



2025

Consolidated Sustainability Statement

General information

[BP-1]

Webuild Group's (the "Group") Consolidated Sustainability Statement (the "Sustainability statement" or the "statement") for 2025 (from 1 January to 31 December 2025) 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")¹⁰ 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 position¹¹, as per the double materiality assessment which considers the activities performed by Webuild and its upstream and downstream value chain. Information about Webuild's value chain is provided in the "Strategy, business model and value chain" chapter of this section.

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 S.p.A. ("Wbuild" or the "parent") 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 and the paragraph of this statement where the relevant information can be found¹². Information required by the ESRS and already presented in other corporate documents is cross referenced (more information is available in the Annexes).

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

Webuild's Board of Directors approved this Sustainability Statement on 11 March 2026, 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 and its fully consolidated subsidiaries. More information is provided in notes 1 and 2.7 to the consolidated financial statements¹³.

For the purposes of providing both a comprehensive presentation of the Group's performance, Webuild defined two different reporting methods depending on the entity's operations. The sustainability information of entities classified as operating is reported considering all the material indicators while for entities with reduced or no operational activity¹⁴, information is provided about any significant events affecting relevant ESG matters recorded in the reporting period.

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

¹¹ See article 4.1 of Legislative decree no. 125 of 6 September 2024.

¹² See Annex 2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement

¹³ In this Sustainability Statement, Webuild did not avail of the exemption from disclosure of impending developments or matters in the course of negotiation.

¹⁴ 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

In addition, in order to comply with the value chain guidance¹⁵ published by EFRAG with respect to joint operations, Webuild defined two reporting criteria depending on the type of information for this type of entity:

- with respect to the environmental topics envisaged by the ESRS, the joint operations' data are consolidated using the same percentage applied for their consolidation in the consolidated financial statements, i.e., on a proportionate basis;
- with respect to its own workforce (S1) and workers in the value chain (S2), for which there is no specific guidance or application guidelines, 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 consolidate all the data related to the joint operations for which it has taken on responsibility under contract for the health and safety management system; it does not include the data of those joint operations for which the health and safety management system is managed by another partner;
- as regards the other social and governance topics, including entity-specific topics, the metrics presented refer solely to the entities included in the consolidated accounting group and do not include the joint operations' data.

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, i.e., short-term: <1 year; medium-term: 1-3 years; long-term: >3 years.

Value chain estimation

The assessment of impacts, risks and opportunities considered the upstream and downstream value chain activities using a predominantly qualitative approach based on publicly available information, where available, or in-house analysis and knowledge, considering the parties with which the Group does business. For reporting the metrics linked to the value chain that are not already mapped by internal processes¹⁶, the parent again in 2025 availed of the transitional provision allowed by the ESRS, extended to 2025 and 2026 by Delegated Regulation (EU) 2025/1416 of 11 July 2025¹⁷.

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 3 GHG emissions. However, these data could be subject to uncertainty. Webuild is committed to ensuring the disclosure accuracy of its Scope 3 GHG emissions by involving and raising the awareness of its suppliers, as well as through adequate data monitoring

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 substantially completed).

¹⁵ IG2 Value Chain Implementation Guidance

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

¹⁷ This regulation amends Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure obligations for certain undertakings.

and collection systems. More information is available in the “Metrics - Gross Scopes 1, 2 and 3 and Total GHG emissions” paragraph of the “Climate change” 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 the collection of information and on-site measurements using, for example, 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 and their in-depth contextual understanding of the data and their 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 involved¹⁸.

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

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

Any changes compared to the data published in the 2024 Consolidated sustainability statement are disclosed in the text. More information is available in the “Metrics” paragraphs in the “Health and safety” and “Diversity and inclusion” chapters of the “Social information” section and the “Water” chapter in the “Environmental information” section.

Incorporation by reference

The disclosure requirements and chapters in which references to other documents that are part of Webuild’s corporate reports have been included are listed below:

ESRS 2 requirements	Reference document
GOV-3 – Integration of sustainability-related performance in incentive schemes	<i>Remuneration policy and compensation report</i>
SBM-1 – Strategy, business model and value chain	<i>Directors’ report Part I: Webuild Group – We envisage, We design, We build the future</i>

¹⁸ Specifically as regards environmental metrics, hours worked, pay gap and investments in clean technology innovation.

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

Phase-in provisions Webuild 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 in the Annexes.

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. Thirteen out of the 15 directors have stated that they meet the independence requirements as established by the Consolidated Finance Act (86.6%) while 11 directors have stated that they meet the independence requirements set out in the Corporate Governance Code for Listed Companies (73.3%)¹⁹. Of the 15 directors, 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)²⁰.

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.

Webuild’s sustainability governance is set out below.

Board of Directors	Board of Statutory Auditors
<ul style="list-style-type: none">• Defines (i) the governance and internal control and risk management system for sustainability matters; (ii) remuneration policies that include sustainability performance;• Appoints the sustainability manager;• Approves (i) the sustainability plan; (ii) the material topics and related impacts, risks and opportunities identified by the double materiality assessment; (iii) internal sustainability policies; (iv) the sustainability statement;• Assesses and regularly monitors ESG risks as part of	<ul style="list-style-type: none">• Oversees compliance with the provisions of Legislative decree no. 125/2024 with respect to its mandatory duties and 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;• Prepares a reasoned proposal for the appointment of a sustainability auditor and checks and monitors their independence.

¹⁹ 2020 edition.

²⁰ 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. More information is available in the subsections on “Own workforce” in the “Social information” section.

Chief Executive Officer

- Prepares the proposal for the Board of Directors on the internal control and risk management system for sustainability matters;
- Identifies and manages sustainability risks;
- Confirms compliance of the Sustainability Statement with the applicable standards and the disclosure requirements of the Taxonomy regulation;
- Defines a system to share sustainability information with the workers' representatives.

Corporate Reporting Officer /Sustainability manager

- Defines suitable procedures for the preparation of the Sustainability Statement;
- Confirms compliance of the Sustainability Statement with the applicable standards and the disclosure requirements of the Taxonomy regulation;
- Confers a mandate on the Internal Audit Department for assistance for the purposes of issuing their statement.

Committees

Control, Risk and Sustainability Committee

Examination of the following for the purposes of the Board of Directors' deliberations:

- the sustainability plan, including the double materiality assessment process and findings;
- the governance and internal control and risk management system for sustainability matters;
- the sustainability plan and targets included in the remuneration policies;
- the parent's sustainability policies;
- sustainability risks as part of the group risk assessment.

Compensation and Nominating Committee

Preparation of draft remuneration policies that include sustainability performance goals.

Webuild also has a management committee whose duties include monitoring changes in regulations and market practices about sustainability reporting in order to continuously develop and update the related processes.

Webuild has internal units that oversee individual sustainability matters such as HR, Organisation and QHSE 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.

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 2025 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 pertinent 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 offers all the directors and statutory auditors refresher and specialist courses on sustainability so they can address the topics in an informed, diligent and knowledgeable manner and consider the main sustainability aspects when taking decisions.

Therefore, over the past two years, it designed and delivered induction sessions about the content of the Corporate Sustainability Reporting Directive and the related Legislative decree no. 125/2024, which transposed it into Italian law, and the main provisions of the ESRS.

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 2025, after the Control, Risk and Sustainability Committee had performed its checks and reviews, the Board of Directors (i) examined and approved the material topics for the 2024 Consolidated Sustainability Statement, as identified by the double materiality assessment, (ii) defined the sustainability governance, and the allocation of duties to each corporate body, and updated accordingly the guidelines for the internal control and risk management system as well as the regulation for the Board of Directors and board committees, (iii) delegated the duty of preparing the statement on the Consolidated Sustainability Statement to the competent manager and updated their powers, and (iv) approved the 2024 Consolidated Sustainability Statement drawn up in accordance with Legislative decree no. 125/2024. The Board of Directors also reviewed the key new sustainability matters introduced by the Omnibus Regulation. In addition, the Control, Risk and Sustainability Committee considered the more material impacts, risks and opportunities ("IRO") related to environmental, social and governance topics identified in the double materiality assessment. Finally, on 11 March 2026, the Board of Directors approved this Sustainability Statement including the findings of the double materiality assessment.

Integration of sustainability-related performance in incentives schemes

[GOV-3]

The 2023-2025 remuneration policy (the “policy”), approved by Webuild’s shareholders on 27 April 2023 and supplemented by the shareholders in their meeting of 24 April 2024, 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, company objectives and management objectives;
- a 2023-2025 long-term incentive (LTI) system, designed to go hand-in-hand with achievement of the 2023-2025 business plan objectives.

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 update 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: financial indicators and risk and sustainability indicators. The latter are:

- Lost Time Injury Frequency Rate (10%)
- Reduction of Scope 1 and 2 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 it complies with regulations and promote sustainable practices. These processes are embedded in the Group's policies, procedures and management systems, and actions and objectives, and in the related monitoring processes.

A mapping of the information provided in the Sustainability statement about the due diligence processes with regard to social, environmental and governance matters for 2025 is provided below.

