li>Description of the process to identify and assess material impacts, risks and opportunities</li> </ul>
ESRS 2 IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement			<ul style="list-style-type: none"> <li>Disclosure requirements in ESRS covered by the sustainability statement</li> </ul>
ESRS 2 MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> </ul>
ESRS 2 MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Climate change - Actions</li> <li>Pollution - Actions</li> <li>Water - Actions</li> <li>Biodiversity and ecosystems - Actions</li> <li>Resource use and circular economy: <ul style="list-style-type: none"> <li>Resource inflows, including resource use - Actions</li> <li>Waste - Actions</li> </ul> </li> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Actions</li> <li>Training and skills development - Actions</li> </ul> </li> <li>Human rights - Actions</li> <li>Diversity and inclusion - Actions</li> <li>Working conditions - Actions</li> <li>Workers in the value chain: <ul style="list-style-type: none"> <li>Human rights - Actions</li> <li>Health and safety - Actions</li> <li>Training and skills development - Actions</li> </ul> </li> <li>Affected communities - Actions</li> <li>Business conduct: <ul style="list-style-type: none"> <li>Management of relationships with suppliers - Actions</li> </ul> </li> <li>Innovation and digitalisation - Actions</li> </ul>
ESRS 2 MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Climate change - Metrics</li> <li>Water - Metrics</li> <li>Resource use and circular economy: <ul style="list-style-type: none"> <li>Resource inflows, including resource use - Metrics</li> <li>Waste - Metrics</li> </ul> </li> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Metrics</li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
			<ul style="list-style-type: none"> <li>• <i>Training and skills development - Metrics</i></li> <li>• <i>Human rights - Metrics</i></li> <li>• <i>Diversity and inclusion - Metrics</i></li> <li>• <i>Working conditions - Metrics</i></li> <li>• <i>Business conduct:</i> <ul style="list-style-type: none"> <li>• <i>Corporate culture - Metrics</i></li> <li>• <i>Management of relationships with suppliers – Metrics</i></li> </ul> </li> <li>• <i>Innovation and digitalisation - Metrics</i></li> </ul>
ESRS 2 MDR-T Tracking effectiveness of policies and actions through targets			<ul style="list-style-type: none"> <li>• <i>Tracking effectiveness of policies and actions through targets</i></li> </ul>
<b>ESRS E1 CLIMATE CHANGE</b>			
GOV-3 Integration of sustainability-related performance in incentive schemes			<ul style="list-style-type: none"> <li>• <i>Integration of sustainability-related performance in incentive schemes</i></li> </ul>
E1-1 Transition plan for climate change mitigation			<ul style="list-style-type: none"> <li>• <i>Climate change - Transition plan for climate change mitigation</i></li> </ul>
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model			<ul style="list-style-type: none"> <li>• <i>Environmental management system</i></li> <li>• <i>Climate change – Material impacts, risks and opportunities</i></li> </ul>
IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities			<ul style="list-style-type: none"> <li>• <i>Material impacts, risks and opportunities and their interaction with strategy and business model</i></li> </ul>
E1-2 Policies related to climate change mitigation and adaptation			<ul style="list-style-type: none"> <li>• <i>Climate change - Policies</i></li> </ul>
E1-3 Actions and resources in relation to climate change policies			<ul style="list-style-type: none"> <li>• <i>Climate change - Actions</i></li> </ul>
E1-4 Targets related to climate change mitigation and adaptation			<ul style="list-style-type: none"> <li>• <i>Climate change - Targets</i></li> </ul>
E1-5 Energy consumption and mix			<ul style="list-style-type: none"> <li>• <i>Climate change - Metrics</i></li> </ul>
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions			<ul style="list-style-type: none"> <li>• <i>Climate change - Metrics</i></li> </ul>
E1-7 GHG removals and GHG mitigation projects financed through carbon credits	Not applicable		
E1-8 Internal carbon pricing	Not applicable		
E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Phase-in: Webuild has omitted the information required by ESRS E1-9 for 2024, as provided for in Appendix C (ESRS 1) of Commission		

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
	Delegated Regulation (EU) 9/2772.		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Climate change - Policies</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Climate change – Actions</li> </ul>
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Climate change – Metrics</li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets			<ul style="list-style-type: none"> <li>• Tracking effectiveness of policies and actions through targets</li> <li>• Climate change - Targets</li> </ul>
ESRS E2 POLLUTION			
IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities			<ul style="list-style-type: none"> <li>• Material impacts, risks and opportunities and their interaction with strategy and business model</li> </ul>
E2-1 Policies related to pollution			<ul style="list-style-type: none"> <li>• Pollution - Policies</li> </ul>
E2-2 Actions and resources related to pollution			<ul style="list-style-type: none"> <li>• Pollution - Actions</li> </ul>
E2-3 Targets related to pollution		No measurable targets related to pollution are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>• Pollution - Targets</li> </ul>
E2-4 Pollution of air, water and soil	Not applicable		
E2-5 Substances of concern and substances of very high concern	Not applicable		
E2-6 Anticipated financial effects from pollution-related risks and opportunities	Not applicable		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Pollution – Policies</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Pollution - Actions</li> </ul>
MDR-M Metrics in relation to material sustainability matters	Not applicable		
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to pollution are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>• Pollution - Actions</li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
ESRS E3 WATER			
IRO-1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities			<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model</li> </ul>
E3-1 Policies related to water and marine resources			<ul style="list-style-type: none"> <li>Water - Policies</li> </ul>
E3-2 Actions and resources related to water and marine resources			<ul style="list-style-type: none"> <li>Water - Actions</li> </ul>
E3-3 Targets related to water and marine resources		No measurable targets related to water are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Water - Targets</li> </ul>
E3-4 Water consumption			<ul style="list-style-type: none"> <li>Water - Metrics</li> </ul>
E3-5 Anticipated financial effects from water and marine resources-related risks and opportunities	Not applicable		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Water - Policies</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Water - Actions</li> </ul>
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Water - Metrics</li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to water are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Water - Targets</li> </ul>
ESRS E4 BIODIVERSITY AND ECOSYSTEMS			
E4-1 – Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Not applicable		<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Transition plan and consideration of biodiversity and ecosystems in strategy and business model</li> </ul>
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model			<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Impacts, risks and opportunities</li> <li>Environmental management system</li> </ul>
IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities			<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Material impacts, risks and opportunities</li> </ul>
E4-2 Policies related to biodiversity and ecosystems			<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Policies</li> </ul>
E4-3 Actions and resources related to biodiversity and ecosystems			<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Actions</li> </ul>
E4-4 Targets related to biodiversity and ecosystems		No measurable targets related to biodiversity and ecosystems are included in the 2024	<ul style="list-style-type: none"> <li>Biodiversity and ecosystems - Targets</li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
		Sustainability statement.	
E4-5 Impact metrics related to biodiversity and ecosystems change	Not applicable		
E4-6 Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Phase-in: Webuild has omitted the information required by ESRS E4-6 for 2024, as provided for by Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Biodiversity and ecosystems - Policies</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Biodiversity and ecosystems - Actions</li> </ul>
MDR-M Metrics in relation to material sustainability matters	Not applicable		
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to biodiversity and ecosystems are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>• Biodiversity and ecosystems - Targets</li> </ul>
ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY			
IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities			<ul style="list-style-type: none"> <li>• Material impacts, risks and opportunities and their interaction with strategy and business model</li> </ul>
E5-1 Policies related to resource use and circular economy			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Policies</li> <li>• Waste - Policies</li> </ul> </li> </ul>
E5-2 Actions and resources related to resource use and circular economy			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Actions</li> <li>• Waste - Actions</li> </ul> </li> </ul>
E5-3 Targets related to resource use and circular economy		No measurable targets related to resource use and circular economy are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Targets</li> <li>• Waste - Targets</li> </ul> </li> </ul>
E5-4 Resource inflows			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Metrics</li> </ul> </li> </ul>
E5-5 Resource outflows			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Waste - Metrics</li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
E5-6 – Anticipated financial effects from resource use and circular economy-related risks and opportunities	<b>Phase-in:</b> Webuild has omitted the information required by ESRS E5-6 for 2024, as provided for by Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Policies</li> <li>• Waste - Policies</li> </ul> </li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Actions</li> <li>• Waste - Actions</li> </ul> </li> </ul>
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• Resource use and circular economy: <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Metrics</li> <li>• Waste - Metrics</li> </ul> </li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to resource use and circular economy are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>• Tracking effectiveness of policies and actions through targets</li> <li>• Resource use and circular economy: - <ul style="list-style-type: none"> <li>• Resource inflows, including resource use - Targets</li> <li>• Waste - Targets</li> </ul> </li> </ul>
<b>ESRS S1 OWN WORKFORCE</b>			
SBM-2 Interests and views of stakeholders			<ul style="list-style-type: none"> <li>• Interests and views of stakeholders</li> </ul>
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model			<ul style="list-style-type: none"> <li>• Material impacts, risks and opportunities and their interaction with strategy and business model</li> <li>• Own workforce: <ul style="list-style-type: none"> <li>• Health and safety – Material impacts, risks and opportunities</li> <li>• Training and skills development - Material impacts, risks and opportunities</li> <li>• Human rights – Material impacts, risks and opportunities</li> <li>• Diversity and inclusion – Material impacts, risks and opportunities</li> <li>• Working conditions - Material impacts, risks and opportunities</li> </ul> </li> </ul>
S1-1 Policies related to own workforce			<ul style="list-style-type: none"> <li>• Policies adopted to manage material sustainability matters</li> <li>• Own workforce: <ul style="list-style-type: none"> <li>• Health and safety - Policies</li> <li>• Training and skills development - Policies</li> <li>• Human rights - Policies</li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
			<ul style="list-style-type: none"> <li>Diversity and inclusion - Policies</li> <li>Working conditions - Policies</li> </ul>
S1-2 Processes for engaging with own workforce and workers' representatives about impacts			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety – Processes for engaging with own workforce and workers' representatives about impacts</li> <li>Training and skills development– Processes for engaging with own workforce and workers' representatives about impacts</li> <li>Diversity and inclusion - Processes for engaging with own workforce and workers' representatives about impacts</li> </ul> </li> </ul>
S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Processes to remediate negative impacts and channels for own workforce to raise concerns</li> <li>Diversity and inclusion - Processes to remediate negative impacts and channels for own workforce to raise concerns</li> </ul> </li> </ul>
S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Actions</li> <li>Training and skills development - Actions</li> <li>Human rights - Actions</li> <li>Diversity and inclusion – Actions</li> <li>Working conditions - Actions</li> </ul> </li> </ul>
S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		No measurable targets related to training and skills development, human rights and working conditions are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety – Targets</li> <li>Training and skills development - Targets</li> <li>Human rights - Targets</li> <li>Diversity and inclusion - Targets</li> <li>Working conditions - Targets</li> </ul> </li> </ul>
S1-6 Characteristics of the undertaking's employees			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Working conditions - Metrics</li> </ul> </li> </ul>
S1-7 Characteristics of non-employees in the undertaking's own workforce	Phase-in: Webuild has omitted the information required by ESRS S1-7 for 2024, as provided for by Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772		
S1-8 Collective bargaining coverage and social dialogue	Not applicable		
S1-9 Diversity metrics			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Diversity and inclusion - Metrics</li> </ul> </li> </ul>



Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
S1-10 Adequate wages	Not applicable		
S1-11 Social protection	Not applicable		
S1-12 Persons with disabilities	Not applicable		
S1-13 Training and skills development metrics	<b>Phase-in:</b> Webuild has omitted the information required by ESRS S1-13, par. 83 (a) and (b) related to the breakdown by gender in 2024, as provided for by Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772		<ul style="list-style-type: none"> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Training and skills development - Metrics</i></li> </ul> </li> </ul>
S1-14 Health and safety metrics	<b>Phase-in:</b> Webuild has omitted the information required by ESRS S1-14, par. 88 (b), (d) and (e) related to fatalities as a result of work-related ill health, the number of cases of recordable work-related ill health and the number of days lost to work-related injuries in 2024, as provided for by Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772.		<ul style="list-style-type: none"> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Health and safety - Metrics</i></li> </ul> </li> </ul>
S1-15 Work-life balance metrics	Not applicable		
S1-16 Remuneration metrics (pay gap and total remuneration)			<ul style="list-style-type: none"> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Diversity and inclusion - Metrics</i></li> </ul> </li> </ul>
S1-17 Incidents, complaints and severe human rights impacts			<ul style="list-style-type: none"> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Human rights - Metrics</i></li> </ul> </li> </ul>
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Policies adopted to manage material sustainability matters</i></li> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Health and safety - Policies</i></li> <li>• <i>Training and skills development - Policies</i></li> <li>• <i>Human rights - Policies</i></li> <li>• <i>Diversity and inclusion - Policies</i></li> <li>• <i>Working conditions - Policies</i></li> </ul> </li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Own workforce:</i> <ul style="list-style-type: none"> <li>• <i>Health and safety - Actions</i></li> <li>• <i>Training and skills development - Actions</i></li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
			<ul style="list-style-type: none"> <li>Human rights - Actions</li> <li>Diversity and inclusion - Actions</li> <li>Working conditions - Actions</li> </ul>
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Metrics</li> <li>Training and skills development - Metrics</li> <li>Human rights - Metrics</li> <li>Diversity and inclusion - Metrics</li> <li>Working conditions - Metrics</li> </ul> </li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to training and skills development, human rights and working conditions are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Own workforce: <ul style="list-style-type: none"> <li>Health and safety - Targets</li> <li>Training and skills development - Targets</li> <li>Human rights - Targets</li> <li>Diversity and inclusion - Targets</li> <li>Working conditions - Targets</li> </ul> </li> </ul>
ESRS S2 WORKERS IN THE VALUE CHAIN			
SBM-2 Interests and views of stakeholders			<ul style="list-style-type: none"> <li>Interests and views of stakeholders</li> </ul>
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model			<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model</li> <li>Value chain workers: <ul style="list-style-type: none"> <li>Human rights - Material impacts, risks and opportunities</li> <li>Health and safety - Material impacts, risks and opportunities</li> <li>Training and skills development - Material impacts, risks and opportunities</li> </ul> </li> </ul>
S2-1 Policies related to value chain workers			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Value chain workers: <ul style="list-style-type: none"> <li>Human rights - Policies</li> <li>Health and safety - Policies</li> <li>Training and skills development - Policies</li> </ul> </li> </ul>
S2-2 Processes for engaging with value chain workers about impacts			<ul style="list-style-type: none"> <li>Value chain workers: <ul style="list-style-type: none"> <li>Health and safety – Processes for engaging with value chain workers about impacts</li> <li>Training and skills development – Processes for engaging with value chain workers about impacts</li> </ul> </li> </ul>
S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns			<ul style="list-style-type: none"> <li>Value chain workers: <ul style="list-style-type: none"> <li>Health and safety - Processes to remediate negative impacts and channels for value chain workers to raise concerns</li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions			<ul style="list-style-type: none"> <li>Value chain workers:               <ul style="list-style-type: none"> <li>Human rights - Actions</li> <li>Health and safety - Actions</li> <li>Training and skills development - Actions</li> </ul> </li> </ul>
S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		No measurable targets related to training and skills development and human rights are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Value chain workers:               <ul style="list-style-type: none"> <li>Human rights - Targets</li> <li>Health and safety - Targets</li> <li>Training and skills development - Targets</li> </ul> </li> </ul>
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Value chain workers:               <ul style="list-style-type: none"> <li>Human rights - Policies</li> <li>Health and safety – Policies</li> <li>Training and skills development - Policies</li> </ul> </li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Value chain workers:               <ul style="list-style-type: none"> <li>Human rights - Actions</li> <li>Health and safety - Actions</li> <li>Training and skills development - Actions</li> </ul> </li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to training and skills development and human rights are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Tracking effectiveness of policies and actions through targets</li> <li>Value chain workers:               <ul style="list-style-type: none"> <li>Human rights - Targets</li> <li>Health and safety - Targets</li> <li>Training and skills development - Targets</li> </ul> </li> </ul>
<b>ESRS S3 AFFECTED COMMUNITIES</b>			
SBM-2 Interests and views of stakeholders			<ul style="list-style-type: none"> <li>Interests and views of stakeholders</li> </ul>
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model			<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model</li> <li>Affected communities - Material impacts, risks and opportunities</li> </ul>
S3-1 Policies related to affected communities			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Affected communities - Policies</li> </ul>
S3-2 Processes for engaging with affected communities about impacts			<ul style="list-style-type: none"> <li>Affected communities - Processes for engaging with affected communities about impacts</li> </ul>
S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns			-
S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions			<ul style="list-style-type: none"> <li>Affected communities - Actions</li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		No measurable targets related to affected communities are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Affected communities - Targets</li> </ul>
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Affected communities - Policies</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Affected communities - Actions</li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to affected communities are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Tracking effectiveness of policies and actions through targets</li> <li>Affected communities - Targets</li> </ul>
ESRS G1 BUSINESS CONDUCT			
ESRS 2 GOV-1 The role of the administrative, management and supervisory bodies			<ul style="list-style-type: none"> <li>The role of the administrative, management and supervisory bodies</li> </ul>
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities			<ul style="list-style-type: none"> <li>Material impacts, risks and opportunities and their interaction with strategy and business model</li> </ul>
G1-1 Business conduct policies and corporate culture			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> <li>Business conduct: <ul style="list-style-type: none"> <li>Corporate culture - Policies</li> <li>Management of relationships with suppliers - Policies</li> </ul> </li> </ul>
G1-2 Management of relationships with suppliers			<ul style="list-style-type: none"> <li>Business conduct: <ul style="list-style-type: none"> <li>Management of relationships with suppliers - Actions</li> </ul> </li> </ul>
G1-3 Prevention and detection of corruption and bribery	Not applicable		
G1-4 Incidents of corruption or bribery	Not applicable		
G1-5 Political influence and lobbying activities	Not applicable		
G1-6 Payment practices	Not applicable		
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>Policies adopted to manage material sustainability matters</li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>Business conduct: <ul style="list-style-type: none"> <li>Corporate culture - Actions</li> <li>Management of relationships with suppliers - Actions</li> </ul> </li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets		No measurable targets related to business conduct are included in the 2024 Sustainability statement.	<ul style="list-style-type: none"> <li>Tracking effectiveness of policies and actions through targets</li> <li>Business conduct: <ul style="list-style-type: none"> <li>Corporate culture - Targets</li> <li>Management of relationships with suppliers - Targets</li> </ul> </li> </ul>

Disclosure requirement and related datapoints	Not applicable/ phase-in	Note	Chapter in 2024 Sustainability statement
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Business conduct:</i></li> <li>• <i>Corporate culture and Management of relationships with suppliers - Metrics</i></li> </ul>
Entity- specific disclosures: Innovation and digitalisation			
MDR-P Policies adopted to manage material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Policies adopted to manage material sustainability matters</i></li> <li>• <i>Innovation and digitalisation - Policies</i></li> </ul>
MDR-A Actions and resources in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Innovation and digitalisation - Actions</i></li> </ul>
MDR-T Tracking effectiveness of policies and actions through targets			<ul style="list-style-type: none"> <li>• <i>Tracking effectiveness of policies and actions through targets</i></li> <li>• <i>Innovation and digitalisation - Targets</i></li> </ul>
MDR-M Metrics in relation to material sustainability matters			<ul style="list-style-type: none"> <li>• <i>Innovation and digitalisation - Metrics</i></li> </ul>

## Policies adopted to manage material sustainability matters

[MDR-P]

To effectively implement its vision, mission and values (such as integrity, transparency and correctness) and to ensure the effectiveness of its processes, Webuild has defined and adopted an organisational and management model based on a system of principles (Code of Ethics and Policies) and management and control tools (risk management, models, procedures and controls) to supervise material ESG topics in line with the regulations applicable in the countries where it operates, the main standards and international guidelines.

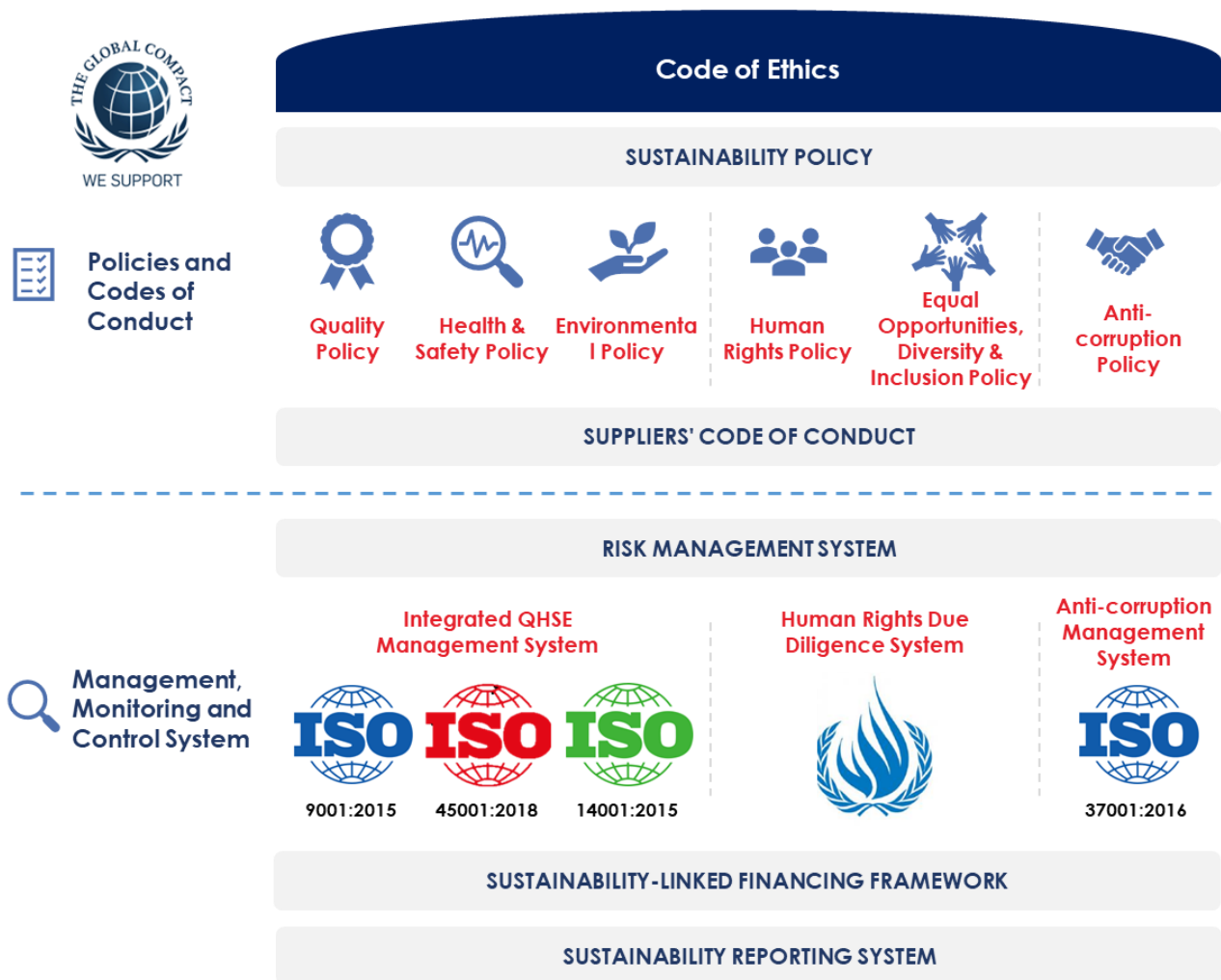
The values stated in the Policies, approved and signed by the parent's chief executive officer, are applicable to all Webuild personnel and the individual and companies that work for or with it to the extent of their duties and responsibilities (subcontractors, suppliers, consultants, brokers and agents).

Top management oversees compliance with the Policies by regularly reviewing performances in light of achieved targets. Webuild monitors and transparently communicates its strategies and results achieved related to the areas covered by the Policies to stakeholders in documents published on its website or by using other communication tool deemed appropriate in the circumstances.

Webuild's Policies are applicable to all its branches and directly-run work sites. When a work site is managed by another entity, this entity is responsible for the drafting and approval of policies in line with those of Webuild through the aegis of the project manager/director (or the entity's management). It is also responsible for sharing them with relevant third parties.

The Policies are available on Webuild's website to all stakeholders in the "Sustainability - Organisation and Policies" section (<https://www.webuildgroup.com/en/sustainability/organization/>).

Webuild is a signatory of the UN's Global Compact, the largest global sustainability initiative that requires companies to align their operations and strategies with ten universally-recognised principles on human rights, labour practices, the environment and anti-corruption.



## Overview of the Group's policies

Policy	Key content	Topics dealt with and reference chapters	Internationally-recognised references
<b>Sustainability Policy</b>	This sets out the principles that Webuild is committed to complying with during its operations in order to contribute to economic progress, social well-being and the environmental protection of the countries where it operates.	<ul style="list-style-type: none"> <li>Climate change</li> <li>Pollution</li> <li>Biodiversity and ecosystems</li> <li>Resource use and circular economy</li> <li>Training and skills development</li> <li>Human rights</li> <li>Working conditions</li> <li>Affected communities</li> <li>Corporate culture</li> <li>Innovation and digitalisation</li> </ul>	<ul style="list-style-type: none"> <li>SDGs</li> <li>UN Global Compact</li> <li>ISO 26000</li> </ul>
<b>Environmental Policy</b>	This contains the principles that Webuild is committed to complying with in order to mitigate possible adverse	<ul style="list-style-type: none"> <li>Climate change</li> <li>Pollution</li> <li>Water</li> </ul>	<ul style="list-style-type: none"> <li>ISO 14001</li> <li>ISO 39001</li> <li>ISO 14040</li> <li>PAS 2080</li> </ul>

Policy	Key content	Topics dealt with and reference chapters	Internationally-recognised references
	effects on the environment, protect the ecosystem and increase the beneficial effects, contributing through its projects to resolving the main global environmental issues, and reaffirming the right of each worker to intervene to stop activities that could be harmful to the environment.	<ul style="list-style-type: none"> <li>Biodiversity and ecosystems</li> <li>Resource use and circular economy</li> <li>Affected communities</li> <li>Innovation and digitalisation</li> </ul>	<ul style="list-style-type: none"> <li><i>IFC's Environmental and Social Performance Standards (World Bank Group)</i></li> </ul>
Suppliers' Code of Conduct	Introduced at the start of 2020 to extend Webuild's responsible and sustainable operating practices to its supply chain.	<ul style="list-style-type: none"> <li>Climate change</li> <li>Pollution</li> <li>Water</li> <li>Biodiversity and ecosystems</li> <li>Resource use and circular economy</li> <li>Human rights</li> <li>Diversity and inclusion</li> <li>Health and safety</li> <li>Training and skills development</li> <li>Affected communities</li> <li>Corporate culture</li> <li>Management of relationships with suppliers</li> </ul>	<ul style="list-style-type: none"> <li><i>OECD Guidelines for Multinational Enterprises</i></li> <li><i>UN Global Compact</i></li> <li><i>ISO 9001</i></li> <li><i>ISO 45001</i></li> <li><i>ISO 14001</i></li> <li><i>ISO 37001</i></li> <li><i>IFC's Environmental and Social Performance Standards (World Bank Group)</i></li> <li><i>United Nations Guiding Principles on Business and Human Rights</i></li> </ul>
Environmental Code of Conduct	This contains a set of operating and organisational rules designed to facilitate the cultural change, encourage the proactive involvement of workers and the value chain, strengthen a sense of belonging, standardise conduct and support the conscious adoption of Webuild's Environmental Policy.	<ul style="list-style-type: none"> <li>Climate change</li> <li>Pollution</li> <li>Water</li> <li>Biodiversity and ecosystems</li> <li>Resource use and circular economy</li> <li>Affected communities</li> <li>Corporate culture</li> <li>Management of relationships with suppliers</li> </ul>	<ul style="list-style-type: none"> <li><i>ISO 14001</i></li> <li><i>ISO 14040</i></li> <li><i>ISO 50001</i></li> <li><i>ISO 20400</i></li> <li><i>IFC's Environmental and Social Performance Standards (World Bank Group)</i></li> </ul>
Code of Ethics	This establishes the conduct to be adopted at work and promotes an ethical leadership model.	<ul style="list-style-type: none"> <li>Working conditions</li> <li>Health and safety</li> <li>Human rights</li> <li>Diversity and inclusion</li> <li>Pollution</li> <li>Affected communities</li> <li>Corporate culture</li> <li>Management of relationships with suppliers</li> <li>Resource use and circular economy</li> </ul>	<ul style="list-style-type: none"> <li><i>SDGs</i></li> <li><i>OECD Guidelines for Multinational Enterprises</i></li> <li><i>UN Global Compact</i></li> </ul>
Health and Safety Policy	This sets out the principles that Webuild is committed to	<ul style="list-style-type: none"> <li>Training and skills development</li> </ul>	<ul style="list-style-type: none"> <li><i>ISO 45001</i></li> <li><i>SA8000</i></li> </ul>

Policy	Key content	Topics dealt with and reference chapters	Internationally-recognised references
	complying with to protect the health and safety of its employees, suppliers and subcontractors during the entire life cycle of its contracts (design, construction and development) and in the workplace; it establishes the workers' "right to intervene" when necessary and its objective is "zero injuries".	<ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Innovation and digitalisation</li> </ul>	
<b>Quality Policy</b>	This presents the principles that Webuild is committed to complying with to ensure full customer satisfaction, the active involvement of all stakeholders and the continuous improvement of the Quality System, based on its fundamental goal of "build to perfection".	<ul style="list-style-type: none"> <li>• Training and skills development</li> <li>• Innovation and digitalisation</li> </ul>	<ul style="list-style-type: none"> <li>• <i>ISO 9001</i></li> <li>• <i>ISO 21500</i></li> </ul>
<b>Social Responsibility and Human Rights Policy</b>	This sets out the Group's commitments to ensure respect of human rights of the affected stakeholders, such as health and safety, child labour, forced or illegal labour (especially as regards migrants), freedom of association and the right to collective bargaining, inclusion and diversity and, more generally, working conditions and the rights of local communities and indigenous peoples.	<ul style="list-style-type: none"> <li>• Human rights</li> <li>• Working conditions</li> <li>• Affected communities</li> </ul>	<ul style="list-style-type: none"> <li>• <i>OECD Guidelines for Multinational Enterprises</i></li> <li>• <i>SA8000</i></li> <li>• <i>ISO 45001</i></li> <li>• <i>IFC's Environmental and Social Performance Standards (World Bank Group)</i></li> </ul>
<b>Equal opportunities, Diversity &amp; Inclusion Policy</b>	This presents the Group's commitment to discourage all forms of discrimination based on gender, nationality, ethnicity, marital status, religion or other characteristics envisaged by law.	<ul style="list-style-type: none"> <li>• Diversity and inclusion</li> <li>• Working conditions</li> </ul>	<ul style="list-style-type: none"> <li>• <i>UNI/PdR 125</i></li> <li>• <i>ISO 30415</i></li> </ul>
<b>Anti-corruption Policy</b>	This contains the anti-corruption principles to be adhered to by employees, based on the fundamental tenet of "zero tolerance".	<ul style="list-style-type: none"> <li>• Corporate culture</li> <li>• Management of relationships with suppliers</li> </ul>	<ul style="list-style-type: none"> <li>• <i>ISO 37001</i></li> </ul>
<b>Road traffic safety Policy</b>	This sets out the principles Webuild is committed to	<ul style="list-style-type: none"> <li>• Health and safety</li> <li>• Innovation and digitalisation</li> </ul>	<ul style="list-style-type: none"> <li>• <i>ISO 39001</i></li> </ul>



Policy	Key content	Topics dealt with and reference chapters	Internationally-recognised references
	complying with to ensure road traffic safety.		

## Integrated management system

Webuild has designed and implemented an integrated management system for quality, the environment, occupational health and safety, road traffic safety, social accountability and protection of human rights, gender equality and diversity and inclusion. It has defined a strategic organisational model to achieve its targets and meet stakeholder expectations.

Meeting the requirements of the international standards ISO 9001, ISO 14001, ISO 45001, ISO 39001, SA8000, ISO 30414 and UNI/Pdr 125, the integrated management system is based on risk management-orientated processes, conscious and shared involvement, consideration of the life cycle and sustainability of the infrastructure balancing the requirements of the Group, customers and local stakeholders.

Webuild describes and formalises its integrated management system in documents that are organised hierarchically for the various internal levels (corporate, subsidiaries, branches and projects/work sites, etc.) but are consistent with each other. These documents include guidelines, policies and procedures for internal processes and operating instructions, management expectations, strategic objectives and management system manuals designed to ensure the optimal management of core processes.

All of the group operating entities and those with reduced operational activity (see the “Reporting boundary” chapter in this section) have implemented Webuild’s integrated management system for the quality, environment and occupational health and safety. These entities include the Italian head offices (corporate), directly-managed work sites, the offices and work sites of the subsidiaries and work sites for jointly managed projects when the specific joint venture agreement between the partners provides for the adoption of a management system in line with that of the Group. With respect to the other jointly controlled projects, the agreements entered into with partners provide for the adoption of a quality, environmental, health and safety management system compliant with the international standards ISO 9001, ISO 14001 and ISO 45001, including when this system is based on that of another partner. While Lane Construction Corporation, Clough, CSC, Cossi, Fisia Italimpianti and Seli Overseas have independent management systems that comply with the applicable ISO standards, they also comply with Webuild’s procedures and guidance for management systems.

## Integrated management system certifications

The integrated management system is certified by third parties and covers:

- the definitive and executive designs, works management and performance to build large works, complex civil and industrial works and related technological systems;
- the design and management of integrated operation and maintenance services for infrastructure, civil and industrial buildings, related technological systems and electromedical devices;
- remediation of contaminated sites.

(reference to IAF 28, 34, 19 and 39).

The certification scope is defined with stand alone certificates in the case of certifications/statements in line with SA 8000, ISO 30415, Uni Pdr 125 and ISO 39001 or with a “master certificate” and some “child certificates” as well as a specific list of contracts<sup>33</sup> for certificates in line with ISO 9001, ISO 14001 and ISO 45001. With respect to the quality system, which is ISO 9001 compliant, the certification scope is extended to the production of prefabricated structures (IAF 16) and coordination of the general contractor activities carried

<sup>33</sup> More information is provided in the annexes to each certificate.

out in accordance with Title III of Legislative decree no. 50/2016 and Legislative decree no. 56/2017 as subsequently amended and integrated.

Although Clough, CSC, Cossi, Fisia Italimpianti and Seli Overseas comply with the parent’s procedures and guidance, their management systems are independently certified.

### Tracking effectiveness of policies and actions through targets

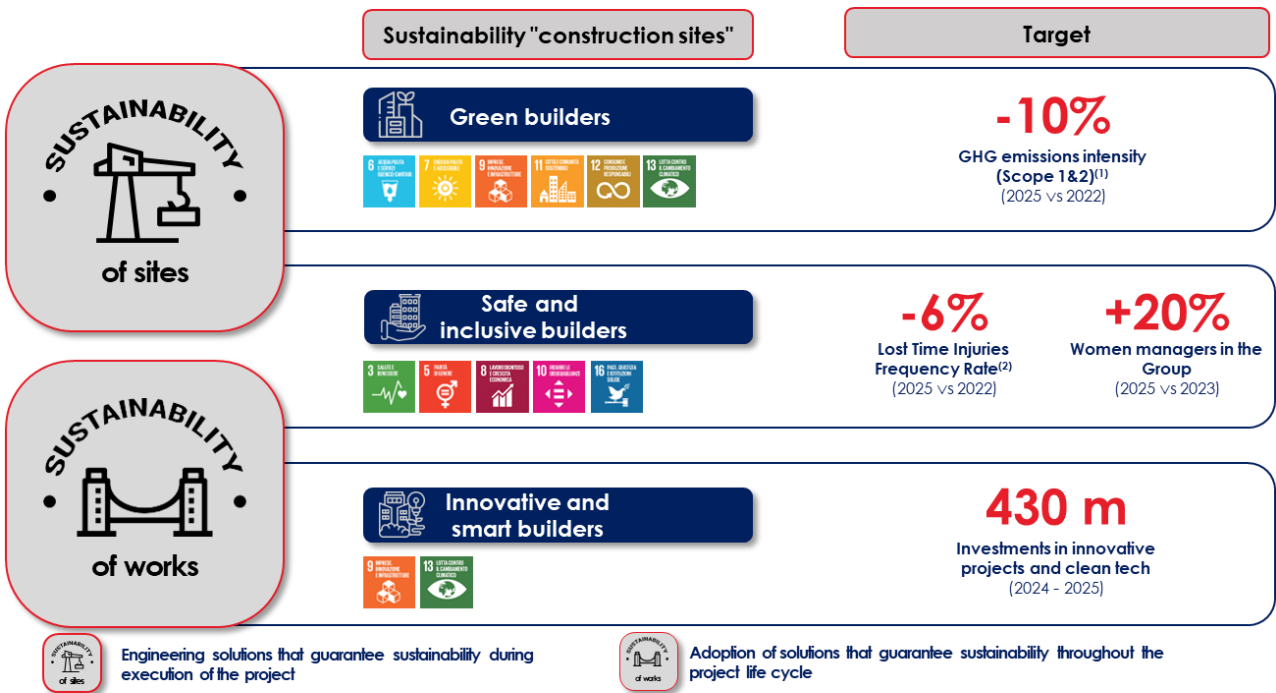
[MDR-T]

Webuild periodically draws up an ESG plan, using the results of the materiality assessment and considering its strategic plan, to translate its commitments into firm targets.

Starting from the results achieved and full achievement of all the previous 2021-2023 ESG Plan targets, the 2024-2025 ESG Plan is a continuation of the Group’s commitment to respond to stakeholders’ increasing requirements and global challenges in a more concrete manner.

Webuild’s ESG priorities include combatting climate change and promotion of the circular economy (environment), the protection and enhancement of its people (social), and innovation as a strategic driver for sustainability and the improvement of business efficiency, to ensure high standards of governance, integrity, transparency and stakeholder engagement (governance).

The Group has defined programmes and targets for the key Green, Safety & Inclusion and Innovation (the sustainability “work sites”) areas to be pursued over the plan period.



Note: 1) tCO2 scope 1-2/€m revenue. Scope 1: direct emissions Scope 2: indirect emissions Scope 3: indirect emissions associated with activities upstream or downstream of the Group's operations; 2) LTIFR – Lost time Injury Frequency Rate: sick leave (days) x 1 million hours worked

In 2024, it monitored progress towards achievement of these targets using the reporting system which showed:



Topics	GHG emissions intensity (scope 1&2)	LTIFR	Women managers in the Group	Additional investments in innovative projects and clean tech
Results	-25% (2024 vs 2022)	-33% (2024 vs 2022)	+6% (2024 vs 2023)	≈€250 m (in 2024)

Given these targets, the Group's short- and medium to long-term goals are to:

- accelerate climate transition by developing innovative solutions to improve the environmental sustainability of the Group's projects and operations;
- be the sector benchmark for health and safety, expertise and diversity and inclusion;
- contribute to improving sector efficiency, leveraging innovation and digitalization.

More information about these targets is provided in the "Targets" paragraphs of the "Climate change" chapters of the "Environmental information" section, the "Health and safety", and "Diversity and inclusion" chapters of the "Social information" section and the "Innovation and digitalisation" chapter of the "Governance section".

Thanks to its core business of building infrastructure that directly contributes to advancement towards the main SDGs and the transition to a low-carbon economy, Webuild responds to today's challenges and exploits the opportunities of the megatrends underway. Nearly all its business contributes to achievement of the United Nations' SDGs and in particular:








As well as the constant checking of the progress, assessments and ratings of Webuild by investors, leading ESG rating agencies, assessment and certification bodies, customers and other stakeholders are all taken into consideration in monitoring the progress made towards achieving the parent’s targets.

Ratings are assigned after Webuild’s ESG policies and performances are analysed and assessed and are an important tool for its stakeholders because they provide succinct, independent and comparable information that can be used to understand the Group’s progress towards achievement of its targets and its non-financial performance tied to governance, ethics and integrity, social and environmental areas.

Webuild is an undisputed leader in the Italian construction sector and its steadily improving ESG ratings rank it among the major international sector players. Its main ESG ratings are set out below.

Moreover, the Group’s achievements are confirmed by independent accolades received such as its inclusion in the “Europe Climate Leaders 2024” ranking drawn up by Statistica in collaboration with the Financial Times and in the “Azienda più attente al clima 2024” (The most climate-conscious companies of 2024) by the Italian newspaper Corriere della Sera, Pianeta 2030 and Statista.

Rating agencies	Results
	In 2024, Webuild received the “Gold” rating from EcoVadis, one of the most accredited rating systems. EcoVadis acknowledged the Group as one of the most sustainable organisations in the world in terms of its environmental, social and governance practices, with a preeminent position in the infrastructure sector.
	Its “A-” rating, obtained in 2023 and 2022, was confirmed in 2024 by CDP (ex Carbon Disclosure Project) in its annual classification, placing it in the “leadership” category, above the European and sector average (which is “B”). As part of this programme, Webuild also obtained a “B” rating in the Water Security category, assessed for the first time in 2024.
	In the most recent 2024 report update, Webuild confirmed its “AA” rating (MSCI ESG Ratings) obtained with the 2023 rating action, ranking among the leading companies in the sustainability field and strengthening the positive trend underway since 2018.
	In 2024, Webuild maintained its B- score of the ISS ESG rating, thus confirming the growth trend which allowed it to keep its “Prime” status along with other sector leaders. The Group has been included in the ISS ESG classification since 2017.
	In 2024, Webuild confirmed its place at the top of the Heavy Construction sector. It has been included in the Moody’s ESG Solutions since 2016 by this leader in the European rating sector for its CSR management. The Group was well above the sector average for each ESG Pillar (i.e., ESG Overall Score Webuild 66 vs ESG Overall Score average) in the classification updated to July 2024.

# Environmental information

## Environmental management system

The environmental management system is part of the Group's integrated management system and, as such, is adopted by each group unit after adaptation considering their location, applicable regulations and contracts (see the previous section in the "Integrated management system" chapter). The aim is to ensure that material negative environmental impacts are properly identified, managed and mitigated while positive impacts are seized as opportunities.

When contractually provided for, the Group's contracts are aligned with environmental management standards as well as ISO 14001 which may, in turn, require special certifications and ratings. They may be:

- system standards, which involve reaching specific environmental performance targets during construction activities (e.g., lower emissions, waste recycling);
- product standards, which require the infrastructure to meet specific environmental performance targets (e.g., use of low-carbon construction materials, energy-efficient buildings) when in operation.

The certification systems most frequently used by the Group are LEED (Leadership in Energy and Environmental Design), ENVISION and PAS 2080 (Carbon management in buildings and infrastructure) on a global basis, EMAS (Eco-Management and Audit Scheme) in Europe, GSAS (Global Sustainability Assessment System) in the Middle East and IS (Infrastructure Sustainability) in Australia.

As part of its risk management activities, Webuild monitors environmental impact-related risks right from the time it starts to prepare a bid using a structured approach involving both the corporate offices and individual project management teams.

At corporate level, environmental risk management is part of the methods and activities described in the next chapter considering the external context, typical sector risks (including those arising from new legislative measures that affect the Group or market/significant third party requirements) and operations (ongoing project activities, the efficiency and effectiveness of the integrated environmental management system and its deployment for projects and by the group companies).

Minimising environmental risks at the source is essential in any construction project to efficiently safeguard the environment and prevent pollution. This requires design, planning and construction processes that consider the work's entire life cycle. Specifically, the environment risk management procedure begins in the bidding phase, continues through design and planning, and final design and execution, right through to the operation & maintenance phase. An environmental risk assessment is performed during each of these phases to identify material environmental matters that could have a significant impact on the environment. Specific contract risks are assessed during the bidding phase by Webuild and added to the risks identified and managed through the Environment and Social Impact Assessment (ESIA) performed for the project (it is usually an integral part of the contract). The risks are communicated to the project team during the start-up and addressed during the execution phase. Depending on the contract format, the risk assessment process starts during the design phase (using the LCA approach) and continues into the execution phase when they are analysed in detail in line with the work site's specific work areas and methods.

The corporate offices prepare general guidelines and rules to provide the work sites with methods to mitigate, monitor and check common or higher general risks, which the work sites then adapt to their projects. They identify appropriate control and mitigation measures that consider the local environmental context.

Identification, assessment of their materiality and the subsequent definition of measures to manage, mitigate, monitor and check impacts take place in accordance with specific system procedures which also cover the operations of subcontractors and suppliers.

The materiality of environmental impacts is assessed using a method based on an analysis of well-defined criteria, such as the existence of specific regulatory or contractual requirements, assessment of the related risk, management of the impact and the territory's sensitivity to the specific environmental aspect.

The assessment considers various scenarios: standard operating conditions, irregular conditions (e.g., plant start-up, maintenance), emergencies (e.g., fire, spills), as well as the different work areas (e.g., tunnel portals, workshops, earthworks) and the related context (e.g., urban, riverbeds, etc.).

Identification of the material environmental aspects includes an analysis of the main effects of the contract work and other activities on the different environmental components:

- natural and energy resources;
- atmosphere and climate (emissions);
- soil, subsoil and water environment;
- waste and use of hazardous substances/preparations;
- existence of systems containing GHG or ozone-depleting substances (ODS);
- traffic, atmospheric, light and electromagnetic pollution;
- noise and vibrations;
- ecosystem, cultural/landscape heritage and environmental restoration.

After the environmental risk assessment, analysis of the contractual obligations and related environmental regulations, the following is prepared for each project:

- environmental plans/procedures setting out guidelines for the management/protection of each specific environmental component, prepared on the basis of the guidelines and rules provided by the corporate offices;
- environmental protection plans defining the mitigation activities (preventive, protective and precautionary) to be adopted in the specific area, as well as the appropriate emergency response measures to be deployed and implemented;
- environmental monitoring and control plans defining the specific control and monitoring activities for the environmental components identified in the various areas that also allow an assessment of the mitigation actions' effectiveness;
- specific instructions for the different method statements applied in order that the related impacts can be mitigated and monitored and improvement actions taken.

In addition, the environmental risk assessments are regularly reviewed when conditions change, for example, due to the introduction of new machinery, processes, dangers or new legal/regulatory requirements.

Together with the lessons learnt about projects, the results of the risk assessment, monitoring and regular project reviews contribute to continuously improving the Group's environmental management system.

In order to ensure the correct implementation of the environmental plans, the work sites schedule and provide information/training to be given to the employees involved in projects with potential impacts on the environment, including the subcontractors' employees. They provide regular training about the work processes for labelling, storage, handling and transport of hazardous goods as well as procedures to respond to environmental emergencies in order to prevent or contain the impacts. In 2024, 137,628 hours of training on environmental matters was provided to the group's employees.

The corporate office runs regular campaigns to raise employee awareness of specific issues (e.g., energy savings, waste, spills, use of hazardous substances/preparations, design and LCA planning) and environmental projects (technical, communication, training, etc.). All the group companies' work sites are required to proactively participate in these activities.

In line with the contract terms, assessment of the project's social and environmental impact and ruling regulations, the customer ensures that the environmental monitoring procedures are carried out during the works in order to identify any unexpected environmental changes and/or critical issues that arise external to

work sites while the infrastructure is being built and placed in operation. It analyses their causes to determine whether they are due to the infrastructure and, if so, defines mitigation/prevention measures, with Webuild's assistance, if necessary.

The project proponent is responsible for assessing the social and environmental impacts and engaging with the stakeholders affected by the project both before and during construction. Moreover, the Group considers stakeholders' specific interests as part of its environmental risk assessment and identifies additional monitoring, control and mitigation measures to respond to them. Special attention is paid to highly urbanised areas and those with sensitive or protected receptors in order to focus on the well-being of the local community and foster a collaborative relationship with the competent authorities.

## Climate change

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Building infrastructure that contributes to climate change adaptation	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>Local communities</li> <li>Clients &amp; potential clients</li> </ul>	X					X
Support for the energy transition of the countries where the Group operates with infrastructure projects in the Sustainable Mobility, Clean Hydro Energy and Green Buildings business areas offering customers and the market a contribution to the global challenges and the SDGs posed by climate change	<b>Potential positive impact</b>	<ul style="list-style-type: none"> <li>Governments and public administrations</li> <li>Customers and potential customers</li> </ul>	X				X	
Contribution to the reduction of embodied carbon in projects built by Webuild	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>Customers and potential customers</li> <li>Environment</li> <li>Local communities</li> </ul>	X	X				X
GHG emissions from own operations (Scope 1, Scope 2) mostly due to the use of fossil fuels (e.g., working of plants, use of vehicles and machinery and energy generation)	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>Environment</li> <li>Local communities</li> </ul>		X		X		
GHG emissions from Webuild's value chain (Scope 3) that contribute to the effects of climate change	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>Environment</li> <li>Local communities</li> </ul>	X		X	X		
Extreme weather events and damage to people, plant and equipment, materials and workplaces	<b>Risk</b>			X			X	X
New processes and technologies that facilitate a reduction in emissions and consumption of energy and materials to generate financial savings	<b>Opportunity</b>			X				X
Know-how and experience in building infrastructure for climate change mitigation and adaptation, acquiring more market share given the projected growth in public and private investment	<b>Opportunity</b>			X				X



With respect to the climate change topic, the double materiality assessment identified the physical risk “Extreme weather events and damage to people, plant and equipment, materials and workplaces” as material.

Webuild has considered the assessments arising from the analysis of various types of climate-related physical and transition risks performed in accordance with the TCFD (Task Force on Climate-Related Financial Disclosure) requirements. It used scenario analyses based on three physical scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) which can be summarised as follows: an increase in temperature and of the physical impacts caused by climate change have been projected in all the scenarios analysed albeit at different speeds and magnitudes.

	Limited reduction in emissions	Large reduction in emissions	Reduction in line with the Paris Agreement objectives
	RCP 6.0 <sup>34</sup>	RCP 4.5	RCP 2.6
IPCC (Intergovernmental Panel on Climate Change) scenario	GHG emissions continue to increase throughout most of the century, the average global temperature rises by well above 2°C, the acute effects (heat waves, landslides, flooding, etc.) and chronic effects (extreme temperatures and humidity, water stress, etc.) of climate change will become more frequent, significantly affecting economic activities	GHG emissions peak before mid-century to then reduce slowly. The rise in temperature hovers around 2°C, the acute and chronic effects of climate change intensify	GHG emissions begin to decrease significantly to reach net zero during the century. The rise in temperature does not exceed 2°C compared to pre-industrial levels. The effects of climate change stabilise and economic systems are heavily affected by governmental climate policies.

The Group has a plethora of mitigation actions for this risk, calibrated to each project’s nature and environmental and regulatory context. These include work site start-up activities, insurance cover for assets and contract measures or terms related to negotiations with customers<sup>35</sup>.

<sup>34</sup> RCP (Representative Concentration Pathway) 6.0, 4.5 and 2.6 are the three pathways adopted by the IPCC for different GHG concentration trajectories used for research purposes and to develop the forward-looking models.

<sup>35</sup> Although not identified as material, the Group has implemented measures to reduce its exposure to transition risks such as innovation programmes to make plant and equipment more energy efficient, new construction techniques and the use of materials, partnerships with the supply chain to jointly develop lower emission solutions, technical and environmental training for personnel involved in sensitive processes, ongoing monitoring of new regulations to ensure compliance, etc.

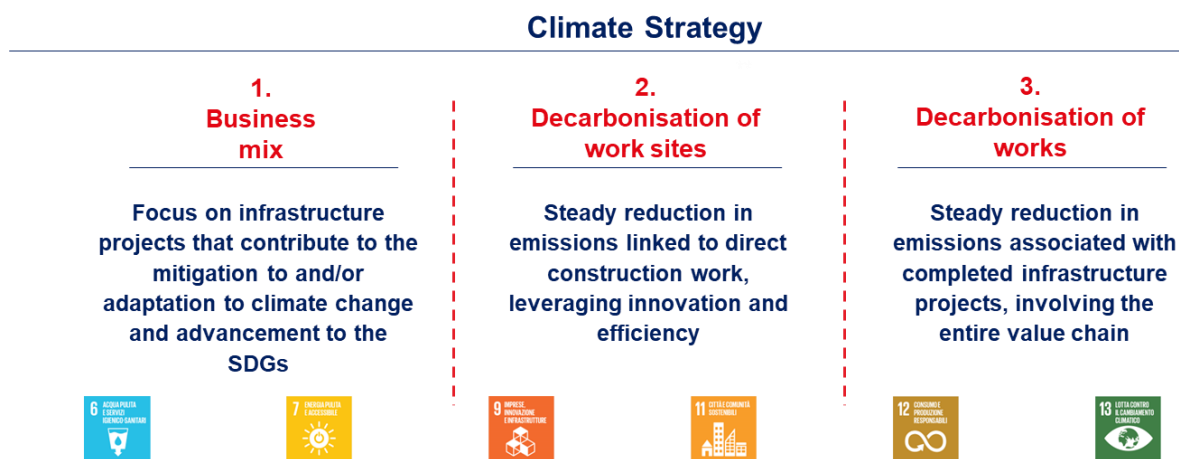
## Transition plan for climate change mitigation<sup>36</sup>

[E1-1]

Webuild supports the global fight against climate change and the transition to a low-carbon economy.<sup>37</sup>

The Group has a transparent, coherent Climate Strategy based on the reduction of relative and absolute GHG emissions<sup>38</sup>. It intends to draw on its strategy to act as a beacon in the infrastructure industry supporting its customers in their journey to mitigate and adapt to climate change<sup>39</sup>.

The strategy has three priority areas of intervention: business mix, decarbonisation of work sites and decarbonisation of works as shown below.



In recent years, the Group has made good inroads: nearly all its activities (93%<sup>40</sup> of its construction order backlog) contribute to advancement towards the SDGs and 40.1% of its 2024 revenue, 66.8% of CapEx and 51.1% of OpEx are EU taxonomy-aligned.<sup>41</sup>

**Business mix:** Webuild occupies a unique place in its market thanks to its focus on developing low-carbon footprint infrastructure (i.e., that contributes to climate change mitigation) and/or resilient infrastructure (i.e., contributes to climate change adaptation). Specifically, the Group's Sustainable Mobility (railways and metros), Clean Hydro Energy and Green Buildings projects contribute significantly to reducing GHG in the transport, energy and real estate sectors, the largest contributors to the climate-altering emissions.

<sup>36</sup> Webuild is excluded from the EU Paris-aligned benchmarks.

<sup>37</sup> More information about how Webuild discloses and takes into account climate considerations in the remuneration of the administrative, management and supervisory bodies is provided in the caption "Integration of sustainability-related performance in incentive schemes" in the "General information" section.

<sup>38</sup> The Climate Strategy, which is also presented in the Sustainability-Linked Financing Framework approved by the Board of Directors in 2021, and related targets (including those validated by the SBTi) are approved by top management after their review by the Corporate Social Responsibility Department. However, the climate change mitigation transition plan has not been formalised in a specific document approved by the administrative, management and supervisory bodies. More information on the GHG emissions reduction targets is available in the "Targets" paragraph of this chapter.

<sup>39</sup> Webuild performed analyses to identify capital expenditure which is part of a plan ("CapEx plan") to expand the Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned (category B as per paragraph 1.1.2.2. Annex I to Delegated Act, article 8) and capital expenditure related to the purchase of output from Taxonomy-eligible economic activities and individual measures enabling the group activities to become low carbon or to lead to GHG reductions (category (c) as per paragraph 1.1.2.2. Annex I to Delegated Act, article 8).

<sup>40</sup> This figure reflects the actual values of the construction order backlog for the Clean Hydro Energy, Clean Water, Sustainable Mobility and Green Buildings business areas. The measurement method used for the order backlog is not a measurement parameter provided for by the International Financial Reporting Standards (IFRS) and is not calculated using financial information prepared in accordance with such standards. Therefore, the calculation method may differ from that used by other sector operators. Accordingly, it cannot be considered as an alternative indicator to the revenue calculated under the IFRS or other IFRS measurements. The method used to measure the order backlog differs from the method used to prepare information about the Group's unsatisfied performance obligations as per IFRS 15 (see note 33 to the consolidated financial statements at 31 December 2024).

<sup>41</sup> More information is available in the "EU taxonomy for sustainable economic activities" chapter of this section.

The ongoing hydropower, railway and metro projects will generate very significant benefits in terms of lower emissions and greater numbers of people served, while by improving the resilience of infrastructure, the clean water and sustainable mobility (roads, bridges and tunnels<sup>42</sup>) projects also contribute to climate change adaptation, which can be:

- chronic (e.g., higher temperatures, water scarcity), as in the case of drinking water and water treatment projects, aqueducts and water storage for drinking water and/or irrigation and desalination plants;
- acute (e.g., adverse weather events), such as hydraulic projects in urban areas to reduce flooding and the related water pollution or transport infrastructure projects (to improve its resilience).

The clean water projects underway respond to the specific requirements of areas affected by increasing water scarcity (such as the desalination plants built in the Middle East and irrigation water storage in Africa), the more frequent extreme weather events (the hydraulic projects carried out in major urban centres in the US) and the pollution of rivers and water basins leading to a loss of biodiversity (the Riachuelo River in Argentina and the Caloosahatchee West Basin Storage Reservoir in the US).

With respect to transport infrastructure, there is a growing focus on new infrastructure's resilience to climate change, especially those works that are heavily exposed to the effects of atmospheric agents, such as roads, bridges and viaducts, as their resilience over time is essential to user safety.

Webuild is well-positioned in this market as it has accumulated significant experience in the use of design techniques and studies of materials that reflect future climate projections. Example of this are the award-winning Skytrain Bridge, built as part of the Sydney Metro Northwest project in Australia and designed to stand up to rain, flooding and winds forecast after 2100, or the New Genoa San Giorgio Bridge, designed to deal with the expected extreme increase in rainfall over the next 80 years. It is expected that use of these design techniques will become widespread over the coming years, also given the new regulations that will be brought in from time to time.

**Decarbonisation of work sites:** The second area of intervention of the Group's Climate Strategy is to reduce GHG emissions of its construction business.

The Group has made and intends to make continuous investments in efficiency actions and measures at its work sites around the world, as well as innovation programmes designed to develop technical solutions. These initiatives enable Webuild to move beyond the business-as-usual operating methods to define new more ambitious GHG emission objectives.

Webuild formalised its commitment to defining objectives in line with the SBTi standard in 2021 and obtained validation of its 2030 reduction targets in 2022.

The following sections provide a detailed description of the Group's programmes and performances to reduce its GHG emissions associated with its construction business.

**Decarbonisation of works:** A steady reduction in GHG emissions associated with infrastructure projects developed by the Group is the third focus area of its Climate Strategy.

While work site decarbonisation aims to reduce emissions generated during the construction work, the works decarbonisation entails decreasing the emissions from permanent materials used to build the infrastructure and the emissions generated by its use.

This objective requires the full engagement and commitment of the entire value chain, from investors to customers, designers, regulators and supply chain, and not just Webuild.

Webuild has honed its expertise in the field in the construction of infrastructure in line with eco-design and construction frameworks, certified in accordance with LEED, GSAS, IS, Envision and other certification protocols. This approach means the Group's projects are evaluated over their entire life cycle to identify and develop integrated energy efficiency and decarbonisation solutions, right from the design stage.

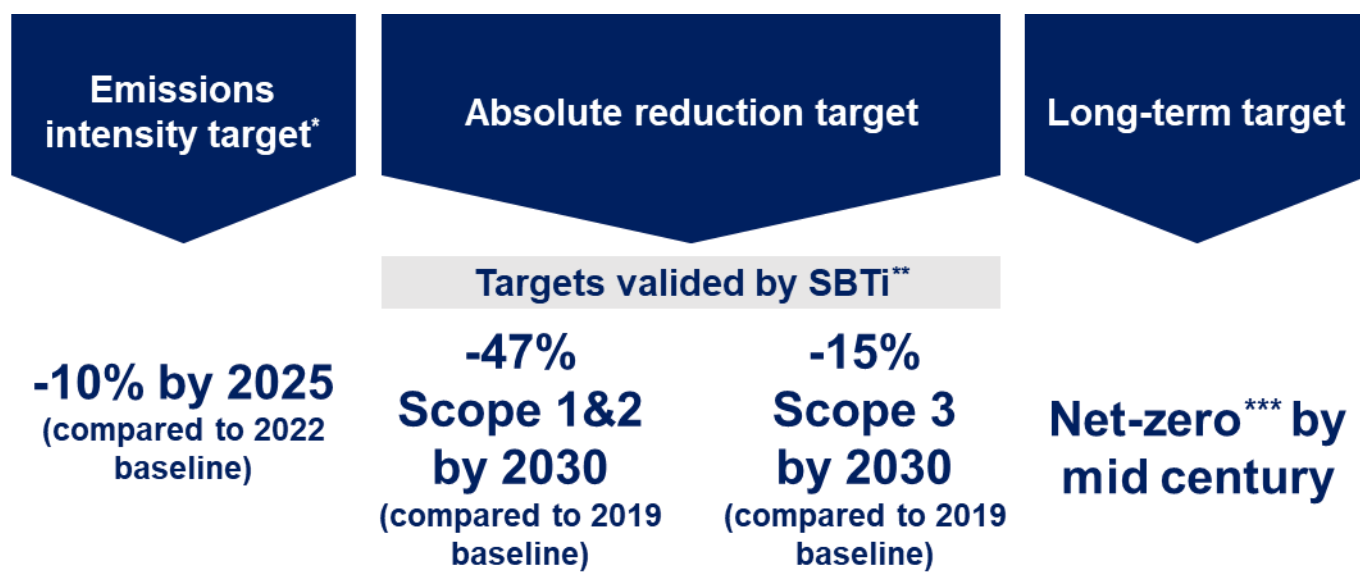
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<sup>42</sup> Designed according to resilience criteria.

The Group's objective is to make this approach standard, progressively incorporating it into new business initiatives irrespective of the adoption of eco-design and construction frameworks.

In agreement with the customer and in line with local technical regulations, Webuild aims to build increasingly low-carbon infrastructure, thereby decreasing its indirect emissions (Scope 3). It has defined a roadmap and specific initiatives for these Scope 3 emissions as described later.

The Group's roadmap underpinning its Climate Strategy is entirely focused on steadily reducing GHG emissions. Its short-, medium- and long-term targets<sup>43</sup> are as follows:



\* In terms of t CO2e Scope 1&2/€M. Scope 1 (emissions from fuel, explosives and refrigerant gases), Scope 2 (emissions from electricity purchased, market-based method)

\*\* Science Based Target initiative

\*\*\* State of no impact on the climate, obtained by reducing emissions and neutralising any residual emissions difficult to eliminate

Specifically, in 2022, Science-Based Target Initiative (SBTi)<sup>44</sup> validated the Group's absolute GHG emission reduction targets to 2030, formally submitted in 2021 to make a real contribution to the international Climate Agreements signed in recent years, especially to limit global warming to 1.5°C above pre-industrial levels.

Webuild's main intervention levers to reduce Scope 1 & 2 emissions are:

- the gradual transition away from diesel generators at work sites to connection to electricity grids;
- improving the efficiency of the vehicle fleet by:
  - steadily replacing existing vehicles with low emission models, introducing hybrid and/or electric vehicles;
  - using conveyor belts to move excavation materials at the work sites instead of lorries;
  - progressively adopting high efficiency catalytic systems on site vehicles;
  - introducing real time consumption monitoring systems for vehicles and machinery;

<sup>43</sup> The Group's Climate Strategy also benefits from the European and other laws and regulations that have been introduced, especially in recent years, that require all companies, economic activities and business sectors to commit to combating climate change with positive effects for all the players involved.

<sup>44</sup> International organisation that establishes guidelines to calculate targets related to companies' contribution to decarbonisation in line with the Paris Agreement using a scientific approach.

- making plant, equipment and electrical systems more efficient by:
  - adopting power quality solutions able to stabilise electrical loads and reduce consumption in the work sites;
  - ongoing deployment of “green” TMBs, i.e., machines engineered especially by Webuild together with the manufacturers for lower energy and water consumption compared to traditional machines (see the “Innovation and digitalisation” chapter of the “Governance information” section for more information);
  - developing environmentally-friendly robotic prefabrication systems, engineered specifically by Webuild with the manufacturers, which comply with the circular economy principles through the more efficient use of energy, water and materials;
  - introducing predictive maintenance systems, able to identify inefficiencies in work site equipment and improve maintenance cycles;
  - ongoing deployment of ventilation systems in tunnels that operate with automated pollutants controls, able to make energy consumption more efficient and improve the air quality;
  - progressively introduce renewable production systems at the work sites, such as photovoltaic systems;
- using renewable energy by purchasing electricity from renewable sources and fuel with blends of renewable components (e.g., biodiesel);

As the emissions from the use of the principal construction materials (cement, concrete, steel) make up more than two thirds of the Group’s scope 3 emissions, Webuild will focus on them to define its reduction target in line with the requirements defined by SBTi.

The main intervention levers to reduce its scope 3 emissions are:

- deploying low emission construction materials (generated during their production), especially:
  - transitioning to low-carbon cement and concrete;
  - transitioning to steel with high recycled content;
- development of processes to optimise infrastructure design, to achieve:
  - optimisation of quantities of materials used during construction, thanks to value engineering solutions and/or innovative materials;
  - utilisation of alternative low emission solutions (such as steel fibre instead of traditional metal reinforcements for tunnel sections).

Webuild has also committed to reducing, where possible, its indirect emissions (scope 3) generated by its non-core activities, such as transport, waste generation and personnel movements. Specifically:

- its procurement policy is designed to maximise purchases from local suppliers (88% in 2024), cutting out the need for long transport journeys and minimising the associated emissions. When goods are not available on the local market, the Group prefers to ship materials and machinery by sea as this is the means of transport with the lowest associated emissions;
  - its environmental policy (see the relevant paragraph of this chapter) targets the steady increase in waste sent for recycling and reuse to minimise atmospheric emissions compared to waste sent to landfills or to waste-to-energy plants;
- with respect to reducing personnel movements, the Group has equipped its offices and work sites with video conference systems which significantly reduced the number of business trips even before the pandemic’s onset:
  - it has introduced extensive remote working programmes in recent years;

- its travel policies favour travelling by train rather than by plane and the use of public transport rather than taxis;
- the Italian head offices have a mobility manager who regularly draws up a home-office commuting plan;
- when possible, projects have collective transport methods (buses) for blue collars and car-pooling for white collars at the work site offices.

On the basis of the GHG (Scope 1, 2 and 3) emissions reduction targets and the above decarbonisation levers, and after a qualitative assessment, the Group has not identified “locked-in”<sup>45</sup> emissions related to its key assets that would compromise achievement of these targets.

## Policies

[E1-2]

**Sustainability Policy:** Webuild introduced its sustainability policy in 2011 (most recently updated in 2023) to formalise its commitment to build large complex infrastructure for the sustainable mobility, hydro energy, water and green buildings sectors using sustainable methods and practices, and by integrating them into its business model.

The Group builds infrastructure that effectively responds to global challenges, such as climate change, contributes to advancement towards the main SGDs and makes a positive contribution to the environmental objectives defined by the European Union. In addition, during the actual construction work, the Group contributes to the local area’s economic and social development, ensuring the well-being of people and environmental protection.

Specifically, its policy has ten key principles, which include protection of the environment and combating climate change. The Group pursues this objective by defining a decarbonisation strategy and goals, implementing climate change mitigation and adaptation initiatives and promoting the use of equipment that can minimise the emissions from its production processes and along the value chain.

Moreover, Webuild strives to safeguard natural capital, ecosystems and biodiversity and natural and cultural heritage, contributing, including through its own projects, to tackling the main global environmental challenges. For this purpose, it adopts the best solutions designed for preventing or mitigating possible negative effects on the environment, taking into consideration the entire life cycle of works, including from a circular economy perspective.

**Environmental Policy:** protection of the environment is a priority for the Group, which formalised a specific Environmental Policy in 2002, one of the first European construction companies to do so. In 2007, it introduced an environmental management system which is ISO 14001 certified and ensures a structured, systematic approach to protection of the environment<sup>46</sup>. Introduction of an ISO 14001 compliant environmental management system implies application of the Deming cycle to all processes and, hence, the continuous improvement of their efficiency and effectiveness. More information is provided in the “Environmental management system” chapter of this section.

The Environmental Policy defines ten principles to guarantee:

- compliance with applicable legal and contractual requirements related to the environment;
- identification and assessment of environmental aspects tied to the parent’s direct and indirect, present and future operations, identification of the related significant effects and management of the mitigation and control measures, integrating the life cycle perspective and sustainable supply chain logics;

<sup>45</sup> “Locked-in” GHG emissions are estimates of future GHG emissions that are likely to be caused by an undertaking’s key assets or products sold within their operating lifetime.

<sup>46</sup> Webuild strives for continuous improvement in line with the ISO 14001 standard. To this end, it performs an annual management review which includes assessing the policy’s adequacy, that of the Group’s performance and achievement of its goals.

- identification of all the technical and organisational measures, including innovative, for the rational use of natural resources, including their reuse in the circular economy, and the mitigation of pollution, GHG emissions, waste generation and inconvenience to the local communities as well as maximisation of the positive effects for the environment;
- involvement and engagement of all employees or people who work for Webuild, by raising awareness, disseminating information, training courses, dialogue and transparency;
- the best sustainable solutions for customers in order to enhance the works and territories and to protect the environment and the health and safety of users;
- engagement with the community and stakeholders;
- each worker has the right and is obliged to intervene and stop work if there is a potential risk to the environment.

Webuild consciously strives to promote a careful and conscious management of resources according to the principles of the circular economy. This includes minimising extractions from the biosphere, especially for non-renewable sources, encouraging recovery and reuse, particularly for water resources, raw materials, excavated materials, reducing the use of virgin resources, waste generation, atmospheric emissions (greenhouse gases or ozone-depleting gases, dust, noise and light pollution) and the efficient use of energy, preferably from renewable sources.

The content of the Environmental Policy and the Code of Ethics are essential for the implementation of the environmental management system in all project phases (from the bidding phase to placement in service and delivery). They are available to all Webuild employees around the world as well as its suppliers and subcontractors.

**Suppliers' Code of Conduct:** introduced at the start of 2020 to extend the parent's responsible and sustainable operating practices to its supply chain.

This Code is binding for all Webuild suppliers that undertake to: respect the local environment, favouring the responsible use of resources and the use of recycled and recovered products and/or those less harmful to the environment, preferring local products, in support of the regional economy and more generally the principles of the green economy and the fight against climate change. Webuild guarantees the right for everyone to intervene if there is any doubt that the environment or health and safety may be compromised.

Webuild guarantees the application of its principles and standards described in the Code as it regularly monitors its activities and performances, by way of reporting systems, inspections, audits, periodic performance assessments, etc., also involving the activities carried out by its suppliers in order to prevent and limit any negative impacts (such as product non-compliance, incidents and emergencies).

Contracts agreed with suppliers include provisions requiring compliance with the applicable regulations, the principles of the Code of Ethics, the Suppliers' Code of Conduct and quality, health and safety, environment requirements (e.g., the QHSE system, the HSE system). More information about supplier screening using social and environmental criteria is provided in the "Business conduct - Management of relationships with suppliers" chapter in the "Governance information" section.

Finally, Webuild also considers the information that emerges from long-lasting, consolidated relationships with its stakeholders in the value chain, paying close attention to their expectations and engaging them in strengthening and consolidating a culture of environmental awareness.

**Environmental Code of Conduct:** in addition to its Environmental Policy and Sustainability Policy, Webuild has defined and endorses environmental rules, which are a set of operating and organisational rules designed to facilitate the cultural change process, encourage the proactive involvement of workers and the value chain, strengthen a sense of belonging, standardise conduct and support the conscious adoption of Webuild's Environmental Policy. It drew up these rules considering the Group's performance, the regulations already in place at the work sites, benchmarks and the main environmental aspects of the Group's business. They cover

the following operating issues which are relevant to Webuild: landscape, biodiversity and territory, water, soil and subsoil, noise and vibrations, atmospheric emissions, energy and decarbonisation, excavated earth and rocks, waste and hazardous substances and preparations. They also address the following organisational issues: compliance, emergency management, value chain involvement, life cycle, definition of roles and identification of weak signals.

## Actions

[E1-3]

In line with its Climate Strategy, Webuild rolled out and implemented 70 actions to reduce emissions in 2024. They related to various areas and generated benefits in terms of avoided emissions of more than 36 million tonnes of CO<sub>2e</sub>. These initiatives positively contribute to achievement of the Group's emissions reduction targets for its direct Scope 1 emissions and indirect Scope 2 and 3 emissions.

Almost all the initiatives relate to the decarbonisation levers identified by the Group such as connecting to electricity grids instead of using diesel generators, improving the efficiency of the vehicle fleet and plant, equipment and electrical systems, and the utilisation of renewable energy by purchasing electricity from renewable sources and fuel with blends of renewable components (e.g., biodiesel) with respect to Scope 1 and 2 emissions while initiatives that contribute to reducing value chain emissions (Scope 3) focus on the deployment of low emission construction materials (generated during their production), as shown in the following table<sup>47</sup>.

The financial resources in terms of CapEx and OpEx associated with actions that meet the taxonomy criteria are presented in annex 1 to this statement.

GHG emission reduction initiatives	Unit	2024
<b>Active initiatives</b>	no.	70
<b>Total reduced emissions</b>	tCO <sub>2e</sub>	36,466,587
<b>Reduced GHG emissions (Scope 1 &amp; 2)</b>	tCO <sub>2e</sub>	<b>31,305,309</b>
<i>Transition to using the electricity grid</i>	tCO <sub>2e</sub>	41,544
<i>Improving the efficiency of vehicle fleet</i>	tCO <sub>2e</sub>	30,941,413
<i>Improving of efficiency of electrical equipment</i>	tCO <sub>2e</sub>	291,056
<i>Use of renewable energy</i>	tCO <sub>2e</sub>	31,295
<b>Reduced GHG emissions (Scope 3)</b>	tCO <sub>2e</sub>	<b>99,208</b>
<i>Low-carbon materials</i>	tCO <sub>2e</sub>	99,208
<i>Optimised designs</i>	tCO <sub>2e</sub>	-

With respect to the total Scope 1 and Scope 2 reduced emissions, the largest contribution was from the Rogun project in Tajikistan which introduced an electrical conveyor belt system to transport excavated earth and rocks thus avoiding the use of lorries running on fossil fuels.

In addition to the initiatives set out in the table, the Group has planned others as part of its emissions reduction strategy that allow it to determine the potential contribution to decarbonisation over a five-year time horizon. These current and planned initiatives are very important given the current situation of widely fluctuating energy costs as they will allow the Group to obtain significant cost savings.

The steady introduction of policies and regulations to accompany and accelerate the climate transition is an important lever to generate new business opportunities. The Group already plays a leading role in the development of infrastructure that contributes to both climate objectives defined by the international community: mitigation and adaptation. These business areas will continue to offer strong growth potential in the coming years, bolstered by the state investment plans rolled out in the main markets of strategic interest

<sup>47</sup> Roughly 5 million tonnes of CO<sub>2e</sub> shown in the "Total reduced emissions" balance relate to reduction actions introduced that do not currently fall under one of the identified decarbonisation levers.



to the Group, given their capacity to contribute to the achievement of the Paris Climate Agreement objectives and the SDGs.

To best tackle the decarbonisation challenges, starting from 2018, Webuild has set up various interdepartmental and interdisciplinary technical teams at corporate level, including:

- CLEF (Climate and Energy Efficiency) team, which scouts, tests and introduces new solutions and technologies to reduce Scope 1 & 2 GHG emissions, such as those related to tunnelling activities, which are one of the most energy intensive areas of the large infrastructure sector;
- LCO (Life Cycle Optimisation) team, which scouts, tests and introduces new solutions and technologies to reduce scope 3 GHG emissions, for example, those related to optimising the use of cement and concrete.