Core elements of due diligence	Sections, chapters and paragraphs in the Sustainability statement
<p><i>a) Embedding due diligence in governance, strategy and business model</i></p>	<ul style="list-style-type: none"> • 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 • Material impacts, risks and opportunities and their interaction with strategy and business model • Impacts, risks and opportunities (in the Environmental information, Social information and Governance information sections) • Policies adopted to manage material sustainability matters • Policies (in the Environmental information, Social information and Governance information sections) • Integrated Management System • Environmental Management System
<p><i>b) Engaging with affected stakeholders in all key steps of the due diligence</i></p>	<ul style="list-style-type: none"> • 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 • Integration of sustainability-related performance in incentive schemes • Interests and views of stakeholders • Description of the process to identify and assess material impacts, risks and opportunities • Integrated Management System • Environmental Management System • Impacts, risks and opportunities (Climate change and Biodiversity and ecosystems chapters) • Processes for engaging with own workers and workers' representatives about impacts (chapter on Own workforce - Health and Safety - Diversity and Inclusion)
<p><i>c) Identifying and assessing adverse impacts</i></p>	<ul style="list-style-type: none"> • Description of the process to identify and assess material impacts, risks and opportunities • Material impacts, risks and opportunities and their interaction with strategy and business model • Integrated Management System • Environmental Management System • Impacts, risks and opportunities (the Environmental information, Social information and Governance information sections) • Actions (chapters on Own workforce and Workers in the value chain)

Core elements of due diligence

Sections, chapters and paragraphs in the Sustainability statement

<p><i>c) Taking action to address those adverse impacts</i></p>	<ul style="list-style-type: none"> • Integrated Management System • Environmental Management System • Actions (the Environmental information, Social information and Governance information sections) • Transition plan for climate change mitigation (Climate change chapter) • Material impacts, risks and opportunities (Biodiversity and ecosystems chapter)
<p><i>e) Tracking the effectiveness of these efforts and communicating</i></p>	<ul style="list-style-type: none"> • Strategy, business model and value chain • Integrated Management System • Environmental Management System • Tracking the effectiveness of policies and actions through targets • Actions (the Environmental information, Social information and Governance information sections) • Targets and metrics (the Environmental information, Social information and Governance information sections) • Transition plan for climate change mitigation (Climate change chapter) • Impacts, risks and opportunities (Biodiversity and ecosystems chapter) • Actions (chapters on Own workforce and Workers in the value chain)

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 COSO²¹ report which was supplemented in March 2023 with guidance on sustainability reporting, entitled 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 compliance with the applicable standards.

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:

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

²¹ Framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (the "COSO Report").

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 in terms of, for example, the completeness and integrity of figures, the accuracy of estimates and timeliness with which the information was made available. 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 entities²².

Webuild has 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 the development of Webuild personnel's skills.

The Group designed a system of specific controls for the sustainability reporting process, integrated into its regulatory framework. It also updated its guidelines for financial reporting including sustainability checks and risk control matrices. 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. It also defined 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 operating errors 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 2025, tailored information flows were provided to the administrative, management and supervisory bodies, documenting, inter alia, the updating of the analyses about the reporting boundary and the double materiality assessment as well as development of the risk management and internal control system in relation to the sustainability reporting process. The relevant manager presents a report, prepared with the assistance of the Internal Audit Department, every six months on the activities performed and adequacy of the internal control system to the Board of Directors, the Control, Risk and Sustainability Committee, the Chief Executive Officer and the Board of Statutory Auditors.

²² 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 has adopted a long-term sustainability strategy embedded in its business model and strategic decision-making processes. This strategy has a two-pronged approach:

- contribute to tackling the main global challenges linked to climate change, resources management and social-economic development;
- act responsibly in all areas of its operations.

Accordingly, Webuild undertakes to not only define ESG targets but to also embed them in all its operating activities and projects, strengthening its ability to respond to the main global megatrends and with pace with developments in its sector, such as the growing focus on digitalisation, sustainable materials, electric equipment, autonomous solutions and climate-resilient designs.

Webuild’s sustainability strategy is formalised in its 5P Sustainability Manifesto which identifies five strategic priorities, People, Planet, Partnership, Progress and Prosperity, and is closely tied to the Group’s Vision, Mission and Purpose. The Manifesto reflects Webuild’s real commitment to working towards achievement of the United Nations’ Sustainable Development Goals (SDGs) that are pertinent to it²³.

VISION

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

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



²³ Reference is made to the “Webuild Group – We envisage, We design, We build the future” section of Part I of the Directors’ report for information about the Group’s business areas and geographical footprint.

The Group's commitment is reflected in its business areas:

- Sustainable Mobility: rail and metro projects contribute to reducing the carbon footprint in the transport sector, while roads, bridges and tunnels (designed in line with resilience criteria) improve the infrastructure's ability to adapt to climate-related effects.
- Clean Hydro-Energy: hydroelectric plants built by the Group contribute to increasing the generation of clean energy which significantly benefits the environment;
- Clean Water: water treatment plants and infrastructure facilitate better management and quality of water resources;
- Green Buildings: the sustainable buildings built by the Group reduce the sector's carbon footprint and strengthen its resilience to climate impacts.

In performing its contracts in these business areas, 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 strengthen climate resilience, such as technologies to reduce CO₂ emissions and manage water resources sustainably and efficiently;
- reach and maintain high standards in terms of environmental certification for projects such as LEED, which attests to the sustainability of buildings, and ENVISION or IS certification which guarantee the sustainability of infrastructure.

Business model and contribution to global challenges²⁴

Webuild's business model is designed to assist its customers to build complex infrastructure able to efficiently address the current megatrends and challenges posed by the wider social-economic contest, through three strategic pillars:

- expertise and innovation
- centralised governance
- 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).

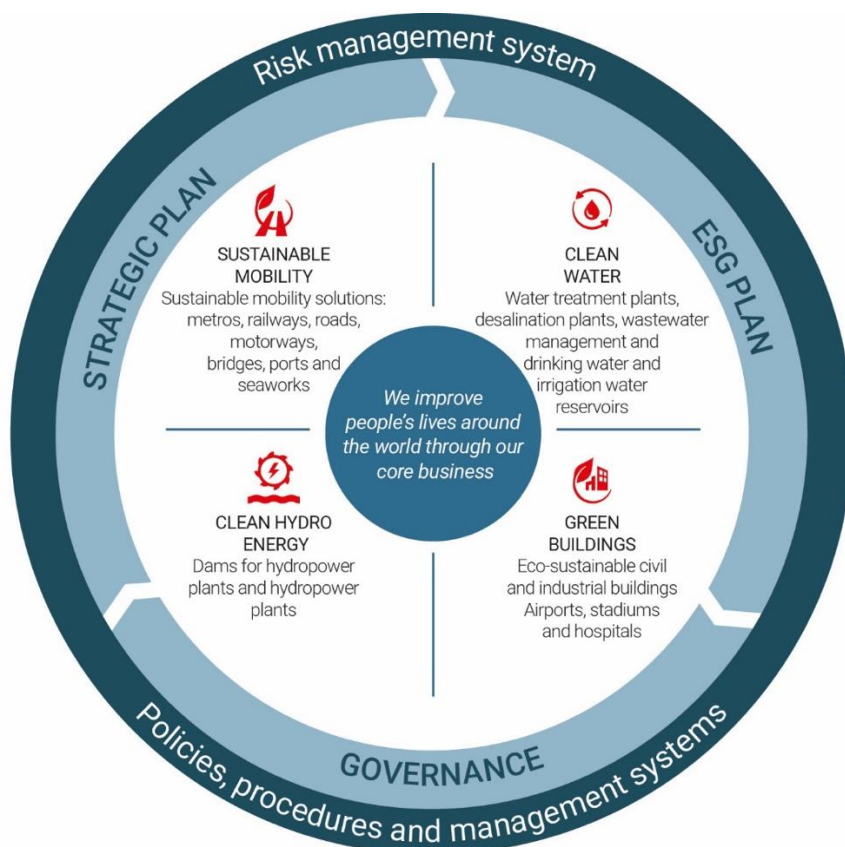
The following figure presents Webuild's business model, showing the main inputs leveraged by the Group to grow its business and the main outputs and results in the form of short- and medium to long-term benefits for stakeholders, the environment and the wider community.

²⁴ Data and information about the business model's inputs and outputs are consistent with the disclosures in this report to which reference is made for more information (specifically for data about: financial resources, human capital, natural resources, innovation and clean technology). Information about the business areas is provided in line with the disclosures in the Directors' report to which reference is made for more information about the Group's performance (specifically for data about: business areas and engagement with stakeholders).

INPUT

Material and immaterial resources necessary to carry out our business

<p>Financial resources Financial resources to make the investments necessary to build infrastructure and, where applicable, operate/maintain it Sustainability linked bonds of €400 million</p>	<p>Human capital Capacity, expertise and experience of the Group's people necessary to reach its strategic objectives ~ 40,700 own workers</p>	<p>Stakeholder engagement The Group's network of relationships with key stakeholders, its license to operate and support to local communities ~ 50 countries with projects underway ~ 17,500 supply chain partners</p>	<p>Natural resources Environmental processes and resources that provide goods and services enabling Webuild to carry out its activities ~ 1.7 m MWh energy consumed ~ 31 m tonnes of materials used</p>	<p>Innovation and clean tech Innovative solutions and technologies that contribute to the Group's competitive edge €333 m investments in innovative and clean tech projects in 2024</p>
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OUTPUTS

Effects on stakeholders, the environment and the local communities

<p>Financial resources Contribution to sustainable development by building infrastructure that can address global challenges 44.6% Taxonomy-aligned turnover, 52.1% Taxonomy-aligned CapEx and 50.1% of Taxonomy-aligned OpEx</p>	<p>Human capital Development of specific know-how, enhancement of people and dissemination of a culture of health and safety as an essential value for business ~1.3 m training hours provided to own workers and value chain workers 23% workers under 30 -20% LTIFR to 2025 (vs 2022)</p>	<p>Stakeholder engagement Strengthening of the value chain and contribution to local communities, thanks to the involvement of local suppliers and the dissemination of specific technical knowledge and ESG principles 80% workers hired locally 92% local procurement</p>	<p>Natural resources Reduction of direct and indirect GHG emissions through the targets established in Webuild's Climate Strategy and optimised use of natural resources 2030 target -47% Scope 1&2 to 2030 (vs 2019) -15% Scope 3 by 2030 (vs 2019)</p>	<p>Innovation and clean tech Adoption of solutions that ensure better construction quality and social-environmental performance €586 m investments in innovative projects and clean tech in the 2024-2025 two-year period</p>
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Specialist technical expertise and the experience of Webuild's people are essential²⁵ 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 to advanced construction techniques to improve the infrastructure's sustainability during its construction and over the project's entire life cycle. Innovation is key to this process as it facilitates the pursuit of competitive design solutions to the technical and engineering and challenges that arise right from the tendering stage, drives improvements in the infrastructure's environmental efficiency, and generates value for the workers and areas in which Webuild works.