In 2024, it set up an interdepartmental decarbonisation team to work at different levels (corporate, geographical area, work site) and define a single strategy to implement and manage decarbonisation initiatives, starting with corporate processes before extending to each project throughout the infrastructure's life cycle (beginning with its design and considering each stage of the work's life right through to its end-of-life) and the contract term (participation in the call for tenders, construction and delivery) and in the value chain.

To emphasise the importance of decarbonisation, the parent's board of directors approved a Sustainability-linked Financing Framework, formalising the inclusion of environmental sustainability criteria in the Group's funding strategy. It also affirms the Group's stated purpose of contributing to the achievement of the UN's SDGs and acceleration of the global climate transition.

The Framework sets out guidelines to be adhered to when the parent issues new financial instruments linked to sustainability objectives. It defines carbon intensity as the KPI and fixes specific intermediate and long-term sustainability performance targets that contribute to the advancement of SDG 9 Industry, Innovation and Infrastructure and SDG 13 Climate Action. The Framework was assessed by an independent body which issued a Second Party Opinion on the document's compliance with Webuild's sustainability strategy and the international standards regulating sustainability-linked financing. In January 2022, Webuild completed the issue of its first sustainability-linked bonds, receiving orders for more than twice the amount offered, confirming the international and domestic financial community's appreciation of Webuild's strategy of recent years.

## Targets

[E1--4]

Goals and target years	Baseline	2024	Target	
			2025	2030
Absolute reduction target for GHG emissions (Scope 1 & 2)* (tCO <sub>2</sub> e)	476,621 (2019)	416,788	-	-47%
Absolute reduction target for GHG emissions (Scope 3) (tCO <sub>2</sub> e)	1,502,970 (2019)	1,793,099	-	-15%
Emissions intensity target (Scope 1 & 2)* (tCO <sub>2</sub> e /€M)	47 (2022)	35.3	-10%	

\*market-based

The Group is firmly committed to combating climate change with numerous initiatives, the first of which is the definition of targets to reduce its absolute and relative GHG emissions<sup>48</sup>.

Specifically, Webuild has set itself the objective of reducing its absolute Scope 1 & 2 emissions by 47% by 2030 compared to its 2019 baseline, confirming its long-term intention to mitigate the environmental impact of its operations. In addition, it has defined an ambitious target of reducing the Scope 3 emissions of its value chain by 15% by 2023 compared to 2019. Scope 3 emissions, which include other indirect emissions from the value

<sup>48</sup> The emissions data shown in the "Baseline" column of the "Goals and target years" table refer to the emission boundary of the indicated base year. Therefore, they differ from the 2024 data. The figure for the "Absolute reduction target for GHG emissions (Scope 3) (tCO<sub>2</sub>e)" solely considers emissions associated with the main construction materials (cement, concrete and steel) which made up more than two thirds of the total Scope 3 emissions at the date when the SBTi targets were defined, in line with the SBTi's requirements.

chain, are challenging but their reduction is essential to make a real contribution to the international Climate Agreements signed in recent years. These targets were approved and validated by SBTi.

In defining the SBTi<sup>49</sup> targets, the CSR Department is assisted by the Environmental Department and takes stakeholders' opinions into consideration. Webuild regularly monitors its emissions to ensure that it meets its stated objectives. Once a quarter, it collects the data needed to check the emissions that contribute to the targets. This monitoring procedure and transparency about its performance compared to the set targets are also achieved through the CDP (ex Carbon Disclosure Project) questionnaires which are published and show the progress made in the year.

The Group has set itself the objective of reducing the intensity of its Scope 1 and Scope 2 (market-based) emissions by 10% by 2025 compared to 2022, as set out in the ESG Plan<sup>50</sup>. This objective is also included in its Sustainability-Linked Financing Framework with a 2017 baseline<sup>51</sup>.

## Metrics

### *Energy consumption and mix*

[E1-5]

Energy requirements are the main source of GHG emissions at the work sites.

While the Group's business is characterised by highly customised processing, techniques and technologies depending on the specific requirements of the works to be built and the characteristics of the territories where they will be located, Webuild has long developed production processes and technical-organisational solutions to decrease its energy footprint.

Accordingly, when designing and setting up its work sites, Webuild checks all the energy components of its industrial processes to optimise them and make them more efficient.

The following table shows its direct energy consumption and energy intensity rate<sup>52</sup> :

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<sup>49</sup>At methodological level, when the absolute emission reduction targets were defined, the GHG emission data was based on an inventory of the Group's emissions. This inventory was prepared in compliance with the GRI standards, the recommendations of GHG Protocol Corporate Accounting and Reporting Standards and the requirements of the Science-Based Target Initiative (SBTi). These standards and recommendations ensure that the data are accurate, transparent and aligned with best international practices. The method adopted was that of absolute contraction rather than sector decarbonisation. In order to estimate the growth in activities and related GHG emissions and be able to calculate the reduction necessary to be in line with the decarbonisation trajectories set by the SBTi, Webuild analysed historical and projected data about its business. This analysis used revenue from contracts with customers and operating expenses shown in the Group's statement of profit or loss. It looked for the connection between operating expenses and data; this assumption was confirmed by the fact that Scope 1, 2 and 3 emissions are usually linked to the expected production levels and, therefore, operating expenses. Webuild also studied the assumed correlations between financial figures and operating data using regression analyses. Based on this method, it developed a BAU- Business As Usual scenario for its Scope 1, 2 and 3 emissions. This scenario envisages a growth in emissions in line with the growth in economic output without any emission mitigation actions (in this scenario to 2030, the weight of Scope 1 emissions would be 68% compared to 32% for Scope 2 emissions). Starting from this scenario, Webuild defined its decarbonisation curve based on the reduction initiatives planned from 2022 to 2030. The initiatives mapped for Scope 1 & 2 emissions fall under four main decarbonisation levers that contribute with different weights to achievement of the targets. Specifically, at the target presentation date, the gradual transition from diesel generators at work sites to their connection to electricity grids made a 10% contribution, improving the efficiency of the vehicle fleet 3%, making plant, equipment and electrical systems more efficient 15%, while the use of renewable energy by purchasing electricity from renewable sources and fuel with blends of renewable components (e.g., biodiesel) 72%. With respect to Scope 3 emissions, two main decarbonisation levers were identified: the deployment of low emission construction materials (generated during their production) that make a 70% contribution to the reduction of emissions in the 2022-2030 period and the development of processes to optimise infrastructure design for 30%.

<sup>50</sup> This objective's baseline was set in line with the other objectives of the ESG Plan.

<sup>51</sup> Emissions intensity target for Scope 1 and Scope 2 market-based emissions (tCO<sub>2e</sub>/€M):-50% to 2025 with 2017 baseline (110).

<sup>52</sup> The energy intensity rate is calculated considering note 33 "Revenue and other income" to the consolidated financial statements.

Energy consumption and mix	Unit	2024
1) Fuel consumption from coal and other products	MWh	-
2) Fuel consumption from crude oil and petroleum products	MWh	1,110,157
3) Fuel consumption from natural gas	MWh	27,867
4) Fuel consumption from other fossil sources	MWh	997
5) Consumption of purchased or acquired electricity, heat, steam or cooling from fossil sources	MWh	134,610
6) <b>Total energy consumption from fossil sources (sum of lines 1 to 5)</b>	MWh	1,273,631
<b>Percentage of fossil sources to total energy consumption</b>	%	89%
7) Consumption from nuclear sources	MWh	-
8) Fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin, biogas, hydrogen from renewable sources, etc.)	MWh	8,955
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	139,487
10) Consumption of self-generated non-fuel renewable energy	MWh	1,062
11) <b>Total energy consumption from renewable sources (sum of lines 8 to 10)</b>	MWh	149,504
<b>Percentage of renewable sources to total energy consumption</b>	%	11%
<b>Total energy consumption (sum of lines 6 to 11)</b>	MWh	1,423,135
<b>Energy intensity</b>	MWh/€m	121

In 2024, 51% of the electricity consumed by the Group for its direct operations came from renewable sources. Subcontractors' energy consumption included 2,724 MWh from renewable sources and 405,033 from fossil sources.

#### *Gross Scopes 1, 2, 3 and Total GHG emissions*

[E1-6]

The Group's Scope 1, 2 and 3 emissions<sup>53</sup>, defined and calculated in accordance with the GHG Protocol Corporate Accounting and Reporting Standard, are set out below. They comply with the requirements of the Science-Based Target Initiative (SBTi)<sup>54</sup> and the emissions intensity rates<sup>55</sup>. Specifically:

- Scope 1 includes emissions from sources controlled directly by the Group, i.e., from the use of fuel for vehicles, machinery and power generators, fugitive emissions deriving from the topping up of air conditioning systems, emissions deriving from the use of explosives for demolition and excavation activities performed by the Group<sup>56</sup>;
- Scope 2 includes indirect emissions from purchased electricity for directly-performed activities;
- Scope 3 includes other indirect emissions generated by sources not owned or controlled by the Group. The emissions from goods and services purchased are the most significant and are largely influenced by the use of the principal construction materials (cement, steel, concrete). They are followed by emissions

<sup>53</sup> The independent auditors checked the reported metrics and issue their assurance report. Moreover, an external body checks the emissions inventory once a year to monitor progress towards the SBTi targets.

<sup>54</sup> The GHG emissions were calculated and expressed as CO<sub>2</sub> equivalent (CO<sub>2</sub>eq). The Group used a calculation method based on the use of specific emission factors (EF) to calculate the total emissions of CO<sub>2</sub>eq. The unit emission factors refer to the individual emission source and consider all the GHG contributions included in the calculation of the emissions expressed as CO<sub>2</sub> equivalent (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub> and NF<sub>3</sub>). The emissions factors are taken from accredited databases and/or product environmental certifications. The main databases used are: Government GHG Conversion Factors for Company Reporting (UK Department for Business, Energy & Industrial Strategy – BEIS), CO<sub>2</sub> Emissions from Fuel (International Energy Agency), Fourth Assessment Report AR4 (IPCC), Inventory of Carbon and Energy (Bath Inventory of Carbon and Energy- ICE) and SimaPro modelling software.

<sup>55</sup> The intensity rate is calculated considering note 33 "Revenue and other income" to the consolidated financial statements.

<sup>56</sup> Biogenic emissions of CO<sub>2</sub> from the combustion or bio-degradation of biomass are disclosed separately from Scope 1 emissions which include the emissions of other forms of GHG (specifically CH<sub>4</sub> and N<sub>2</sub>O).

from transport, upstream energy, waste and the travel of head office personnel (in Italy, the United States, Australia and Switzerland)<sup>57</sup>.

Scope 3	Methodology
<b>Purchased goods and services</b>	This category includes all upstream emissions (cradle-to-gate) due to the production of products or implementation of services acquired by the Group. It comprises emissions linked to the production of raw materials used in the Group's work sites, emissions associated with products/services provided by subcontractors (including fuel and the purchase of electricity not allocated to Scope 1 or 2). Emissions associated with fuel consumption and purchase of electricity by subcontractors are included in this category with respect to their "use" while emissions associated with production are included in "Activities linked to fuel and energy (not included in Scope 1 and 2)". The data used to calculate the emissions from fuel, electricity and materials used at the work sites for own operations and activities performed by subcontractors are taken from the reporting systems used by the work sites (e.g., cost accounting, warehouse records and QHSE reporting systems).
<b>Capital goods</b>	After a dedicated qualitative and quantitative assessment, which also took the Group's annual investments into consideration, this category was found to be immaterial.
<b>Fuel and energy-related activities (not included in Scope 1 or Scope 2)</b>	This category includes emissions associated with the production of fuel and energy purchased by Webuild and its subcontractors, such as upstream emissions of purchased fuel, upstream emissions of purchased electricity, transmission and distribution losses. The data used to calculate the fuel and electricity emissions both for own operations and activities performed by subcontractors are taken from the reporting systems used by the work sites (e.g., cost accounting, warehouse records and QHSE reporting systems).
<b>Upstream transportation and distribution</b>	This category includes emissions from the transport and distribution of materials purchased by the Group and delivered to the work sites and equipment/spare parts delivered to the work sites by third party carriers during the year. The logistics services considered include air, ship, railway and road transport. Webuild has a comprehensive reporting system used by each work site manager to fill in the quantities of material transported, the distance from the supplier to the work site, the means of transport used (road, ship, plane or train) and whether the materials were delivered using the Group's vehicles or those of its subcontractors. In the latter case, these data are excluded from the reporting in this sub-category in order to avoid double counting with Scope 1 emissions (mobile combustion) and Scope 3 (fuel consumption included in the service provided by subcontractors). Data about the emissions associated with the transport of materials to the work sites from the production sites are calculated using documentation supplied by the service provider (logistics operator, vehicle lease company) and estimates.
<b>Waste generated in operations</b>	This category includes emissions from the disposal and treatment of waste generated by the Group at its work sites. The data used to calculate the emissions associated with the waste generated at the work sites are taken from their reporting systems.
<b>Business travelling</b>	This category includes emissions associated with employee business trips. The data about emissions associated with business trips are calculated using the documentation supplied by the service provider (travel agencies).
<b>Employee commuting</b>	This category includes emissions associated with employees' commute to work. The data related to the emissions associated with the home-work commute are calculated using the home-work commuting plan prepared in accordance with the Guidelines for the preparation and implementation of home-work commuting plans and estimates.
<b>Upstream leased assets</b>	All the emissions from own operations, including those from upstream leased assets, are already included in the Scope 1 or Scope 2 inventories. Therefore, this category is not applicable.

<sup>57</sup>100% of emissions are calculated using data obtained from suppliers or value chain partners.

The following are exceptions: the environmental data for the offices solely refer to the Italian headquarters (corporate offices in Milan and Rome) and the headquarters of Lane in the United States, Fisia Italimpianti in Italy, Clough in Australia and CSC Costruzioni in Switzerland. They include energy consumption, direct emissions and emissions from employee travel. The other offices are not included as they are immaterial.

<b>Downstream transportation</b>	Webuild does not produce goods that require transport and distribution. Therefore, this category is not applicable.
<b>Processing of sold products</b>	All the emissions from own operations, including those for any intermediate product or processed materials, are included in the Scope 1 or Scope 2 inventories. Therefore, this category is not applicable.
<b>Use of sold products</b>	Webuild does not own the asset, i.e., infrastructure it builds which is owned by the customer. Rather it provides the construction service to the customer. Therefore, this category is not applicable.
<b>End-of-life treatment of sold products</b>	This category is not applicable for the same reasons set out for the previous category.
<b>Downstream leased assets</b>	Webuild does not have assets leased from other entities. Therefore, this category is not applicable.
<b>Franchises</b>	Webuild does not have franchises. Therefore, this category is not applicable.
<b>Investments</b>	Based on the analyses performed, this category is not relevant as its contribution to the Group's total Scope 3 emissions is below 5% (materiality threshold).

<b>Gross Scopes 1, 2 and 3 and Total GHG emissions</b>	<b>Unit</b>	<b>2024</b>
<b>Scope 1 GHG emissions</b>		
Gross Scope 1 GHG emissions	tCO <sub>2eq</sub>	333,250
Percentage of Scope 1 GHG emissions covered by regulated emissions trading systems	%	-
<b>Scope 2 GHG emissions</b>		
Gross location-based Scope 2 GHG emissions	tCO <sub>2eq</sub>	81,441
Gross market-based Scope 2 GHG emissions	tCO <sub>2eq</sub>	83,538
<b>Significant Scope 3 GHG emissions</b>		
Total gross indirect (Scope 3) GHG emissions	tCO <sub>2eq</sub>	2,639,233
Purchased goods and services	tCO <sub>2eq</sub>	2,147,254
Capital goods	tCO <sub>2eq</sub>	-
Fuel and energy-related activities (not included in Scope 1 or Scope 2)	tCO <sub>2eq</sub>	103,187
Upstream transportation and distribution	tCO <sub>2eq</sub>	348,847
Waste generated in operations	tCO <sub>2eq</sub>	29,096
Business travelling	tCO <sub>2eq</sub>	7,327
Employee commuting	tCO <sub>2eq</sub>	3,522
Upstream leased assets	tCO <sub>2eq</sub>	-
Downstream transportation	tCO <sub>2eq</sub>	-
Processing of sold products	tCO <sub>2eq</sub>	-
Use of sold products	tCO <sub>2eq</sub>	-
End-of-life treatment of sold products	tCO <sub>2eq</sub>	-
Downstream leased assets	tCO <sub>2eq</sub>	-
Franchises	tCO <sub>2eq</sub>	-
Investments	tCO <sub>2eq</sub>	-
<b>Total GHG emissions</b>		
Total GHG emissions (location-based)	tCO <sub>2eq</sub>	3,053,925
Total GHG emissions (market-based)	tCO <sub>2eq</sub>	3,056,022
<b>Biogenic emissions</b>	<b>Unit</b>	<b>2024</b>
Scope 1	tCO <sub>2</sub>	2,298
Scope 2	tCO <sub>2</sub>	0
Scope 3	tCO <sub>2</sub>	699
<b>GHG intensity based on net revenue</b>	<b>Unit</b>	<b>2024</b>
Total GHG emissions (location-based) based on net revenue	tCO <sub>2eq</sub> /M€	259
Total GHG emissions (market-based) based on net revenue	tCO <sub>2eq</sub> /M€	259
Scope 1 and 2 GHG emissions (market-based) based on net revenue <sup>58</sup>	tCO <sub>2eq</sub> /M€	35.3

<sup>58</sup> This ratio is used in the Group's ESG Plan as the metric for the Scope 1 and 2 GHG emissions (market-based) reduction target.

It is important to note that the infrastructures for which the Group generates emissions during their construction in turn generates benefits that are very significant in terms of avoided or reduced emissions once they have been rolled out. In addition, while the emissions generated by the Group are temporary (as they only take place during the construction period), the environmental benefits arising from the use of the infrastructure are nearly permanent given that many works have a useful life of between 80 to 100 years if not longer.

## Pollution

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Improvement in the quality of water resources and receiving waters through purification plants and/or the building of sewerage infrastructure that reduces the presence of pollutants in water	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>• <i>Environment</i></li> <li>• <i>Local communities</i></li> </ul>	X			X		
Generation of pollutants (e.g, NOx, SOx and PM10) by the value chain	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>• <i>Environment</i></li> <li>• <i>Local communities</i></li> </ul>	X			X		

Webuild's own operations do not generate significant pollutants<sup>59</sup> thanks to its sustainable practices and efficient internal processes, which minimise its environmental impact. Atmospheric pollution mostly derives from upstream value chain activities, such as the production of materials and procurement of resources, where the emissions come from industrial processes and transportation of goods.

The construction of drinking water, desalination and purification plants, works to upgrade wastewater management infrastructure and drinking water and irrigation water storage systems means that Webuild contributes to improving the water resources. Its projects fall into the Clean Water category and respond to the specific needs of territories increasingly affected by increasingly frequent extreme weather conditions as well as the pollution of rivers and water basins.

More information about the processes to identify and assess the material impacts, risks and opportunities linked to this topic is provided in the "Description of the processes to identify and assess material impacts, risks and opportunities" chapter in the "General information" section.

### Policies

[E2-1]

Webuild's environmental management system ensures ongoing oversight and the adoption of effective policies to manage the environmental impacts of its operations and those of its value chain. Specifically, the Group requires its suppliers and subcontractors to comply with the integrated management system and has introduced a disciplinary system to guarantee compliance with environmental and safety standards. Its policies (Environmental Policy, Sustainability Policy, Code of Ethics, Suppliers' Code of Conduct and the Environmental Code of Conduct among others) actively promote the reduction of the entire value chain's environmental impact. More information is available in the "Climate change" chapter and the "Integrated Environmental management system" chapter of this section.

<sup>59</sup> The assessment is based on Regulation (EC) no. 166/2006, under which Webuild's operations are not included in the list of activities in Annex I.

## Actions

[E2--2]

As already described, compared to other industrial sectors, the construction sector is not a significant source of direct atmospheric pollutants. Moreover, polluting emissions (such as NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub>) mostly derive from the value chain's operations and chiefly, transport and earthworks, especially in dry areas with little rain. Management of these emissions throughout the value chain is thus essential and the Group has introduced mitigation measures, which it also requires its suppliers and subcontractors to comply with.

The main actions adopted to reduce upstream value chain pollution are:

- **Preventative and regular maintenance schedules for plant and vehicles:** in addition to these schedules, the Group is progressively renewing its excavation equipment by introducing Stage V and Euro 6 compliant vehicles, which are also used by suppliers and subcontractors to build infrastructure and that decrease the emissions of NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub>, thus contributing to an improvement in air quality.
- **Design of mobility in the work sites:** when designing infrastructure, the Group deploys a safe and sustainable approach to mobility with specific measures to also manage polluting emissions. It performs a preliminary analysis of the access routes and logistics to optimise the work site tracks and reduce the number of kilometres travelled. Regulating the access of heavy vehicles optimises traffic flows, improving efficiency and reducing excess emissions both within the work sites and in the surrounding areas. This approach complies with ISO 39001 and promotes the safer, more efficient and sustainable mobility in the work sites and nearby areas, which has a positive impact throughout the value chain.
- **Collective transport service:** this service eliminates the need for personnel in the base camps and value chain workers to organise individual travel arrangements.
- **Local procurement:** to reduce transport-related pollutants (in 2024, 67% of the purchased materials were sourced within 160 km of the work sites). When agreed with customers and compliant with local regulations, Webuild builds increasingly low-carbon infrastructure to minimise the emission of NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub> along the value chain.

In addition, works for purification and sewerage systems to improve the quality of the water resources and receiving waters and limit the emission of pollutants are designed during the pre-construction phases carried out by the upstream value chain to ensure a sustainable approach to water management, so that these projects also have a positive impact on the water ecosystem.

As the above actions are an integral part of the Group's normal operations, they did not entail significant non-recurring investments or costs in 2024.

## Targets

[E2-3]

Well-aware of the importance of protecting the environment, Webuild is committed to strengthening its oversight and prevention approach in line with its values, changes in regulations and international best practices. Its aim is to minimise atmospheric emissions although it has not yet formalised public measurable targets in this respect.

Moreover, the Group holds that proper water management is essential and undertakes to safeguard its availability and quality for future generations. To this end, it plans to make significant investments to develop innovative infrastructure, such as desalination plants, drinking water and wastewater treatment systems, upgrade transport infrastructure and civil buildings to improve their resilience, and to carry out hydraulic works in urban areas to combat water pollution with the active involvement of its entire value chain.

Webuild's commitment is acknowledged by its ranking as the no. 1 contractor in the sanitary & storm sewers sector and the dams & reservoirs sector by Engineering News-Record (ENR), the most important international magazine for the construction sector. Both these sectors are strategic for the resilience of territories to withstand extreme weather events and to combat water scarcity.



## Water

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Exploitation of water resources due to the consumption of water for own operations, especially in water stressed areas	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>Environment</li> <li>Local communities</li> <li>Governments &amp; public administrations</li> </ul>		X		X		
Exploitation of water resources due to the withdrawal and consumption of water for the upstream value chain's operations, especially in water stressed areas	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>Environment</li> <li>Local communities</li> <li>Governments &amp; public administrations</li> </ul>	X			X		

More information about the processes to identify and assess the material impacts, risks and opportunities linked to this topic is provided in the "Description of the processes to identify and assess material impacts, risks and opportunities" chapter in the "General information" section.

### Policies

[E3-1]

Webuild is firmly committed to the responsible management of water as it is fully aware of its limited availability and, therefore, how important it is to preserve it for future generations. The Group has a multi-faceted approach, deploying protection and prevention systems to ensure the efficient, sustainable and innovative use of water both in its own operations and along the value chain. It has formalised these principles in the Environmental Policy, the Suppliers' Code of Conduct and the Environmental Code of Conduct (see the "Climate change" chapter and the "Integrated environmental management system" chapter of this section).

### Actions

[E3-2]

The Group's main actions in place to ensure efficient water management are set out below.

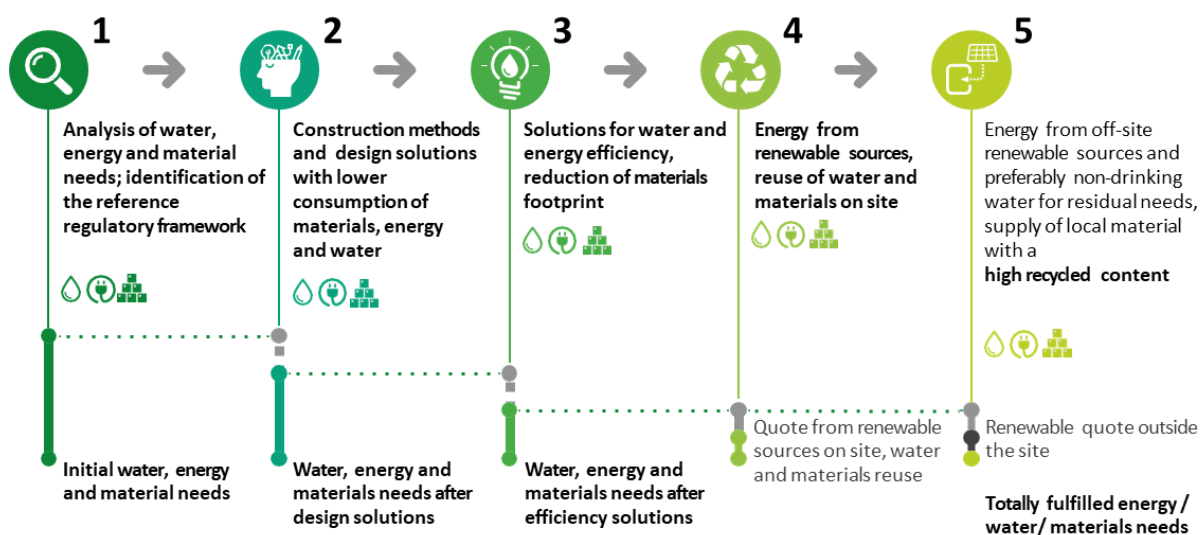
Webuild has drawn up a low-carbon, sustainable work site strategy as summarised in the figure below. The aim is to deploy specific construction methods to reduce the use of water, energy and materials during construction.

This strategy has five phases: the first phase involves identifying the regulatory and mandatory constraints on work sites and the identification of their water, energy and materials requirements. The second phase identifies design solutions and construction methods to reduce the requirements identified in the previous phase. Water and energy efficiency solutions are identified in the third phase as well as solutions to reduce the climate and environmental footprint of materials for an additional reduction in water, energy and materials requirements. These optimisations allow the Group to decrease its initial requirements.

It then obtains the energy, water and materials resources on site, meeting part of the requirements using internal resources and thereby reducing the impact on the biosphere and the work site's impact. An example

is decreasing a work site's use of virgin and/or drinking water by reusing rainwater or industrial and drainage water recovery systems. Another example is the introduction of the Webuild Water Efficiency optimisation system developed inhouse and described in more detail later.

In the fifth and final phase, the Group covers its remaining requirements through off-site resources, procured in a sustainable manner: it favours the use of non-drinking water rather than drinking water for industrial requirements, the use of energy from certified renewable sources and the use of low-carbon materials that are recycled in part and locally sourced in order to reduce transport emissions.



WWE – *Webuild Water efficiency* is a water optimisation system developed by the Group. This an innovative monitoring system for the remote digitalised mapping of water resources means it can locate water losses and immediately repair them, identify waste, reduce water consumption and ensure efficiency. The WWE system monitors two parameters, the water efficiency parameter and the water autonomy parameter. These provide an immediate overview of how the water management system is working and the work site's autonomy to ensure they are always at maximum levels. The Group is rolling out the system to its work sites.

In addition, Webuild has designed a green Tunnel Boring Machine (TBM) that can operate with less water than the traditional TBMs thanks to the optimisation of the on-board systems and devices to improve the excavation and of the numerous related functions and equipment. Green TBMs, engineered with the help of the manufacturers, can operate at lower temperatures than the traditional TBMs, thus requiring a smaller number of cooling cycles which implies a reduction in water losses through the cooling towers. More information about this innovative transformation is available in the "Innovation and digitalisation" chapter of the "Governance information" section.

As the above actions are an integral part of the Group's normal operations, they did not entail significant non-recurring investments or costs in 2024.

## Targets

[E3-3]

Although it has not yet formalised public measurable targets, Webuild continues its commitment to the optimised use of resources and the reduction of its environmental footprint through the implementation of mitigation actions (prevention, protection and precautionary) identified during its environmental risk assessment and by providing its own workers and value chain workers with the proper training (more information is available in the "Integrated environmental management system" chapter of this section). It will continue to protect territories, ensuring that environmental incidents with serious negative impacts do not take place. It will also make production processes more efficient, increasing the efficiency and effectiveness of

the use of local raw materials and reusing (in line with the applicable legislation) water resources and materials in order to reduce the percentage of recycled/recovered waste. Webuild will also assess its water management cycle and machinery to identify further opportunities to mitigate impacts.

## Metrics

The Group is committed to optimising the use of water, especially in areas of high-water stress. Whenever possible under local legislation, it minimises the use of drinking water and prefers to use wastewater from treatment plants as industrial water in its production processes.

### Water consumption

[E3-4]

The next table shows the Group's drinking water consumption<sup>60</sup>, the water intensity ratio<sup>61</sup> and withdrawals by source.

Water consumption is calculated as the difference between the volume of water withdrawn and discharged.

In 2024, the Group recycled and reused approximately 3.8 million cubic metres of water, equal to 25% of water withdrawn. Specifically, 49% of the water withdrawn in water-stressed areas is recycled/reused<sup>62</sup>.

Stored water is calculated considering the volume in water storage tanks at the work sites stored to cover any periods in which water is unavailable to ensure work continuity<sup>63</sup>.

Water consumption	Unit	2024
Water consumption	m <sup>3</sup>	599,145
Water consumption in areas at high water risk	m <sup>3</sup>	1,796,405
Water consumption in areas of high-water stress	m <sup>3</sup>	1,460,137
Recycled and reused water	m <sup>3</sup>	3,832,187
Stored water	m <sup>3</sup>	289,660
Change in volume of stored water	m <sup>3</sup>	-
<b>Water intensity</b>	m <sup>3</sup> /€m	51
Water withdrawals	Unit	2024
Wells	m <sup>3</sup>	2,379,672
Rivers	m <sup>3</sup>	10,421,979
Lakes	m <sup>3</sup>	158,166
Sea	m <sup>3</sup>	-
Aqueducts	m <sup>3</sup>	1,713,530
Water produced at work site (e.g., drainage)	m <sup>3</sup>	928,089
<b>Total</b>	m <sup>3</sup>	15,601,437

<sup>60</sup> Water with concentration of total dissolved solids of ≤ 1,000 mg/litre.

<sup>61</sup> The water intensity ratio is calculated considering note 33 "Revenue and other income" to the consolidated financial statements.

<sup>62</sup> Areas at high water risk and very high water stress are those classified as high and extremely high risk by the Water Risk Atlas issued and managed by World Resources Institute.

<sup>63</sup> If a work site has more than one water storage tank, the volumes are added together. Water stored in tanks for fire-fighting purposes and rainwater are not included in the calculation.

## Biodiversity and ecosystems

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Impacts on biodiversity due to the construction of works, affecting the ecosystems and biodiversity and the cultural/landscape/archaeological heritage of the areas surrounding the operating sites	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>• <i>Environment</i></li> <li>• <i>Local communities</i></li> </ul>	X					X

The loss of biodiversity is a global event affecting an increasing percentage of natural habitats, accelerated by climate change and pollution.

Infrastructure works can mitigate the impact of human activities on biodiversity, such as hydraulic engineering projects to reduce the pollution of water bodies (rivers, lakes, wetlands, oceans) the Group is carrying out in various parts of the world.

On the other hand, these works could also have a potential impact on biodiversity in certain contexts. As described in the “Strategy, business model and value chain” chapter of the “General information” section, this happens upstream of the Group’s operations.

It performs a dedicated biodiversity assessment, which may be part of the environmental impact assessment or an environmental social impact assessment (ESIA) for each project in line with the applicable legislation. Once it has identified biodiversity-sensitive areas, as defined by the national legislation and international guidelines<sup>64</sup>, it determines the potential negative impacts and related mitigation measures. Implementation of these latter measures, when appropriate, ensures the safeguarding and oversight of the ecosystem and services in order that the work’s residual impact is acceptable or eliminated (this may also involve identifying compensation actions).

Ecosystem and biodiversity protection is central to Webuild’s strategy, as is their monitoring and management along its value chain. The Group has dedicated procedures to protect the ecosystem, flora and fauna, biological diversity and the cultural/landscape and archaeological heritage of the areas around its work sites that comply with social and environmental requirements of the applicable regulations, contracts and provisions of the competent authorities communicated when they approve the impact assessments (more information is available in the “Integrated environmental management system” caption of this section).

Roughly 31% of the areas where it worked in 2024 (more than 2,200 square kilometres) is inside biodiversity-protected areas while around 53% is adjacent to such areas.

### Policies

[E4-2]

Webuild acknowledges biodiversity protection as a fundamental principle and is committed to complying therewith throughout the construction of the infrastructure. Thanks to the adoption of environmental criteria

<sup>64</sup> Sensitive areas include the Natura 2000 protected areas network, the UNESCO World Heritage Sites and key biodiversity areas, as well as other protected areas identified at country and local level.

in the project design phase, the scrupulous preliminary assessment of the impacts on ecosystems, it is able to reduce land consumption and prevent the fragmentation of natural habitats.

By extending its environmental management system and internal regulations along the value chain, Webuild encourages suppliers and subcontractors to adopt sustainable practices, the responsible use of resources and the adoption of environmental mitigation and offset measures.

These essential and non-negotiable principles are applied to all business areas and all levels of the value chain to cover the main environmental aspects of the construction sector.

More information on the Environmental Policy, the Sustainability Policy, the Suppliers' Code of Conduct and the Group's Environmental Code of Conduct is provided in the "Climate change" and "Integrated environmental management system" chapters of this section.

## **Actions**

[E4-3]

Webuild manages biodiversity in many various operating phases of its value chain, involving a large number of actors.

Upstream, infrastructure projects are planned by public or private sector proponents that carry out essential preliminary activities to identify the development areas, perform feasibility studies and comply with mandatory social and environmental procedures. They are supervised by public authorities (ministries, state environmental protection agencies, local bodies) that assess the thoroughness of the social and environmental impact studies, the consultation programmes and mitigation plans. Only after approval from the competent authorities do the projects obtain the necessary permits and social and environmental authorisations.

Webuild intervenes in the subsequent phase, i.e., during performance of the works, and adopts solutions to mitigate the environmental impacts of its construction activities, including those related to biodiversity. While primary responsibility for the work's impact on the natural environment remains with the project proponents, Webuild performs a robust environmental risk assessment as part of its work to identify, assess and manage potential material impacts. This procedure also covers its subcontractors and suppliers in the form of requirements and contract terms they are obliged to satisfy. More information about the environmental risk management process is available in the "Integrated environmental management system" chapter of this section.

In addition, Webuild has put in place biodiversity protection measures which are even more robust when the work sites are located in areas of special natural, cultural or archaeological interest. For example, Webuild organises the works programme considering the biological rhythms of wildlife, such as breeding seasons and seasonal migrations. This involves drawing up special plans to protect the local ecosystems, such as the capture and controlled relocation of animals to safe areas or the gradual occupation of areas to encourage the natural movement of fauna to surrounding areas. The Group creates wildlife corridors for small animals at the "linear" work sites (roads, railways) using state-of-the art technologies to monitor and protect biodiversity. These include satellite systems and distance monitoring tools to map the impact of the work sites' activities on sensitive flora and habitats, or environmental sensor systems to intercept and monitor local fauna using appropriate protection measures.

In order to mitigate the risk of soil erosion due to excavations and aggravated by weather events (rain, wind), the Group takes specific soil protection measures consisting of systems to consolidate excavation fronts and to channel rainwater, as well as covering more exposed areas (e.g., escarpments) and planting trees that mitigate erosion. The mitigation measures are determined considering the natural elements, the environment and features of the territory.

Once construction has been completed, the work sites clean up the areas affected by their work, such as access roads, plants, installations, quarries and deposits to return the areas to their original conditions, where necessary, in line with the contractual terms and current regulations. These restoration activities facilitate natural revegetation, prevent soil erosion and improve soil stability. They may also include reforestation.

In addition, any land reclamation activities, if provided for in the contract and necessary due to previous contamination, are agreed with the customers and performed in line with the competent authorities' instructions.

The main protection and remediation activities performed by the Group are shown below.

Protection and remediation activities	Unit	2024
Reforested area	m <sup>2</sup>	604,729
Restored areas	m <sup>2</sup>	2,020,392

The Group prioritises awareness-raising and training of work site personnel (both own and value chain workers) who are provided with information and training sessions on biodiversity, the landscape and archaeology. It ensures that all operators are properly trained to prevent and manage environmental impacts in a responsible manner.

A concrete example of activities to protect biodiversity (by a customer) is the Pergenova Breakwater project to build a breakwater at the Genoa Port. During the preliminary design phase and the pre-operations phase, surveys were conducted which identified the presence of encrusting organisms and organogenic conglomerates (gorgonians) in the part of the seabed between the existing breakwater and the footprint of the new breakwater to be built. This stretch of seabed required a translocation intervention. In accordance with the project plan, the encrusting organisms and organogenic conglomerates have been transferred to the Genoa Aquarium, where they will be kept until the end of the construction activities, before being subsequently reintroduced into their natural environment.

At the same time, several management measures have been implemented to raise awareness of boats and companies operating in the sector on the importance of responsible whale watching such as, for example, communications to inform boats of the Code of Good Conduct in the case of encounters with whales or awareness raising for companies that organise whale watching and other trips.

These initiatives are not only designed to protect the marine environment but also to foster sustainable and respectful practices among boating and ship personnel.

As the above actions are an integral part of the Group's normal operations, they did not entail significant non-recurring investments or costs in 2024.

## Targets

[E4-4]

The focus on biodiversity and ecosystems reflects Webuild's commitment to protect and enhance the natural heritage in line with stakeholders' expectations and the Group's values, although the Group has not yet formalised public measurable targets.

While it is aware that the main challenges for biodiversity arise in the early stages of the value chain, Webuild is committed to strengthening its biodiversity monitoring and prevention in line with its values, the changing regulations and international best practices in order to reinforce its oversight of this matter. The Group's global commitment is to manage the local situations in order to not simply protect the natural heritage but also to enhance it.

## Resource use and circular economy

### Resource inflows, including resource use

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Exploitation of natural resources due to the use of raw materials, mostly not renewable (e.g., aggregates, iron, cement and backfill) in own operations	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>Environment</li> </ul>		X		X		
Unavailability or delays in the procurement of materials and machinery	<b>Risk</b>			X		X	X	

More information about the processes to identify and assess the material impacts, risks and opportunities linked to resource use and the circular economy is provided in the “Description of the processes to identify and assess material impacts, risks and opportunities” chapter in the “General information” section.

## Policies

[E5-1]

Protection of the environment is vitally important to the Group which integrates this approach into all its operations. The principles enshrined in the Environmental Policy and Environmental Rules set out clear-cut and well-defined guidelines to limit extractions from the biosphere, especially for non-renewable sources, and to encourage recovery and reuse, especially in the case of raw materials.

More information about the Environmental Policy, the Sustainability Policy, the Code of Ethics, the Suppliers’ Code of Conduct and the Environmental Code of Conduct is provided in the “Climate change” chapter of this section.

## Actions

[E5-2]

The Group has a low-carbon, sustainable work site strategy to ensure the efficient management of material resources, designed to reduce work site requirements and thus limit the extraction of resources from the biosphere (see the “Water” chapter of this session for more information about the low-carbon, sustainable work site strategy).

This strategy is in line with the principles of the circular and green economy, designed to minimise (when possible) the use of natural resources, including through their reuse. Similarly, it encourages the recovery of waste materials in the same project or surrounding areas.

It achieves this through innovative solutions and the optimisation of resources inside the work sites in accordance with the ruling regulations and design and construction requirements. Procurement from external sources is guided by sustainability considerations, favouring the use of local resources, reducing transport distances, scouting innovative materials and the use of non-drinking water when possible.

Webuild considers the entire life cycle of the infrastructure and not just the construction phase, and encourages stakeholders to follow this approach. Designers are required to adopt a life cycle approach and to comply with the main certification protocols for infrastructure and buildings. Subcontractors must adopt Webuild's environmental management system while suppliers are required to comply with the Suppliers' Code of Conduct and Environmental Rules. The Group also works with strategic suppliers, including universities and research institutes, to identify and develop innovation solutions.

The main initiatives introduced by the Group to limit the exploitation of natural resources in its operations are described below.

Construction of motorways, bridges, dams, railway and metro lines and civil and industrial buildings requires the use of large quantities of raw materials, most of which are non-renewable, such as aggregates, iron, cement and backfill. For this reason, Webuild is engaged on all fronts to optimise the use of these materials at its work sites through:

- **Value engineering processes:** designed to reduce the quantities of materials used or their replacement by more innovative and high performing materials (more information is available in the "Actions" paragraph of the "Innovation and digitalisation" chapter in the "Governance information" section).
- **Excavated soil balance:** excavated earth and rocks are classified and stored in batches at the work sites for reuse in the industrial processes when possible and in compliance with law, for example, to produce aggregates for concrete or the construction of embankments and other backfills as required by the projects, or sold to third parties for external use. During the year, 53% of the excavated materials was reused<sup>65</sup>.
- **Cement mix-design optimisation:** development of special optimised concrete mixes with a low cement content or that include cement substitutes from other industrial sectors (e.g., the iron and steel sector) to allow a reduction in the use of cement of up to 65%. During the year, more than 350,000 low-impact cement materials were used.
- **Recycled materials or materials with a high recycled content:** greater use of steel with a higher recycled content; in 2024, 51% of the steel used was low-carbon steel with recycled content equal to or greater than 90%. It also used recycled asphalt for 29.5% of the total.
- **Optimisation of the segment geometry and/or use of fibre-reinforced segments:** the improved design of the segments means less material consumption and greater structural efficiency. The steel used in fibre-reinforced segments is up to 40% less than that required for traditional segments.

Finally, the Group has developed a circularity tool to facilitate the transition of projects from a production system and linear methodology to a circular system, while minimising resource wastage and optimising its use.

Webuild Circular is a tool, currently being digitalised, which will be used to assess and measure the circular output of a project in terms of the work being built and the work site by performing a qualitative analysis of the level of maturity and dissemination of circular economy principles along the project's entire value chain, considering its lifecycle from its design and planning to the end of its life and a new life. The tool's design complies with the main reference standards for a circular economy. The application of Webuild Circular is central to the adoption of mitigation and reduction measures to improve project performance in both environmental and economic terms, as well as the Group's performance when considering the various projects as a whole.

As the above actions are an integral part of the Group's normal operations, they did not entail significant non-recurring investments or costs in 2024.

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<sup>65</sup> The materials reused during the year may include excavated materials from previous years.



## Targets

[E5-3]

The Group is fully committed to maximising the reuse, recycling and recovery of materials. It promotes sustainable, low-environmental impact practices although it has not yet formalised public measurable targets in this respect. Specifically, during the design and planning of projects, this leads to benefits in terms of the circular economy (reuse of materials), decarbonisation (reduction of emissions associated with transport and procurement) and interaction with the territory.

## Metrics

### *Resource inflows*

[E5-4]

Webuild's operations such as the construction of motorways, bridges, dams, railway and metro lines and civil and industrial buildings require the use of large quantities of raw materials, which are mostly non-renewable, such as aggregates, iron, cement and backfill. However, it can also use recycled or recovered materials.

The environmental assessments made at the start of a new project consider these aspects and the related mitigation measures are designed to ensure the efficient management of these resources (more information is available in the "Integrated environmental management system" chapter of this section).

The main raw materials used by the Group in the reporting period are shown below<sup>66</sup>.

The data used to calculate the quantities of materials used at the Group's work sites in 2024 are taken from the reporting systems used by the work sites (e.g., cost accounting and warehouse records).

Materials used	Unit	2024
<i>Principal technical construction materials</i>		
Bitumen	t	39,891
Cement	t	529,707
Steel	t	382,594
Ready-mixed and pre-cast concrete	t	6,111,577
Ready-mixed asphalt		694,479
Aggregates and sand	t	17,367,092
<i>Principal biological materials</i>		
Wood	t	19,827
<b>Total</b>	t	25,145,168

<sup>66</sup> The Group did not use biofuel for non-energy uses while the percentage of wood used compared to total materials used is 0.1%. Specifically, it used roughly 110 tonnes of FSC (Forest Stewardship Council) certified wood.

## Waste

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Negative environmental impacts of waste generated in operations damaging the territories and with negative consequences for human health if not properly disposed of	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>• <i>Environment</i></li> <li>• <i>Local communities</i></li> </ul>		X		X		
Environmental impacts of the generation of waste materials in the end-of-life phase of the work	<b>Actual negative impact</b>	<ul style="list-style-type: none"> <li>• <i>Environment</i></li> <li>• <i>Local communities</i></li> </ul>		X	X	X		

More information about the processes to identify and assess the material impacts, risks and opportunities linked to resource use and the circular economy is provided in the “Description of the processes to identify and assess material impacts, risks and opportunities” chapter in the “General information” section.

## Policies

[E5-1]

Protection of the environment is a priority for the Group, which prioritises this mission in all its operations. The principles enshrined in the Environmental Policy and the Environmental Rules establish transparent, strict guidance to limit waste generation, define its classification, ensure its separation and storage in the designated areas and prevent its dispersion into the ground, watercourses or aquifers either as part of its own operations or in the value chain.

More information about the Environmental Policy, the Sustainability Policy, the Code of Ethics, the Suppliers’ Code of Conduct and the Environmental Code of Conduct is provided in the “Climate change” chapter of this section.

## Actions

[E5-2]

Waste generated during construction of large-scale infrastructure can be grouped into two separate categories: municipal waste and special waste. Municipal waste is generated by logistics sites where the support activities for the industrial production are carried out such as offices, accommodation for non-resident workers and canteens. Special waste is generated by the actual industrial activities, such as construction, plant operation and the workshops.

Management flows of the various types of waste is optimised to minimise its generation and related impacts throughout the production cycle, right from the design and work site planning phase. Waste is accordingly collected, sorted and stored in designated enclosed areas from which it is taken to be transferred to third parties authorised to recycle/dispose of the waste.

An excellent example for several years now is Sant’Agata, the consortium building the Bicocca - Catenanuova section of the high-capacity Palermo - Catania railway line: since 2021, it has sent more than 99% of the waste generated each year for recovery.

Other projects, like the Ruta del Sol project in Colombia, creatively and innovatively reuse materials: the floating barrier (Biobardas) is made of plastic bottles to retain suspended anthropogenic polluting material present on the surface of the river following its dumping/discharge by third parties.

Overall, all the Group's projects make excellent progress in this area, thanks to the scrupulous management of waste at the work sites, which all apply a waste categorisation system to maximise the quantities sorted for reuse, or the recovery of materials and energy rather than sending waste to the landfill or for incineration without recovering the energy. During the year, 91% of the non-hazardous construction and demolition waste generated was sent for reuse or recovery.

As the above actions are an integral part of the Group's normal operations, they did not entail significant non-recurring investments or costs in 2024.

## Targets

[E5-3]

Webuild continues to prioritise the optimal use of resources and reduction of its environmental footprint. Specifically, the Group strives to limit waste generation, minimise hazardous waste generated and increase its reuse, recycling and recovery while sending as little waste possible to landfills. Construction methods are designed to reduce the need for materials and the concurrent generation of waste. The Group optimises the management of the different types of waste to reduce it and the related impacts starting from the design and planning of the work site start-up phases.

Group management regularly reviews environmental performances and the management system's strengths and weaknesses. Although it does not publish them, Webuild sets objectives for the subsequent period to ensure ongoing improvement.

## Metrics

### *Quantities of waste generated*

[E5-5]

The Group's performance is set out below<sup>67</sup>. The data refer to waste generated by the contracts (including waste generated by subcontractors) in line with the applicable regulations. When the data are expressed as a volume, the related weight is calculated using specific conversion factors. Information about the allocation methods for EU projects (i.e., how the waste is treated: recovery or disposal) is based on EU regulations. The methods used for non-EU projects reflect the conditions of the contracts agreed with third party waste management companies.

69% of the waste generated is from excavations, which significantly affects Webuild's global waste performance. It is classified as waste in line with the applicable regulations and its possible internal and/or external reuse, which varies depending on the projects' characteristics and the material's geotechnical characteristics which the Group cannot always influence.

The remainder mostly consists of construction or demolition waste (including waste from plants), such as, for example, cement, mortar, asphalt, copper, wood or sludge from water treatment, while the general waste component is minimal (for example, cardboard and packaging).

The percentage of waste recovered, reused and recycled is 68% for the year.

Hazardous waste is a marginal part of the waste generated in the Group's projects (4% in 2024). Normally it involves paint, additives and solvents, used oil and oil filters from vehicle maintenance, batteries, rechargeable batteries and, in some cases, earth and sludge.

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<sup>67</sup> No radioactive waste is produced.

Waste	Unit	2024
<b>Waste generated</b>	t	4,402,567
<b>Hazardous waste diverted from disposal</b>	t	4,242
Hazardous waste diverted from disposal through reuse	t	3,258
Hazardous waste diverted from disposal through recycling	t	549
Hazardous waste diverted from disposal through other recovery operations	t	435
<b>Non-hazardous waste diverted from disposal</b>	t	2,972,016
Non-hazardous waste diverted from disposal through preparation for reuse	t	1,485,207
Non-hazardous waste diverted from disposal through recycling	t	459,732
Non-hazardous waste diverted from disposal through other recovery operations	t	1,027,076
<b>Hazardous waste directed to disposal</b>	t	168,818
Hazardous waste directed to disposal through incineration	t	8
Hazardous waste directed to disposal through transport to landfill	t	42,293
Hazardous waste directed to disposal through other disposal operations	t	126,517
<b>Non-hazardous waste directed to disposal</b>	t	1,257,492
Non-hazardous waste directed to disposal through incineration	t	796
Non-hazardous waste directed to disposal through transport to landfill	t	1,198,976
Non-hazardous waste directed to disposal through other disposal operations	t	57,720
<b>Non-recycled waste</b>	t	1,426,310
<b>Percentage of non-recycled waste</b>	%	32%
<b>Waste</b>	<b>Unit</b>	<b>2024</b>
Construction and demolition waste	t	1,224,139
Excavation waste	t	3,024,690
Waste from support activities	t	153,739
<b>Total waste generated (hazardous and non-hazardous)</b>	t	4,402,567

## EU taxonomy for sustainable economic activities

The European Union is leading the global transition to a sustainable, resilient and low-carbon economy in line with the Paris Agreement and UN's 2030 Agenda.

By adopting the EU Green Deal, the EU institutions have defined an integrated, ambitious strategy to make Europe carbon neutral by 2050. This strategy includes plans, investments and reforms, such as, in particular, the initiatives to direct private investments (in addition to public investments) towards sustainability objectives.

The most important initiative in this respect is the EU taxonomy, adopted with Regulation (EU) no. 2020/852 (the "Taxonomy Regulation"), the first EU-wide classification system designed to objectively and transparently establish the criteria for classification of economic activities as environmentally sustainable in order to protect investors from greenwashing and encourage companies to become more sustainable.

The Regulation defines six environmental objectives to be prioritised by the European Union (climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and protection and restoration of biodiversity and ecosystems). It establishes that economic activities can be classified as:

- eligible economic activities, i.e., those economic activities that meet the definition of at least one of the activities listed in the Delegated Acts adopted as per Regulation no. 2020/852, irrespective of whether these activities satisfy one or all of the technical screening criteria established by the European Commission;
- non-eligible economic activities, i.e., those economic activities that do not meet the definition of at least one of the activities listed in the Delegated Acts adopted as per Commission Delegated Regulation no. 2020/852;
- aligned economic activities, i.e., those economic activities that, in addition to being eligible, make a substantial contribution to the achievement of at least one of the six environmental objectives defined by the European Commission, do no significant harm to any of the other environmental objectives, pass the minimum social safeguards and comply with the technical screening criteria established by the European Commission.

In 2023, the European Commission completed its definition of the economic activities and the technical screening criteria for the other four environment objectives, i.e., the sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and protection and restoration of biodiversity and ecosystems<sup>68</sup>. Regulation (EU) no. 2020/852<sup>69</sup> requires that companies shall report the KPIs for the proportion of turnover, capital expenditure ("CapEx") and operating expenditure ("OpEx") associated with taxonomy-eligible, non-eligible and aligned economic activities for all six objectives in their financial statements at 31 December 2024.

Therefore, in 2024, Webuild refreshed and extended the assessment of the eligibility and alignment of its activities to include new initiatives, considering the additional economic activities related to the other four environmental objectives as well as an extension of the reporting boundary as set out in the "Reporting boundary" chapter of the "General information" section.

The taxonomy sectors and eligible economic activities for 2024 are set out below<sup>70</sup>.

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<sup>68</sup> Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

<sup>69</sup> Article 8 of the Taxonomy Regulation establishes that companies subject to Directive 2014/95/EU (Non-Financial Reporting Directive- NFRD) shall include in their non-financial statement "information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable". This requirement is completed by Commission Delegated Regulation no. 2021/2178 of 6 July 2021 (Disclosures Delegated Act) which specifies the information to be reported and the templates to use.

<sup>70</sup> CCM – Climate Change Mitigation, CCA – Climate Change Adaptation, CE – Circular Economy.

Sector	Code	Economic activities	Target
Protection and restoration activities	2.1	Restoration of wetlands	CCM - CCA
Energy	4.5	Electricity generation from hydropower (construction or operation of plant)	CCM - CCA
	4.29	Electricity generation from fossil gaseous fuels	CCM-CCA
Water supply, sewerage, waste management and remediation	5.1	Construction, extension and operation of water collection, treatment and supply systems	CCM - CCA
	5.3	Construction, extension and operation of waste water collection and treatment	CCM - CCA
	5.13	Desalination	CCA
Transport	6.14	Infrastructure for rail transport	CCM - CCA
	6.15	Infrastructure enabling low-carbon road transport and public transport	CCA
	6.16	Infrastructure enabling water transport	CCA
Construction	7.1 – 3.1	Construction of new buildings	CCM – CCA (7.1) CE (3.1)
	7.2 – 3.2	Renovation of existing buildings	CCM – CCA (7.2) CE (3.2)
Disaster risk management	14.2	Flood risk prevention and protection infrastructure	CCA

Specifically, the Group's activities were eligible for six taxonomy categories and 12 economic activities.

The energy sector plays an important role for the Group, which considered it as eligible within economic activity 4.5 (several projects involving the building of dams and the related power stations, as well as the upgrade of existing power stations to increase their capacity). In addition, following the extension of the analysis boundary in 2024, the Group added economy activity 4.29 (one project related to the construction of a gas turbine power plant, completed in the first half of the year).

With respect to the transport sector, the Group's projects related to the construction of railway and metro lines and stations, and the design and extension or development of high-speed railway line sections (economic activity 6.14) are eligible, while projects for the building and expansion of roads and motorways and the design and building of tunnels and bridges fall under economic activity 6.15, and a project for the construction of a new pier connected to the mainland falls under economic activity 6.16.

Webuild is also active in the civil and industrial building sectors and identified building construction and restructuring projects as eligible. They include projects for the construction of new residential buildings such

as villas and large-scale housing projects as well as non-residential buildings like underground multi-storey car parks, hospitals and laboratories, and the restructuring of a military naval base and a military air base.

Webuild is a global leader in the water infrastructure sector as it is active throughout the entire water cycle, from drinking water and irrigation supplies thanks to the design and construction of plants included in economic activities 5.1 and 5.13<sup>71</sup> to the construction of waste water collection and treatment systems, which are included in economic activity 5.3.

A project to restore wetlands and contain wastewater is eligible as part of economic activity 2.1, while economic activity 14.2<sup>72</sup> includes projects to build, raise or restore embankments to avoid flooding of waterways.

Webuild Group has extended its eligibility assessment to the activities included in the four new objectives which shows that activities 3.1 (Construction of new buildings) and 3.2 (Renovation of existing buildings) are eligible for the transition to a circular economy objective.

The Group is committed to reporting all those economic activities that have the same description for more than one environmental objective as eligible for several objectives in line with the guidance published by the European Securities and Markets Authority (ESMA)<sup>73</sup>. In addition, as required by the ESMA in October 2024<sup>74</sup>, it assessed the alignment with all the objectives for which an economic activity is eligible. At present, the Group does not have economic objectives aligned with more than one objective.

### Alignment assessment

The European Taxonomy defines an economic activity as aligned when it complies with all the technical screening criteria and specifically, when it:

- a) contributes substantially to at least one of the six environmental objectives;
- b) causes no significant harm (Do No Significant Harm - DNSH) to any of the other environmental objectives;
- c) meets the minimum safeguards.

Webuild assessed its projects' alignment applying the technical screening criteria (defined in the Climate Delegated Act<sup>75</sup>) on an extensive basis, i.e., not limiting the assessment to just the work site/construction activities specifically mentioned in the Delegated Acts but extending it to the design and operating characteristics of the infrastructure. It took this approach to give a better understanding of how environmentally sustainable the projects it participates in are, in addition to those activities closely related to its core business.

Webuild drew up a special checklist which complied with all the regulatory requirements and compiled it with the involvement of the competent departments and units. The process to assess its projects' alignment also included dedicated meetings and the acquisition of any necessary supporting documentation.

Webuild included the in-scope entities based outside the EU in the assessment to check whether they acted in compliance with EU legislation, the equivalent applicable national law or international standards applied in a third country. This allowed it to comply with the reporting requirements of the Regulation which cover all economic activities performed by entities subject to the Non-Financial Reporting Directive (NFRD) regardless of their geographical location.

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<sup>71</sup> Economic activity introduced with Commission Delegated Regulation (EU) 2486 of 27 June 2023.

<sup>72</sup> Economic activity introduced with Commission Delegated Regulation (EU) 2486 of 27 June 2023.

<sup>73</sup> Section 2 of the European common enforcement priorities for 2023 annual financial reports of 25 October 2023, published by ESMA, setting out the priorities for taxonomy reporting, notes the importance of considering economic activities as eligible for more than one objective when they have the same description.

<sup>74</sup> Section 2 of the European common enforcement priorities for 2024 corporate reporting of 24 October 2024, published by ESMA, setting out the priorities for taxonomy reporting, notes the importance of considering economic activities as eligible and aligned for more than one objective.

<sup>75</sup> Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

## **Substantial contribution to the climate change mitigation objective**

### **Economic activity 4.5 Electricity generation from hydropower**

The aligned projects included in economic activity 4.5 have a power density of the electricity generation facility above 5 W/m<sup>2</sup>.

### **Economic activity 6.14 Infrastructure for rail transport**

The aligned projects included in economic activity 6.14 have an electrified trackside infrastructure and associated subsystems: infrastructure, energy, on-board control-command and signalling, and trackside control command and signalling subsystems as defined in Annex II.2 to Directive (EU) 2016/797.

### **Other economic activities**

Economic activities 2.1, 4.29, 5.1, 7.1 and 7.2 were assessed with regard to the climate change mitigation objective. However, after analysing the criteria and conditions, Webuild found that they did not fully comply with the requirement of making a substantial contribution to this objective.

## **Substantial contribution to the climate change adaptation objective**

The projects included in economic activities 2.1 Restoration of wetlands, 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings are aligned with the climate change adaptation objective, have performed a robust climate risk and vulnerability assessment and implemented the necessary physical and non-physical solutions (“adaptation solutions”) that significantly reduce the more important physical climate risks identified, including those listed in Appendix A to the Climate Delegated Act. In addition, Webuild checked that, for these projects, the climate risk and vulnerability assessment was proportionate to the scale of the activity and its expected lifespan, so that:

- a) for activities with an expected lifespan of less than 10 years, the assessment was performed at least by using climate projections at the smallest appropriate scale;
- b) for all other activities, the assessment was performed using the highest available resolution, state-of-the-art climate projections across the existing range of future scenarios consistent with the expected lifetime of the activity, including, at least, 10 to 30 year climate projections scenarios for major investments.

Specifically, Webuild assessed both compliance with these criteria for construction activities that usually fall under point a) due to their lifespan (i.e., less than 10 years) and compliance with the criteria for the infrastructure as if falls under point b) during its operation phase (i.e., with a lifetime of more than 10 years).

Webuild deems that the criteria for a substantial contribution to the climate change adaptation objective are met when either both the work site and the infrastructure jointly meet them or when just the construction activity meets them. Its construction activities are closely related to its core business and Webuild can act and direct its efforts and investments to make sure these alone are sustainable. In line with this approach, when the project is aligned, only its turnover, CapEx and OpEx deriving from the construction activities are considered to be environmentally-friendly.

Webuild assessed economic activities 4.5, 4.29, 5.1, 5.3, 5.13, 6.16, 7.2 and 14.2 also with respect to the climate change adaptation objective. However, after analysing the criteria and conditions, it found that these activities do not fully comply with the related requirement.

## **DNSH Climate change adaptation**

### **Economic activities 4.5 Electricity generation from hydropower and 6.14 Infrastructure for rail transport**

With respect to the projects that classify as economic activities 4.5 and 6.14, which are aligned for the climate change mitigation objective, the same considerations set out for the “Substantial contribution to the climate change mitigation objective” are true for the assessment of the “DNSH Climate change adaptation” criteria, as any adaptation solutions to be implemented are identified during the design phase and integrated over the construction of the infrastructure as required by the regulation: “For new activities and existing activities using newly-built physical assets, the economic operator integrates the adaptation solutions that reduce the most



important identified physical climate risks that are material to that activity at the time of design and construction and has implemented them before the start of operations.”<sup>76</sup>

## **DNSH Climate change mitigation**

### **Economic activity 2.1 Restoration of wetlands**

Projects included in economic activity 2.1, which are aligned for the climate change adaptation objective, have a restoration plan which complies with the principles and guidance of the Ramsar Convention on Wetlands about the restoration of wetlands or a management plan in line with the Ramsar Convention guidance for the planning of the management of Ramsar sites and other wetlands.

### **Economic activity 6.15 Infrastructure enabling low-carbon road transport and public transport**

With respect to projects included in economic activity 6.15, which are aligned for the climate change adaptation objective, the infrastructure is not dedicated to the transport or storage of fossil fuels. In addition, Webuild assessed the carbon footprint of infrastructure under construction and, if appropriate, used the shadow price of carbon to calculate the emissions.

### **Economic activity 7.1 Construction of new buildings**

With respect to projects included in economic activity 7.1, which are aligned for the climate change adaptation objective, buildings are not used for the extraction, storage, transportation or production of fossil fuels. In addition, the primary energy demand that defines the buildings’ energy performance after construction do not exceed the thresholds set for nearly zero-energy buildings (“NZEB”) under the applicable national regulations.

## **DNSH Sustainable use and protection of water and marine resources**

### **Economic activity 4.5 Electricity generation from hydropower**

Projects included in economic activity 4.5, which are aligned for the climate change mitigation objective, comply with the provisions of Directive 2000/60/EC or equivalent applicable national law or international standards that preserve the good quality of water and avoid water stress. In addition, projects undergo impact assessments to consider all their potential impacts on the status of water bodies within the same water basin and on protected habitats and species directly dependent on water. The cumulative impacts of the new project with other existing or planned infrastructure in the water basis are also assessed. Webuild then implements all the technically feasible and ecologically relevant mitigation measures to reduce adverse impacts on water as well as on protected habitats and species directly dependent on water. Finally, the projects do not cause any deterioration or compromise the good status or potential of the specific water body they are connected to nor water bodies in the same river basin district.

### **Economic activities 6.14 Infrastructure for rail transport, 6.15 Infrastructure enabling low-carbon road transport and public transport, 2.1 “Restoration of wetlands and 7.1 Construction of new buildings**

The projects included in economic activity 6.14, aligned for the climate change mitigation objective, and economic activities 2.1, 6.15, and 7.1, aligned for the climate change adaptation objective, undergo a risk assessment of environmental degradation related to preserving water quality and avoiding water stress. These risks are identified and addressed with the aim of achieving good water status and good ecological potential in line with Directive 2000/60/EC or equivalent applicable national law or international standards. Pre-treated brackish water withdrawn from the sea is not used at the work sites.

In addition, with respect to projects included in economic activity 7.1 (not for residential use), the plumbing fixtures installed comply with the following technical specifications: sink and washbasin taps have a maximum water flow of 6 litres/minute, showers have a maximum water flow of 8 litres/minute, toilets, including those coupled to a flush system, toilets and cisterns have a maximum full flush capacity of 6 litres and a maximum

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<sup>76</sup> Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021, Annex I- Appendix A.

average flush capacity of 3.5 litres, urinals use a maximum of 2 litres/bowl/hour. Flush-flushing urinals have a maximum full flush capacity of 1 litre.

#### **DNSH Transition to a circular economy**

##### **Economic activity 2.1 Restoration of wetlands**

For projects included in economic activity 2.1, aligned for the climate change adaptation objective, peat bogs are reduced to a minimum.

##### **Economic activities 6.14 Infrastructure for rail transport, 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings**

For projects included in economic activity 6.14, which are aligned for the climate change mitigation objective, as well as economic activities 6.15 and 7.1, aligned for the climate change adaptation objective, throughout the construction site's lifecycle, at least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material defined in category 17 05 04 in the European List of Waste) is prepared for reuse, recycling and other material recovery.

In addition, projects included in economic activity 7.1 are designed to be more efficient in terms of resources, adaptable, flexible and disassembly to allow their reuse and recycling.

Not applicable for activity 4.5.

#### **DNSH Pollution prevention and control**

##### **Economic activity 2.1 Restoration of wetlands**

With respect to projects included in economic activity 2.1, aligned for climate change adaptation, the use of pesticides and fertilisers is minimised and manure is not used. The projects comply with the national regulations about fertilisers or soil improvers for agricultural use and on active substances, hazardous chemicals and pesticides, mercury and substances which contribute to the depletion of the ozone layer. Restoration activities are carried out in such a way to prevent water and soil pollution.

##### **Economic activities 6.14 Infrastructure for rail transport, 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings**

The projects included in economic activity 6.14, aligned for the climate change mitigation objective, as well as economic activities 6.15 and 7.1, aligned for the climate change adaptation objective, adopt measures to reduce noise, dust and pollutant emissions during construction or maintenance works.

Where appropriate, noise and vibrations from use of infrastructure are mitigated by introducing open trenches, wall barriers, or other measures and comply with Directive 2002/49/EC or equivalent applicable national law or international standards.

In addition, projects included in economic activity 7.1 use construction materials/compounds compliant with national laws regulating the presence in them of substances harmful to human health or the environment.

Not applicable for activity 4.5.

#### **DNSH Protection and restoration of biodiversity and ecosystems**

##### **Economic activity 2.1 Restoration of wetlands**

Projects included in economic activity 2.1, aligned for the climate change adaptation, comply with the protection objectives of the relevant area, when necessary.

##### **Economic activities 4.5 Electricity generation from hydropower, 6.14 Infrastructure for rail transport, 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings**

Webuild performed an environmental impact assessment or equivalent document to assess the risks related to the conservation of the ecosystems and biodiversity for projects included in activities 4.5 and 6.14, aligned for the climate change mitigation objective, and activity 6.15 and 7.1, aligned for the climate change

adaptation objective. Where appropriate, the required mitigation and compensation measures for protecting the environment were implemented. In addition, for sites/operations located in or near biodiversity-sensitive areas (including the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas, as well as other protected areas), an assessment was conducted where applicable and the necessary mitigation actions implemented based on the conclusions of the assessment.

With respect to the projects included in activity 6.15, mitigation measures have been implemented to avoid wildlife collisions.

Finally, projects included in economic activity 7.1 do not impact the cultivated and arable land with a moderate to high level of soil fertility and below-ground biodiversity, virgin land with a recognised high biodiversity value, land which is the habitat of endangered species (flora and fauna) and land which meets the definition of forest established by national legislation or, if not available, the FAO definition of forest.

## Minimum safeguards

Compliance with the minimum safeguards is mandatory throughout the Group and is assessed by considering the four main topics of human rights, corruption, taxation and fair competition, as identified in the most recent report issued by the Platform on Sustainable Finance published in October 2022.

Webuild is committed to ensuring respect for the human rights enshrined in the International Charter of Human Rights, the fundamental conventions of the International Labour Organisation, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. The parent reaffirmed its commitment in the Code of Ethics and the Sustainability Policy to the ten principles set out in its Human Rights Policy (available on the company website). These principles cover health and safety, child labour, forced labour, freedom of association and collective bargaining, non-discrimination, diversity and inclusion, working conditions, local communities and the rights of indigenous peoples, the value chain and whistleblowing systems. More information is available in the “Own workforce - Human Rights” chapter of the “Social information” section. In addition, the “Own workforce - Diversity and inclusion” chapter of the same section provides information about the “unadjusted gender pay gap” while the “The role of the administrative, management and supervisory bodies and Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies” chapter in the “General information” section provides details of gender diversity in the board of directors.

Webuild has a zero-tolerance policy for all types of corruption and is committed to complying with the anti-corruption laws ruling in the countries where it operates. It requires its stakeholders to act with honesty and integrity at all times. The parent condones behaviour designed to improperly influence the decisions taken by representatives of public or private bodies. In fact, Webuild has an Anti-corruption System which meets the ISO 37001 requirements and is certified by an independent certification body.

Taxes are one of the main sources of the Group’s contribution to the countries where it operates as they can be used by the public administration to finance the economic and social development of their territories. Webuild scrupulously meets all its tax requirements arising from its business in line with its Code of Ethics and the Sustainability Policy. It fully complies with the applicable tax regulations in all the countries where it operates and has a collaborative and transparent relationship with the tax authorities. Webuild’s 231 model defines its rules of behaviour, prevention protocols and controls to ensure compliance with tax requirements and minimise the risk that tax crimes could be committed. It also serves to guarantee that the Group respects all the rules, procedures and processes to calculate taxes, keep tax records and prepare tax returns for approval<sup>77</sup>.

Webuild supports fair and sustainable competition as the best way to select the most qualified suppliers and to improve quality in the supply chain. The Group complies with competition laws in the markets where it operates and collaborates with the regulators. It refrains from collusive behaviour and abuse of a dominant position. It prohibits the collection of information about its competitors using illegal or unethical means.

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<sup>77</sup> More information is available in the relevant paragraphs of the “Business conduct” chapter of the “Governance information” section.

In 2024, Webuild did not receive definitive convictions for violations of laws relating to human rights, corruption, competition and taxation. More information on pending disputes is provided in the paragraphs on tax litigation and criminal litigation in the Directors' report.

The Group is not exposed to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

### Calculation of the KPIs

Pursuant to article 8 of the Taxonomy Regulation, supplemented by Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 (the Disclosures Delegated Act) and by Annex I to Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023, the following tables show the KPIs associated with the eligible and aligned economic activities as per the 2024 taxonomy.

The KPIs are calculated as the ratio of the proportion of turnover, CapEx and OpEx associated with taxonomy-eligible or aligned activities (numerator) and the Group's total revenue, CapEx and OpEx for the period (denominator). Figures for entities accounted for as joint operations for financial reporting purposes are presented in proportion to the Group's investment in such joint operations.

### Turnover

The proportion of turnover was calculated as the portion of net revenue from products or services (including intangible) associated with the taxonomy-eligible or aligned activities (numerator), divided by net revenue (denominator)<sup>78</sup>; the Group was able to allocate the aligned turnover as it relates directly to the projects that complied with the technical screening criteria. As required by the Regulation, Webuild identified and excluded intragroup turnover.

### CapEx

CapEx includes increases in property, plant and equipment and intangible assets during the reporting period before amortisation, depreciation, impairment losses and any revaluations, including those arising from remeasurements and impairment losses, and excluding changes in fair value; the denominator also includes increases in property, plant and equipment and intangible assets arising from business combinations<sup>79</sup>. The proportion of eligible/aligned CapEx includes capital expenditure related to assets or processes associated with Taxonomy-eligible/aligned economic activities (category (a) as per point 1.1.2.2. of Annex I to Delegated Act, article 8). The Group also performed analyses to identify capital expenditure which is part of a plan ("CapEx plan") to expand the Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned (category (b) as per point 1.1.2.2 of Annex I to Delegated Act, article 8) and capital expenditure related to the purchase of output from Taxonomy-eligible economic activities and individual measures enabling the group activities to become low-carbon or to lead to GHG reductions (category (c) as per point 1.1.2.2. of Annex I to Delegated Act, article 8)<sup>80</sup>. It did not identify these types of CapEx and was, once again, able to match the CapEx to the contracts without having to make estimates.

### OpEx

OpEx includes direct expenditure that cannot be capitalised incurred for research and development, real estate restructuring, short-term leases, maintenance and repairs and all other direct costs related to the ordinary maintenance of property, plant and equipment<sup>81</sup>. The Group did not resort to estimates to identify and allocate OpEx as it can be directly associated with the individual projects.

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<sup>78</sup> Recognised in accordance with IAS 1.82.a) endorsed by the European Commission with Regulation (EC) no. 1126/2008. See note 33.1 "Revenue from contracts with customers" to the consolidated financial statements.

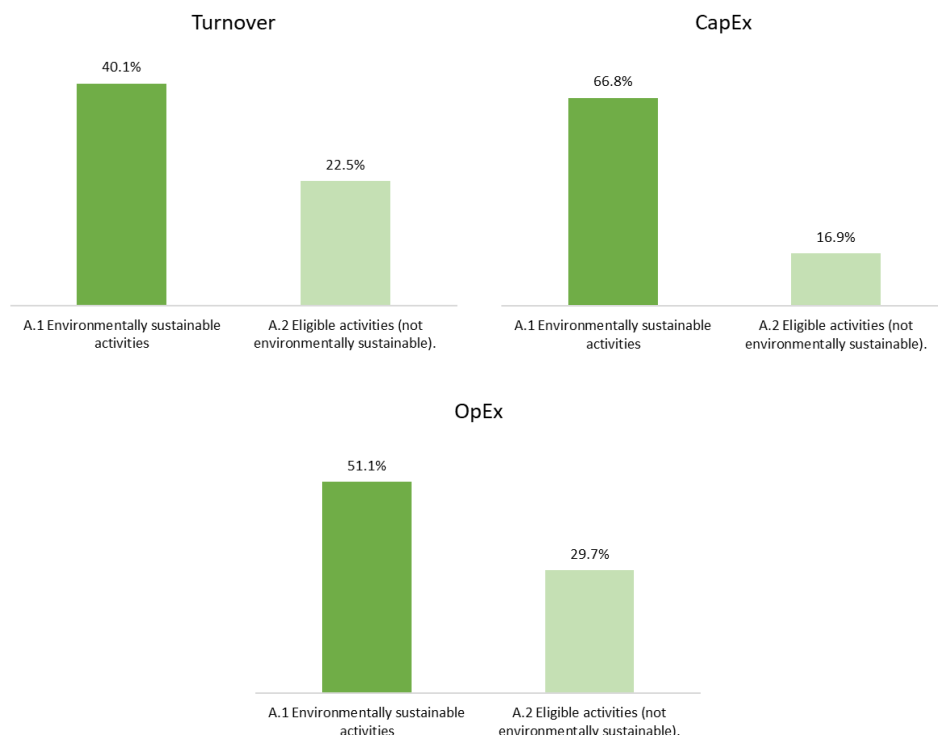
<sup>79</sup> CapEx includes, when applicable, costs recognised in accordance with point 73.e)i) and iii) of IAS 16- Property, plant and equipment; point 118.e)i) of IAS 38- Intangible assets; point 76.a) and b) (fair value model) of IAS 40- Investment property; point 79.d)i) and ii) (cost model) of IAS 40- Investment property; point 50.b) and e) of IAS 41- Agriculture; and point 53.h) of IFRS 16- leases. See the tables on changes in property, plant and equipment, right-of-use assets and intangible assets in notes 7.1, 7.2 and 7.3 to the consolidated financial statements.