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 environments. 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 business model is supported by:

- the corporate governance system, anchored in principles of ethics and integrity;
- the group strategy set out in its 2023-2025 strategic plan and ESG Plan, essential to pragmatically plan how to evolve the business and ensure continuity;
- the risk management system designed to facilitate knowledgeable decisions by assessing and analysing risks and opportunities;
- 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 within the scope of its operations 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. More information is available in the "Tracking the effectiveness of policies and actions through targets" chapter.

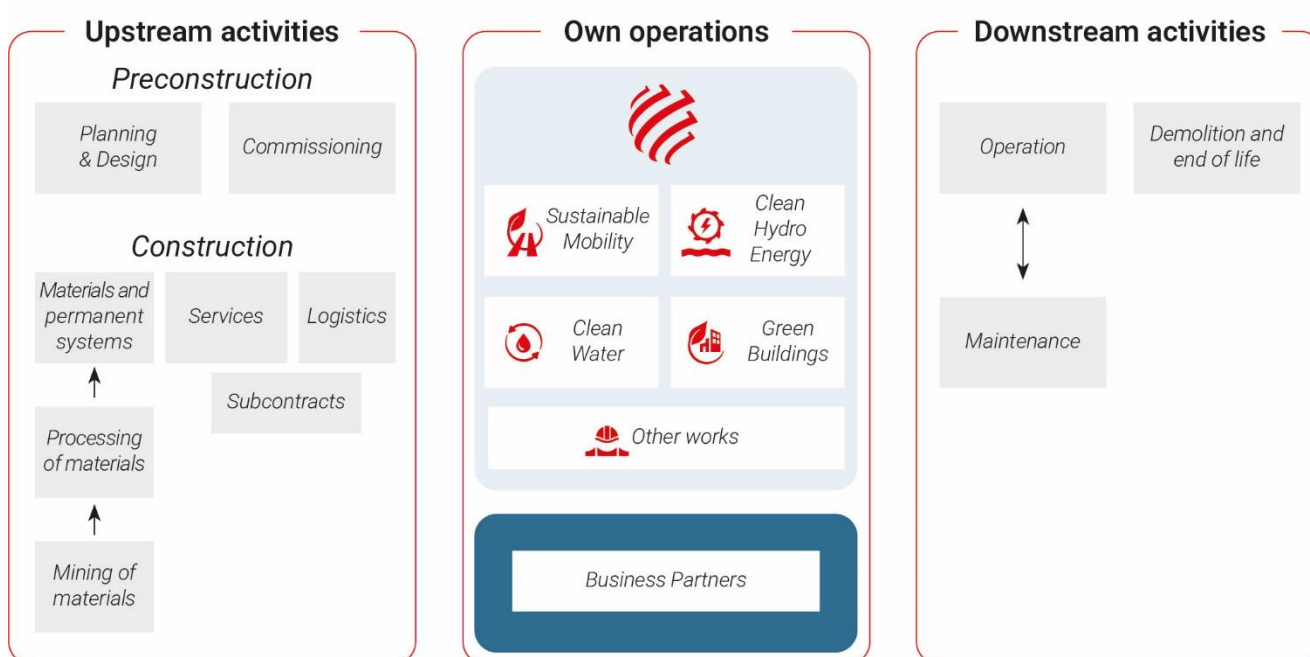
²⁵ As defined by Legislative decree no. 125/2024, essential immaterial resources are those without physical substance that are intrinsic to an entity's business model and a source of value for it.

Value chain

With a view to continuous and widespread improvement, Webuild scrupulously monitors 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, comprising:

- planning, design and commissioning performed before a contract is awarded, and production of the goods and services procured by the Group - upstream,
- operation, maintenance and demolition of the works built by Webuild - downstream²⁶.



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. During this phase, the public authorities (usually ministries, state environmental protection agencies and local bodies of the area where the project is to take place) 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 and 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 assessment processes, including the analyses of the project's social and environmental impacts and stakeholder consultations. Any long-lasting effects of the project, such as the loss of biodiversity or expropriation of land, are the sole responsibility of the project proponent. The contractor is obliged to comply with the applicable

²⁶ 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.

regulations, the contract and any provisions imposed by the competent authorities. The 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 sites, 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 requires its business partners and designers to 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 actors include:

- c. suppliers of raw materials to produce materials and other goods for construction;
- d. suppliers of materials such as cement, steel, aluminium, concrete and other construction materials;
- c. 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;
- c. subcontractors and suppliers of specialist services such as logistics, installation of sundry systems, security systems, civil engineering works and geotechnical activities;
4. 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 commissioned, the operation and maintenance phase begins. The final phase is when the infrastructure reaches the end of its life. These phases 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 commissioned infrastructure. This is however a very small part of the Group's business model.

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 tailors 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 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.

These stakeholders are also key stakeholders for the purposes of the anti-corruption system. The most important requirements of this system include, where applicable, compliance with laws and contract terms, upholding ethical and compliance standards as well as probity in business relationships. Engagement with external stakeholders such as suppliers may for instance take the form of surveys which include questions about corruption (more information is available in the "Description of the process to identify and assess material impacts, risks and opportunities" chapter of this section). Engagement activities with internal stakeholders include specific activities, such as those set out in the table later in this paragraph (the "Actions" paragraph of the "Business conduct" chapter of the "Governance information" section provides more information).

As part of its institutional relations and advocacy activities, the Group engages with public institutions, regulators and other stakeholders about strategic topics such as infrastructure, sustainable mobility, water resources, innovation and development of local areas. 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, engagement with institutions and monitoring of legislation in Italy and abroad. Webuild also actively works with the academic world to encourage the adoption of innovative technologies.

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.

In this respect, Webuild consults annually with the national and international trade unions, provided for by a specific agreement, to monitor human rights compliance and safeguard workers' interests. At the same time, the Group's internal resources, such as HR business partners and project managers, collect and analyse the main issues raised by external stakeholders, such as non-governmental organisations and business and human rights experts to integrate them into the Group's policies.

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 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:

3. 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 above, while the Group usually handles 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 based on 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 ensure complete transparency about its role, responsibilities and work as a contractor engaged to build the works provided for by the relevant contract.

In 2025, the Group continued to expand its communications with its key internal and external stakeholders in Italy and abroad to ensure continuity of information, transparency and quality. Communication activities take place across various media and channels. They are monitored using dedicated performance indicators, as follows:

External communication	Internal communication	Digital communication	Face to face communication
<p>Centralised production of communication content and materials distributed through the Group's proprietary and third party channels:</p> <ul style="list-style-type: none"> • 1,550 videos, infographic systems and multimedia products; • >170 press releases/press notes; • ~2,000 editorial and multi-media content in the We Build Value digital magazine. 	<ul style="list-style-type: none"> • +10,000 employees reached directly via digital channels; • +50% reach on the Webuilders employee app (vs 2024); 53 companies and group contracts presented on the intranet and app; • Advocacy Brand Builders programme: more than 4,500 posts shared by advocates in 50 offices and projects around the world; • 6,000 employees involved directly in roughly 180 cascading/alignment meetings about the Group's results and objectives (+160% vs 2024) 	<ul style="list-style-type: none"> • 4.6 million visits to the Group's website. • 28 million interactions via the Group's social media. • 117 million impressions on the Group's digital touchpoints; • 667,000 direct audience contacts via the digital channels. 	<ul style="list-style-type: none"> • 18 live webcams to follow construction activities at six work sites; • ~11.8 thousand people involved in more than 550 meetings with local communities and their representatives; • ~16 thousand people visited the Group's projects during over 480 tours and open door events; • ~880 information campaigns about the Group's projects, which are estimated to have reached more than 190 thousand people.

These activities 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-11; E1 IRO-1; E2 IRO-1; E3 IRO-1; E4 IRO-1; E5 IRO-1]

In 2025, 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. 125/2024 and the ESRS. It also considered the guidance issued by the European Financial Reporting Advisory Group (EFRAG)²⁷.

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:

Analysis and understanding of the context - the Group analysed its reference context in order to identify any new potentially relevant sustainability areas compared to the previous year double materiality assessment. Accordingly, it reviewed its business model and geographies, the main ESG ratings and other public sources of information²⁸, developments in European sustainability regulations and topics that Webuild's peers considered material in 2024. The outcome of this phase confirmed alignment with the topics already identified in 2024.

Identifying impacts - Based on the results of the context analysis, the specific characteristics of the areas where the Group operates and considering Webuild's commercial relationships and the viewpoints of stakeholders (including those in the value chain), Webuild reviewed, where opportune, the positive or negative actual or current impacts generated directly or indirectly in the short-, medium- and long-term identified in 2024. No significant changes either with respect to the process or list of identified impacts were identified.

Identifying risks and opportunities - as part of the group risk assessment, Webuild further refined its robust risk identification process to include, for example, a more granular analysis of the causes of certain specific risks. The process used to identify opportunities was refreshed to better align with the method used for the group risk assessment. With respect to the risk identification process, Webuild also mapped the main risks and impacts to check if risks could arise from and/or be closely related to the identified impacts.

Assessment of the materiality of impacts - impacts were assessed by experts from the competent departments in line with the ESRS parameters. They used a four-level scale (irrelevant, of little relevance, relevant, very relevant) to rate the impacts based on their materiality, considering the factors of scale, scope and irremediable character factors and likelihood of occurrence.

Assessment of risks and opportunities - the competent departments assessed risks and opportunities 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 expected effects and the likelihood of occurrence.

Stakeholder engagement - in 2025, Webuild involved two key stakeholder categories (employees and suppliers) in the impact materiality assessment process, obtaining their views on the preliminary findings on the impacts most important to them and collecting ideas or suggestions for possible inclusion in future surveys. As part of Webuild's continuous improvement and in order to receive the most representative feedback, this engagement took the form of online surveys. Webuild sent invitations to participate to more

²⁷ IG1: Materiality Assessment Implementation Guidance, IG2: Value Chain Implementation Guidance

²⁸ Public sources include: the ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) database developed by the Taskforce on Nature-related Financial Disclosures (TNFD)

than 3,000 employees and 2,000 suppliers based in all the geographies where the Group operates, thus significantly extending the scope of engagement.

Prioritisation and definition of material IROs - Once the assessments of the impacts, risks and opportunities had been consolidated and 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 and 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.

Sharing of results with the competent corporate bodies - 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. More information about the main internal controls over the identification and assessment of impacts, risks and opportunities is provided in 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 this section.

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

[SBM-3]

Leveraging its business model centred on qualitative excellence and focused on costs and timing, sustainability and innovation, Webuild aims to create shared benefits and positive impacts on the environment, people and society, addressing global challenges such as demographic growth, urbanisation, resource scarcity and climate change. The infrastructure it builds is designed to be sustainable and resilient, generating 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, addresses 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 results of the previous three-year plan, the 2024-2025 ESG Plan is equally ambitious in addressing global challenges and stakeholders' expectations with the further integration of ESG aspects into planning and risk management processes.

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 around 89% of its order backlog in Italy, central and northern 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 supplement and are aligned with the most significant impacts, risks and opportunities identified by the double materiality assessment performed in 2025.

Its results showed substantial alignment with the material aspects of 2024 albeit with some changes at sub-topic level related to a more prudent assessment approach. Specifically, the sub-topic of corruption was assessed as material under the financial materiality perspective in 2025.

Finally, considering the material risks and opportunities mapped in 2025, 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 material adjustments within the next annual reporting period to the carrying amount of assets and liabilities. In this respect, it should be noted that the assessment of financial materiality considered longer time horizons to those considered in the consolidated

financial statements. Therefore, the financial effects of risks and opportunities, which are only probable in nature, may be seen in future years.

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

Material IRO

Topic	Sub-topic or Sub-sub-topic	DESCRIPTION OF IRO					
		Actual impact		Potential impact		Risk	Opportunity
		+	-	+	-	R	O
		positive	negative	positive	negative		
Climate change	Climate change adaptation	+	Building of infrastructure that contributes to climate change adaptation (such as roads, bridges and tunnels)				
		R	Extreme weather events and damage to people, plant and equipment				
	Climate change mitigation	+	Reduction of the carbon footprint of works built by Webuild thanks to the use of low embodied carbon materials and processes				
		+	Support for the energy transition with infrastructure projects in the Sustainable Mobility, Clean Hydro-Energy and Green Buildings business areas that contribute to global efforts to reduce climate-altering emissions				
		-	GHG emissions from own operations (Scope 1, Scope 2) mostly due to the use of fossil fuels (e.g., equipment/plant operation, use of vehicles and machinery and energy generation)				
		-	GHG emissions generated by Webuild's value chain (Scope 3) that contribute to the Group's carbon footprint				
		O	Optimisation of operating efficiency and cost reduction through new processes and low-impact technology that reduce consumption, emissions and materials				
Climate change adaptation Climate change mitigation	O	Business growth driven by the rising demand for climate resilient solutions (e.g., dams, bridges, desalination plants, maintenance, etc.)					
Pollution	Pollution of water	+	Improvement in the quality of water resources and receiving water bodies through the building of purification plants and/or the building of sewerage infrastructure by Webuild				
	Pollution of air	-	Emission of pollutants into the air (e.g, NOx, SOx and PM10) by suppliers' operations that compromise air quality				
Water and marine resources	Water	-	Exploitation of water resources due to the consumption of water for suppliers' operations, especially water stressed areas				
	Water consumption Water withdrawals	-	Exploitation of water resources due to the consumption of water for own operations, especially water stressed areas				
Biodiversity and ecosystems	Direct impact drivers of biodiversity loss Climate change, Land-use change, Fresh water-use change and sea-use change, Direct exploitation	-	Impacts on biodiversity of works located near biodiversity-sensitive areas (in terms of their ecosystems, biodiversity, the cultural/landscape and archaeological heritage)				

Material IRO

Topic	Sub-topic or Sub-sub-topic	DESCRIPTION OF IRO					
		Actual impact		Potential impact		Risk	Opportunity
		+	-	+	-	R	O
		positive	negative	positive	negative		
Resource use and circular economy	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				
		R	Unavailability or delays in the procurement of materials and machinery				
		O	Optimisation of operating efficiency and reduction of costs by adopting new low-impact processes and technologies that reduce consumption, emissions and materials				
	Waste	-	Waste generated by own operations				
-		Environmental impacts of the generation of waste materials in the end-of-life phase of the infrastructure					
Own workforce	Working conditions <i>Health and safety</i>	+	Dissemination of a health and safety culture in the workplace to own workers through training and awareness-raising				
		-	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				
		R	Work-related incidents involving own workers				
		O	Reduction in the number of injuries, greater productivity and competitiveness thanks to processes and activities to protect worker health and safety				
	Working conditions	R	Unavailability of workers				
	Equal treatment and opportunities for all <i>Training and skills development</i>	+	Upskilling and professional growth opportunities for own workers through adequate technical and management training plans				
		R	Insufficiently trained or untrained workers				
		O	Attraction of new talents and reduction in turnover thanks to a stable and inclusive work environment				
	Equal treatment and opportunities for all <i>Gender equality and equal pay for work of equal value</i>	-	Gender discrimination within the workforce, with possible negative impacts on career paths and remuneration due to conduct that does not comply with Webuild policies and/or the relevant regulations				
	Working conditions Equal treatment and opportunities for all <i>Other work-related rights</i>	R	Non-observance of human rights				
Workers in the value chain	Working conditions <i>Health and safety</i>	-	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				
		R	Incidents involving workers (subcontractors)				
	Equal treatment and opportunities for all <i>Training and skills development</i>	+	Support to develop the skills of workers of suppliers and subcontractors in the upstream value chain through initiatives to build up their technical skills necessary to carry out their jobs				
	Working conditions Equal treatment and opportunities for all <i>Other work-related rights</i>	R	Non-observance of human rights				

Material IRO

Topic	Sub-topic or Sub-sub-topic	DESCRIPTION OF IRO					
		Actual impact		Potential impact		Risk	Opportunity
		+	-	+	-	R	O
		positive	negative	positive	negative		
<i>Affected communities</i>	Communities' economic, social and cultural rights	+		Direct and indirect contribution and initiatives that benefit local communities			
	Adequate housing Water and sanitation	R		Differences of opinion or disputes with local stakeholders (trade unions, communities, local organisations, etc.)			
<i>Business conduct</i>	Corporate culture	+		Dissemination and cultivation of a business culture based on ethics, integrity and sustainability via the Code of Ethics and responsible governance policies, transparent and anti-corruption practices and integration of sustainability principles into decision-making processes and leadership models			
		R		Tax risk			
	Corporate culture and fight against corruption	R		Non-compliance with laws and regulations by own workers and value chain workers			
	Management of relationships with suppliers, including payment practices	+		Encouraging a sustainable development culture when engaging with partners and suppliers to disseminate and cultivate high ethical, environmental and social standards along the value chain			
R			Inadequate or non-performing suppliers/subcontractors				
<i>Innovation and digitalisation</i> [Entity-specific]	-	+		Development and/or systematic adoption of innovative solutions and digital technologies to design and build large infrastructure, with the aim of improving its social and environmental performances and reducing its environmental footprint			
		R		Risk of a lack of or inadequate innovation			
		O		Use of innovative solutions to create value, be more competitive and expand market share			

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

Policies adopted to manage material sustainability matters

[MDR-P]

To effectively implement its vision, mission and values (such as integrity, transparency and probity), Webuild has 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 local regulations and international guidelines.

Webuild drafts its Policies, which are approved and signed by the parent's Chief Executive officer, using structured processes that incorporate the expectations and concerns of the relevant stakeholders. They are applicable to all Webuild personnel and the parties that work for or with it (e.g., subcontractors, suppliers, consultants, brokers and agents). These Policies and embedded principles are applicable to all its branches and directly-run work sites. In the case of non-group companies and work sites managed by an entity other than the parent, their competent person (legal representative, project manager or director) is responsible for the definition of policies in line with those of Webuild. They are also responsible for sharing them with relevant third parties.

Top management oversees application of the Policies by regularly comparing performances to targets. Webuild monitors and transparently communicates its Policies, strategies and results achieved to stakeholders in documents published on its website (in the "Sustainability"²⁹ section) or by using other communication tools deemed appropriate in the circumstances.

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.

²⁹ <https://www.webuildgroup.com/en/sustainability>

An overview of the Group's policies is provided below.

Policy	Internationally-recognised references
<p>Code of Ethics This establishes the conduct to be adopted at work and sets out an ethical leadership model.</p>	<i>SDGs, OECD Guidelines for Multinational Enterprises, UN Global Compact</i>
<p>Sustainability Policy This sets out the guidelines to foster the economic growth, social well-being and environmental protection in the countries where Webuild operates.</p>	<i>SDGs, UN Global Compact, ISO 26000</i>
<p>Suppliers' Code of Conduct This extends Webuild's responsible and sustainable operating practices to its supply chain.</p>	<i>OECD Guidelines for Multinational Enterprises, UN Global Compact, ISO 9001, ISO 45001, ISO 14001, ISO 37001, IFC's Environmental and Social Performance Standards (World Bank Group), United Nations Guiding Principles on Business and Human Rights</i>
<p>Social Responsibility and Human Rights Policy This sets out the Group's commitments to protect the human rights of the affected stakeholders in areas 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.</p>	<i>OECD Guidelines for Multinational Enterprises, United Nations Guiding Principles on Business and Human Rights, SA 8000, ISO 45001, IFC's Environmental and Social Performance Standards (World Bank Group)</i>
<p>Health and Safety Policy This sets out the Group's principles 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 promotes the workers' "right to intervene" when necessary and its objective of "zero injuries".</p>	<i>ISO 45001, SA 8000</i>
<p>Road traffic safety Policy This sets out the principles Webuild is committed to complying with to ensure road traffic safety.</p>	<i>ISO 39001</i>
<p>Equal opportunities, Diversity & Inclusion Policy This presents the Group' commitment to discourage all forms of discrimination based on gender, nationality, ethnicity, marital status, religion or other characteristics envisaged by law.</p>	<i>UNI PdR 125; ISO 30415</i>
<p>Environmental Policy This contains the principles designed to mitigate adverse effects on the environment, protect the ecosystem and promote environmental benefits, addressing global challenges and affirming the right of workers to intervene to stop activities that could be harmful to the environment.</p>	<i>ISO 14001, ISO 39001, ISO 14040, PAS 2080, IFC's Environmental and Social Performance Standards (World Bank Group)</i>
<p>Environmental Code of Conduct This contains operating and organisational rules designed to facilitate cultural change, actively involve workers and the value chain, cultivate a sense of belonging and support the conscious adoption of Webuild's Environmental Policy.</p>	<i>ISO 14001, ISO 14040, ISO 50001, PAS 20400, IFC's Environmental and Social Performance Standards (World Bank Group)</i>
<p>Energy Management Policy This sets out the principles for the efficient and responsible use of energy, encouraging the adoption of innovative technologies and cutting edge energy solutions.</p>	<i>ISO 50001</i>
<p>Quality Policy This presents the principles that guide Webuild to ensure 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".</p>	<i>ISO 9001, ISO 21500</i>
<p>Anti-corruption Policy This contains the anti-corruption principles to be adhered to by employees, based on the fundamental tenet of "zero tolerance".</p>	<i>ISO 37001</i>

Integrated Management System

Webuild has implemented an Integrated Management System as its strategic organisational model to achieve its targets and meet stakeholder expectations. It covers essential areas such as quality, environment, energy efficiency, occupational health and safety, road traffic safety, social responsibility and protection of human rights, gender equity and diversity and inclusion. Meeting the requirements of the international standards ISO 9001, ISO 14001, ISO 50001, ISO 45001, ISO 39001, SA 8000, ISO 30415 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.