<sup>80</sup> The analysis identified these types of CapEx associated with the installation of e-vehicle charging stations at the Rome offices.

<sup>81</sup> See note 34.3 "Services" to the consolidated financial statements for information on the denominator.

## Overview of results

Based on the assessment, the Group calculated the proportion of turnover, CapEx and OpEx recorded in 2024 as follows:



The eligible economic activities account for 62.6% of turnover, 83.7% of CapEx and 80.8% of OpEx<sup>82</sup>.

Of these, the environmentally sustainable activities (i.e., aligned) account for 40.1% of turnover, 66.8% of CapEx and 51.1% of OpEx<sup>83</sup> and relate to four taxonomy sections and five economic activities:

- 2.1 Restoration of wetlands, eligible activity that makes a substantial contribution to the climate change adaptation objective;
- 4.5 Electricity generation from hydropower and 6.14 Infrastructure for rail transport that make a significant contribution to the climate change mitigation objective;
- 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings that makes a significant contribution to the climate change adaptation objective which were assessed as aligned solely for CapEx and OpEx purposes<sup>84</sup>.

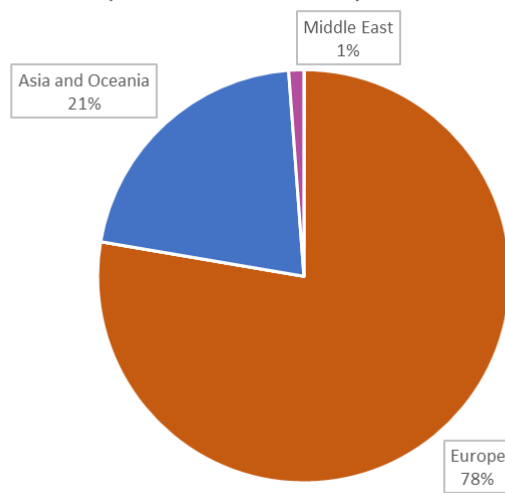
A breakdown of the taxonomy-aligned turnover by geographical area is provided below: 78% of the Group's environmentally sustainable turnover is generated in Europe, followed by Asia and Oceania with 21%.

<sup>82</sup> The non-eligible activities include activities that are not included in the taxonomy lists (such as mining projects, the building of waste-to-energy plants and corporate activities).

<sup>83</sup> More information is available in the table in Annex 1 prepared in accordance with Annex V of Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 which amends Annexes I, II, III, IV, V, VII, IX and X to Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021.

<sup>84</sup> In accordance with the provisions of Annex I to Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, for the calculation of the turnover KPI.

Capex - Environmentally sustainable activities



## Social information

### Own workforce

#### Working conditions

#### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Unavailability of workers	<i>Risk</i>	-		X		X	X	

Webuild's operations involve a high number of workers<sup>85</sup>, all of whom are committed to ensuring the effectiveness and quality of the complex projects and infrastructure that the Group is commissioned to build.

The workforce is essential to Webuild's operations and its business model. Therefore, the unavailability of workers, especially highly-skilled workers, could compromise the correct performance of works and Webuild's overall efficiency. The Group defines appropriate mitigation actions in this respect.

At the same time, Webuild strives to understand the needs of workers with particular characteristics, those working in specific contexts or those undertaking particular activities. It has an integrated and systematic approach to analyse and continuously monitor working conditions, with a management system that identifies and assesses the risks associated with each type of activity and context. This assessment takes into consideration factors such as age, health, position and specific working conditions including, for example, hiring policies, promotions, training, development and remuneration.

The Group also encourages ongoing dialogue with workers to obtain direct feedback and ensure that measures in place effectively meet their individual and collective needs, with the aim of responding to real on-site requirements with preventative and corrective actions.

### Policies

[S1-1]

The Group's Sustainability and Social Accountability and Human Rights Policies represent fundamental guidance to ensure adequate physical and mental working conditions, foster a stimulating and rewarding environment, facilitate professional growth and worker satisfaction. The equal opportunities, diversity and inclusion policy plays a central role as Webuild recognises and enhances the diversity of each individual and promotes an inclusive work environment based on mutual respect. It guarantees equal treatment and rejects all forms of discrimination.

In line with these principles, Webuild is committed to the concept of fair and impartial treatment, based solely on objective criteria that consider the individual's skills, aptitudes and performance. Decisions about employment relationships, including hiring, promotions, training, development, working conditions and remuneration, are taken in such a way so as to ensure that each worker, regardless of their background, has the same growth opportunities as everyone else and is rewarded for their merits. This commitment takes the

<sup>85</sup> Workers include employees and non-employees, i.e., collaborators with continuous collaboration contracts, VAT number self-employed persons, interns and temporary workers.

form of the Group's continuous investment in training, which is one of its key actions and is fundamental to developing talent, improving productivity and supporting workers' overall well-being.

All aspects about the material impacts, risks and opportunities associated with the different matters that affect the own workforce are addressed and regulated, when applicable, by policies, procedures and specific management methods (described in the following chapters, to which reference is made).

## Actions

[S1-4]

In a rapidly changing context, the construction sector is expected to grow significantly over the next few years, especially in Italy, bolstered by the public investments earmarked to relaunch the economy and the National Recovery and Resilience funds set aside for infrastructure.

This will require a large number of specialised workers who may not be immediately available on the market. With specific reference to Italy, given the volume of the works awarded and the need to ensure the necessary availability of highly qualified and specialised labour, Webuild launched the **Cantiere Lavoro Italia** project (also described in previous chapters) to support the rising demand for workers at Italian work sites in the next three years (2024-2026), and which will be subsequently replicated abroad (more information is provided in the "Training and skills development" chapter of this section).

The project's key characteristics are summarised below:

1. competitive remuneration, accommodation and meals including during the specialist training phase, certification of the skill level reached, solid future prospects with basic and specialised training provided on site;
2. memoranda of understanding signed with southern Italy regions (Sicily, Calabria and Campania) to facilitate collaboration between Webuild and the institutions.

The corporate HR and workforce planning departments continuously monitor personnel planning, project requirements and courses held at the Webuild schools<sup>86</sup> to analyse employee needs in qualitative and quantitative terms.

At 31 December 2024, the Cantiere Lavoro Italia project had trained and hired around 1,000 participants, of whom 80% are from southern Italy (roughly 75% through the Scuola dei Mestieri and 25% through the Scuola delle Professioni).

The Group used its own financial resources for this project. In some cases, it was able to access training funds, such as Forma.Temp, Fondimpresa and the sector academy.

### Retention initiatives, especially for key project personnel

In 2024, the Group continued its retention initiatives for project personnel, including several action plans designed to promote stability and the development of key employees.

Key steps in this approach were:

1. assessment of position risk - an analysis of the risk associated with each key position, considering the stability of managers, the availability of internal/external candidates and the complexity of the related succession plan;
2. intervention actions - definition of specific actions and priorities based on the risk assessment, to ensure operating continuity and the growth of internal candidates;
3. inclusion and diversity policies - creation of inclusive and safe work environments, enhancing the capacity and potential of individuals, and taking steps to discourage discrimination.

<sup>86</sup> More information about the Webuild schools is provided in the "Own workforce- Training and skills development" chapter of this section.



The actions implemented are described below.

1. incentives and bonuses: introduction of a short-term annual variable incentive plan for key project positions and a retention bonus paid after three years which is not pegged to performance;
2. interdepartmental collaboration: promotion of collaboration among departments to address challenges posed by the retention of key employees in a coordinated manner;
3. assessment and development: performance of regular risk assessments to identify critical areas and adopt suitable preventive measures.

These actions are designed to retain key employees and promote Webuild's growth and stability. They are scheduled once a year as part of the continuous retention and development approach for the key project employees. This action does not require ongoing monitoring as it entails tailored interventions with individual employees.

Training is essential to personnel management and is part of all the above retention initiatives. In 2024, the Group developed and provided important training and onboarding programmes in Italy and abroad. More information is available in the "Own workforce - Training and skills development" chapter of this section.

In conjunction with the recruiting drive to fill open positions, Webuild continued to deploy its advanced search tool to create a network of talents in Italy and abroad to meet future staffing needs in 2024. This initiative is part of the succession plan, representing an additional lever to guarantee and safeguard business continuity.

Again in 2024, proactive recruiting included younger people, who were targeted with attraction and professional orientation initiatives facilitated by the Group's use of innovative channels and greater number of partnerships with academia. Proactive recruiting directed at schools and universities will continue in the next few years as a strategic tool to promote large infrastructure works as opportunities for work and career paths for the young generations.

The Group defined an annual attraction and employer branding plan to attract the best talents and support its business. This plan included the following initiatives in Italy and abroad:

Initiative	Description
Partnerships with universities	Italy <ul style="list-style-type: none"> <li>longstanding relationships with 15 major Italian universities, contributing to projects for students, work placements and improved training paths.</li> </ul>
	United States – Lane Construction <ul style="list-style-type: none"> <li>partnerships with 11 major universities in eight states of the United States to strengthen its foothold in the academic world.</li> </ul>
	Australia – Webuild/Clough <ul style="list-style-type: none"> <li>University of Technology Sydney – Development and provision of content for the postgraduate major in Tunnelling and Underground Engineering program;</li> <li>University of Melbourne – Holding a Risk Management in Construction course for engineering students;</li> <li>Curtin University – Girls+ Engineering Tomorrow Program (GET), an initiative increasing the visibility of engineering among young women and non-binary students, encouraging them towards STEM and university engineering courses;</li> <li>University of Western Australia – Engineering Your Career, a networking event to familiarise engineers starting out on their careers.</li> </ul>
Events and activities	Italy

- Five Recruitment Days (one in Calabria and four in Sicily) as part of the Cantiere Lavoro Italia project to select work site operators for Italian projects with nearly 2,000 interviews held;
- participation at roughly 40 events to engage with the younger generations, including group ambassadors, seminars, career orientation meetings and career days.

#### United States – Lane Construction

- participation at 10 university career fairs in the last three months of the year and presentations at the SHPE (Anaheim) and SWE (Chicago) conventions to recruit highly qualified talents. Lane representatives collected more than 450 applications at these university fairs and conventions. It also mentored 13 students at Purdue University (the no. 3 civil engineering programme in the United States) and provided guest lecturers. During the year, 11 field engineers joined the Field Engineer Development Program (FEDP), a two-year competency-based course for early in career hires.

#### Australia – Webuild/Clough

- It takes a Spark EDU Conference: this conference is designed to inspire and bring together forward-thinking students, teachers and leaders in the STEM sector;
- Open Day at the Perth offices.

#### Employer Branding programmes<sup>87</sup>

##### Italy

- UniWeLab: partnership with Genoa University renewed for another three years, including a course on project management of large sustainable infrastructure. It includes the donation of €90,000 over three years;
- Alberto Giovannini Award: third edition wrapped up with eight winners given the opportunity to work in the Group and a PhD scholarship assigned to the Naples Federico II University. The Group has set aside €1 million for the five editions.
- Build Up project: completion of the first edition of the PCTO (Pathway for Transversal Skills and Orientation) involving 950 technical high school students and launch of the second edition with the objective of attracting young people to Webuild work sites and involve another 1,000 students.

##### United States – Lane Construction

- high schools: participation in the spring career fairs and advisory committees in North Carolina;
- universities: participation in a curriculum review process at the University of South Florida, engaging with 14 students to build brand visibility.

##### Australia – Webuild/Clough

- scholarships: provided six scholarships through the Australian universities in New South Wales and Victoria, including:
  - University of Technology Sydney – two Australia Tomorrow's Builders scholarships;
  - Western Sydney University – one Webuild Future Leaders Aboriginal and Torres Strait Islander Scholarship scholarship;
  - University of Melbourne – two Webuild Master of Engineering (Civil) Scholarships and one Webuild Women into STEM Scholarship.
- The Group also gave scholarships directly to five Clough employees who reached the university semester objectives.

<sup>87</sup> Aimed at university and high school students

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S1-5]

While it has not currently adopted specific targets, the Group has actions that reflect its real commitment to minimise the risk of unavailable personnel and promote a growth in jobs, especially for work site personnel (workers and staff). Specifically, all the actions aim to:

- improve working conditions, ensuring that they are fair and favourable, respect human rights and guarantee worker dignity;
- implement continuous training programmes to develop employees' skills and ensure they are properly trained for their jobs, with a special focus on health, safety and the environment;
- actively involve workers in the development and implementation of company processes, including through structured induction and onboarding sessions;
- promote inclusion and diversity policies to create an inclusive work environment that respects diversity;
- introduce an annual attraction and employer branding plan to attract the best talents and support business;
- implement an emergency management plan with dedicated task forces to ensure business continuity.

## Metrics

*Characteristics of employees in its own workforce*<sup>88</sup>

[S1-6]

The trend seen in recent years was confirmed in 2024, with employment rates up in particular in certain geographical areas (e.g., Middle East and Italy) due to the start-up of large contracts and continuation of full operations at the projects in the order backlog.

The figures in the tables refer to the workforce at 31 December of each year.

Employee head count by gender	Unit	2024
Female	no.	4,644
Male	no.	38,929
Other	no.	-
Not reported	no.	-
<b>Total employees</b>	<b>No.</b>	<b>43,573</b>

The next table shows the countries in which the Group has at least 50 employees representing at least 10% of its total number of employees.

<sup>88</sup> The total number of employees refers to the own workers involved in projects where Webuild guarantees management of the QHSE processes and integrated systems. It differs from the consolidation scope described in the basis of consolidation section of the notes to the consolidated financial statements (see note 34.4 "Personnel expenses").

Number of employees (head count)	Unit	2024
Ethiopia	no.	8,829
Italy	no.	6,857
Saudi Arabia	no.	14,891

Employees by contract type, broken down by gender	2024				
	Female	Male	Other	Not disclosed	Total
<b>Total number of employees</b>	4,644	38,929	-	-	43,573
Number of permanent employees	3,865	31,635	-	-	35,500
Number of temporary employees	719	7,185	-	-	7,904
Number of non-guaranteed hours employees	60	109	-	-	169
Number of full-time employees	4,581	38,849	-	-	43,430
Number of part-time employees	63	80	-	-	143

Number of employees by contract type, broken down by region	2024						Total
	Italy	Africa	Europe	Americas	Asia	Oceania	
<b>Total number of employees</b>	6,857	10,138	2,262	4,995	16,657	2,664	43,573
Number of permanent employees	5,825	9,428	1,134	2,723	14,590	1,800	35,500
Number of temporary employees	971	698	1,127	2,271	1,989	848	7,904
Number of non-guaranteed hours employees	61	12	1	1	78	16	169
Number of full-time employees	6,801	10,108	2,246	4,994	16,652	2,629	43,430
Number of part-time employees	56	30	16	1	5	35	143

Turnover rate	Unit	2024
Number of employees who left the Group	no.	9,041
Outbound turnover rate	%	21%
Number of employees hired by the Group	no.	9,982
Inbound turnover rate	%	23%

## Health and safety

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizons		
			Upstream	Own operation	Downstream	Short-term	Medium-term	Long-term
Dissemination of a health and safety culture in the workplace to own workers is of fundamental importance	<i>Actual positive impact</i>	<i>Employees</i>		X			X	
Work-related injuries and ill health and/or damage to the mental and physical health of own employees due to the inadequate management and monitoring of health and safety	<i>Actual negative impact</i>	<i>Employees</i>		X		X		
Work-related incidents involving own workers	<i>Risk</i>	-		X		X	X	
Processes and activities to protect health and safety can reduce the number of injuries and related costs. In addition, better work-related injury indexes improve Webuild's competitive edge in calls for tenders	<i>Opportunity</i>					X	X	X

A fundamental pillar of Webuild's strategy is to maintain the highest levels of protection for health and safety for its employees, ensuring the necessary prevention and protection measures are in place to avoid or minimise work-related risks and instil a safety-based culture at all levels and proactive and ethical conduct.

This requires a structured planning process that starts by identifying risks and opportunities to define the targets and related programmes needed to improve the performance, effectiveness and efficiency of Webuild's integrated management system that meets product/service requirements and customer and stakeholder expectations, is respectful of the environment and health and safety at work in line with the Group's strategies.

Employee (own workers and value chain workers - mostly subcontractors' workers) accidents are mostly caused by poor safety leadership and potential unsafe conduct (insufficient safety culture), deficient assessment of health and safety risks and/or implementation of prevention and protection measures, weak organisational structure/resources dedicated to occupational health and safety (OHS) matters, poor supervision, monitoring and coordination by operations and project OHS personnel, inadequate skillset and

experience in OHS matters of key subcontractors and suppliers, inadequate definition/design of construction methods and poor management and maintenance of machinery and equipment.

Specifically, the negative impact identified by the double materiality assessment is associated with individual incidents. The Group identifies precise or systematic weaknesses and particularly critical activities, jobs or situations through its monitoring activities in the integrated management system. It subsequently defines new preventative strategies and targeted actions.

Given the international context in which it operates and the differences between various groups of people, Webuild tailors its training activities accordingly and defines activities to develop a health and safety culture. For example, 1) in the case of great need for personnel, it integrates school learning with special pathways for the building sector; 2) if it identifies specific gaps in knowledge about the use of personal protective equipment (PPE) (for example, in the case of work at heights), it engages third party suppliers to assist the operating units in selecting suitable protective equipment and directly provides training on its correct use; 3) it provides female workers with training on how to safely manage their maternity leave in line with or complementary to local laws; 4) in the case of pandemics and limitations on movement, it provides physiological support, etc.; 5) it instils a safety culture through the Safety Leadership Programme (Safety Builders Programme).

## Policies

[S1-1]

Guided by its values of Excellence, Respect, Sustainable Innovation, Integrity and Trust, the Group contributes to the economic development and social well-being of the countries where it operates, protecting the health and safety of its workers, suppliers, subcontractors and end customers by developing its business in line with its Safety Vision and the principles enshrined in the Health and Safety Policy.

This policy sets out the principles the Group abides by to protect the health and safety of its workers, suppliers and subcontractors from the design stage of its works through to the construction and development phases and in the workplace. Its target is zero accidents. The Group developed this policy together with the Social Responsibility and Human Rights Policy in line with its strategies and the international standards ISO 45001 and SA8000 and its systems are certified under these standards.

The content of the policy, the Code of Ethics, the Suppliers' Code of Conduct, the Road Traffic Safety Policy and Life Saving Rules are the cornerstones of the integrated management system implemented by all operating units and for all project phases (from the tendering process to inspection and delivery to the customer). Webuild has defined and introduced an occupational health and safety management system which is ISO 45001-certified and sets out how the main processes are to be performed, the roles and responsibilities for achievement of the defined targets and the implementation of Webuild's health and safety policies.

The policies are available on Webuild's website and intranet. They are also posted in meeting rooms, canteens and/or breakout areas at the work sites where access to digital tools is more difficult. In addition, policies are sent directly to the affected stakeholders during the tendering phase and/or during the contract management phase. All the value chain considered significant is involved in Webuild's health and safety policy.

Top management monitors application of the Health and Safety Policy by regularly reviewing its performance and progress towards achievement of the set targets.

The targets established in the ESG Plan and the QHSE Management Expectations reflect the commitments delineated in the Health and Safety Policy. Webuild analyses the related risks and opportunities for their achievement and defines action plans to prevent and mitigate/control the risks.

Each action plan is reflected in the annual performance levels set for each project. The "Actions" paragraph of this chapter describes the actions implemented during the year.

<i>Health and Safety Policy principles</i>	<i>Action plan to guarantee compliance with the Policy principle</i>
Ethics and accountability	Guarantee the adequacy of the organisational structure/resources dedicated to OHS matters Maintain the QHSE management system Ensure compliance with health and safety legislation
Innovation	Innovation for machinery and equipment
Health and safety	Improve the health and safety risk assessment and introduce prevention and protection measures Improve the level of definition/design of construction methods Improve health and safety management vis-à-vis the maintenance of plant and equipment Activities that reduce the impact on health and safety following accidents
Health and Safety Culture and Leadership	
Protection and growth of all affected parties	Increase the safety leadership and introduce safety-conscious conduct (build up a safety culture)
Right to intervene	
Involvement of the supply chain	Guarantee the adequacy of the organisational structure/resources dedicated to OHS matters Improve the level of expertise and experience in OHS matters of the key subcontractors and suppliers
Experience sharing	Improve the health and safety risk assessment and introduce prevention and protection measures
Dialogue	Consultation and involvement of workers
Transparency	Reporting and communication (internal and external)

## Processes for engaging with own workforce and workers' representatives about impacts

[S1-2]

Webuild has always considered consulting with its workers through engagement and communication to be an essential part of the integrated management system. To ensure this and the cooperation of all employees, Webuild guarantees the workers' right to appoint safety representatives, in accordance with the applicable legislation. During the year, it consults with the workers' safety representatives and keeps them informed about safety issues. The representatives actively contribute to monitoring the effectiveness of mitigation, control and improvement measures to improve the Group's safety performance.

The Employers and top managers consult the workers' safety representatives about various aspects, such as:

- new processes and equipment or any related modifications to them;
- the results of the risk assessment;
- training programmes;
- the introduction of new technologies;
- trends and analyses of accidents;

- the findings of the review of the management system (at least once a year);
- improvement plans.

The workers' safety representatives' tasks include fundamental activities such as:

- informing the Employer and top management of concerns about worker safety;
- informing the Employer and top management of potential dangerous situations;
- representing the workforce on issues related to HSE aspects and other important matters.

Each operating unit holds meetings in accordance with article 35 of Legislative decree no. 81/2008 (or its equivalent depending on the applicable local legislation). In addition, each unit has an officer in charge of ensuring compliance with Webuild's regulations, including the process to engage with the workforce and the workers' representatives.

Since 2022, the Group has participated in the activities as per the memorandum of understanding signed by INAIL (the Italian National Institute for Insurance against Accidents at Work) and FS Group for large works safety to deepen its employees' perspective. This document establishes a structured collaboration between the parties for the adoption of health and safety initiatives to foster a culture of prevention of work-related accidents and ill health.

This agreement is applicable to the work sites set up under the National Recovery and Resilience Plan, due to the scope of the works and the short timeline for their completion. It covers inter alia:

- joint initiatives to disseminate and promote a health and safety culture;
- the development of training courses for all positions and personnel;
- research and trialling of innovative technological solutions;
- the study and analysis of information about work-related accidents and ill health.

### **Processes to remediate negative impacts and channels for own workforce to raise concerns**

[S1-3]

Webuild has a systematic and integrated approach to ensure the health and safety of its workers and to address any material negative impacts caused by or contributed to its activities and to remedy the situation. Its commitment is represented by a dedicated corporate unit that provides support and guidance for the management of health and safety issues at the operating units.

The corporate Safety, Environment and Quality Department conducts regular audits to check the effective application of the ISO 45001-certified management system by the Group's work sites as well as compliance with the preventive health and safety rules. All accidents are investigated by the relevant work site assisted by the corporate departments (depending on the severity of the accident). The investigation includes a root cause analysis to identify what caused the accident in order to define appropriate actions to prevent the occurrence of other similar events. The integrity board is informed of the results of investigations into significant accidents as per the organisational, management and control model as per Legislative decree no. 231/2001, as subsequently amended.

The Health and Safety Policy establishes workers' right to intervene whenever there is a doubt that people's health and safety could be compromised. The "Business conduct" chapter of the "Governance information" section provides information about the formal methods the workforce can use to directly communicate their concerns and needs, including the channels made available by Webuild in the workplaces, and how feedback is provided to workers about their concerns and the effectiveness of these tools.

Occupational medicine, industrial hygiene (periodic inspections at work sites to verify workplace conditions and compliance with applicable legislation), travel medicine, healthcare and medical emergencies, digitalisation of health processes and services, as well as health promotion initiatives represent further opportunities for discussion with workers and are also useful to collect feedback.



## Actions

[S1-4]

Webuild is committed to providing the highest standards of health and safety in the workplace through targeted actions (both corrective and preventive) to address material impacts, manage risks and pursue opportunities that can improve the overall well-being of its workforce.

The Group proactively works to prevent accidents by reducing risks and taking advantage of opportunities. It has prevention and protection measures in place, summarised in the following action plan which is updated once a year with new quantitative targets:

- a) increase the safety leadership and introduce safety-conscious conduct (build up a safety culture);
- b) improve the health and safety risk assessment and introduce prevention and protection measures;
- c) guarantee the adequacy of the organisational structure/resources dedicated to OHS matters;
- d) guarantee adequate supervision, checks and coordination by operations and project OHS personnel;
- e) improve the level of expertise and experience in OHS matters of the key subcontractors and suppliers;
- f) improve the level of definition/design of construction methods;
- g) improve health and safety management vis-à-vis the maintenance of plant and equipment;
- h) maintain the QHSE management system;
- i) activities that reduce the impact (damage) on health and safety as a result of an accident (involving own workers and subcontractor workers);
- j) actions to improve Webuild's reputation.

This general action plan is implemented by all operating units and transformed into a programme of SMART - Specific, Measurable, Achievable, Relevant, Time-based - objectives, which establishes the owner, necessary and available resources, and the implementation and completion times for each action. The action plan's status is monitored regularly as part of the regular review of the operating system of the various operating units.

Webuild includes all the impacts associated with its own operations and its upstream and downstream value chain, including through its products or services, in its assessment of enterprise risks.

After this analysis, it identifies the main health and safety risks to which the Group is exposed, which may be related to the incomplete implementation of health and safety policies, with potential impacts on workers in terms of work-related accidents and ill health, as well as on Webuild in terms of potential penalties. Specifically, workers are exposed to various categories of material risks depending on their geographical location and the activities that they perform.

Webuild is able to identify any specific or systematic critical issues thanks to the monitoring and frequent analyses of data about accidents that happen at its operating units, near misses, unsafe behaviour and the outcome of inspections and checks of the operating units through internal and third party audits. As a result, it can identify activities, jobs or situations that are particularly critical and define new preventive strategies and targeted actions.

Specific attention is given to training workers about certain duties and the operating controls over work processes, performed either directly by the Group's employees or subcontractors' workers. Training programmes are defined at operating unit level by the health and safety management system manager and approved by the Employer, based on a risk assessment and the applicable legislative requirements. The training courses provided to each worker cover at least the following issues:

- the health and safety organisation (Employer, health and safety manager, prevention and protection officers, company doctor and the workers' safety representative), the legislative framework and an overview of the management system;
- health and safety risks arising from the Group's activities in general and the specific risks faced by the workers depending on their job;
- first aid and emergency management procedures (in particular, the fire fighting and evacuation plans).

The health and safety managers receive special information and training courses. The key topics are the legal-regulatory framework, safety management and organisation, risk identification and measurement, communication, training and consultations with workers. The health and safety officers and supervisors undergo additional training to that provided to the workers on the definition and identification of risk factors, incidents and near misses, techniques to communicate with and raise the awareness of employees, checking that workers comply with the legal and internal rules and the use of collective and personal protective equipment. Workers, Officers/Supervisors and Managers attend regular refresher courses. The courses for health and safety specialists (Protection and Prevention Manager, Protection and Prevention Officer, First Aid Officers, etc.), meet the minimum requirements of the relevant legislation. The work site workers (employees of the Group and its subcontractors) receive special training on the related risks, specific activities and the possible risks of interference (Induction, Tool Box Talks, Job Safety Analysis/Pre-Job Meetings, etc.). In order to ensure the collaboration of all the Group's employees, they have the right to appoint safety representatives in accordance with the applicable legislation. These representatives are given the relevant training and information. They are also consulted when key mitigation measures are implemented, including as a minimum:

- the introduction of a new process or equipment or its adaptation;
- the appointment of the risk assessment manager;
- accidents.

In 2024, 570,432 hours of health and safety training was provided to own workers (corporate and operating sites).

Webuild believes that protecting the health of its workers is a non-negotiable priority. It considers workplace health promotion as the meeting point between the prevention of work-related risks, the adoption of healthy lifestyles by workers and the improvement of work organisation. Health interventions take place on four levels:

1. worker health surveillance, designed to address specific work-related risks, considering also the inherent characteristics of persons in vulnerable situations (such as, for example, disabilities or physical and/or mental issues)<sup>89</sup>. Every six months, Webuild collects (at corporate level) the aggregated data of clinical, medical-statistical and health-hygienic interest of all workers in order to:
  - monitor management of the medical service in charge of the surveillance and protection of workers' health;
  - keep corporate top management informed;
2. work organisation (flexible working hours, workers' involvement in work organisation, availability of ongoing learning opportunities and anonymous stress management counselling);
3. work environment, ensuring that all hygiene rules are complied with for ideal working conditions;
4. for the individual, promoting, for example, participation in health promotion, health screening, health education and nutrition counselling programs.

Webuild is committed to ensuring, on a daily basis, a healthy and balanced diet for all its staff in more than 100 work sites and all its offices in Italy and in the rest of the world, which is also respectful of the expectations

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<sup>89</sup> The company doctor's role is to properly assess workers in vulnerable situations and their working capacity through health surveillance activities and considering their safety and health.

and customs of the different nationalities. It has a centralised internal health management unit to achieve this. Assisted by expert nutritionists, the unit coordinates initiatives related to healthy eating and the health of Webuild's people.

Initiatives launched in 2024 include those aimed at:

- smoking cessation programmes for smokers;
- prevention of cardiovascular risks;
- campaigns to promote healthier life styles with better nutrition and increased exercise;
- prevention of flu (and its complications) through vaccine programmes.

In 2024, Webuild introduced a new format for the well-being content on its intranet. Monthly topics are grouped by Mind, Body and Nutrition and offer bite-sized suggestions and advice to live better. Examples are:

- the World Health Day campaign;
- health news and campaigns grouped into macro-areas (screening, prevention, food, psychological well-being);
- focus on mental health and mindfulness for inner balance;
- online personal training for stretching routines at home or in the office;
- suggestions for healthy, balanced meals.

Webuild celebrates World Health Day promoted by the World Health Organisation every year with a number of initiatives for all its workers.

The 2024 theme, "My health, my right", was chosen to protect everyone's right to access to healthcare services, education and information, safe drinking water, clean air, good food, quality housing, decent working and environmental conditions and freedom from discrimination.

Celebrating World Health Day is an opportunity to reflect on Webuild's contribution to this issue. All work sites in Italy and abroad actively participated in important humanitarian initiatives for the health, well-being and quality of life of workers and local communities. They shared their experiences and initiatives to promote a sustainable and inclusive culture that guarantees everyone's right to good health. Once again in 2024, the Group rewarded the work site with the best initiatives and the Koysha work site in Ethiopia won the **Health Trophy 2024**. Since its set-up, it has implemented health prevention measures, encouraged education and rolled out humanitarian initiatives that have a great impact on the health, well-being and quality of life of its workers and the local community.

Finally, during the year, the Group continued the Safety Builders Programme designed to engender a strong safety culture based on strengthening safety leadership skills at all management levels as part of a wider safety communication and training strategy, Valyou - Our Health and Safety Way. Thanks in part to careful planning, 63 workshops and 216 safety intervention (s.a.f.e.r.) training courses were held in 2024, with the participation of 4,646 managers, supervisors and workers for a total of over 15,320 hours of training. As an integral part of the Valyou - Our Health and Safety Way programme, Webuild continued to roll out and introduce its "Your Lifesaving Rules" initiative. Launched in 2019, this set of operating and management rules is devised to:

- supplement the culture change process commenced with the Safety Builders Programme;
- foster workers' active involvement;
- strengthen the sense of belonging to the Group;
- systematise conduct;
- promote the mindful adoption of the Group's Health & Safety Vision.

Webuild's corporate offices and all its project work sites celebrated the World Day for Safety and Health at Work ("WSD") in April 2024 in line with the theme promoted by the International Labour Organisation (ILO) "The impacts of climate change on occupational health and safety". Over 19 thousand people were involved across 37 projects. Initiatives included organisation of Time to Talk on 22 April, "World Safety Day 2024 – The impacts of climate change on occupational health and safety", and Webuild's participation in the Workclimate 2.0 project promoted by INAIL on thermal risk management.

The Safety Trophy was again awarded this year to the work site that stood out both during the WSD celebrations and throughout the year. This year it went to the Sang Villas project, which involved more than 2,200 people in the celebrations with a number of initiatives (toolbox talks, prizes for workers who stood out in specific areas, deep dive meetings) about a "hot" topic, such as the consequences of climate change on health and safety. These initiatives were part of the work site's proactive commitment, demonstrated with its excellent safety performance for the year with a LTIFR of zero.

The effectiveness of the initiatives is assessed through the active involvement of employees, who are aware of the importance of their safe and responsible conduct to ensure greater awareness and group participation. Webuild also closely monitors accident rates as they are a key indicator of the results achieved and are used to define continuous improvement plans.

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S1-5]

Webuild aspires to maintain the highest levels of protection for worker health and safety, ensuring the necessary prevention and protection measures are in place to avoid or minimise occupational risks and instil a safety-based culture at all levels and proactive and ethical conduct.

As part of the Safe & Inclusive Builders sustainability "construction site" of the ESG plan, the Group has set itself a new target: -6% in the LTIFR to 2025 compared to 2022. More information about the process used to define this target is provided in the "Tracking effectiveness of policies and actions through targets" chapter of the "General information" section.

The Corporate Safety, Environment and Quality Department is organised to be increasingly responsive to management's objectives:

- ensuring coordination of the HSE management system activities to support the HSE teams at work sites;
- encouraging a change in the HSE culture through a competence centre to develop innovative policies and programmes;
- strengthening the integration of health and safety aspects within engineering processes through the technical safety unit;
- monitoring health at corporate level and providing guidance for work sites;
- systematise conduct;
- ensuring continued health and safety operating support to the work sites.

These activities are regulated by internal guidelines and procedures, which include, inter alia, the documentation each operating unit is required to have, comprising the risk assessment document, operating safety plans, emergency and evacuation plans, fire prevention and control plans and first aid plans. The Employer and downstream (in line with the proxy system) the managers, officers and workers must ensure that health and safety management measures are in place. Specialist teams oversee the implementation of the measures in each operating unit.

In addition, to ensure achievement of its health and safety objectives, Webuild has introduced SMART plans that include:

- dedicated training courses to improve the culture and leadership focusing on health and safety factors and involving the entire value chain;
- regulating and standardising accident risk prevention and reduction processes starting from the design stage, with the sharing and communication of positive and negative events as “lessons learnt”;
- innovation and digitalisation to improve risk management tools and methods.

The action plans are drawn up for the entire organisation starting with the annual QHSE strategic plan that reflects the QHSE policies and management expectations using a cascading process, implemented by the heads of the various operating units and monitored by the QHSE managers around the world. Each operating unit is responsible for preparing its plan tailored to meet contractual requirements or local legislation.

Webuild will continue to make occupational health and safety improvements over the coming years to achieve a further reduction in its injury rates (LTIFR and TRFR), an increase in the per capita safety training provided for direct employees and as part of the Safety Builders programme, and to step up its operating monitoring activities, with on-site security assessments and audits.

## Metrics

### *Health and safety metrics*

[S1-14]

The rates are expressed as the number of days lost due to work-related injuries (LTIFR) and the number of recordable injuries (TRFR) per one million hours worked.

Specifically, the LTIFR (Lost Time Injury Frequency Rate) is calculated as the ratio of the total number of injuries leading to absence from work in the period (including fatalities) to the total number of hours worked, multiplied by 1,000,000.

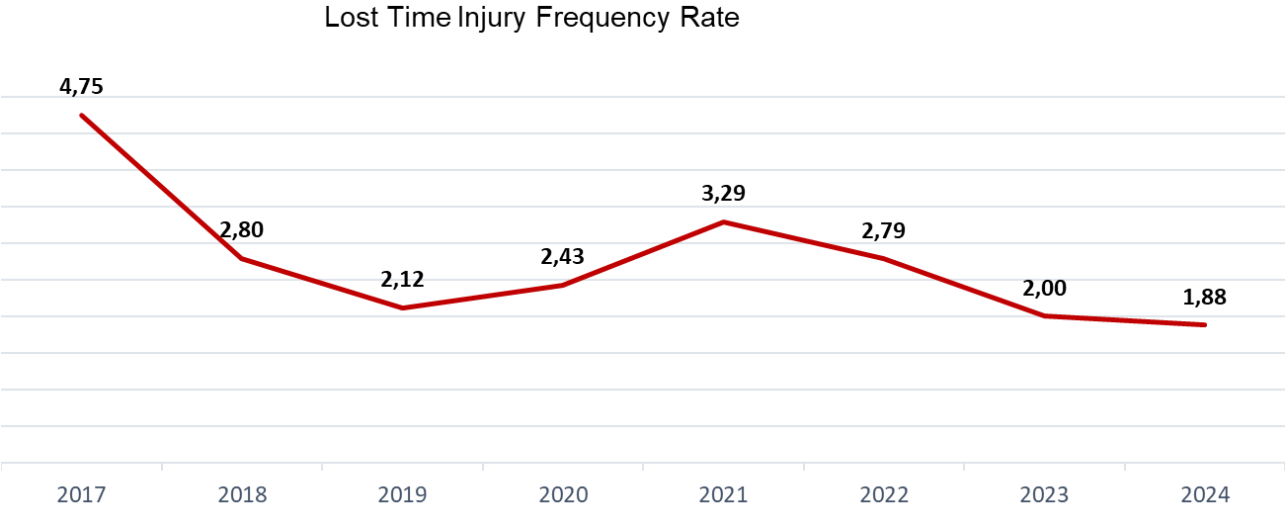
The TRFR (Total Recordable Injury Frequency Rate) is calculated as the ratio of total recordable injuries (calculated considering fatalities, injuries leading to absence from work, injuries only requiring medical treatment and injuries leading to assignment of reduced workloads in countries where this is allowed) to the total number of hours worked, multiplied by 1,000,000.

Any commuting injuries during the period are not considered while road accidents that take place for work reasons are considered<sup>90</sup>.