The Integrated Management System is formalised in documents that are organised hierarchically for the various internal levels (corporate, subsidiaries, branches and projects/work sites, etc.). They 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 quality, the 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 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. Group companies with independent management systems (Lane, Clough, CSC, Cossi, Fisia Italmimpianti and Seli Overseas) comply with the applicable ISO standards, guaranteeing consistent and quality management of their processes.

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.

The certification scope is defined with stand alone certificates in the case of certifications 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 contracts³⁰ 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 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 Italmimpianti and Seli Overseas comply with the parent’s procedures and guidance, their management systems are independently certified.

³⁰ More information is provided in the annexes to each certificate.

Tracking the 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 and measurable targets.

The Group intends to use the ESG Plan to accelerate its climate transition by developing innovative solutions to improve the environmental sustainability of projects and activities, consolidate its role as a sector leader in terms of health and safety, skills development, diversity and inclusion, and contribute to improving the sector's efficiency, leveraging innovation and digitalisation.



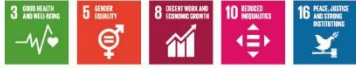




To this end, the 2024-2025 ESG Plan builds on the results achieved with the previous 2021-2023 ESG Plan with even more ambitious goals in order to respond even more concretely to stakeholders' expectations and the main global challenges.

In line with this vision, 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, ensuring high standards of governance, integrity, transparency and stakeholder engagement (governance).

The ESG Plan's three strategic pillars (Green, Safety & Inclusion, Innovation - the sustainability "work sites"), for which the Group has defined programmes and targets to be pursued over the plan period, are based on these priority areas.

The targets set out in the 2024-2025 ESG Plan and the results which confirm full achievement of all the Group's objectives are presented below. They show how the Group makes a substantial contribution to the UN's main SDGs and seizes the opportunities offered by global megatrends and the transition to a low-carbon economy, thanks to its core business strongly oriented towards the creation of sustainable infrastructures. The results for 2025 represent the final outcomes of the 2024-2025 ESG Plan³¹.

³¹ More information about the targets is provided in the "Climate change" chapter of the "Environment information" section, the "Own workforce - Diversity and inclusion - Health and safety" chapter of the "Social information" section and in the "Innovation and digitalisation" chapter of the "Governance information" section.

	SUSTAINABILITY "WORK SITES"	TARGETS	2025 RESULTS
Sustainability of Sites 	Green builders 	GHG emissions intensity (scope 1&2) ⁽¹⁾ (2025 vs 2022)	-10 % -34 %
	Safe and inclusive builders 	Lost time injury frequency rate ⁽²⁾ (2025 vs 2022)	-6 % -20 %
Sustainability of Works 	Innovative and smart builders 	Investments in innovative and clean-tech projects (2024 - 2025)	+20 % +27 %
		Investments in innovative and clean-tech projects (2024 - 2025)	€430 m €586 m
	 Engineering solutions that guarantee sustainability during execution of the project	 Adoption of solutions that guarantee sustainability throughout the project life cycle	

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) Lost time injury frequency rate: sick leave (days) x 1 million hours worked

As well as the Group's own ongoing monitoring of its progress, the 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 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. The Group's steadily improving ESG ratings rank it among the global leaders in its sector. Moreover, the Group's achievements are confirmed by independent accolades received such as its inclusion in the "Europe Climate Leaders 2025" ranking drawn up by Statista in collaboration with the Financial Times, where it ranks second among only seven Italian companies in the "Construction & building materials" category. Webuild also ranked first in the "Listed companies" category of the "2025 Sustainability Statement Award", thanks to its statement's quality and clear presentation. The award, now in its seventh edition and promoted by the Department of Economics and Business Sciences of the University of Pavia with LSEG (London Stock Exchange Group) Italy, rewards the integrity of Webuild's reporting and its commitment to fighting climate change, supported by its ability to translate complex climate targets into transparent and measurable metrics.

An overview of the main rating agencies and Webuild's ratings in 2025 is provided below³².

Rating agencies

Results



In 2025, Webuild improved its EcoVadis rating, scoring 83/100, and held on to its Gold medal, ranking in the 98th percentile globally. EcoVadis, one of the most accredited rating systems, acknowledged the Group as one of the most sustainable organisations in the world in terms of its environmental, social and governance practices, placing it among the most virtuous companies.³³



In 2025, Webuild entered CDP Climate Change's A-List, obtaining an "A" rating (CDP's - former Carbon Disclosure Project - highest ranking) and joining the top 4% of the more than 24,800 companies assessed worldwide. This achievement confirms the Group's excellent handling of environmental topics and strengthens its reputation with investors and stakeholders. Inclusion in the A-List is due to Webuild's robust climate strategy, which is fully integrated into its growth plans and designed to reduce its environmental impact and contribute to achievement of the SDGs. Webuild was also included in the A-List of the 2025 Supplier Engagement Assessment, obtaining the highest possible marks in CDP's system used to assess climate change management along the value chain for the second consecutive year. 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 2025 report update, Webuild confirmed its "AA" rating (MSCI ESG Ratings), ranking among the leading companies in the sustainability field and strengthening the positive trend underway since 2018.



In 2025, Webuild maintained its B- score of the ISS ESG rating, thus confirming the positive trend of recent years which allowed it to keep its "Prime" status reserved for those companies with above-average sustainability performances. The Group has been included in the ISS ESG classification since 2017.

³² Following the strategic partnership announced on 1 July 2024, Moody's began to replace the Moody's ESG Scores it used previously with MSCI ESG Ratings. Accordingly, Webuild now refers to the MSCI ESG ratings for its sustainability performance.

³³ More information is available at the following link: https://recognition.ecovadis.com/4q9x3wCiTUuOUJ_1Yo309g

Environmental information

Environmental Management System

[E1-2; E2-1; E3-1; E4-2; E5-1]

As part of the Group's Integrated Management System, the Environmental Management System is adopted by each group unit after adaptation considering their location, applicable regulations and contracts. The aim is to ensure that material negative environmental impacts are properly identified, managed and mitigated while positive impacts are cultivated 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 allow 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) globally, 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 follows the methods set out in the next chapter ("Climate change – Material impacts, risks and opportunities") considering both the external context and typical risks of the sector. These include those arising from new legislative measures that affect the Group or market/significant third party requirements. Risks related to operations (ongoing project activities and the efficiency and effectiveness of the Integrated Environmental Management System and its deployment for projects and by the group companies) are also evaluated. The Group prepares guidelines and rules to equip the companies with methods to mitigate, monitor and control the most significant risks. These guidelines are the general framework that work sites tailor to each individual project, identifying the specific risks and related control mitigation measures in the context of the local environment.

Minimising environmental risks at the source is essential in any construction project to efficiently safeguard the environment and prevent pollution. This goal requires the proper performance of the design, planning and construction processes. These must consider the project's entire life cycle, involving the Group's suppliers which are required to comply with the Suppliers' Code of Conduct and the Environmental Code and the Group's subcontractors, which are also required to comply with Webuild's Environmental Management System. Environmental risks are minimised through the environmental risk management procedure which starts 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 phase, who will subsequently manage them 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.

Implementation of the Environmental Management System

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

Identification of the material environmental aspects includes an analysis of the main effects of the project and other activities on the various environmental components:

- natural and energy resources; soil, subsoil and water environment; waste and use of hazardous substances/preparations;
- atmosphere and climate (emissions); 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.

The materiality of environmental impacts is assessed using well-defined criteria, such as specific regulatory or contractual requirements, assessment of the impact-related risk, management of the impact and the area's sensitivity to the specific environmental aspect. The assessment considers various scenarios and variables including 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.).

After the environmental risk assessment and the 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) for the specific area and the appropriate emergency response measures to be implemented;
- environmental monitoring and control plans defining the specific 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.

The environmental risk assessments are regularly updated to reflect any changes such as the introduction of new machinery, processes, dangers or new legal/regulatory requirements. Together with the lessons learnt about projects on-site, the results of the risk assessment, monitoring and regular project reviews contribute to continuously improving the Group's Environmental Management System.

The correct implementation of environmental plans requires proper training at work site and head office level. The work sites schedule and provide regular information/training to employees involved in projects with potential impacts on the environment, including the subcontractors' employees. These sessions cover the processes for labelling, storage, handling and transport of hazardous goods. They also involve environmental emergency drills covering how to prevent pollution, manage waste and emissions and protect biodiversity and resources, in order to prevent or contain the related impacts. In 2025, 173,649 hours of training on environmental matters was provided to the Group's employees. In addition, the corporate office runs regular group-wide campaigns to raise employee awareness of specific issues (e.g., energy savings, waste, spills, use of hazardous substances/preparations, design and LCA) 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, ruling regulations and assessment of the project's social and environmental impact, 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.

While the project proponent is responsible for assessing the project's impacts and engaging with the affected stakeholders, the Group considers stakeholders' interests as part of its environmental risk assessment and identifies additional communication, monitoring, control and mitigation measures as necessary. Special attention is paid to highly urbanised areas, those with sensitive receptors, the well-being of the local community and fostering a collaborative relationship with the competent authorities.

Policies related to Environmental information

[E1-2; E2-1; E3-1; E4-2; E5-1; MDR-P]

The Group implements its Environmental Management System via its environmental policies, Sustainability Policy and Code of Ethics throughout the projects' life cycle. Its main policies contribute to mitigating the impacts and promoting sustainable practices along the value chain with respect to the material environmental topics, i.e., climate change, pollution, water management, biodiversity and ecosystems, and resource use and circular economy.

The Group's policies for the main environmental topics are set out below.

Policy	Climate change	Pollution	Water	Biodiversity and ecosystems	Resource use and circular economy
Environmental Policy	✓	✓	✓	✓	✓
Environmental Code of Conduct	✓	✓	✓	✓	✓
Suppliers' Code of Conduct	✓	✓	✓	✓	✓
Energy Management Policy	✓	✓			

Protection of the environment, fighting climate change and the efficient use of energy are undisputable priorities for the Group. Its Environmental Policy, Energy Management Policy, Sustainability Policy, Environmental Code of Conduct, the Suppliers' Code of Conduct and Code of Ethics make up a framework of strict guidelines and standards to protect ecosystems, encourage decarbonisation, reduce environmental impacts and ensure the responsible and efficient use of natural resources and energy in its own operations and along the value chain.

Environmental Policy: this document, issued in 2002, formalises the Group's commitment to protecting the environment³⁴ and defines the principles aimed at:

- integrated and compliant environmental management, ensuring compliance with legal and contractual requirements, identification and assessment of significant environmental aspects and adoption of mitigation and control measures in line with the Life Cycle Perspective and Sustainable Supply Chain principles;
- developing sustainable solutions and measures by identifying and adopting the best technical and organisational processes to minimise the extraction of resources from the biosphere, especially non-renewable resources. This entails encouraging the recovery and reuse of resources like water, raw materials

³⁴ 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.

and excavated soil and rocks, as well as the reduction of the use of virgin resources, waste generation and atmospheric emissions, including GHG, ozone-depleting substances and dust. The Group also takes steps to minimise noise and light pollution, improving energy efficiency by favouring the use of renewable sources and ensuring the protection of biodiversity and ecosystems.

- encourage involvement and engagement through the active participation of all employees, by awareness-raising initiatives and training courses, and ongoing interaction with local communities and stakeholders about its performance;
- promote a spirit of environmental responsibility in order to protect the right and responsibility of each worker to intervene and stop work if there is a potential risk to the environment.

The Group's suppliers and subcontractors are required to apply the above principles and practices to manage the environmental impacts along the value chain. Webuild has disciplinary procedures in place to ensure their compliance with environmental and safety standards.

Environmental Code of Conduct: this contains a set of operating and organisational rules designed to facilitate cultural change, standardise conduct and support the conscious adoption of Webuild's Environmental Policy within its own operations and along the entire value chain.

These rules are based on the work sites' activities and operating procedures, performance and benchmark analyses and cover both environmental issues such as energy, emissions, water, soil, waste, hazardous substances, landscape and biodiversity, and organisational issues like compliance, emergency management, the value chain, life cycle, definition of roles and identification of weak signals.

The Code also establishes the standards and practices employees, suppliers and partners are required to comply with in order to ensure sustainability and protection of the environment as part of the Group's mission to foster a culture of shared responsibility towards the Planet. It expects all stakeholders to behave in a responsible and sustainable manner throughout the infrastructure's life cycle. The Code goes above the spatial and temporal boundaries of individual projects to make a conscious contribution to reducing environmental impacts.

The Code confirms the Group's attentiveness to the responsible management of water, by deploying specific protection and prevention systems to ensure its efficient, sustainable and innovative use both within its own operations and along the entire value chain. This approach reflects Webuild's broader commitment as it is well aware of the limited availability of this resource and the importance of preserving it for future generations.

With respect to the protection of biodiversity and ecosystems, the Environmental Code of Conduct (supplemented by the Environmental Management System) revisits and reinforces the importance of protecting natural habitats and cultural and landscape heritage throughout its operations and the supply chain. These standards apply to the entire value chain. This approach is in line with Webuild's broader commitment as it acknowledges biodiversity protection as a fundamental principle and is committed to its pursuit throughout the construction of the infrastructure.

The Environmental Code of Conduct also sets out specific guidelines to limit extractions from the biosphere, especially of non-renewable sources, and to encourage recovery and reuse, especially in the case of raw materials.

In addition, the Code establishes transparent, strict guidance for the management of hazardous substances/mixtures and waste, requiring their correct classification, separation and storage in the designated areas and measures to avoid its dispersion into the ground, watercourses or aquifers either as part of its own operations or in the value chain.

Suppliers' Code of Conduct: this extends Webuild's responsible and sustainable operating practices to its supply chain. It is binding for suppliers, which are required to commit to reducing their impact on the local areas and limiting, where possible, their generation of waste, emissions and effluents and supporting the green economy and the fight against climate change. Webuild monitors application of environmental standards through a dedicated system (reporting, inspections, audits and regular performance assessments) which also extends to its suppliers. 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 and environment requirements (e.g., the QHSE system and the HSE system).

Energy Management Policy: this document sets out Webuild's commitment to the effective and responsible use of energy as a strategic competitive lever and to protect the environment. The Policy encourages the deployment of innovative technology and cutting-edge energy solutions, investments in R&D and reduced emissions throughout the projects' entire life cycle. Webuild has a specific unit, with defined roles, duties and decision-making processes, to monitor its energy performance. This allows it to bring together innovation (energy optimisation) and a robust monitoring system to address the challenges posed by the energy transition.

The Policy requires the Group's internal and external (strategic partners, suppliers and subcontractors) stakeholders to also manage energy sustainably. Webuild disseminates an energy culture through internal training and awareness-raising campaigns, as well as encouraging its supply chain to adopt sustainable energy practices.

In addition to its environmental policies, Webuild's **Code of Ethics** and Sustainability Policy also act as group-wide reference points to consolidate Webuild's sustainability culture and conduct. Specifically, Webuild constantly updates its **Sustainability Policy** to be in line with changes in the global context and with the Group's mission to build sustainable complex infrastructure. This Policy incorporates responsible business practices and promotes solutions to facilitate sustainable mobility, the development of renewable energy, the responsible management of water and the adoption of green building criteria.

Its key principles include the fight against climate change, protection of biodiversity, natural capital and landscapes, which the Group works towards with decarbonisation strategies, climate change mitigation and adaptation initiatives, tools to minimise emissions along the value chain and circular economy solutions throughout the projects' life cycle.

Climate change

Material impacts, risks and opportunities

[E1 IRO-1; E1 SBM-3]

Impacts, risks and opportunities

	Actual impact		Potential impact		Risk R	Opportunity O	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
	+	-	+	-								
	positive	negative	positive	negative								
Building infrastructure that contributes to climate change adaptation (such as roads, bridges and tunnels)						+	●	○	○	○	○	●
Reduction of the carbon footprint of works built by Webuild thanks to the use of low embodied carbon materials and processes						+	●	●	○	○	○	●
GHG emissions from own operations (Scope 1, Scope 2) mostly due to the use of fossil fuels (e.g., equipment/plant operation, use of vehicles and machinery and energy generation)						-	○	●	○	●	○	○
GHG emissions generated by Webuild's value chain (Scope 3) that contribute to the Group's carbon footprint						-	●	○	●	●	○	○
Support for the energy transition with infrastructure projects in the Sustainable Mobility, Clean Hydro-Energy and Green Buildings business areas that contribute to global efforts to reduce climate-altering emissions						+	●	○	○	○	●	○
Extreme weather events and damage to people, plant and equipment					R		○	●	○	○	●	●
Optimisation of operating efficiency and cost reduction through new processes and low-impact technology that reduce consumption, emissions and materials						O	○	●	○	○	○	●
Business growth driven by the rising demand for climate resilient solutions (e.g., dams, bridges, desalination plants, maintenance, etc.)						O	○	●	○	○	○	●

The Group's formalised targets related to climate change³⁵ are set out below.

[E1-4; MDR-T]

³⁵ The absolute targets shown in the table were both validated by Science-Based Target Initiative (SBTi). The emission figures in the "Base year" column of the "Targets" table refer to the emissions boundary of the base year indicated which differs from that of 2025. In addition, figures shown in the "Reduction in absolute Scope 3 emissions" line only include emissions associated with the principal construction materials (cement, concrete, steel), which accounted for more than two thirds of the Group's Scope 3 emissions when the Science-based targets were defined. Finally, the base year for the "Reduction in Scope 1 and Scope 2 market-based emissions intensity" is 2022, in line with the baseline of the LTI 2023-2025 Plan. The baseline for the two absolute targets was defined using the SBTi methodology.

TARGETS					
Statement	Base year	Base year figure	Target year	Target	2025 performance
Reduction in Scope 1 and Scope 2 market-based emissions intensity ³⁶	2022	47 (tCO2e/€m)	2025	-10%	31.2
Reduction in absolute Scope 1 and Scope 2 market-based emissions	2019	476,621 (tCO2e)	2030	-47%	423,559
Reduction in absolute Scope 3 emissions	2019	1,502,970 (tCO2e)	2030	-15%	2,321,109
Commitment: Net Zero by 2050 ³⁷					

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)³⁸.

The next table shows the salient aspects of the three IPCC scenarios analysed, all of which predict increases in temperature and physical impacts caused by climate change, albeit at varying speeds and to different extents.

IPCC (Intergovernmental Panel on Climate Change) scenario

RCP 6.0 scenario	RCP 4.5 scenario	RCP 2.6 scenario
Limited reduction in emissions ³⁹	Large reduction in emissions	Reduction in line with the Paris Agreement objectives
GHG emissions continue to increase throughout most of the century, the average global temperature rises to 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 before reducing 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 influenced by governmental climate policies.