<b>Accident figures and rates - own workers</b>	<b>Unit</b>	<b>2024</b>
Percentage of people in own workforce covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines	%	100
Number of fatalities as a result of work-related accidents	no.	2
Number of recordable work-related accidents	no.	156
Number of days lost to work-related accidents	no.	5,822
Rate of recordable work-related accidents	TRFR	2.66
Lost Time Injury Frequency Rate	LTIFR	1.31
<b>Accident rates - subcontractors</b>	<b>Unit</b>	<b>2024</b>
Rate of recordable work-related accidents	TRFR	2.99
Lost Time Injury Frequency Rate	LTIFR	2.17
<b>Total accident rates</b>	<b>Unit</b>	<b>2024</b>
Rate of recordable work-related accidents	TRFR	2.78
Lost Time Injury Frequency Rate	LTIFR	1.64

<sup>90</sup> The number of fatalities of value chain workers who work at Webuild work sites is zero.

In line with the reporting boundary used to define the target of -6% LTIFR to 2025, included in the ESG Plan and top management’s long-term incentive plan, Webuild monitors the safety performance of a larger number of entities compared to the reporting boundary of the data in the above table. This larger perimeter ensures continuity and the relevance of the Group’s assessment of its performance compared to the targets and a comparison with previous years (on a like-for-like basis). Accordingly, the LTIFR of 1.88 is shown, which refers to a longer list of entities over which Webuild deems it has material management levers for topics associated with the health and safety management system.



## Training and skills development

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Upskilling and professional growth opportunities for own workers through adequate technical training plans and the development of managers and talents	<i>Actual positive impact</i>	• <i>Employees</i>		X			X	
Insufficiently trained or untrained workers	<i>Risk</i>	-		X		X	X	
Training activities and adequate career paths make Webuild more attractive, reducing turnover rates and related costs	<i>Opportunity</i>	-					X	

Promoting its people's growth and talents is a key part of the Group's strategy which includes tools to support and facilitate career development. It also introduces new programmes and initiatives to best respond to its employees' specific requirements.

Training and career development for all employees help mitigate the risks of an inadequate or untrained workforce (especially the highly trained workers), helping to reach strategic targets, improve workers' skills, the Group's attractiveness and reduce the cost of high turnover.

Given the international context in which it operates, the Group takes steps to understand the training needs of its employees. The corporate departments, coordinated by the Learning & Development Department together with the operating units, analyse the strategic initiative requests received from area managers. They then draw up a training plan which responds to these needs and includes both scheduled training courses and tailored sessions to meet specific requirements tied to exceptional events or circumstances.

### Policies

[S1-1]

Webuild is committed to creating a working environment that cultivates employees' abilities and the skills necessary to carry out their jobs and develop the business. The Sustainability Policy, the Health and Safety Policy and the Quality Policy represent this commitment as they include principles strictly related to the development of skills applicable to all those who work with and for the Group around the world. In particular:

- ongoing support within the Group to develop skills and allow people to express their potential to provide their best contribution to the Group (Sustainability Policy, Social Accountability and Human Rights Policy and Equal Opportunity, Diversity and Inclusion Policy);
- promotion of information and training programmes to facilitate the professional growth of workers and an adequate level of skills in relation to their duties (Quality Policy).

## Processes for engaging with own workforce and workers' representatives about impacts

[S1-2]

Webuild has an inclusive and structured approach to engagement with its own workers and their representatives, encouraging active participation through a detailed training plan. This plan includes regular coordination meetings, classroom training sessions and practical experience, which is also provided to subcontractors' workers. Engagement with workers and stakeholders is flexible and tailored to corporate and operating level requirements and those of each individual project.

### Actions

[S1-4]

The Group annually plans its worker development and training actions, which include defining contents, the related budget, scheduling of the initiatives and any applicable funding (e.g., interprofessional funds).

This approach allows it to optimise resources and provide effective training programmes that meet workers' requirements and company objectives. In addition, activities are designed with a view to improving internal skills, thus reducing turnover rates and the related costs.

Webuild has a system in place to monitor and assess training and skills development actions, measure their effectiveness and the performance and growth potential of workers.

This system has five levels: participation, reaction, learning, behaviour change and business impact (KPIs). As part of the LMS (Learning Management System) platform, it collates and analyses the data about each level to identify opportunities for improvement and monitor the results from both a quantitative and qualitative viewpoint.

By analysing the tests completed by the participants, reaction questionnaires given to students and trainers and, when applicable, on-the-job assessments, the system prepares the results of each participant's evaluation journey. It is also designed to encourage participation and engagement by employees, by providing them with structured, transparent growth opportunities and completed course certification.

In 2024, Webuild continued to develop the Knowledge Management Programme to optimise the tools to capitalise on employee know-how and methods to share knowledge and access to specialist skills, including by using digital technologies.

The Knowledge Management Programme has two main areas: an integrated platform hosts "explicit" information structured so as to easily located while collaboration communities make specific knowledge readily available as needed, transforming "tacit" skills into "explicit" skills in a digital format. In line with 2023, the platform continued to be upgraded and the innovation communities continued to disseminate company know-how about innovative topics.

The Group also set up two new communities: Community HR (a practical community) and Community Induction (to assist the training and onboarding of new hires).

The **Cantiere Lavoro Italia** project has strengthened the Group's reputation as a training centre of excellence, attracting thousands of young and unemployed people. It provides them with the opportunity to acquire sought-after technical skills, and to lift standards and know-how in the large works sector.

This project ensures the Group has people with skills that are hard to find on the market (specialised workers and office staff) through classroom and on-the-job training, giving them the necessary technical and safety skills to work in a work site. The Cantiere Lavoro Italia project aims to create a new class of workers drawn from the younger generations and has three schools conceived for different targets as well as a school to provide ongoing training to group resources.

The programme has a two-step process to train and hire people:

- general basic training for the sector with a pre-employment formula, organised with the main employment agencies in Italy;



- specialist paid training post-onboarding in the work sites and advanced training centres.

The Group has three advanced training centres in Belpasso (CT), Novi Ligure (AL) and Apice (BN) which are fully equipped with classrooms and training areas where practical exercises reinforce and consolidate the concepts learned in the classroom and increase the technical skills of tomorrow's workers by using machines and equipment as well as simulators that provide a highly realistic environment to safely provide training about complex tunnel boring projects. The three schools are structured as follows:

- **a territorial school:** conceived as a physical and virtual learning hub to attract resources throughout Italy and for the selection and training of young talents and new hires. Course participants are high school leavers, university students and unemployed people. The school has different pathways to provide the basic skills necessary to find work at a work site for a large infrastructure project either as a blue collar or white collar worker with training sessions of two to three weeks. The Group works with employment agencies (Adecco and Randstad) in order to attract and select participants and provide basic theoretical training: TBM courses, conventional excavation courses, work site operator courses as well as to attract and select white collars and provide them with basic training on how to become a buyer, TBM engineer, works accountant, AFC, etc..

Through these courses, the school also aims to combat school dropout and the NEETS - Not in Education, Employment or Training - phenomenon by stimulating a work mindset and the development of technical construction skills.

The training pathways are designed to develop skills related to the roles and general rules for work sites, basic safety and basic technical training.

The courses are provided in 13 locations around Italy near the hiring work sites (e.g., Campania, Calabria and Sicily) to facilitate the efficient placement of the newly trained resources.

The main stakeholders of the Scuola del Territorio are schools, universities, construction schools, work agencies and local training agencies as well as the third sector. The first project involving the third sector is WeCare, a social-work project for persons in vulnerable situations developed with Caritas' branches in Sicily.

- **a trade school:** this school focuses on providing training about the specific skills required in work sites building large infrastructure. It provides experiential and practical training courses to new hires and workers who participate in the training courses with temporary contracts aimed at permanent employment. The school caters for blue collars and specialised technicians and courses are carried out at advanced training centres and in the classroom. The advanced training centres (boot camps) can be divided into two groups: those specialised in conventional excavation skills (excavator operators, carpenters, blacksmiths, jumpers) and those specialised in mechanised excavations (TBM operators, mechanics and TBM electricians). After completing their training at the advanced training centres, participants move to the work sites where they (especially those without experience) are followed by a tutor whose duty is to provide them with technical know-how and assess the new hires' aptitude and growth potential. In 2024, over 84,000 hours of training were provided to blue collars and specialist technicians with temporary contracts (labourers directed to the school by agencies that mostly carry out personnel selection and placement activities).
- **A professions school:** this school provides specialist training to white collars who will hold specialist and management positions (e.g., work site assistants, buyers, planners, accountants, BIM specialists, environmental experts, plant assistants, etc.). The courses are designed to support the workers over their entire professional lifetime working on projects, ideally from before they take on their position and as they progress to management roles and acquire greater seniority. The school's 16 locations provide courses tailored to the different roles with theoretical classroom learning and on-the-job training provided on the basis of planned learning pathways that last three to four weeks and are agreed with the tutors (an essential part of the on-the-job training and assigned to each participant in the work site) and monitored centrally. The training courses are designed by Webuild's experts and the classroom learning

is provided in classrooms located directly in the work sites where the participants have been hired. The on-the-job sessions are an innovative approach based on a structured programme that blends experiential learning with lab work in order to upskill and reskill the participants, reinforce their motivation and develop a new technological mindset. In 2024, this school provided roughly 44,000 hours of training to workers hired with temporary contracts (white collars sourced through agencies that mostly perform personnel selection and placement activities).

In addition to the Cantiere Lavoro Italia programmes, the Group also has structured, systematic onboarding and development sessions for all white collar workers.

New hires are provided with an online onboarding training course about the Group's principles, notions and fundamental guidelines, applicable regulations and its systems, processes and procedures. This course includes a company overview module which presents Webuild's identity pillars and training about the Code of Ethics and main internal systems (anti-corruption, privacy, human rights and cyber security).

The Group also provides annual classroom onboarding and induction programmes, which include:

- Project Team Foundations, an induction programme for the first level staff of operating units' project teams, hired in the last two years on the market. This is designed to facilitate their integration into the Group, familiarise themselves with the main processes, procedures and mindset. The training modules are provided by a team of internal subject matter experts and focus on the specific nature of Webuild's business, focusing both on soft skills and the skillset required for each professional group.

In 2024, 60 participants from Italian projects took part in this programme, which will continue in 2025 in Italy and abroad, in the geographical areas where the Group intends to develop its business.

- Company Onboarding Program, an induction programme for junior staff from Italian projects who have been with Webuild for less than one year. It consists of both online and classroom sessions and is designed to foster a sense of belonging and to share the Group's culture, its values and vision, present the contract management standards and encourage networking. More than 170 junior staff members participated in the programme in 2024, and it will be gradually extended to other group companies in 2025.

Webuild also continued its tailored development and training programmes to hone leadership skills and soft skills:

- the Global Managerial Academy, which provides training for figures who are already working in key roles or who are rising within Webuild, to foster both the development of their managerial and technical skills that are fundamental to the Group's business. Training involves business simulation sessions, technical deep dive sessions of the main internal processes and leadership sessions to strengthen soft skills in line with the Group's leadership model. Since its start-up, more than 370 managers throughout the group have received training, including 60 in 2024 in the two editions provided by Webuild and 30 in the first edition provided by the subsidiary Clough;
- Early Careers Program, a programme designed for young talents to accelerate their growth through assessment and self-awareness tools to become more aware of their strengths, areas that need improvement and career goals. It also includes training sessions to strengthen and share the skills required to improve Webuild's performance, and the identification of adequate career paths (e.g., growth paths and job rotations). In 2024, 112 people were provided with tailored training on the basis of their assessments and specific development needs.

Finally, other important technical and managerial training initiatives were designed and held in Italy and abroad during the year:

- e-learning and innovation master classes, attended by more than 6,500 people who completed the learning pills on technological and soft skills while nearly 1,000 people took part in the Industry 4.0 and cyber security master classes for the construction industry;

- digital workshops and innovation plan meetings for corporate staff to increase their understanding of the transformations impacting society and organisations, analyse the potential and impact of digitalisation and innovation and identify and share innovation proposals that can facilitate business transformation and boost results;
- continuation of the environmental sustainability in constrAction: ecodesign, decarbonisation and circular economy course for corporate staff and group companies to address climate change, the circular economy and decarbonisation with a concrete, objective and specific approach for the construction sector;
- specialist courses for professional groups to sharpen the technical skills of workers in different departments (corporate and work sites) in line with business challenges and needs (e.g., Plant Management Academy, training course for electrician and mechanic managers, Envision protocol and BIM updates).

#### Clough – Australia:

- development of a platform for mandatory onboarding training about SSTOM;
- the Process and Systems Alignment Training programme was provided to 500 participants about the subsidiary's processes and applications;
- the Elevate management growth programme for the development of five female key talents and Execonnect programme for 17 high performers who participated in a mentorship journey with a senior executive as their mentor.

#### Lane – USA:

- Field Engineering Development Program Orientation, an onboarding programme involving an introduction to Lane's processes, site visits and team building;
- specialist training sessions on new HR, procurement, vendor management, estimating, design and technical support processes and procedures involving roughly 500 participants;
- Leader Essentials programme focused on team management attended by 49 managers;
- Power Hours: online workshops to build up soft skills for all employees.

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

### Targets

[S1-5]

Webuild considers it fundamental to support its people's professional growth through career paths, training programmes and initiatives designed to foster their development. Although it has not defined measurable publicly-stated targets in this respect, it has concrete actions and training programmes that support workers throughout their working lives, providing them with competitive knowledge and professional skills.

### Metrics

#### *Training and skills development metrics*

[S1-13]

Average number of training hours per employee	Unit	2024
Managers and white collars	hours	16
Blue collars	hours	20
<b>Total</b>	hours	19

In addition to training provided to own workers, the Group also provides classroom and on-site training to value chain employees (employees of its service providers) as part of the Cantiere Lavoro Italia project (128,780 hours in 2024).

It provided 828,363 hours of training to own workers during the year for a total of 1,115,527 hours of total training, including subcontractors' workers.

## Diversity and inclusion

### Material impacts, risks and opportunities

[IRO-1: SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Negative impacts on gender equality within the workforce due to conduct that is not compliant with Webuild's policies and/or applicable laws and adversely affects career development and fair remuneration	Potential negative impact	<ul style="list-style-type: none"> <li>Employees</li> </ul>		X		X		

Webuild's sustainability strategy is designed to consolidate its guiding role in promoting diversity and inclusion in the construction sector. The Group is committed to creating a corporate culture that values individual differences and guarantees equal opportunities to everyone through an integrated, inclusive approach.

Given the complexity and scale of its operations, Webuild is conscious that individual workers or particular categories could be involved in situations or subjected to incidents of discrimination and non-inclusive behaviour in the workplace. These potential negative impacts could be caused by one-off, isolated episodes, like in the case of gender inequality or discriminatory behaviour.

The Group has HR management procedures to identify and understand any critical situations in order to avoid different treatment of workers on the grounds of their gender, nationality or ethnic origin, religion, age, political beliefs, sexual orientation, disability or other characteristics protected by the regulations in force in the countries where the Group operates throughout the entire HR management procedure (recruitment, training, assessment and termination of employment). They include periodic surveys carried out by the corporate Human Resources and Organisation Office. The surveys include questions on whether employees have personally experienced unwelcome behaviour, resulting in discomfort or distress, within or in the performance of their work (sexist attitudes, disrespectful behaviour or situations).

Webuild closely monitors workers with particular characteristics, those working in particular contexts or those undertaking particular activities potentially exposed to a greater risk of negative impacts.

### Policies

[S1-1]

Webuild nurtures a work environment that fosters inclusion, recognition and celebration of diversity in all its forms (gender, age, nationality, ethnic origin, social or civil status and religion). It believes that this gives it a competitive edge in terms of growth, the creation of synergies and in understanding and capitalising on the challenges of a multi-cultural business environment.

To reaffirm and strengthen its commitment to these issues, in addition to the Code of Ethics, Webuild set out key requirements in a dedicated Policy on Equal Opportunities, Diversity and Inclusion in 2019 (updated in July 2024):

- advancement of a safe, rewarding and respectful work environment, where inclusion and equity are prioritised. The Group supports and encourages its resources to develop and express their potential so they can give their best possible contribution;

- guarantee the same treatment to all, refusing all types of discrimination of gender, nationality, ethnic origin, social or civil status, religion or any other characteristic recognised by applicable laws and regardless of the work requirements. Decisions about employment such as, for example, recruitment, promotions, training and development, working conditions and remuneration are based on objective criteria and solely on the individual's ability, aptitude and performance;
- foster and enhance equality, diversity and inclusion in daily activities, taking all measures to create an inclusive culture and raise awareness of unconscious bias and provide workers with the tools to overcome such bias when taking decisions;
- include the capacity to work with all cultures in the leadership model and fully support its leaders in managing diverse teams and encourage everyone to promote an inclusive work environment.

The Group rejects any form of discrimination and intervenes against any inappropriate behaviour or behaviour that goes against these principles, including harassment, intimidation, threats, coercion and insults. It encourages employees who feel they have been discriminated against to report this using a range of whistleblowing systems that take into account the reference context and protect the whistleblower from any form of reprisal. The Group ensures that the most appropriate procedures are launched to investigate the persons involved, the workers or third parties.

Webuild also encourages its suppliers and subcontractors to adopt practices that promote diversity and inclusion. Therefore, as a group committed to fostering a culture that encourages diversity in all its forms, the Policy on Equal Opportunities, Diversity and Inclusion is also applicable to Webuild's suppliers, which are required to comply with its principles (as set out in the Suppliers' Code of Conduct). It requires systems be put in place to monitor and report on diversity and inclusion commitments and results.

The Group is committed to complying with all applicable diversity and inclusion regulations as well as best practices in the geographical regions where it works. It ensures that all employees receive adequate information and training about its policies and procedures about diversity in the workplace. In addition, its promotion of a diversity and inclusion culture has been acknowledged by receipt of the UNI/PdR 125 gender equality certification and the ISO 30415: Diversity and Inclusion certification, which confirm the Group's efforts to develop business processes characterised by greater inclusiveness and sustainability and the promotion of equal opportunities.

### **Processes for engaging with own workforce and workers' representatives about impacts**

[S1-2]

Webuild has recently set up a corporate steering committee to foster engagement with workers about diversity and inclusion topics and especially gender equality. Specifically, this corporate-level committee was created to manage all the aspects related to achievement of UNI/PdR 125 gender equality certification. Its members include workers' representatives for the certification and managers. Responsibility for compliance with standards remains however with top management.

When a steering committee is set up at project level, the relevant trade unions may appoint one or more members as the workers' representatives to the committee. Should they not appoint a representative or if the group company is not unionised, the workers may elect one or more representatives for UNI/PdR 125 certification purposes.

### **Processes to remediate negative impacts and channels for own workforce to raise concerns**

[S1-3]

Webuild acknowledges the importance of diversity and inclusion as essential to create a fair, respectful and collaborative working environment, where the individual characteristics of each worker are valued. It has procedures to prevent, mitigate and remediate material impacts that could affect its workforce.

To this end, the Group has revisited the recruiting and human capital management procedures, partly in the light of its approach to gender equality and diversity and inclusion. It has specific procedures for recruitment

and HR management to prevent any form of discrimination. Specifically, they establish the recruitment methods to ensure they are not biased in gender terms and include both men and women. The procedures highlight the need to avoid using terms and clichés that could potentially be discriminatory. During interviews, it is not permitted to ask questions about marriage, pregnancy or carer responsibilities.

In addition, the career management procedure sets out the career steps to ensure non-discrimination and equal opportunities in professional development and promotions, which are solely based on capacity and professional levels attained. The procedure also ensures gender equality in leadership roles.

The Group has formal protocols and mechanisms to enable employees report any pay gaps, while the Diversity & Inclusion and Gender Equality Committee checks that the practices comply with the stated non-discrimination policies at least every six months. These checks cover wages, benefits, bonuses and well-being programmes. Management also analyses the data once a year.

The Policy on Equal Opportunities, Diversity and Inclusion promotes adequate, formalised tools to report any harassment and discriminatory behaviour. More information is provided in the “Business conduct” chapter of the “Governance information” section about the formal methods workers may use to directly communicate their concerns and needs, including the channels available in the workplace, and how feedback is provided to the workers about their concerns raised and the effectiveness of these tools.

## Actions

[S1-4]

Webuild continued its awareness-raising, communication, employer branding, recruiting and training initiatives to proactively foster an inclusive culture which supports diversity in 2024.

During the year, the Group continued to implement its inclusion-oriented selection programme, launched in 2021 to foster diversity and inclusion as part of Webuild’s 2023-2023 ESG plan.

This inclusion-oriented selection programme is comprised of three steps covering:

- the presentation of diversity-oriented shortlists (when possible);
- assessment of the working for inclusion aspect described in the leadership model;
- the presentation of blind CVs to managers involved in selection to avoid possible unconscious bias during the selection phase.

In addition, in line with the previous year, the Group continued to partner with important Italian and international universities and bodies, providing scholarships and contributing to academic programmes that promote both female students and young people. During 2024, Webuild confirmed its membership of the Italian association **Valore D**, which promotes gender balance and an inclusive culture through training, as well as communication and networking. This paved the way for Webuild’s participation in numerous training initiatives, including mentoring programmes to foster management skills and reinforcement of an inclusive culture, workshops, training labs and talks, designed to cultivate soft skills as part of the development of wider leadership skills.

At corporate level, the first edition of the mentoring programme on female leadership was completed. This is designed to encourage the growth of women in managerial roles and/or towards roles with greater responsibility at head office and the work sites. The Group also launched a Buddying programme to accompany the young winners of the Giovannini Award who were assigned a Buddy to assist them settle into the company culture and facilitate an understanding of the Group’s processes and structure.

Several initiatives took place in Australia, including:

- the Girls+ Engineering Tomorrow Program at Curtin University to raise awareness about engineering among young women and non-binary students and encourage them to think about engineering degrees. The initiative aims to inspire and contact female students interested in STEM subjects;

- a scholarship for a female engineering student at the University of Melbourne as part of the Webuild Women into Engineering Scholarship, and a Webuild Future Leaders Aboriginal and Torres Strait Islander Scholarship for an Aboriginal student at Western Sydney University;
- a management development programme, Elevate, for five key female talents.

More information about training initiatives is provided in the “Training and skills development” chapter of this section.

Training initiatives include online diversity and inclusion courses such as, for example a course on unconscious bias, a course on SDG 5 (Gender equality) and a course on harassment and gender-based violence, accompanied by targeted communication and awareness raising activities. In 2024, Webuild extended its training programmes with new sessions on inclusive and inter-cultural communication, diversity management and the development of an inclusion-oriented working culture. Finally, as part of the Cantiere Lavoro Italia project, Webuild held a workshop on D&I issues for 376 participants and a total of 752 hours of training. To deliver this course, the trainers were specially certified in learning style inclusion skills.

To reinforce perception of the issue of gender equality, the Group also continued its communication and awareness raising activities through the online Time to talk seminars. These are open to all workers and discuss topics related to diversity and gender equality with internal and external interlocutors and open floor discussions. In particular, they included:

- the Time to Talk “Diversity and inclusion in the construction sector” on International Women’s Day with Assimpredil and Ance Nazionale involving more than 300 participants;
- the Time to Talk “Culture and responsibility for gender-based violence” with CADMI (a safe home for mistreated women in Milan) that Webuild supports and has worked with since 2023 on the International Day for the Elimination of Violence against Women, with the participation of around 900 employees.

As the above actions are an integral part of the Group’s activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S1-5]

Webuild’s aim is to promote diversity and inclusion as a lever to understand the different cultural contexts in which it operates and to continuously improve decision-making processes essential to achieve its business objectives. As part of this project and with respect to the key role succession plan, Webuild has met its target of 25% of women in the succession pipeline for key roles (set for the end of 2023), confirming its focus on prioritising female growth paths.

As it had fully met all its previously-established objectives, in early 2024, Webuild drew up a new ESG Plan in order to continue its commitment in the coming years with new tools, programmes and initiatives dedicated to talented female workers in its workforce.

As part of the Safe & inclusive builders “construction site”, the Group has set itself a new target: **+20% of women managers in the Group (2025 vs 2023)**<sup>91</sup>. In Webuild, the term “manager” includes managers, junior managers or equivalent positions under regulations other than those ruling in Italy.

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<sup>91</sup> The base year value is 299.



## Metrics

### Diversity metrics at 31 December 2024

[S1-9]

Number of employees	Unit	2024
<b>Under 30 years</b>	no.	10,589
Under 30 years %	%	24%
<b>30 to 50 years old</b>	no.	25,392
30 to 50 years old %	%	58%
<b>Over 50 years old</b>	no.	7,592
Over 50 years old %	%	17%

Number of employees by position	Unit	2024
Managers	no.	2,090
White collars and junior managers	no.	12,464
Blue collars	no.	29,019
<b>Total</b>	no.	43,573

As required by Disclosure Requirement S1-9 and the definition of top management given by the ESRS, the disclosure about the gender distribution at top management level, i.e., the first and second level below the parent's administrative and supervisory bodies, is provided below.

Gender distribution in number and percentage at top management level	Unit	2024				
		Female	Male	Other	Not disclosed	Total
Top management	no.	7	42	0	0	49
Top management	%	14%	86%	0%	0%	100%

### Remuneration metrics

[S1-16]

Webuild refined its gender pay gap calculation method in 2024 to analyse any such gaps.

Specifically, the total shown in the table is the weighted median pay gap by geographical area<sup>92</sup> compared to the number of employees.

The foreign projects that were the most representative in terms of own workers were considered to guarantee coverage of more than 99% of the workforce.

Finally, Webuild considered both the ordinary basic salary and variable components such as the one-off bonuses provided for as part of remuneration policies or STI (short-term incentives)/MBO (Management by Objectives).

Remuneration metrics	Unit	2024
Gender pay gap	%	15%

<sup>92</sup> The geographical areas considered are Italy, Africa, Asia, America (North, South and Central), Europe (excluding Italy), Middle East and Oceania.

## Human rights

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Non-compliance with human rights	<i>Risk</i>	-		X		X	X	

Webuild is committed to ensuring respect for human rights in all its activities, as it acknowledges that respect for fundamental rights is indispensable for the responsible management of the workforce and engagement with all stakeholders.

The construction sector has always encountered a plethora of challenges linked to human rights, some of which are closely tied to the UN's SDGs, such as for example, the need to ensure access to energy, clean water and sanitation and hygiene services, proper levels of health and safety, fair and decent working conditions and protection of communities and territories.

The Group operates in geographical areas where the particular characteristics of the labour markets and regulatory framework and/or practices do not comply with international conventions and best practices. This could give rise to risks of forced or compulsory labour.

Specifically, in the Persian Gulf area, where the local labour force is insufficient and/or inadequate for the Group's needs, significant resort to migrant workers (mostly from South-East Asia) is necessary to carry out the projects. This category of workers, identified by the Group using specific methods and analyses, is particularly vulnerable and is exposed to risks of forced or compulsory labour practices. Specifically, there are two risk factors:

- use of recruitment agencies that may adopt improper practices, such as obliging the workers to pay recruitment fees (when hired), employment fees (throughout their employment) and cash deposits which are forms of debt (debt bondage);
- labour conditions that may limit the migrant workers' freedom of movement which are in some cases allowed or facilitated by local regulations, such as the ban on leaving their accommodation outside work hours, as well as limitations on holiday arrangements, the possibility of leaving the country, resignations and changes of employer.

The Group ensures that candidates for work in these countries are provided with exhaustive information about the contractual terms and work conditions in a language that they understand before they leave their country of origin. In addition, the Group fully bears the costs of recruitment, travel, visas, medical visits, etc.. The Group requires the recruitment agencies to comply with these principles through specific contractual clauses and non-compliance entails termination of the contracts.

The potential risk of hiring people under the minimum working age established by the applicable local regulations is minimal and tied to the risk of false identity documents (e.g., in some Sub-Saharan countries). When necessary, the Group has special procedures in place to check the authenticity of the candidates' identity documents (including by involving the local authorities) and, when necessary, implements on-site monitoring procedures for subcontractors. Its intention is to ensure scrupulous compliance with the application regulations in each country to mitigate the risk of non-compliance and, where possible, provide conditions that are better than those envisaged by the local regulations.

## Policies

[S1-1]

Webuild acknowledges and is committed to ensuring respect for the human rights enshrined in the International Charter of Human Rights, the Fundamental Conventions of the International Labour Organisation, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This commitment is documented and supported by the Code of Ethics, the Suppliers' Code of Conduct, the Sustainability Policy and the Social Accountability and Human Rights Policy, which establish the principles and conduct that all parties around the world that work with or for the Group must comply with.

Specifically, the Social Accountability and Human Rights Policy sets out the Group's commitments to ensure respect of human rights of the affected stakeholders, such as health and safety, child labour, forced or illegal labour (especially as regards migrants), freedom of association and the right to collective bargaining, inclusion and diversity and, more in general, working conditions and the rights of local communities and indigenous peoples. In line with the approach indicated in the UN Guiding Principles on Business and Human Rights and in order to define regulatory tools that better take into account affected stakeholders' views, Webuild defined the policy by mapping the main components of its value chain, identifying those at greater risk associated with its operations and the geographical areas where it carries out the most work. It also interviewed the main local reference people (such as HR business partners and project managers) who conveyed the principal concerns of key stakeholders such as NGOs and business and human rights experts. The content of the Social Accountability and Human Rights Policy is also reiterated in the Suppliers' Code of Conduct.

In addition to its specific commitments, presented in detail in the relevant sections and for which the Group also has dedicated policies (for example, for health and safety and diversity and inclusion), Webuild does not tolerate:

- any form of forced, compulsory and illegal labour, as well as slavery and human trafficking. It monitors in particular migrant workers, who are provided with comprehensive information about the living and working conditions before they leave their country of origin and who are free to resign from their jobs;
- any form of child labour and fully complies with the minimum age established by the laws of the countries where it operates; it does not hire workers who have not reached the minimum school leaving age or who are not yet 15.

Webuild signed a framework agreement with the Italian national (Feneal-UIL, Filca-CISL and Fillea-CGIL) and international (BWI - Building and Wood Workers' International) trade unions of the construction sector. This agreement's shared objective is respect for fundamental rights in employment relationships, to encourage social justice and sustainable development by both itself and the consortia of which it is a member and vis-à-vis its contractors, subcontractors and suppliers. The framework agreement covers important matters such as child labour, forced labour, the freedom of association and collective bargaining, non-discrimination, work hours, economic treatment, working conditions, training, employee well-being and the environment. By signing it, Webuild ensures that all workers enjoy the same rights, without distinction of ethnic origin, sex, religion, political opinions, nationality, social background or other distinctive characteristics.

As part of the trade union agreement with BWI and the Italian trade unions, Webuild set up a consultancy and monitoring group, whose members are HR managers and trade union representatives who meet once a year or whenever necessary to assess and revisit the agreement.

In addition, in 2024, Webuild obtained SA8000, ISO 30415 and UNI/Pdr 125 certification for all its operations in Italy and personnel on secondment abroad. Over the next few years, it will extend this certification scope to all group companies around the world.

Webuild has whistleblowing mechanisms available to workers and other affected parties to collect reports about its operations while protecting whistleblowers from any retaliatory action. More information about the formal channels workers can use to directly communicate their concerns and needs, including those available

in the workplace, the methods used to provide responses and the effectiveness of these tools is provided in the “Business conduct” chapter of the “Governance information” section.

## Actions

[S1-4]

Webuild has a due diligence procedure in line with the UN Guiding Principles on Business and Human Rights to identify the main areas of impact on human rights of its operations.

Accordingly, it analysed:

- human rights enshrined in the international law applicable to it;
- parties potentially at risk;
- internal processes.

The takeaway of this analysis was the drafting of a Human Rights Impact Matrix, which the Group then used to measure the risks and prioritise the impacts on human rights most relevant to it.

On this basis, the Group carries out regular human rights risk assessments on the activities carried out by its own workers and/or its subcontractors at its work sites as well as the rest of its supply chain. This assessment firstly considers specific indicators for the countries in which the in-scope projects are based. Based on the country-specific factors summarised by these indicators, the Group proceeds with additional assessments of projects in countries with a medium or high risk. It considers the following six risk categories:

- child labour;
- forced labour;
- freedom of association and collective bargaining;
- non-discrimination;
- working conditions;
- rights of local communities.

The project’s management team identifies one or more specific risks for each category, assessing them both from an initial and residual risk perspective, i.e., following the adoption of appropriate mitigation measures by the operating units.

The effectiveness of this system is measured using various approaches:

- monitoring reporting system data about the operating units provided to corporate offices;
- on-site audits performed by different departments that (also) carry out other checks such as Internal Audit, Compliance, Safety, Environment and Quality;
- reporting mechanisms and related internal investigations/follow-up checks;
- engagement with external stakeholders (e.g., NGOs, trade unions, rating agencies, etc.) that communicate any critical concerns about Webuild’s process.

In addition, in 2022, the Group set up a Social Performance Team (STP) which performs regular assessments of social accountability risks and monitors its performance. Specifically, the Social Performance Team addresses and manages the aspects required by the SA8000 standard - Social Accountability. The team comprises a balanced representation of:

- worker representatives for SA 8000; and
- management team members.

While the SPT team has an inclusive approach, final responsibility for compliance with SA 8000 standard lies with top management.

When a Social Performance Team is set up at individual project level:

- if present, the relevant trade unions may appoint one or more members as workers' representatives to the SPT;
- when the trade unions do not designate a representative or the organisation is not unionised, the workers may directly elect one or more representatives for the SA 8000 standard.

In no circumstance may the workers' representatives for SA 8000 be considered to substitute the trade union representatives.

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S1-5]

With respect to human rights, Webuild ensures constant monitoring and the adoption of effective practices to meet stakeholder expectations and business needs. Although it does not have measurable publicly-stated targets, Webuild acknowledges the importance of this aspect and will continue to strengthen its oversight and prevention approach in line with its values, changes in regulations and international best practices to consolidate its role to promote and protect human rights.

In addition, from 2022 to 2024, the Social Performance Team focused its operating scope on the activities performed by the Group in Italy and its workers seconded abroad. It will extend the scope of its work to all the group companies around the world over the next few years.

## Metrics

### *S1-17 Incidents, complaints and severe human rights impacts*

[S1-17]

In 2024, Webuild received 35 reports of alleged mobbing, discrimination and harassment<sup>93</sup> related to the workers of the parent, SPEs and subsidiaries in Italy (NBI S.p.A., Consorzio Xenia, Consorzio Hipinia AV, Consorzio Dolomiti), Australia (Clough, Snowy Hydro and SSTOM JV), Switzerland (CSC), France (Webuild branch) and Saudi Arabia (Connector). These reports are managed in accordance with the related internal procedures.

Incidents of discrimination	Unit	2024
Number of incidents of discrimination, including harassment	no.	4
Number of complaints filed through internal channels to allow own workers to raise concerns	no.	35
Number of complaints filed through National Contact Points for OECD Guidelines for Multinational Enterprises	no.	0
Total amount of fines, penalties, and compensation for damages as a result of the violations related to social and human rights factors	€	0
Number of severe human rights incidents connected to the workforce	no.	0
Number of severe human rights incidents connected to the own workforce that are violations of United Nations Global Compact Principles and OECD Guidelines for Multinational Enterprises	no.	0
Amount of significant fines, penalties and compensation for severe human rights incidents connected to its own workforce	€	0

<sup>93</sup> With respect to complaints filed via internal channels, the number shown relates to the whistleblowing category, present on the Whistleblowing platform (Mobbing, Harassment and Discrimination).

## Workers in the value chain

### Human rights

#### Material impacts, risks and opportunities

[IRO-1: SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Non-compliance with human rights	<i>Risk</i>	-	X			X	X	

Aware of its leadership role in its value chain, Webuild promotes socially responsible values, conduct and working practices, which it shares with suppliers and business partners. It asks that they comply with the highest established human rights, health and safety and training standards.

However, if not properly managed, some practices can create risks arising from negative impacts on workers in the value chain. Specifically, those workers who could suffer material negative impacts connected with the Group's operations are mostly subcontractors.

In order to identify specific groups of workers, geographical areas and situations at risk connected with the Group's operations, it conducts a due diligence in accordance with the UN Guiding Principles on Business and Human Rights to ascertain the presence of suppliers based in countries at risk and/or supplies of commodities at risk (based on the production country).

### Policies

[S2-1]

The principles enshrined in the Social Accountability and Human Rights Policy and policies that address specific topics are expressly aimed also at the value chain and are not limited in any way with respect to stakeholders or geographical areas.

More information about the Group's Social Accountability and Human Rights Policy is available in the "Own workforce - Human rights" chapter of this section.

Webuild also has a Suppliers' Code of Conduct that acts as a practical reference and guide for its suppliers and subcontractors, building on the commitments set out in the Code of Ethics, Sustainability Policy, Social Accountability and Human Rights Policy, the Environment, Health and Safety Policy and the Quality Policy. The Suppliers' Code of Conduct sets out the mandatory standards and conduct expected of the supply base in 11 well-defined areas (quality and performance excellence, work-related health and safety, the environment, fair and favourable working conditions, equal opportunities and non-discrimination, local communities, anti-corruption and combating fraud, the correct management of cash flows, unfair competition, conflicts of interest and privacy) as well as the procedures for the oversight of these standards and management of any notifications of non-compliance. In addition, contracts have specific termination clauses if the suppliers do not comply therewith.

When asked to present an offer, each potential supplier must confirm it has read and accepted the Code of Ethics and Suppliers' Code of Conduct, which are usually an integral part of contracts agreed by Webuild with its partners. Webuild encourages its suppliers to share its principles of integrity, honesty, reliability and sustainability in order to encourage and promote compliance along the entire supply chain.

In addition, the Suppliers' Code of Conduct underpins Webuild's integrated management system for all operating units and all phases of its projects (from the tendering phase to inspection and delivery to the customer).

To supplement the widespread regulatory tools in place, the Group makes whistleblower reporting systems available to workers and third parties, protecting whistleblowers from any retaliatory action and guaranteeing their anonymity.