³⁶ In terms of t CO2e and Scope 1 and 2/€m. Scope 1 (emissions from the consumption of fuel, explosives and refrigerating gas), Scope 2 (emissions from purchased or acquired electricity, heat, steam or cooling).

³⁷ Balanced position with no net impacts on the climate, obtained by reducing emissions and neutralising any residual emissions difficult to eliminate.

³⁸ A group-wide resilience analysis was performed in 2020. However, in accordance with the applicable regulations and customer requests, the Group carries out specific analyses and assessments of climate risk and infrastructure vulnerability for each project in order to ensure that the expected impacts of climate change are appropriately handled.

³⁹ RCP (Representative Concentration Pathway) 6.0, 4.5 and 2.6 are the three scenarios adopted by the IPCC for different GHG concentration trajectories used for research purposes and to develop the forward-looking models.

The Group has a plethora of mitigation actions for this risk, calibrated to each project's nature and environmental and regulatory context. These include sustainable work site start-up activities, insurance cover for assets and contract measures or terms related to negotiations with customers⁴⁰.

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.

⁴⁰ 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.

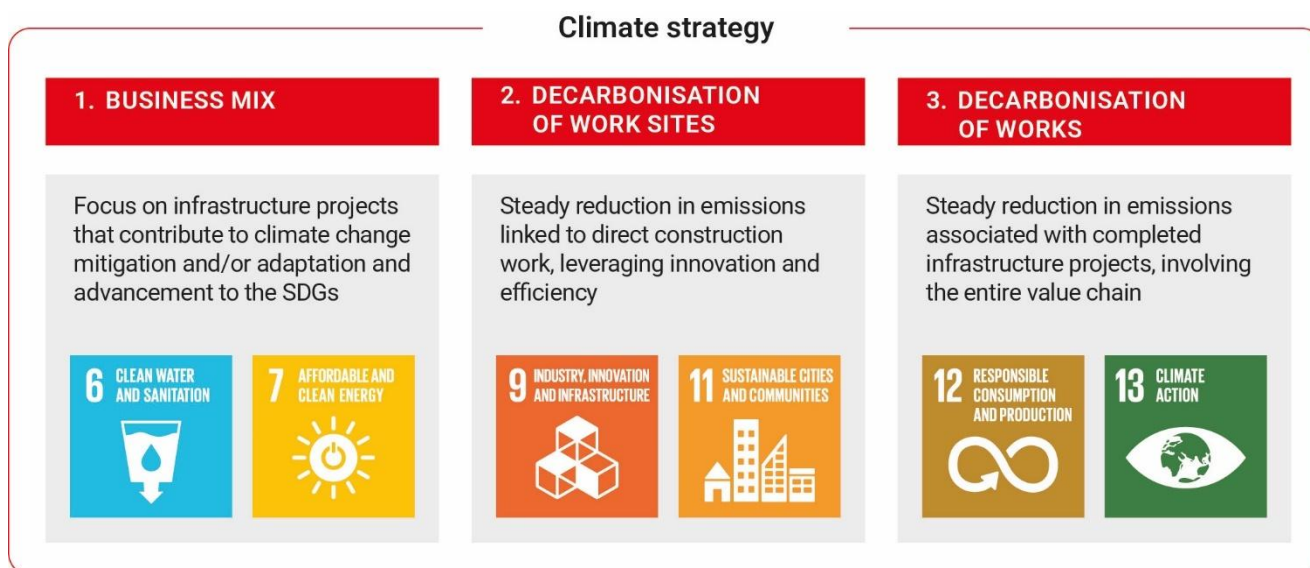
Transition plan for climate change mitigation

[E1-1]

Webuild supports the global fight against climate change and the transition to a low-carbon economy.

The Group has a transparent, coherent Climate Strategy based on the reduction of relative and absolute GHG emissions⁴¹. 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 change⁴².

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



⁴¹ 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. More information is available in the “Targets” paragraph of this chapter. However, the climate change mitigation transition plan has not yet been formalised in a specific document approved by the administrative, management and supervisory bodies.

⁴² 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).

In recent years, the Group has made good inroads: nearly all its activities 96% of its construction order backlog (93%⁴³ in 2024) contribute to advancement towards the SDGs and 44.6% of its 2025 revenue, 52.1% of CapEx and 50% of OpEx are EU taxonomy-aligned. More information is available in the “EU taxonomy for sustainable economic activities” chapter of this section.

1. 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 climate-altering emissions.

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 climate-resilience of infrastructure, the clean water and sustainable mobility (roads, bridges and tunnels) 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 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 integrate 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 beyond 2100, or the New Genoa San Giorgio Bridge, designed to deal with the expected extreme increase in rainfall over the next decades.

The design approach to infrastructure projects funded by the Australian government includes durability and climate resilience criteria based on analyses of future climate change scenarios and the possible impacts of extreme weather events and more intense rainfall. The outcome of these analyses is constructive solutions that enable the infrastructure to maintain their serviceability levels in the long-term, including in harsher weather conditions. Stringent design standards and materials selected to stand up to these changes means the resulting infrastructure is more robust, reliable and able to meet the climate challenges of the coming decades.

Together, these practices confirm a more evolved approach to construction materials and technologies, conceived for sustainability, climate resilience and durability. They attest to the Group’s ability to cater for climate change variables in its design and construction models.

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

⁴³ 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 2025).

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, including operating procedures. 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.

3. Decarbonisation of infrastructure: 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 mainly 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 goes beyond Webuild itself, to require the full engagement and commitment of the entire value chain, from investors to customers, designers, regulators and the supply chain.

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.

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 this way and especially when 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).

The Group's roadmap underpinning its Climate Strategy is entirely focused on steadily reducing GHG emissions. Its short-, medium- and long-term targets⁴⁴, both absolute and relative as set out in the "Targets" table at the start of this chapter.

In 2022, Science-Based Target Initiative validated the Group's absolute GHG emission reduction targets to 2030, in line with the global commitment to limit global warming to 1.5°C above pre-industrial levels. Specifically, Webuild undertook to reduce its absolute Scope 1 and Scope 2 emissions by 47% by 2030 compared to 2019 and to concurrently decrease the Scope 3 emissions of its value chain by 15%.

In defining the SBTi targets⁴⁵, the CSR Department is assisted by the Environmental Department and takes stakeholders' opinions into consideration.

⁴⁴ 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 involved.

⁴⁵ 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 applicable reporting 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 a correlation 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 hypothesised 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.

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 2024-2025 ESG Plan⁴⁶. This target is also included in its Sustainability-Linked Financing Framework with a 2017 baseline⁴⁷. Based on the results achieved in the reporting period, Webuild met this target in full at 31 December 2025.

Webuild regularly monitors its emissions to ensure that it meets its targets. It collects the data needed to check the emissions that contribute to the targets during the year. This monitoring procedure and transparency about its performance compared to the targets are also achieved through the CDP (formerly Carbon Disclosure Project) questionnaires which are published and show the progress made in the year.

On the basis of the GHG (Scope 1, 2 and 3) emissions reduction targets, the above decarbonisation levers, and after a qualitative assessment, the Group has not identified "locked-in"⁴⁸ emissions related to its key assets that would compromise achievement of these targets.

The "Actions" paragraph of this chapter includes a description of the intervention levers to reduce Scope 1, 2 and 3 emissions⁴⁹.

⁴⁶ This target's baseline was set in line with the other objectives of the ESG Plan.

⁴⁷ Emissions intensity target for Scope 1 and Scope 2 market-based emissions (tCO_{2e} /€m): -50% to 2025 with 2017 baseline (110).

⁴⁸ "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.

⁴⁹ Webuild is excluded from the EU Paris-aligned benchmarks.

Actions

[E1-3; MDR-A]

The following table sets out the Group's initiatives to contribute to achieving the emissions reduction targets by deploying the identified decarbonisation levers⁵⁰.

⁵⁰ 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 financial resources in terms of CapEx and OpEx associated with actions that meet the taxonomy criteria are presented in Annex 1 to this statement.

OUR JOURNEY TO 2030

Scope	Decarbonisation levers	Contribution to reduction target ⁵¹
Scope 1 & 2 emissions	Use of renewable energy <ul style="list-style-type: none"> • Purchase of electricity from renewable sources and fuel with blends of renewable components (e.g., biodiesel) 	72%
	Transition to the electricity grid <ul style="list-style-type: none"> • Gradual transition away from diesel generators at work sites to connection to electricity grids 	10%
	More efficient plant, equipment and electrical systems <ul style="list-style-type: none"> • Adopt advanced power quality solutions to stabilise electrical loads and reduce consumption • Progressively deploy “green” TMBs, designed to significantly reduce energy and water consumption compared to traditional machines, thanks to efficiency levels of between 13-18% • Develop environmentally-friendly robotic prefabrication systems, based on circular economy principles and the optimised use of energy, water and materials 	15%
	<ul style="list-style-type: none"> • Introduce predictive maintenance systems, able to promptly identify inefficiencies in work site equipment and improve maintenance cycles • Deploy ventilation systems in tunnels that operate with automated pollutant controls for greater energy efficiency and improved air quality • Progressively introduce renewable energy systems at the work sites, such as photovoltaic systems • Efficiency improvement of handling systems, including new technologies applied to conveyor belts (such as permanent magnet motors) to reduce further energy consumption when transporting materials 	
	More efficient vehicle fleet <ul style="list-style-type: none"> • Progressively replace existing vehicles with low emission models, including hybrid and/or electric vehicles • Substitute road transport with conveyor belts for the movement of excavation materials • Install high efficiency catalytic systems on site vehicles • Introduce real time consumption monitoring systems for vehicles and machinery 	
Scope 3 emissions	Low-carbon materials <ul style="list-style-type: none"> • Progressive transition to construction materials with less emissions (generated during production), such as low-carbon cement and concrete and steel with high recycled content (at least 50%) 	70%
	Optimised designs <ul style="list-style-type: none"> • Material efficiency through value engineering and the use of lower-emission solutions, such as steel fibres in the place of traditional reinforcements 	30%

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 (92% in 2025), reducing the need for long transport journeys and minimising the associated emissions. When goods are not available locally, the Group prefers to ship materials and machinery by sea as this is the means of transport with the lowest associated emissions;

⁵¹ These percentages show the contribution of the various intervention levers at the date the targets were presented. They were defined using the decarbonisation trajectory provided for by the SBTi methodology.