Specifically, Webuild's whistleblower reporting system is hosted on an external, multilingual web portal which can be used by both employees and third parties (e.g., suppliers, subcontractors, their workers, etc.) to make anonymous or confidential (to be decided by the whistleblower) reports of potential violations by the company, a colleague, a consultant or third party. Whistleblowers are protected against any form of retaliation, discrimination or penalisation. More information is available in the "Policies" paragraph of the "Corporate culture" chapter of the "Governance information" section.

## Actions

[S2-4]

Webuild has designed and implemented a due diligence process compliant with the UN Guiding Principles on Business and Human Rights described in the "Own workforce - Human rights" chapter of this section, to which reference is made for all aspects not dealt with below.

This process includes a periodic risk assessment of human rights and activities performed by the own workforce and/or by subcontractors at the Group's work sites or by the rest of the supply chain.

The assessment of activities conducted by subcontractors at the Webuild work sites is performed together with the assessment of own operations and, therefore, the method is described in the "Own workforce" chapter of this section.

With respect to the rest of the direct supply chain, the purpose of the assessment is to identify any suppliers based in countries at risk and/or the supply of commodities at risk (based on the production country).<sup>94</sup>

The assessment carried out in the first half of 2024 found that 85.7% of the Group's suppliers are based in countries with a "very low" and "medium low" risk, while 13.5% work in a "medium" or "medium high" risk countries, less than 1% in countries with a "high" risk and none of the assessed suppliers are based in countries classified as "very high" risk. In addition, no significant orders<sup>95</sup> were placed for commodities with suppliers considered at risk during the six months.

As part of its due diligence process and in order to assess supply chain risks, Webuild has defined tailored management methods, including:

- qualification process for potential suppliers based on a dedicated human rights multi-factor assessment;
- contract clauses that require formal acceptance of the Code of Ethics and the Suppliers' Code of Conduct, and extension of this commitment to the supplier's subcontractors, which is mandatory for the contracts to be valid;
- monitoring, checks and audits to ensure compliance with its standards;
- regular assessments of the suppliers' performances, which include ethical and social aspects.

Moreover, Webuild's standard qualification process includes many ESG-related aspects, such as compliance and anti-corruption, human rights, health and safety, diversity and inclusion, respect for the environment,

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<sup>94</sup> The assessment does not include subcontractors as the related risks are covered by the assessments of the contract activities, which consider the Global Slavery Index indicators for country risk as well as the lists of the U.S. Department of Labor's Bureau of International Labor Affairs to assess commodity risk.

<sup>95</sup> Significant orders are those over €100 thousand (or equivalent). Below this threshold, the only purchases of commodities that could be considered at risk were the purchases of work clothes and foodstuffs, equal to less than 0.01% of the total value of orders.

emissions reduction, involvement of the value chain and other governance topics. Full compliance with the human rights requirements is essential for a supplier to pass the qualification process.

In addition, in order to reinforce oversight of the supply chain's ESG performance, Webuild has recently included the invitation to register on the Open-es or EcoVadis platforms (depending on their geographical location) to suppliers during the qualification and sourcing phases. These platforms collect and monitor supplier ESG performances using specific parameters.

Open-es bases its evaluation on three pillars:

- Environment: this indicator measures a company's impact on the environment, considering aspects such as climate change, energy efficiency, pollution, consumption of water resources, etc.;
- Social: this indicator measures a company's impact and engagement with the territory, people, employees, suppliers, customers and communities that it works with, evaluating its respect for human rights, non-resort to child or forced labour and discrimination, compliance with international standards, adequate wages for employees, the right to join a trade union, the existence of whistleblower reporting channels and social protection systems, diversity and inclusion, health and safety, employee well-being, etc.;
- Governance: this indicator measures how a company is managed in terms of ethical standards and best practices and covers business strategy and model, stakeholder engagement, oversight of risks and opportunities, ethical conduct, value chain management, etc..

Evaluation consists of completing a questionnaire and uploading the supporting attachments. Open-es' sustainability score takes into account the size of the evaluated company and its business sector and can be validated by having a third party check the questionnaire content. In addition to a company's sustainability performance, the platform also measures its collaborative attitude and sharing of experiences with the community. In addition, suppliers can also upload action plans for monitoring progress.

The Open-es ESG evaluations are integrated into Webuild's procurement platform, enabling all the supply chain members to access the data and use them as a parameter to assess suppliers during the sourcing phase.

The EcoVadis evaluation system is based on a four pillar screening:

- environment: this indicator covers energy consumption management practices, the generation and disposal of hazardous materials and waste and atmospheric pollutants, possibly providing support for the measurement of carbon emissions;
- work practices and human rights: to ensure human rights best practices, the platform measures a company's commitment to promoting and protecting employee health and safety, taking into consideration the working conditions and training programmes, non-resort to forced and child labour, human trafficking, protection of employee well-being, diversity and inclusion, etc.;
- ethics: this section focuses on preventing corruption and ensuring the transparent use of information;
- sustainable procurement: this section can be used to check the ESG level of a company's supply chain and how the company actually promotes sustainability practices.

The EcoVadis questionnaire is customised to the business sector, geographical location and size of the company, which responds to the questions and attaches documents, certifications and reports. Expert analysts then assess the questionnaire to arrive at an ESG rating. The rating is based on the definition of objectives and targets and their integration into the company's strategies, the existence of procedures, certifications and willingness to share information with stakeholders through reporting. EcoVadis also takes account of information obtained from third party sources. In addition to a score, the EcoVadis scorecard lists strengths and areas for improvement for each aspect, for which the company should develop specific action plans.

Finally, the selection of suppliers for new business is not only based on the quality and competitiveness of their products and services but also on their social and environmental performance and compliance with ethical



values checked at the work sites while the suppliers are carrying out their work. Webuild has a performance assessment process, which has a multi-disciplinary approach involving the project/work site bodies (procurement manager, technical manager, service manager and HSE manager) and economic-financial analyses based on the database on the Orbis platform (external body).

Compliance with requirements is checked by considering the following aspects:

- legal requirements; Code of Ethics, major disruptions: compliance with ruling regulations and Webuild's Code of Ethics;
- HSE (Health, Safety, Environment): compliance with regulations, accident prevention, use of PPI, training on health and safety and the environment, etc..

Additional areas evaluated relate to operating aspects:

- Technical: transparency, availability, proactiveness, competitiveness, accurate account-keeping, machinery, equipment, training and skills, technical capacity, quality requirements;
- Service: compliance with deadlines;
- Financial solidity.

The Webuild procurement platform assesses performance and the results are available to all supply chain actors and are an integral part of the supplier screening criteria during the sourcing phase.

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S2-5]

While it does not currently have a measurable publicly-stated target, Webuild is committed to ensuring respect for human rights along the value chain. Accordingly, the supplier screening process is a key factor and involves rigorous, in-depth checks. In addition, Webuild intends to continuously improve its ability to promote and spread human rights best practices and to monitor and assess its suppliers' performance in this respect using established parameters.

In addition to the contracts assessed to date, which are strategic for the Group and make up a part of its total contracts, during 2025, the scope of strategic contracts will be enlarged. This will mean that a higher percentage of suppliers will be assessed.

Webuild also plans to increasingly involve suppliers in the ESG Open-es and EcoVadis platforms to expand the ESG mapping of the supply chain and encourage suppliers to improve their sustainability performance in line with their size and capacity.

## Health and safety

### Material impacts, risks and opportunities

[IRO-1: SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Work-related injuries and ill health and impacts on the health of value chain workers, specifically those of subcontractors, due to inadequate management and monitoring of suppliers' safety measures	<i>Actual negative impact</i>	<ul style="list-style-type: none"> <li>Suppliers, Contractors, Subcontractors &amp; Partners (workers)</li> </ul>	X	X	X	X		
Incidents involving workers (subcontractors)	<i>Risk</i>	-	X	X	X	X	X	

Worker health and safety is a top priority for the Group, which is why its partners and suppliers are asked to formally commit to and adopt a responsible approach, and to work together to implement effective safety measures and promote a prevention culture along the value chain.

The main negative impact identified related to incidents that can involve workers along the value chain, especially subcontractors. The Group continuously monitors activities using the integrated management system to identify specific or systematic critical issues, as well as jobs or situations that are especially at risk, to define preventative strategies and targeted remedial actions.

### Policies

[S2-1]

The Health and Safety Policy defines Webuild's principles it is committed to in order to protect the health and safety of its workers, and the workers of suppliers and subcontractors throughout the design, construction and development phases of its projects. These principles, reiterated in the Suppliers' Code of Conduct and the Road Traffic Safety Policy, are mandatory for all suppliers and subcontractors, which are obliged to comply with the established safety standards and to respect the principles in place to protect their workers.

Webuild has an ISO 45001-certified occupational health and safety management system, which defines the operating methods for the main processes, roles and responsibilities for achievement of defined objectives and implementation of health and safety policies. This system covers all workers (own workers and those of subcontractors) that work at the Group's operating sites which use the management system.

More information is available in the "Own workforce - Health and safety" chapter of this section.

### Processes for engaging with value chain workers about impacts

[S2-2]

With respect to the ISO 45001-certified occupational health and safety management system, it is essential that all workers at work sites are properly involved in the activities implemented by Webuild to ensure a safe and health work environment. The standard requires a systematic and integrated approach to the identification and management of health and safety risks. Accordingly, Webuild adopts all necessary measures to ensure that subcontractors and their workers are familiar with its policies and standards. It provides adequate training to all workers at the work sites, holds safety meetings which are also attended by subcontractor workers based

on the works planned in a certain period (also with a view to managing interference risks). Webuild also promotes a safety culture that encourages all workers (including subcontractor workers) to raise concerns and make suggestions. More information about worker engagement is provided in the “Own workforce - Health and safety” chapter of this section.

### **Processes to remediate negative impacts and channels for value chain workers to raise concerns**

[S2-3]

Webuild has implemented a number of preventive and corrective actions aimed at enabling adequate and timely management of risks to the health and safety of workers at its work sites, including subcontractor workers. More information is available in the “Own workforce - Health and safety” chapter of this section.

### **Actions**

[S2-4]

With the aim of always responding better to its defined health and safety objectives, Webuild has developed a series of organisational measures and actions to protect both own and value chain workers at its work sites. Specifically, these actions are designed to ensure that all activities performed by own workers and subcontractor workers comply with the highest quality standards and health and safety protection standards. More information is available in the “Own workforce - Health and safety” chapter of this section.

Webuild assesses their effectiveness by continuously monitoring the activities carried out at the work sites and the injury rates of subcontractor workers. It also engages directly with them to emphasise the importance of safe and responsible behaviour.

The assessment of the effectiveness of the implemented actions is flanked by the on-site monitoring of projects by the local QEHS Departments, which mainly covers subcontractors and is designed to check that their activities comply with the parent’s quality standards and applicable requirements for the environment, health and safety. Specifically, the local QEHS Departments regularly audit the subcontractors. Any non-compliance is handled in accordance with the management system procedures and includes the agreement of improvement plans and follow-up checks to ensure that they are implemented.

As the above actions are an integral part of the Group’s activities, they did not lead to material non-recurring investments or costs in 2024.

### **Targets**

[S2-5]

The Group’s ESG Plan includes the following target: -6% LTIFR by 2025 compared to 2022. This target includes both own workers and subcontractor workers. More information is provided in the “Own workforce - Health and safety” chapter of this section.

## Training and skills development

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Support to develop the skills of supply chain workers through initiatives to build up their technical skills necessary to carry out their jobs	<i>Potential positive impact</i>	<ul style="list-style-type: none"> <li>Suppliers, Contractors, Subcontractors &amp; Partners (workers)</li> </ul>	X	X			X	

Promoting skills development of supply chain workers is a priority for Webuild. These workers, and especially those involved in operating and technical tasks, are essential for the Group's proper functioning and competitive edge. The positive impacts of skills development initiatives affect all works along the value chain and in particular the subcontractors that carry out key activities for the completion of the Group's projects.

The activities designed to hone their specific skills enable workers to be more efficient, work to a higher standard and in greater safety, thus contributing to an improvement in the Group's overall performance and responding to its needs. In line with the practices in place for its own workers, Webuild is committed to understanding the value chain workers' training needs and to providing strategic interventions. It designs a training programme with structured sessions and more tailored courses to respond to specific needs that may arise as a result of particular circumstances or extraordinary events.

### Policies

[S2-1]

Webuild has interrelated policies to support the skills development of supply chain workers in line with its commitment to sustainability and innovation and with a special focus on building up the technical skills necessary for workers to carry out their jobs safely and to a high level. In line with its Sustainability Policy, Webuild encourages active collaboration with its partners to deploy cutting-edge technologies and for the ongoing improvement of processes so as to ensure a positive impact on the performance of all workers. Moreover, the Health and Safety Policy advocates the adoption of training and awareness raising programmes to ensure that workers are always informed and trained to work in safe and continuously changing environments. This contributes to their professional growth and protection. The Quality Policy acknowledges and rewards outstanding performances, encouraging employees and subcontractor workers to constantly improve the quality of their work. These principles are reinforced and reiterated by the Suppliers' Code of Conduct, which establishes precise guidelines to ensure that all partners commit to the technical and professional skills of their employees in a context of sustainable growth and operating excellence along the value chain.

More information about these policies is provided in the previous sections and chapters.

### Processes for engaging with value chain workers about impacts

[S2-2]

The "Human rights" and "Health and safety" chapters of this section provide information about the processes for engaging with value chain workers about impacts.

## Actions

[S2-4]

Webuild encourages engagement and collaboration at corporate level to strengthen the technical skills required of the value chain workers and to concurrently accelerate innovation of processes and working techniques. These initiatives include regular supplier meetings with a large audience of Italian and international suppliers to discuss and update on the main procurement activities as well as meetings with individual suppliers to deep dive innovations related to their business. Employees from both the supplier and the Group participate in these meetings to facilitate the exchange of knowledge with high added value.

In addition, in 2021, the Group launched Supplier Development Hub, a collaborative platform to support the supply chain, sharing its know-how, experience and solutions to accelerate innovation and sustainability in the infrastructure sector, including through workshops and webinars about these topics.

Finally, all suppliers registered on the Open-es platform can use the platform's sharing and dialogue tools, i.e.:

- development hub: a section where all the community members can find services and products to implement their own development plan and narrow any identified gaps;
- collaboration area: an area where companies can share doubts, curiosities, requests for clarifications and further information, as well as offer their support and expertise to other community members;
- experience sharing: a section where companies can share and present their sustainability experiences, initiatives and best practices. This makes it possible to compare data and reports with peers, allowing companies to take strategic decisions based not only on their direct experience but also on benchmarks.

In addition, as described in the "Innovation and digitalisation" chapter of the "Governance information" section, Webuild has set up its first Innovation Centre with a technological partner. This physical and digital shared space is designed to hot house innovation and to develop and fine tune methodologies and technologies for the construction sector and its value chain.

Moreover, as part of its initiative to develop the skills of workers in the value chain, Webuild prioritises health and safety. Its actions are designed to ensure worker safety, health and well-being, while concurrently creating an environment that encourages training and skills development. More information about these actions is provided in the "Own workforce - Health and safety" and "Workers in the value chain - Health and safety" chapters of this section.

As the above actions are an integral part of the Group's activities, they did not lead to material non-recurring investments or costs in 2024.

## Targets

[S2-5]

Although it does not have measurable publicly-stated targets, Webuild considers the training of value chain workers to be of vital importance. Accordingly, it will continue to promote the development of skills along the value chain with dedicated initiatives to disseminate knowledge, tools and structured work methods which will be of benefit to the companies and workers in the value chain.

To this end, Webuild encourages its suppliers to register on Open-es, which has a lot of training content about ESG skills, and to disseminate a sustainability culture in their companies.

## Affected communities

### Material impacts, risks and opportunities

[IRO-1; SBM-3]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Direct and indirect contribution and initiatives that benefit local communities	<i>Potential positive impact</i>	• <i>Local communities</i>		X			X	
Differences of opinion or disputes with local stakeholders (trade unions, communities, local organisations, etc.)	<i>Risk</i>	-	X	X		X	X	

Webuild's business strategy, focused on the construction of large infrastructure, has an impact on territories, makes a direct contribution to the creation of jobs and economic development through initiatives of benefit to the local communities. However, the complex nature and large size of the works can trigger risks, such as potential disputes with local communities living around the work sites due to potential inconveniences that may arise from the Group's construction activities. These may include inconveniences caused by noise, dust, vibrations, work site vehicle traffic, light pollution and damage to private property.

In order to manage this critical issue, Webuild is committed to transparent and constructive engagement with the local stakeholders, which includes active listening and social accountability practices to balance its requirements with the local community's needs, reduce risks and maximise shared value.

### Policies

[S3-1]

The Group's strategy and policies are strongly oriented to maximising the positive contribution it can make to local communities through its work, while concurrently fostering collaborative dialogue to reduce risks of disputes or conflicts with local stakeholders.

The Code of Ethics in particular promotes an inclusive and responsive approach with communities affected by projects and the Group accordingly seeks to establish a constructive relationship during the work's construction phases to reduce inconveniences and ensure that the long-term benefits materialise.

Webuild has a hiring and procurement strategy designed to meet its requirements at local level as far as possible, based on availability. As already noted, it believes that this is a fundamental lever to support the local economy and encourage the local communities' direct involvement. In addition, Webuild makes donations to initiatives that promote the territory's growth (such donations always company with integrity criteria and the Group's ethical policies).

The Sustainability Policy, the Environmental Policy and the Social Accountability and Human Rights Policy reiterate these concepts. They refer to the objective of creating shared value that blends economic well-being with a positive social and environmental impact through stakeholder engagement and support for innovation to improve the quality of life in the communities, as well as the Group's strong commitment to respecting the rights and culture of the local communities and indigenous peoples in the territories where it works.

In addition, Webuild is committed to developing and maintaining solid, long-lasting relationships with all its stakeholders, including affected communities, to listening to their legitimate expectations and to adopting suitable, structured approaches to engagement. It is convinced that correct and transparent relationships with all stakeholders are an integral part of a company's responsible conduct. Given the specific nature of its business and international scale, the Group manages thousands of interactions with stakeholders every day, using the best communication channels to promptly engage with them.

The Group ensures the freedom and safety of communities living around its work sites and ensures that workers are properly informed about the content of this policy. This approach is in line with the principles in the International Charter of Human Rights, the Fundamental Conventions of the International Labour Organisation, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Finally, the Suppliers' Code of Conduct promotes and extends this commitment to the Group's partners and suppliers, ensuring that business activities generate value for the territory with a multiplier effect.

More information about the Code of Ethics, the Sustainability Policy, the Environmental Policy, the Social Accountability and Human Rights Policy and the Suppliers' Code of Conduct is available in the previous chapters and sections and, in particular, in the "Policies adopted to manage material sustainability matters" chapter in the "General information" section.

### **Processes for engaging with affected communities about impacts**

[S3-2]

The processes for engaging with affected communities and the whistleblower reporting channels available to all stakeholders are described in detail in the "Interests and views of stakeholders" chapter of the "General information" section and the "Corporate culture" chapter of the "Governance information" section, to which reference is made.

### **Actions**

[S3-4]

Webuild carries out its activities with a view to generating a positive impact on local stakeholders not only by building infrastructure that can improve a country's efficiency and competitiveness but also by creating new jobs, including local suppliers in its supply chain and involvement in local development initiatives that foster the development of the economy and the quality of life of the local communities.

With respect to the creation of jobs in the countries where it works, the possibility to improve the capacity and skills of local workers means the Group can disseminate specialised technical know-know and expertise as well as generating additional wealth for the local economy. The Group's approach is to employ workers from areas around the work sites as far as possible, when the necessary numbers are available and they have the required skills. This approach also creates the opportunity for the Group to build up a pool of qualified workers who can be employed for future projects as well.

Purchases from suppliers resident in the countries where the Group operates are the main trigger to developing related industries (which make a direct contribution to GDP, public revenue and disposable income). In addition, resort to local suppliers reduces long distance transport and thus mitigates the related environmental impacts. More figures and information about locally-hired workers and local procurement are provided in the "Metrics" paragraph of this section.

Initiatives undertaken in areas where Webuild works include sponsorships<sup>96</sup>, social and philanthropic initiatives. The Group's guidelines require that assistance is given in five strategic macro-sectors: social, art and culture, education and research, environment, sport and entertainment.

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<sup>96</sup>Sponsorships and donations are managed in line with the specific guidelines and internal procedures that are part of the Anti-corruption system, which is ISO 37001 certified. This ensures that any assistance is in line with the approved budgets and is only given after the positive outcome of checks of the potential recipients.

The main initiatives carried out can be classified as follows:

- direct assistance to design and build infrastructure benefiting the local community such as, for example, schools, healthcare facilities, roads, etc.;
- assistance with social programmes, carried out directly or through other organisations in the above macro-sectors;
- free access to certain work site facilities such as clinics, water and electricity supply networks for local communities living in rural areas not connected to basic services.

The Group carried out 52 initiatives for €2 million in 2024. The most sizeable initiatives were carried out at both corporate and branch level, mostly for social, environmental, cultural and educational purposes. Other initiatives conducted during the year included the customary free healthcare check-ups provided to local communities by some work site clinics, in particular, those in Ethiopia (GERD and Koysha). Around 18,000 medical check-ups and roughly 9,700 health interventions were provided in 2024.

The Group has a considerate and respectful approach to indigenous peoples whenever its activities take place in areas where they live. Its engagement and interaction with these communities is based on utmost respect for their cultural, intellectual and religious rights, especially as regards transparency and sharing clear information about activities that could affect their territories. A key example of this commitment is the Australian subsidiary Clough that has worked closely with the Aboriginal and Torres Strait Islander peoples for years. It promotes initiatives to create real opportunities for learning, training, employment and business relationships. In 2020, Clough's commitment to this issue led it to prepare the first Reconciliation Action Plan (RAP) approved by Reconciliation Australia, the independent non-profit body that promotes reconciliation between the Australian community and the Aboriginal and Torres Strait Islander Peoples by building relationships, respect and trust. In 2022 and 2024, as further confirmation of its intention to continue this reconciliation journey, the Australian subsidiary developed and obtained validation of a second and third RAP.

The group set up to implement the RAP has three committees responsible for specific tasks and to update on progress made. They are:

- Procurement Committee – responsible for implementation of the objectives tied to procurement and the supply chain;
- First Nations Toolkit Committee – in charge of developing the cultural toolkits;
- Employment, Retention and Development Committee – responsible for achievement of the objectives tied to the workforce.

Moreover, as described in detail in the “Interests and views of stakeholders” section, the Group's customers are responsible for planning and developing the projects which may, when provided for, include the prior consultation of the affected parties and definition of mitigation and compensation actions. Webuild usually provide support with the management of interaction between the work sites and surrounding territories. This two-pronged approach to engagement with local stakeholders could be a potential source of risk for the Group, which could lead to local opposition to projects, with the related operating, financial and reputation risks.

In order to mitigate these risks, Webuild monitors stakeholders' expectations about its projects and all work sites scrupulously comply with legal and contractual requirements as well as any obligations set out in the project impact assessments. The Group ensures the compliance of its operations and those entrusted to third parties (e.g., designers and subcontractors) and that the local communities receive sufficient information both before work starts and as it continues.

In addition, construction activities can cause inconveniences for local stakeholders due to the noise, dust, vibrations, work site vehicle traffic, light pollution and damage to private property. The QEHS management system includes specific procedures to assess and monitor these aspects, so that each site can put in place the



most appropriate measures to ensure protection of the surrounding territories, encourage dialogue and collaborative relationships with the local authorities and stakeholders.

Generally, sensitive receptors who can potentially be affected by noise interference are protected by noise barriers, which can be artificial dunes made of backfill material, support structures and absorption panels made of various materials. The noise barriers can also be one or more rows of trees or shrubs which both absorb the noise and reduce the visual impact and dust (nature based solution). The choice of the barrier depends on its effectiveness, the area in which it will be placed and its landscaping effect. The Group designs specific noise reduction devices tailored to the source (e.g., type of system), in order to maximise containment of the sound waves, for example, by covering conveyor belts.

Specifically, the work sites regularly monitor noise and vibrations, especially when there are sensitive receptors. The Group introduces noise and vibration prevention and/or reduction measures (e.g., noise barriers) based on their effectiveness, the context and related mitigation of the landscaping effect. Close attention is paid to the reduction of light pollution: cut-off lamps are used to limit the upward dispersion of light, the lighting system is calibrated to a minimum so as to guarantee the lux necessary for the safety of the site and the workers without disturbing the surrounding areas. Directional lighting is also used to limit lighting within work site areas.

As the above actions are an integral part of the Group’s activities, they did not lead to material non-recurring investments or costs in 2024.

### Targets

[S2-5]

Although it does not have measurable publicly-stated targets, Webuild deems it essential that engagement with the local communities and territories where it works always be transparent and constructive. The Group has actions (procedures, management systems and monitoring activities) that reflect its commitment and its focus on the complex system of actors that are directly and indirectly involved in its projects.

Some projects may have special local personnel recruitment plans as provided for contractually, which may include employment targets.

### Metrics

#### *Employment created by the Group’s projects*

[MDR-M]

In 2024, 79% of the 43,573 own workers were local personnel, i.e., employees hired in the county of their nationality.

Own workers hired locally	Unit	2024
Africa	%	97%
Europe	%	91%
Americas	%	96%
Asia and Oceania	%	31%
<b>Average</b>	%	79%

The percentage for Asia and Oceania mainly reflects large projects underway in the Persian Gulf area (some of which are recent acquisitions), which require a very significant contribution of labour that is not available locally. Therefore, much greater resort is made to foreign workers compared to the other areas in which the Group operates. Reference should be made to the “Own workforce - Human Rights” chapter of this section for information about the management of migrant workers.

In 2024, local managers made up 78% of the total, with peaks of 99% in Italy. In addition to the own workforce, the involvement of value chain workers (mainly workers of subcontractors and service providers) contributes

significantly to the employment generated locally. Value chain workers involved in group projects numbered 35,352 at 31 December 2024.

#### *Local procurement*

[MDR-M]

In 2024, the Group maintained a strong relationship with its local supply chain, with an average of 88% of its expenditure made with local suppliers, i.e., suppliers with their registered office in the same country where the Group's projects are located.

Local procurement	Unit	2024
Africa	%	60%
Europe	%	89%
Americas	%	100%
Asia and Oceania	%	85%
<b>Average</b>	<b>%</b>	<b>88%</b>

#### *Economic value generated and distributed*

[MDR-M]

The direct economic value generated by the Group in 2024 amounted to €11,930 million, including €11,271 million which was distributed and €659 million which was retained. Specifically, €8,465 million was distributed to suppliers (operating costs), €2,100 million to employees (remuneration and benefits), €538 million to lenders and €168 million to the public administration (taxes)<sup>97</sup>.

<sup>97</sup> This does not include dividends to be distributed to the shareholders, which will be available after the ex-dividend date expected to be 19 May 2025.

## Governance information

### Business conduct

#### Corporate culture

#### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Dissemination of environmental, social and governance sustainability principles thanks to responsible conduct when making business decisions and a corporate culture based on ethics and integrity	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>Suppliers, subcontractors &amp; partners</li> <li>Employees</li> </ul>		X		X		
Tax risk - Non-compliance with local and international tax rules	<b>Risk</b>	-		X		X	X	

### Policies

[G1-1]

Webuild has an organisational and management model based on a set of principles, formalised in the Code of Ethics, the Suppliers' Code of Conduct and Group policies, and management and control tools, such as the risk management model, models (specifically, the anti-corruption model and the organisational, management and control model as per Legislative decree no. 231/2001), procedures and controls designed to address material sustainability matters, which include ethics and legality, in line with the regulations applicable in the countries where it operates, and the main international standards and guidelines.

Webuild is also a signatory of the UN's Global Compact, the largest global sustainability initiative that requires companies to align their operations and strategies with ten universally-recognised principles on human rights, labour practices, the environment and anti-corruption.

The Code of Ethics sets out the principles and rules of conduct to be adhered to by Webuild's directors, statutory auditors, managers and employees, as well as those parties that directly or indirectly, temporarily or on an ongoing basis, work with the Group, to the extent of their duties and responsibilities. They are required to base their conduct on that set out in the Code to ensure their compliance with the laws and regulations applicable in the various areas where the Group operates.

The Code is the culmination of a journey which started with the definition of Webuild's Identity Pillars. It sets the tone for how the parent interacts with its collaborators, partners and, more broadly, its stakeholders. The Code establishes proactive behaviour to be adopted at work and an ethical leadership model.

Webuild has issued a number of policies (posted on its website in various languages), which alongside the Code of Ethics, represent the main points of reference for people working for the Group.

With respect to corruption and bribery which are covered by the Code of Ethics and the Anti-corruption Policy, Webuild also has a dedicated ISO 37001-compliant anti-corruption management system which is certified by an independent body. This system reinforces the policy as it provides for the preparation, updating and application of an Anti-corruption Model, which the parent's Board of Directors approved on 16 June 2014 and was revisited on 28 September 2018 and 15 December 2020; issue of Guidelines and internal procedures and integration of existing ones to define the roles and responsibilities of the parties involved and the operating methods for the processes and controls defined in the above documents.

In accordance with ISO 37001:2016 Anti-bribery management system and given their position in the organisation and the powers conferred on them, department heads are considered to be at high risk of corruption as they oversee the processes most exposed to this risk based on the risk assessment performed by the Compliance Department. Such processes include HR management, procurement and supplier management, management of bids for tenders called by public and private sector customers, etc..

The Board of Directors adopts the Anti-corruption System while the Compliance Unit monitors the Anti-corruption System and its correct application. It draws up an annual Compliance Plan, which sets out the parent's goals to ensure achievement of the compliance system objectives and ISO 37001 recertification. The Control, Risk and Sustainability Committee, the Board of Statutory Auditors and the Director in charge of the Internal Control System all check the Compliance Plan as does the Integrity Board for the aspects related to Legislative decree no. 231/2001.

The Italian group companies that take part in public calls for tenders have anti-corruption compliance systems similar to that of Webuild. They have all maintained the ISO 37001 certification obtained in previous years.

Webuild also has a whistleblower reporting channel that can be accessed through an external multilingual web portal. This allows all affected parties to make anonymous or confidential (at their own discretion) notifications about potential violations. The Integrity Line platform also accepts voice notifications or phone calls (for the Australian group companies). To ensure the correct use of the system, Webuild has issued whistleblowing management guidelines. It also considers notifications made through other channels, such as anonymous letters.

Employees are obliged to report any violations of internal and/or external regulations, ethical and integrity principles, the organisational, management and control model, the anti-corruption model and/or all anti-corruption laws by their company, a colleague, a consultant or third party. Webuild guarantees the protection of the whistleblower in accordance with the provisions of Law no. 24/2023 on whistleblowing and Regulation (EU) no. 2016/679 on personal data protection. All whistleblowers are protected against any form of reprisal, discrimination or unfair treatment, without prejudice to legal requirements or the protection of the rights of the company or people who deliberately make a false notification. Webuild does not allow retaliation of any form against an employee who reports suspected incidents of wrongdoing in good faith.

The Compliance Department handles all notifications and the related checks received through the platform. Once it has performed an initial analysis of the notification, the Department may involve the following departments in performing the necessary checks:

- Internal Audit, for notifications about suspected fraud, inefficiencies and ineffectiveness of internal controls;
- Group HR, Organisation and Systems, for suspected violations of rules of correct conduct;
- Security, for suspected crimes and situations that could put the safety of people or company assets in danger;
- QHSE, for suspected violations of quality, health, safety and environmental regulations.

Given its independent status, the Integrity Board autonomously performs checks and assesses notifications it receives directly related to alleged serious violations as per Legislative decree no. 231/2001. When necessary, it is assisted by external experts.

Webuild requires that all new employees receive the mandatory training on the Code of Ethics, the 231 Model and the Anti-corruption System, including the whistleblowing system as part of a broader compliance training programme and to ensure they have sufficient knowledge and understanding of the principles enshrined in its internal rules. In addition, the Compliance Department organises anti-corruption courses for the departments considered most at risk (e.g., the Business Development and HR Departments). In turn, the Compliance Department personnel attend special courses on relevant topics. For example, they took part in a training course on whistleblowing management in 2024. All employees are required to formally renew their compliance with the Code of Ethics, 231 Model and the Anti-corruption Model once a year, confirming that they have never been involved in conflicts of interest. In addition, to contain the revolving door risk, Webuild has a system to check that potential new hires state whether they have held public positions in the previous three years which involved authorising or negotiating contracts with the Group. If this is the case, they are hired for positions where potential conflicts of interest would not arise.

Moreover, pursuant to the principles of its Code of Ethics, Webuild does not make contributions to political and trade organisations of any kind (parties, movements, committees, etc.) nor their representatives.

Training activities are managed by the dedicated unit which is part of the Group HR, Organisation and Systems Department, assisted by consultants and the Compliance Department when necessary. This unit plans the courses, files the materials distributed and documentation used and registers the participants. It also assesses training needs in terms of usefulness, interest and participation, the available trainers, teaching materials and organisation once a year, supported by the Compliance Department.

With respect to **tax** matters, Webuild's approach is to ensure utmost integrity and correctness, including for the management of tax aspects related to its operations in line with the principles of integrity and legality set out in the Code of Ethics and the Sustainability Policy.

Taxes are one of the main sources of the Group's contribution to the countries where it operates as they can be used by the public administration to finance the economic and social development of their areas. Its approach to tax is directly related to its business given that its foreign interests are mostly limited to those countries where the Group pursues commercial opportunities (participation in calls for tenders) and/or operating possibilities (contract management, concessions, equity investments, etc.).

Webuild fully complies with the applicable tax regulations in all the countries where it operates and has a collaborative and transparent relationship with the tax authorities.

The parent's tax department, which reports to the chief financial officer, analyses, directs and monitors the management of tax issues in line with Webuild's values and principles. It also assists the Group's other departments and companies.

Webuild's organisational, management and control model as per Legislative decree no. 231 defines its rules of behaviour, prevention protocols and controls to ensure compliance with tax requirements and minimise the risk that tax crimes could be committed. It ensures that the Group respects all the rules, procedures and processes to calculate taxes, keep tax records and prepare tax returns for approval.

## **Actions**

[MDR-A]

The Compliance Department regularly performs a risk assessment to identify material risks as per the Anti-corruption Model and the 231 Model covering the internal processes of the parent and ISO 37001-certified companies. The assessment is performed for the other Group's based on KPIs, such as the level of country risk considering the CPI (Corruption Perception Index) and how long their compliance system has been in place. The Department uses its findings to define a Compliance Plan, which sets out the annual activities to disseminate and implement ethical and integrity policies, procedures and organisational models at the group companies and the checks designed to ensure the correct application of the ethical and anti-corruption procedures and standards by them. In addition, Webuild defines and holds training, information and awareness-raising activities for its employees on ethics and integrity, including human rights topics (e.g.,

diversity and inclusion, health, safety and well-being in the workplace, security) every year. These activities are targeted at both the head office and work sites and may cover specific matters or be designed to provide a greater understanding of the Group’s commitments. To this end, Webuild has also set up an e-learning platform, E-learning Academy, which provides both mandatory and optional courses available to all employees with access. For example, the parent has developed a mandatory human rights e-learning programme for all new hires at the head office.

As the above actions are an integral part of the Group’s activities, they did not lead to material non-recurring investments or costs in 2024.

**Targets**

[MDR-T]

Although it does not have a measurable publicly-stated target, the Compliance Department includes measurable targets in its annual report to the governance bodies, including in relation to the corporate culture. It also provides an update on the progress made on the related actions in the subsequent report.

In addition, Webuild promotes principles of ethics, transparency and integrity, as well as best practices to strengthen its corporate culture. It also does this by adopting performance monitoring and assessment tools, such as audits and regular inspections.

**Metrics**

*Entity-specific disclosures*

[MDR-M]

		2024
Hours of training on compliance issues		29,058

## Management of relationships with suppliers

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Dissemination of environmental, social and governance sustainability principles to suppliers and partners in the supply chain to foster a sustainable development culture	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>Suppliers, subcontractors &amp; partners</li> <li>Employees</li> </ul>	X	X			X	
Inadequate or non-performing suppliers/subcontractors	<b>Risk</b>	-	X	X		X	X	

Each year, Webuild works with tens of thousands of suppliers both for its contracts and internal requirements. The main categories of purchases relate to subcontracts, materials, machinery and equipment and services.

The Group is potentially exposed to various risks, including compliance, commercial and reputation risks, due to inadequate supplier screening and/or supplier performance evaluation. Specifically, the main risks arising from external factors include potential risks of non-compliance with regulatory changes requiring the adoption of new measures with suppliers, as well as commercial and reputation risks due to possible issues with suppliers (e.g., inadequate performance in technical, qualitative, human rights, safety and environmental areas, etc.) after the contract has been signed.

### Policies

[G1-1]

As defined in its Code of Conduct, Webuild's conduct hinges on principles of correctness and transparency, and it is committed to not exploiting any conditions of dependence or weakness of its suppliers.

Webuild firmly believes in loyal and sustainable competition as the best way to select the best suppliers and improve quality when procuring goods and services.

At the beginning of 2020, Webuild adopted a Suppliers' Code of Conduct to extend the reach of the principles enshrined in its policies. This Code is binding for the supply chain (more information is available in the "Workers in the value chain" chapter of the "Social information" section).

Webuild selects its suppliers using principles of fairness and transparency and selection criteria which involve checking their quality, technical/professional qualifications, compliance with standards about human rights, labour regulations (including equal opportunities), health, safety and the environment as well as prices.

Suppliers are required to formally accept the Code of Ethics, the Anti-corruption Model and the Suppliers' Code of Conduct as integral parts of their contracts. Webuild encourages its suppliers to apply the same criteria when selecting their subcontractors and also to pass on the Group's principles of integrity, honesty, reliability and sustainability in order to encourage and promote compliance with its principles along the entire supply chain.

The parent is committed to protecting the confidentiality of the corporate information and professional know-how and asks its counterparties to do likewise. When Webuild manages contracts directly or there are specific agreements in place, the suppliers are required, to the extent of their involvement, to comply with/adopt the parent's Quality, Environment, Health and Safety Management Systems.

## **Actions**

### **Management of relationships with suppliers**

[G1-2]

Webuild has a supplier qualification procedure which is part of the procurement process and assesses whether the potential supplier can be included in the Vendor List. This qualification procedure also ensures the Group's requirements are met for all goods categories and in all relevant geographical areas. Assisted by the Compliance Department, the Procurement Department manages the procedure, which involves a number of preliminary checks of the potential supplier's reputation, its expertise and that it is not included in the Sanctions List.

Potential suppliers are required to fill in a questionnaire to allow Webuild to obtain information about and assess various aspects such as: business and production category, organisation and shareholder structure, financial reporting, registration and certifications, quality, the environment and safety, social accountability (including human rights) and specific information about their goods categories (when available).

Based on these questionnaires, the Procurement Department may proceed with specific analyses and detailed checks, which can include assessment visits to the supplier's production units and offices. Additional risk analyses are performed for certain suppliers that fall into the counterparty risk category using the methods and tools defined by the Risk Management Unit. Upon completion of the checks, suppliers found to be suitable for qualification are included in the suppliers register and the reference Vendor List. Certain contracts require adoption of a specific additional qualification system depending on the applicable regulatory and contractual requirements. For example, suppliers working on projects subject to LEED environmental certification are subjected to additional checks to verify their compliance with specific environmental parameters, while other specific requirements, such as social criteria, are checked for projects acquired in some countries. These may include checking potential suppliers whose workforce mainly consists of employees from special categories (e.g., ethnic minorities).

More information about the inclusion of sustainability matters in the supplier qualification process is provided in the "Workers in the value chain - Human rights" chapter of the "Social information" section.

Contracts with suppliers include provisions requiring them to comply with the applicable regulations, the Code of Ethics, the Suppliers' Code of Conduct, the 231 Model and the Anti-corruption Model as well as quality, health and safety and environment requirements

In addition, as envisaged by the Anti-corruption Model, each supplier is required to sign a specific "Compliance" contractual clause whereby they commit to complying with the Code of Ethics and Webuild's organisational principles (non-compliance leads to termination of the contract). Moreover, to ensure fair remuneration of its suppliers, Webuild checks that the remuneration, fees or commissions paid are commensurate with the services provided, the engagement awarded and market conditions/practices or professional rates.

### **Performance monitoring and assessment system**

Once a contract has been signed and is effective, the parent monitors the performance of its key suppliers using a special assessment process, involving the corporate Procurement Department and the contract managers. This system is described in the "Workers in the value chain - Human rights" chapter of the "Social information" section.

The assessment process is flanked by the on-site monitoring of projects by the local QEHS Departments, which mainly cover subcontractors and is designed to check that their activities comply with the parent's quality standards and applicable requirements for the environment, health and safety. Specifically, the local QEHS



Departments regularly audit the subcontractors. Any non-compliance is handled in accordance with the management system procedures and includes the drafting of improvement plans and follow-up checks to ensure that they are implemented. Additional information about this action is provided in the “Own workforce - Health and safety” and “Workers in the value chain - Health and safety” chapters of the “Social information” section.

As the above actions are an integral part of the Group’s activities, they did not lead to material non-recurring investments or costs in 2024.

Targets

[MDR-T]

Although it does not have a measurable publicly-stated target, Webuild is firmly committed to encouraging the adoption of its sustainability practices and best practices by its suppliers and partners. Using performance monitoring and valuation tools, the Group ensures that the performance and quality of the activities performed by suppliers and partners as part of contracts agreed with the Group is fully adequate.

To this end, Webuild plans to increasingly involve suppliers in the ESG Open-es and EcoVadis platforms to expand the ESG mapping of the supply chain and encourage suppliers to improve their sustainability performance in line with their size and capacity.

Over the years, the Group has adopted a method for the implementation of the performance monitoring and valuation system depending on how strategic the contract is, which has allowed it to assess a vast number of suppliers. In 2025 and subsequent years, Webuild plans to extend the scope of strategic contracts and, hence, the number of in-scope projects and the percentage of suppliers assessed<sup>98</sup>.

Metrics

Entity-specific disclosures

[MDR-M]

2024	
Percentage of orders with suppliers qualified using social and environmental criteria	90%

<sup>98</sup> Calculated considering the value of the orders agreed with the suppliers assessed as a percentage of the total value of orders.

## Innovation and digitalisation

(Entity-specific disclosures)

### Material impacts, risks and opportunities

[IRO-1]

Description	IRO	Affected stakeholders	Value chain			Time horizon		
			Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
Adoption of innovation as a lever to improve the social and environmental performances of large infrastructure built by Webuild	<b>Actual positive impact</b>	<ul style="list-style-type: none"> <li>Customers &amp; potential customers</li> <li>Environment</li> <li>Local communities</li> </ul>		X			X	
Inefficient, non-performing and/or obsolete applications and IT systems	<b>Risk</b>	-		X				
Use of innovative solutions, including through collaboration with business partners, to achieve a competitive edge and greater market share	<b>Opportunity</b>	-					X	X

### Policies

[MDR-P]

Webuild considers innovation essential for its long-term sustainable growth in an era of technological and environmental challenges. Its commitment is set out in the following policies that emphasise the importance of innovation to its operations:

- **Sustainability Policy:** Webuild invests and proactively works with all its partners to deploy the best technologies available and develop sustainable innovative solutions in order to improve and streamline its internal processes and build works that meet and exceed expectations of customers and all other stakeholders.
- **Health and Safety Policy:** Webuild actively works with its partners to ensure that technological innovations, conceived to ensure the highest levels of health and safety, are considered during the design and performance of activities;
- **Quality Policy:** Webuild actively works with its partners to ensure that the best technologies available in the sector are taken into account during the design and construction of the works to ensure full compliance with the design requirements and to build the works in line with the fundamental principle of “build to perfection”.
- **Environmental Policy:** Webuild actively works both directly and with its partners to ensure that all the best, sustainable and most innovative materials and technologies are considered during the design and performance of activities, as well as the works to be built and that the works will benefit the planet, workers and communities;

- **Road traffic safety Policy:** Webuild actively works with its partners to ensure that technological innovation is considered when designing and performing activities to reduce road accidents and incidents.

Webuild is committed to ensuring that the above policies are promoted and integrated into the value chain to generate the most possible positive impacts and minimise any negative impacts.

The Group also develops and curates stable, long-term relationships with all its stakeholders through suitable, structured engagement so that their legitimate expectations can be considered when discussing innovation matters. It presents its policies during various stakeholder engagement events, such as the roadshows with investors and specific events like the Sustainability Week, when Webuild discusses its objectives and progress. It also organises initiatives for employees such as dedicated training sessions to ensure everyone is aligned with the Group's standards and practices.

Webuild has a plethora of diverse stakeholders. The workers are mostly involved in issues about work-related health and safety, in which the Group has always invested significant resources to ensure a safe and secure work environment.

Customers are another essential group, as the quality, sustainability and durability of the works are essential to retain customer loyalty and satisfaction.

A key role is played by the supply chain, comprising strategic partners and suppliers that make a direct contribution to innovation through the quality of their materials, technical expertise and ability to adapt to new challenges. Another key stakeholder is the academic world as the development of new technologies, methodologies and approaches is often the result of partnerships with universities.

Local communities are also important stakeholders, as Webuild's projects can generate value through sustainable development, greater efficiency and safety, thus contributing to improving the quality of life and social well-being of the local communities.

Finally, investors are interested in the opportunities offered by the Group's policies as they assess how they can positively affect the return on, and long-term sustainability of Webuild.

## **Actions**

[MDR-A]

Innovation is key to be competitive in terms of:

- Streamlining core and staff processes for improved performance efficiencies (timing and costs);
- social and environmental performance thanks to less work-related incidents and a smaller impact on the environment and the communities affected by its operations;
- quality construction services that meet customer needs;
- reduction of construction lead times;
- ability to pre-empt and respond to future challenges, adapting to a continuously-changing market;
- expansion into new business sectors.

The Group's sector is known for the highly customised processing, techniques and technologies deployed depending on the nature of the works to be performed. Each project is unique and requires the development of personalised solutions designed thanks to highly specialist know-how. The Group's work sites are real hives of innovation and advanced research. Innovative initiatives are carried out at project and corporate level. At project level, in addition to researching new materials, ensuring worker safety, pursuing quality and protecting the environment, the most challenging activities are those for projects with technical characteristics that cannot be dealt with using conventional techniques and technologies.

At corporate level, the technical departments work unceasingly to develop state-of-the-art methods that best respond to the unique characteristics of each project and share the different innovations, pooling replicable initiatives. Webuild's technical teams partner with the best experts and professionals in the market,

universities and research centres right from day one to develop tailored solutions able to meet customers' requirements while protecting the local environment and communities.

To achieve the objectives defined in the policies described above, a suite of actions have been implemented or are being implemented, of which the most representative ones are reported below:

### The first Webuild Innovation Centre

In 2023, the Group opened its first Innovation Centre aimed at promoting innovation for both its work sites and external stakeholders. This new centre will deploy disruptive technologies to design and develop an array of complex solutions, also from a sustainability and safety viewpoint. The objective is to improve the Group's construction products and processes and narrow the technological gap that has traditionally affected the construction sector, in order to increase competition in the Group's markets and promote a culture of innovation.

The Innovation Centre will also allow the Group to teach and foster new expertise, generating greater employment and enhancing territorial resources by creating virtuous collaboration mechanisms both with the academic world and with research organisations and local counterparts. This shared physical and digital centre will cultivate innovation, and develop and optimise methodologies and technologies for the construction sector.

The Centre will facilitate the identification and development of priority innovation areas, such as the study of innovative materials and construction techniques, digitalisation, sustainability and automation. In 2024, the Group set up a special team whose members are skilled in different areas. It also started to work with universities and strategic partners. Between 2024 and 2027, the Innovation Centre will engage in R&D projects with external stakeholders to develop and test the first prototypes and their possible future roll-out.

The Innovation Centre's activities cover different areas ranging from research into materials to construction techniques and methods, from the digitalisation of business processes to cloud transformation and robotisation. Various stakeholders will be involved in achievement of the latter, as well as in projects related to quality, safety, the environment and monitoring of work site activities. From an Open Innovation perspective, partnerships with universities and research centres, as well as the involvement of suppliers, customers and strategic partners will facilitate the co-creation of high-impact innovative solutions for the domestic market, with a planned expansion in line with the Group's presence in the world.

### Segment factory - Roboplant

The segment factory was set up for the sustainable automated production of pre-cast segments for tunnel lining, which are essential to build mechanised bored tunnels. The factory uses robotised technologies and highly-efficient automation techniques with a strong focus on innovation, efficiency, circular economy, safety, quality and sustainability. The Group's intention is to reduce the environmental footprint of its production activities by developing a product that is more resilient and better performing. The factory has also been designed in such a way that it can be dismantled and re-used in other areas in line with the design for deconstruction concept. It is almost autonomous and meets most of its water and energy requirements using environmentally-friendly solutions such as solar energy and the recovery of rain water.

Finally, by automating the most demanding operations, the factory increases work safety and the quality of the workers' work.

- **Roboplant 1 (Belpasso, Sicily):** This factory, opened in November 2023, is the first automated facility in Italy for the production of tunnel segments. Its high automation levels translate into a **significant rise in productivity** compared to a traditional factory. It has a solar photovoltaic system that provides 40% of its energy and a rain water recovery system that meets 70% of its water requirements, thus reducing the factory's environmental footprint. A second factory, **Etnaplant**, operates in Belpasso providing support to Roboplant 1;
- **Roboplant 2 (Bovino, Puglia):** This factory, opened in December 2024, is an upgrade on the former factory with greater production capacity as it has a twinned pair of automated, independent lines for the

production of pre-cast concrete segments. When operating at full capacity, the factory will produce two segments every 7 minutes, reducing CO<sub>2</sub> emissions by approximately 140 tonnes a year;

- **Roboplant 3 (Dittaino, Sicily):** Designs are being prepared for this factory which will support the Sicilian work sites in the construction of the new Palermo - Catania line.

These factories are in Sicily and Puglia and are designed to provide the work sites with tunnel segments for the high-speed Naples - Bari and Palermo - Catania - Messina railway lines, supporting the value chain with the construction of mechanised bored tunnels. Overall, the four factories will help to **create roughly 450 jobs**, mostly local, including positions already filled and to be filled, thus consolidating Webuild's commitment to modernising the infrastructure of southern Italy.

### **Green TBMs**

For some years, Webuild has collaborated for the design and development of state-of-the-art tunnel boring machines (TBMs), designed to reduce energy and water consumption by optimising the on-board systems and devices. These innovations make the boring activities more efficient, reduce the environmental impact, speed up boring times and improve operating safety.

The first green TBMs for use in RFI Italia's railway projects were readied for use and delivered in 2023 and 2024. They have been designed to reduce their environmental footprint and improve the tunnel excavation efficiency by reducing energy and water consumption per cubic metre bored by roughly 20% compared to the traditional TBMs.

The "moles" also have cutting-edge systems to manage energy and water consumption efficiently thus making a significant contribution to reducing the works' environmental impact. They are subjected to continuous monitoring to obtain data about their performance and identify additional opportunities for improvement.

The green TBMs are currently in use in Italy at RFI's railway work sites and will be used in other infrastructure projects in Italy and abroad. They will also undergo additional technological optimisations to improve their efficiency and reduce their environmental impact even further.

The project to build these green TBMs has involved engineers, specialised group technicians who worked with the TMB's suppliers for the machine's development and deployment. It has also involved the value chain with the selection and management of specialist suppliers to optimise the design, engineer the highly energy efficient components and re-engineer the functional and logical components of the on-board systems to achieve greater production efficiency and the related cost optimisations.

### **Connected Webuild**

Connected Webuild is the Group's digital strategy to roll out an integrated, unique IT infrastructure that connects processes, people, skills, data and assets, availing of Cloud potential throughout the Group. This will allow processes that generate data to link with those that use the same data converted into knowledge, thus improving productivity, operating efficiency and sustainability as well as the Group's competitive edge and integration of its organisational structures. Adoption of these new technologies will transform its processes, making them more efficient and effective.

The objective behind the project is to close the gap between the EPC (Engineering, Procurement and Construction) and the other sectors in terms of its digital transformation. The project will resolve some of the sector's main challenges such as the poor replicability of solutions, the difficulty in sharing processes, procedures and corporate culture, and the complexity linked to the change necessary to encourage the adoption of innovations. It aims to introduce common, integrated solutions that facilitate centralised governance and control processes, thus contributing to strategic digitalisation to modernise and make the Group more competitive on the global stage.

The variety of options available and the need to coordinate the corporate office and work sites has required an IT Strategy, which deploys the main disruptive technologies available on the market such as cloud computing, artificial intelligence, cybersecurity, Internet of Things, BIM and digital twinning.

## Targets

[MDR-T; MDR-A]

As part of its ESG plan, Webuild plans to invest €430 million in innovative and clean tech projects. The plan indirectly involves the upstream value chain as strategic partners that will cooperate to innovate the processes used to develop projects and the downstream value chain, helping customers achieve their innovation (or emission reduction/environmental protection) targets.

Webuild defined the investment using a process involving internal departments and considering a range of elements and factors. The methodology was largely based on the forecasts contained in the budgets for the Group's innovation (including R&D) projects and investments in plant and machinery related to clean tech (e.g., green TBMs) scheduled for the 2024-2025 period (depending on the progress of the Group's projects). It has assumed an average standard cost for each type of machinery to define the target for the second aspect.

## Metrics

### *Entity-specific disclosures*

[MDR-M]

Webuild has calculated the total investment in innovative and clean tech projects to monitor and assess the progress made and the effectiveness of its performance in light of the target.

	(€m)	2024
<i>Total investments in innovative and clean tech projects</i>		253

The metric considers actual data for the main innovative projects carried out at group level, related both to R&D activities<sup>99</sup> and innovative activities<sup>100</sup> other than R&D. In addition, it considers investments of the year in plant and machinery that can be classified as clean tech.

<sup>99</sup> Projects that involve progress or acquisition of scientific or technological knowledge or capacity through creative and systematic activities designed to increase the Group's knowledge and/or applications of its available knowledge at least in its reference context / sector.

<sup>100</sup> Projects to create new or significantly improved products or processes (or a combination thereof) compared to those already in use or applied by the Group.

## Annex 1- Tables of economic KPIs associated with EU Taxonomy-eligible and aligned economic activities in the year 2024

Table 1 - Turnover (€'000)

Table 1 – Turnover (€ 000)																						
Year N	2024			Substantial contribution criteria						DNSH (“Do No Significant Harm”) criteria (h)												
Economic activities (1)	Code (a) (2)	Turnover (3)	Proportion of turnover (year N) (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of turnover (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)			
		€’000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T			
A. TAXONOMY-ELIGIBLE ACTIVITIES																						
A.1 Environmentally sustainable activities (Taxonomy-aligned)																						
Restoration of wetlands	2.1 CCA	€5,734.04	0.05%	No	Yes	N/A M	N/A M	N/A M	N/A M	Yes	-	Yes	Yes	Yes	Yes	Yes	0.47%	A				
Electricity generation from hydropower	4.5 CCM	€1,783,412.92	16.17%	Yes	N/AM	N/A M	N/A M	N/A M	N/A M	-	Yes	Yes	Yes	Yes	Yes	Yes	19.72%					
Infrastructure for rail transport	6.14 CCM	€2,635,538.62	23.90%	Yes	No	N/A M	N/A M	N/A M	N/A M	-	Yes	Yes	Yes	Yes	Yes	Yes	8.78%	A				
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		€4,424,685.58	40.13%	40.07%	0.05%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	28.98%					
Of which enabling		€2,641,272.66	23.95%	23.90%	0.05%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	9.26%	A				
Of which transitional		€0.0	0.0%	0.0%						-	-	-	-	-	-	-	0.00%		T			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																						
				AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)													
Restoration of wetlands	2.1 CCM / CCA	€0.00	0.00%	AM	AM	N/A M	N/A M	N/A M	N/A M											0.00%		
Electricity generation from hydropower	4.5 CCM	€130,096.09	1.18%	AM	N/AM	N/A M	N/A M	N/A M	N/A M											3.02%		
Generation of electricity	4.29 CCM	€4,477.30	0.04%	AM	AM	N/A M	N/A M	N/A M	N/A M											-		



Table 1 - Turnover (€'000)

Year N	2024			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)									
Economic activities (1)	Code (a) (2)	Turnover (3)	Proportion of turnover (year N) (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of turnover (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
from fossil gaseous fuels																			
Construction, extension and operation of water collection, treatment and supply systems	5.1 CCM	€2,982.11	0.03%	AM	N/AM	N/A M	N/A M	N/A M	N/A M								0.01%		
Construction, extension and operation of waste water collection and treatment	5.3 CCM	€23,241.63	0.21%	AM	N/AM	N/A M	N/A M	N/A M	N/A M								1.21%		
Desalination	5.13 CCA	€55,061.01	0.50%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Infrastructure for rail transport	6.14 CCM / CCA	€2,134,505.37	19.36%	AM	AM	N/A M	N/A M	N/A M	N/A M								20.92%		
Flood risk prevention and protection infrastructure	14.2 CCA	€126,422.77	1.15%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Construction of new buildings	7.1 CCM / CCA 3.1 CE	-	-	N/AM	AM	N/A M	N/A M	N/A M	N/A M								6.15%		
Renovation of existing buildings	7.2 CCM / CCA 3.2 CE	-	-	N/AM	AM	N/A M	N/A M	N/A M	N/A M								1.64%		

Table 1 - Turnover (€'000)

Year N	2024			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)									
Economic activities (1)	Code (a) (2)	Turnover (3)	Proportion of turnover (year N) (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of turnover (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
Engineering activities and related technical consultancy dedicated to adaptation to climate change	9.1 CCA	-	-	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0.75%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		€2,476,786.28	22.46%	20.81%	1.65%	0.0%	0.0%	0.0%	0.0%								33.70%		
Total (A.1 + A.2)		€6,901,471.85	62.59%	60.89%	1.70%	0.0%	0.0%	0.0%	0.0%								62.68%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities		€4,125,760.57	37.41%																
TOTAL		€11,027,232.43	100.00%																

Portion of turnover/Total turnover		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	40.07%	60.89%
CCA	0.05%	21.05%
WTR	-	-
CE	-	-
PPC	-	-
BIO	-	-

Table 2 – CapEx (€'000)

Financial year N				2024		Substantial contribution criteria					DNSH (“Do No Significant Harm”) criteria (h)											
Economic activities (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of CapEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)			
		€'000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/A M (b) (c)	Yes; No; N/A M (b) (c)	Yes; No; N/A M (b) (c)	Yes; No; N/A M (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T			
A. TAXONOMY-ELIGIBLE ACTIVITIES																						
A.1 Environmentally sustainable activities (Taxonomy-aligned)																						
Restoration of wetlands	2.1 CCA	€0.00	0.00%	No	Yes	N/A M	N/A M	N/A M	N/A M	Yes	-	Yes	Yes	Yes	Yes	Yes	0.04%	A				
Electricity generation from hydropower	4.5 CCM	€76,015.98	7.84%	Yes	No	N/A M	N/A M	N/A M	N/A M	-	Yes	Yes	Yes	Yes	Yes	Yes	17.00%					
Infrastructure for rail transport	6.14 CCM	€541,433.92	55.82%	Yes	No	N/A M	N/A M	N/A M	N/A M	-	Yes	Yes	Yes	Yes	Yes	Yes	22.58%	A				
Infrastructure enabling road transport and public transport	6.15 CCA	€27,625.31	2.85%	N/AM	Yes	N/A M	N/A M	N/A M	N/A M	Yes	-	Yes	Yes	Yes	Yes	Yes	6.91%					
Construction of new buildings	7.1 CCA	€2,618.14	0.27%	N/AM	Yes	N/A M	N/A M	N/A M	N/A M	Yes	-	Yes	Yes	Yes	Yes	Yes	-					
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		€647,693.36	66.78%	63.66%	3.12%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	46.52%					
Of which enabling		€541,433.92	55.28%	55.82%	0.00%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	22.61%	A				
Of which transitional		€0.00	0.0%	0.0%													0.00%		T			
				A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																		
				AM; N/AM (f)	AM; N/AM (f)	AM; N/A M (f)	AM; N/A M (f)	AM; N/A M (f)	AM; N/A M (f)													
Restoration of wetlands	2.1 CCM / CCA	€0.00	0.00%	AM	AM	N/A M	N/A M	N/A M	N/A M											0.00%		
Electricity generation from hydropower	4.5 CCM / CCA	€36.06	0.00%	AM	AM	N/A M	N/A M	N/A M	N/A M											0.11%		
Generation of electricity from fossil gaseous fuels	4.29 CCM / CCA	€0.00	0.00%	AM	AM	N/A M	N/A M	N/A M	N/A M											-		

Table 2 – CapEx (€'000)

Financial year N	2024			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)									
Economic activities (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of CapEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
Construction, extension and operation of water collection, treatment and supply systems	5.1 CCM/CCA	€2.35	0.00%	AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Construction, extension and operation of waste water collection and treatment	5.3 CCM / CCA	€89.25	0.01%	AM	AM	N/A M	N/A M	N/A M	N/A M								0.10%		
Desalination	5.13 CCA	€8.23	0.00%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Infrastructure for rail transport	6.14 CCM / CCA	€121,651.12	12.54%	AM	AM	N/A M	N/A M	N/A M	N/A M								4.11%		
Infrastructure enabling road transport and public transport	6.15 CCA	€41,237.17	4.25%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								4.68%		
Infrastructure enabling water transport	6.16 CCA	€0.00	0.00%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Construction of new buildings	7.1 CCM / CCA 3.1 CE	€195.07	0.02%	AM	AM	N/A M	N/A M	AM	N/A M								0.76%		
Renovation of existing buildings	7.2 CCM / CCA 3.2 CE	€0.00	0.00%	AM	AM	N/A M	N/A M	AM	N/A M								0.22%		
Flood risk prevention and protection infrastructure	14.2 CCA	€471.92	0.05%	N/AM	AM	N/A M	N/A M	N/A M	N/A M								-		
Engineering activities and related technical consultancy dedicated to adaptation to climate change	9.1 CCA	-	-	N/AM	N/AM	N/A M	N/A M	N/A M	N/A M								0.51%		

Table 2 – CapEx (€'000)

Table 2 – CapEx (€ 000)																				
Financial year N	2024			Substantial contribution criteria						DNSH (“Do No Significant Harm”) criteria (h)										
Economic activities (1)	Code (a) (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of CapEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		€163,691.16	16.88%	12.56%	4.32%	0.0%	0.0%	0.0%	0.0%							10.48%				
Total (A.1 + A.2)		€811,384.52	83.66%	76.22%	7.44%	0.0%	0.0%	0.0%	0.0%							57.00%				
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
CapEx of Taxonomy-non-eligible activities		€158,517.51	16.34%																	
Total		€969,902.02	100.0%																	

Proportion of CapEx/Total CapEx		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	63.66%	76.24%
CCA	3.12%	20.00%
WTR	-	-
CE	0.00%	0.02%
PPC	-	-
BIO	-	-

A breakdown of the amounts included in the numerator of the KPI for alignment of the economic activity is provided below:

Table 2.1

€'000

Assets	Increases to property, plant and machinery	Increases to self-generated intangible assets	Increases to right-of-use assets	Total	Of which deriving from a business combination	Of which part of a CapEx plan
2.1	-	-	-	-		
4.5	63,121.68	-	12,894.30	<b>76,015.98</b>		
6.14	491,575.40	98.16	49,760.36	<b>541,433.92</b>		
6.15	26,506.90	-	1,118.42	<b>27,625.31</b>		
7.1	2,618.14	-	-	<b>2,618.14</b>		

Table 3 - OpEx (€'000)

Financial Year N	2024			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)									
Economic activities (1)	Code (a) (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of OpEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		€'000	%	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes; No; N/AM (b) (c)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Restoration of wetlands	2.1 CCA	€5.30	0.00%	No	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	2.15%	A	
Electricity generation from hydropower	4.5 CCM	€88,707.75	14.74%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	12.39%		
Infrastructure for rail transport	6.14 CCM	€153,574.75	25.52%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	17.32%	A	
Infrastructure enabling road transport and public transport	6.15 CCA	€30,759.57	5.11%	N/AM	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	8.14%		
Construction of new buildings	7.1 CCA	€34,528.53	5.74%	No	Yes	N/AM	N/AM	No	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	-		
<b>OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		€307,575.89	51.10%	40.25%	10.85%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	40.01%		
<b>Of which enabling</b>		€153,580.05	25.52%	25.52%	0.00%	0.0%	0.0%	0.0%	0.0%	Yes	Yes	Yes	Yes	Yes	Yes	Yes	19.47%	A	
<b>Of which transitional</b>		€0.00	0.00%	0.00%													0.0%		T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																			
				AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)	AM; N/AM (f)										
Restoration of wetlands	2.1 CCM / CCA	€0.00	0.00%	AM	AM	N/AM	N/AM	N/AM	N/AM								0.0%		

Table 3 - OpEx (€'000)

Financial Year N	2024			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)									
Economic activities (1)	Code (a) (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of OpEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
Electricity generation from hydropower	4.5 CCM / CCA	€1,462.77	0.24%	AM	AM	N/AM	N/AM	N/AM	N/AM								0.43%		
Generation of electricity from fossil gaseous fuels	4.29 CCM / CCA	€59.17	0.01%	AM	AM	N/AM	N/AM	N/AM	N/AM								-		
Construction, extension and operation of water collection, treatment and supply systems	5.1 CCM/CCA	€0.86	0.00%	AM	AM	N/AM	N/AM	N/AM	N/AM								-		
Construction, extension and operation of waste water collection and treatment	5.3 CCM / CCA	€708.39	0.12%	AM	AM	N/AM	N/AM	N/AM	N/AM								1.84%		
Desalination	5.13 CCA	€122.76	0.02%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								-		
Infrastructure for rail transport	6.14 CCM / CCA	€73,252.35	12.17%	AM	AM	N/AM	N/AM	N/AM	N/AM								12.22%		
Infrastructure enabling road transport and public transport	6.15 CCA	€79,265.19	13.17%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								13.94%		



Table 3 - OpEx (€'000)

Table 3 – OpEx (€ 000)																			
Financial Year N	2024			Substantial contribution criteria						DNSH (“Do No Significant Harm”) criteria (h)									
Economic activities (1)	Code (a) (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Taxonomy-aligned (A.1) or eligible (A.2) proportion of OpEx (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
Infrastructure enabling water transport	6.16 CCA	€10.25	0.00%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								-		
Construction of new buildings	7.1 CCM / CCA 3.1 CE	€8,587.88	1.43%	AM	AM	N/AM	N/AM	AM	N/AM								2.47%		
Renovation of existing buildings	7.2CCM / CCA3.2 CE	€2,637.74	0.44%	AM	AM	N/AM	N/AM	AM	N/AM								0.17%		
Flood risk prevention and protection infrastructure	14.2 CCA	€12,586.63	2.09%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								-		
Engineering activities and related technical consultancy dedicated to adaptation to climate change	9.1 CCA	-	-	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0.98%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		€178,693.99	29.69%	12.54%	17.15%	0.00%	0.00%	0.00%	0.00%								32.04%		
Total (A.1 + A.2)		€486,269.88	80.79%	52.79%	28.00%	0.00%	0.00%	0.00%	0.00%								72.05%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities		€115,622.44	19.21%																
Total		€601,892.32	100.00%																

Proportion of OpEx/Total OpEx		
	Taxonomy-aligned by objective	Taxonomy-eligible by objective
CCM	40.25%	54.66%
CCA	10.85%	40.54%
WTR	-	-
CE	0.00%	1.87%
PPC	-	-
BIO	-	-

A breakdown of the amounts included in the numerator of the KPI for alignment of the economic activity is provided below:

Table 3.1

€'000

OpEx	(€'000)
Research and development expenditure	-
Short-term leases	274,302
Maintenance and repairs	33,274
Other direct costs related to the daily maintenance of property, plant and equipment	-
<b>Total</b>	<b>307,576</b>

Table 4 - Nuclear and fossil gas related activities

Line	Nuclear energy activities	Yes; No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Line	Fossil gas related activities	Yes; No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

**Table 4.1 - Taxonomy-eligible but not taxonomy-aligned economic activities**

Line Economic activity		Proportion (amount and percentage) - Turnover					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	4,477.3	0.2%	4,477.3	0.0%		-
2	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in row 1 in the denominator of the applicable KPI	2,472,309.0	99.8%	2,472,309.0	22.4%		-
3	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	2,476,786.3	100.0%	2,476,786.3	22.5%		-

Line Economic activity		Proportion (amount and percentage) - CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.0%	-	0.0%		-
2	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in row 1 in the denominator of the applicable KPI	163,691.2	100.0%	163,691.2	16.9%		-
3	Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	163,691.2	100.0%	163,691.2	16.9%		-

Line Economic activity		Proportion (amount and percentage) - OpEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II of Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	59.2	0.0%	59.2	0.0%		-
2	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in row 1 in the denominator of the applicable KPI</b>	178,634.8	100.0%	178,634.8	29.7%		-
3	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	178,694.0	100.0%	178,694.0	29.7%		-

# Statement on the Consolidated sustainability statement

*pursuant to article 81-ter.1 of Consob regulation no. 11971 of 14 May 1999 and subsequent amendments and integrations*

Pietro Salini, as chief executive officer, and Massimo Ferrari, as corporate reporting officer, considering the provisions of article 154-bis.5-ter of Legislative decree no. 58 of 24 February 1998, state that the Consolidated sustainability statement included in the Directors' report has been prepared:

- (i) in accordance with the reporting standards applied as per Directive (EU) 2013/34 of the European Parliament and of the Council of 26 June 2013 and Legislative decree no. 125 of 6 September 2024;
- (ii) with the specifications adopted as per article 8.4 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020.

Milan, 13 March 2025

Chief executive officer

Pietro Salini

(signed on the original)

Corporate reporting officer

Massimo Ferrari

(signed on the original)

## Independent auditors' limited assurance report on the consolidated sustainability report



## **Independent auditor's limited assurance report on the consolidated sustainability report**

*in accordance with article 14-bis of Legislative Decree No. 39 of 27 January 2010*

To the shareholders of Webuild SpA

### **Conclusion**

In accordance with articles 8 and 18, paragraph 1, of Legislative Decree No. 125 of 6 September 2024 (hereinafter also the "Decree"), we have undertaken a limited assurance engagement on the consolidated sustainability report of Webuild Group (hereinafter also the "Group") for the year ended 31 December 2024 prepared in accordance with article 4 of the Decree, presented in the specific section of the consolidated directors' report.

Based on the procedures performed, nothing has come to our attention that causes us to believe that:

- the consolidated sustainability report of Webuild Group for the year ended 31 December 2024 is not prepared, in all material respects, in accordance with the reporting criteria adopted by the European Commission pursuant to Directive (EU) 2013/34/UE (European Sustainability Reporting Standards, hereinafter also the "ESRS");
- the information set out in section "EU taxonomy for sustainable economic activities" of the consolidated sustainability report is not prepared, in all material respects, in accordance with article 8 of Regulation (UE) No. 852 of 18 June 2020 (hereinafter also the "Taxonomy Regulation").

### **Basis for conclusion**

We conducted our limited assurance engagement in accordance with the Standard on Sustainability Assurance Engagements - SSAE (Italia). The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our responsibilities under this Standard are further described in the *Auditor's Responsibilities for the Limited Assurance Conclusion on the Consolidated Sustainability Report* section of this report.

We are independent in accordance with the principles of ethics and independence applicable to assurance engagements on consolidated sustainability reporting under Italian law.

### **PricewaterhouseCoopers SpA**

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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.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

#### ***Other matters – Comparative information***

The consolidated sustainability report for the year ended 31 December 2024 includes, in the specific section “EU taxonomy for sustainable economic activities”, the comparative information referred to in article 8 of the Taxonomy Regulation in relation to the year ended 31 December 2023 which was not subject to any review.

#### ***Responsibilities of the directors and the board of statutory auditors of Webuild SpA for the consolidated sustainability report***

The directors of Webuild SpA are responsible for developing and implementing the procedures adopted to identify the information included in the consolidated sustainability report in accordance with the provisions of the ESRS (hereinafter the “materiality assessment process”) and for describing those procedures in section “Description of the process to identify and assess material impacts, risks and opportunities” of the consolidated sustainability report.

The directors are also responsible for preparing the consolidated sustainability report, which contains the information identified through the materiality assessment process, in accordance with the provisions of article 4 of the Decree, including:

- its compliance with the ESRS;
- its compliance with article 8 of the Taxonomy Regulation of the information set out in paragraph “EU taxonomy for sustainable economic activities”.

That responsibility involves designing, implementing and maintaining, in the terms prescribed by law, such internal control as they determine is necessary to enable the preparation of a consolidated sustainability report in accordance with article 4 of the Decree that is free from material misstatement, whether due to fraud or error. That responsibility also involves selecting and applying appropriate methods for processing the information, as well as developing hypotheses and estimates about specific items of sustainability information that are reasonable in the circumstances.

The board of statutory auditors is responsible for overseeing, in the terms prescribed by law, compliance with the Decree.



### ***Inherent limitations in the preparation of the consolidated sustainability report***

For the purpose of reporting forward-looking information in accordance with ESRS, the directors are required to prepare such information on the basis of assumptions, described in the consolidated sustainability report, about future events and possible future actions by the Group. Because of the uncertainty connected with any future event, in terms both of occurrence and of the extent and timing of occurrence, variances between actual results and forward-looking information may be significant.

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.

### ***Auditor's responsibilities for the limited assurance conclusion on the consolidated sustainability report***

Our objectives are to plan and perform procedures to obtain limited assurance about whether the consolidated sustainability report is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that contains our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the consolidated sustainability report.

As part of our engagement designed to achieve limited assurance in accordance with the Standard on Sustainability Assurance Engagements - SSAE (Italia), we exercised professional judgement and maintained professional scepticism throughout the engagement.

Our responsibilities include:

- Performing risk assessment procedures to identify the disclosures where a material misstatement, whether due to fraud or error, is likely to arise;
- Designing and performing procedures to verify the disclosures where a material misstatement is likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Directing, supervising and performing a limited assurance engagement on the consolidated sustainability report and assuming full responsibility for the conclusion on the consolidated sustainability report.



### *Summary of the work performed*

An engagement designed to obtain limited assurance involves performing procedures to obtain evidence as a basis for our conclusion.

The procedures performed were based on our professional judgement and included inquiries, primarily of personnel of Webuild SpA responsible for the preparation of the information presented in the consolidated sustainability report, analyses of documents, recalculations and other procedures designed to obtain evidence considered useful.

We performed the following main procedures:

- we understood the Group's business model and strategies, and the environment in which it operates with reference to sustainability issues;
- we understood the processes underlying the generation, collection and management of the qualitative and quantitative information included in the consolidated sustainability report;
- we understood the process implemented by the Group to identify and assess the material impacts, risks and opportunities, in accordance with the double materiality principle, related to sustainability issues and, based on the information thus obtained, we considered whether any contradictory items emerged that could point to the existence of sustainability issues not considered by the Company in the materiality assessment process;
- we identified the disclosures where a material misstatement is likely to arise;
- we defined and performed procedures, based on our professional judgement, to address the risks of material misstatement identified;
- we understood the process implemented by the Group to identify the eligible economic activities and to determine whether they are aligned in accordance with the provisions of the Taxonomy Regulation, and we verified the related disclosures in the consolidated sustainability report;
- we reconciled the information reported in the consolidated sustainability report with the information reported in the consolidated financial statements in accordance with the applicable financial reporting framework, or with the accounting information used for the preparation of the consolidated financial statements, or with management accounting information;
- we verified the structure and presentation of disclosures included in the consolidated sustainability report in accordance with the ESRS;
- we obtained management's representation letter.

Milano, 26 March 2025

PricewaterhouseCoopers SpA

*Signed by*

Andrea Brivio  
(Partner)

*This report has been translated from the Italian original solely for the convenience of international readers.*