- 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 encourage train travel over air travel 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.

Since 2018, Webuild has set up various interdepartmental and interdisciplinary technical teams at corporate level in order to address the decarbonisation challenges. They include:

- 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;
- Decarbonisation team, set up in 2024 as an interdepartmental work group to define a single strategy to implement and manage decarbonisation projects within the Group. This takes place on many levels from the head office to the various locations and individual projects, starting with corporate processes before extending to each project throughout the infrastructure's life cycle (beginning with its design right through to its end-of-life).

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 Action⁵².

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 positive response to Webuild's strategy of recent years.

⁵² 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.

Metrics

ENERGY CONSUMPTION AND MIX

[E1-5; MDR-M]

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 areas 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 rate⁵³:

Energy consumption and mix	Unit	2024	2025
1) Fuel consumption from coal and other products	MWh	–	–
2) Fuel consumption from crude oil and petroleum products	MWh	1,110,157	1,266,911
3) Fuel consumption from natural gas	MWh	27,867	13,643
4) Fuel consumption from other fossil sources	MWh	997	1,043
5) Consumption of purchased or acquired electricity, heat, steam or cooling from fossil sources	MWh	134,610	227,524
6) Total energy consumption from fossil sources (sum of lines 1 to 5)	MWh	1,273,631	1,509,120
Percentage of fossil sources to total energy consumption	%	89%	90%
7) Consumption from nuclear sources	MWh	-	-
Percentage of nuclear sources to total energy consumption	%	-	-
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	14,383
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	139,487	144,128
10) Consumption of self-generated non-fuel renewable energy	MWh	1,062	1,113
11) Total energy consumption from renewable sources (sum of lines 8 to 10)	MWh	149,504	159,624
Percentage of renewable sources to total energy consumption	%	11%	10%
Total energy consumption (sum of lines 6 to 11)	MWh	1,423,135	1,668,744
Energy intensity	MWh/€m	121	123

In 2025, 39% of the electricity consumed by the Group for projects it carried out directly came from renewable sources.

Subcontractors' energy consumption included 5,106 MWh from renewable sources and 506,394 from fossil sources.

⁵³ The energy intensity rate is calculated considering note 33 "Revenue and other income" to the consolidated financial statements. In line with that set out in the "Sources of estimation and outcome uncertainty" chapter of the "General information" section, the data collection process is based on the use of timely and measured data. When data cannot be measured directly, the project teams may make an estimate drawing on their knowledge of the project's specific operating requirements, which is moreover a marginal amount compared to the total. Estimate methods are reviewed internally and may include, for example, an estimate of consumption based on previous periods.

The performance of the key environmental indicators in the 2024-2025 two-year period is consistent with the sector's normal changes, with fluctuations in energy consumption reflecting the number, stage and operating intensity of the Group's work sites. The slight increase seen in 2025 compared to 2024 is due to the step-up of production activities, mainly at the Italian work sites (numerous projects had been in a start-up stage in previous years), assisted by the opportunities created by the Italian National Recovery and Resilience Plan, as well as progress made on important projects in the Middle East and Australia.

In line with this trend, Scope 1, 2 and 3 emissions increased in 2025 due to the greater consumption of energy and materials as a result of the continuation of the projects at the Group's main work sites.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

[E1-6]

The Group's Scope 1, 2 and 3 emissions⁵⁴, 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)⁵⁵ and the emissions intensity rates⁵⁶. 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 Group⁵⁷.
- 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 and concrete). They are followed by emissions from transport, upstream energy, waste and the travel of head office personnel (in Italy, the United States, Australia and Switzerland)⁵⁸.

The next table shows the Scope 1, 2 and 3 emissions for 2025:

⁵⁴ The independent auditors checked the reported metrics in order to issue their assurance report. Moreover, an external body checks the emissions inventory once a year to monitor progress towards the SBTi targets.

⁵⁵ The GHG emissions were calculated and expressed as CO₂ equivalent (CO_{2eq}). The Group used a calculation method based on the use of specific emission factors (EF) to calculate the total emissions of CO_{2eq}. 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 CO₂ equivalent (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃). The emissions factors are taken from accredited databases and/or product environmental certifications. The main databases used are: 2024 Government GHG Conversion Factors for Company Reporting (UK Department for Business, Energy & Industrial Strategy – BEIS), 2025 CO₂ Emissions from Fuel (International Energy Agency), 2007 Fourth Assessment Report AR4 (IPCC), 2019 Inventory of Carbon and Energy (Bath Inventory of Carbon and Energy - ICE) and SimaPro modelling software.

⁵⁶ The intensity rate is calculated considering note 33 "Revenue and other income" to the consolidated financial statements.

⁵⁷ Biogenic emissions of CO₂ 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 CH₄ and N₂O).

⁵⁸ 100% 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 Italmimpianti 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.

Gross Scopes 1, 2, 3 and Total GHG emissions	Unit	2024	2025
Scope 1 GHG emissions			
Gross Scope 1 GHG emissions	tCO2eq	333,250	333,455
Percentage of Scope 1 GHG emissions covered by regulated emissions trading systems	%	-	-
Scope 2 GHG emissions			
Gross location-based Scope 2 GHG emissions	tCO2eq	81,441	90,752
Gross market-based Scope 2 GHG emissions	tCO2eq	83,538	90,104
Significant Scope 3 GHG emissions			
Total gross indirect (Scope 3) GHG emissions	tCO2eq	2,639,233	3,432,622
Purchased goods and services	tCO2eq	2,147,254	2,888,361
Capital goods	tCO2eq	-	-
Fuel and energy-related activities (not included in Scope 1 or Scope 2)	tCO2eq	103,187	129,052
Upstream transportation and distribution	tCO2eq	348,847	301,084
Waste generated in operations	tCO2eq	29,096	104,882
Business travelling	tCO2eq	7,327	7,416
Employee commuting	tCO2eq	3,522	1,828
Upstream leased assets	tCO2eq	-	-
Downstream transportation	tCO2eq	-	-
Processing of sold products	tCO2eq	-	-
Use of sold products	tCO2eq	-	-
End-of-life treatment of sold products	tCO2eq	-	-
Downstream leased assets	tCO2eq	-	-
Franchises	tCO2eq	-	-
Investments	tCO2eq	-	-
Total GHG emissions			
Total GHG emissions (location-based)	tCO2eq	3,053,925	3,856,829
Total GHG emissions (market-based)	tCO2eq	3,056,022	3,856,181
Biogenic emissions			
	Unit	2024	2025
Scope 1	tCO2eq	2,298	3,686
Scope 2	tCO2eq	-	-
Scope 3	tCO2eq	699	1,277
GHG intensity based on net revenue			
	Unit	2024	2025
Total GHG emissions (location-based) based on net revenue		259	284
Total GHG emissions (market-based) based on net revenue		259	284
Scope 1 and 2 GHG emissions (market-based) based on net revenue ⁵⁹		35.3	31.2

It is important to note that the infrastructures for which the Group generates emissions during their construction in turn generate 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.

⁵⁹ 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 refers to note 33 "Revenue and other income" to the consolidated financial statements.

The table below shows the Scope 3 emissions categories and the methodologies used to quantify the related emissions.

Scope 3	Methodology
Purchased goods and services	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).
Capital goods	This category was found to be immaterial after calculating its emissions using the relevant consolidated financial statements items, reclassifications of the Group's property, plant and equipment and annual investments.
Fuel and energy-related activities (not included in Scope 1 or Scope 2)	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).
Upstream transportation and distribution	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.
Waste generated in operations	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.
Business travelling	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).
Employee commuting	This category includes emissions associated with employees' commute to and from 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.
Upstream leased assets	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.
Downstream transportation	Webuild does not produce goods that require transport and distribution. Therefore, this category is not applicable.
Processing of sold products	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.
Use of sold products	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.
End-of-life treatment of sold products	This category is not applicable for the same reasons set out for the previous category.

Downstream leased assets	Webuild does not have assets leased from other entities. Therefore, this category is not applicable.
Franchises	Webuild does not have franchises. Therefore, this category is not applicable.
Investments	This category, whose emissions were calculated using a spend-based approach, is immaterial.

GHG REMOVALS AND GHG MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

[E1-7]

In 2025, the Group's Pergenova Breakwater project purchased carbon credits⁶⁰ of 224,000 tCO₂e through the Mai Ndombe REDD+ project in the Democratic Republic of Congo, developed and managed by a joint venture of Ecosystem Restoration Associates Inc. and Wildlife Works Carbon LLC. This project protects 248,956 hectares of forest which is estimated to be able to absorb more than 175 MtCO₂e in 30 years. The purchase was made to comply with the provisions of the environmental impact assessment, which require the offsetting of residual emissions through certified projects.

The carbon credits are traced and retired in a public register and certified in accordance with the Verified Carbon Standard (VCS) with social and economic benefits guaranteed by the Climate, Community and Biodiversity Standard (CCB)⁶¹.

In addition to avoiding emissions, the project prevents deforestation, protects critical ecosystems and mitigates human-caused fires with positive effects for the local economy as well.

⁶⁰ The purchased carbon credits do not contribute to achievement of the CO₂ emission reduction targets. All of the purchased credits are beyond the value chain.

⁶¹ The Verified Carbon Standard and the Climate, Community & Biodiversity Standard are managed by the non-profit organisation Verra, which defines, applies and oversees the main international standards for the voluntary carbon markets.

Pollution

Material impacts, risks and opportunities

[E2 IRO-1; E2-3; MDR-T]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk R	Opportunity O	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term	
+	-	+	-									
positive	negative	positive	negative									
Improvement in the quality of water resources and receiving water bodies through purification plants and/or the building of sewerage infrastructure by Webuild					+							
Emission of pollutants into the air (e.g. NOx, SOx and PM10) by suppliers' operations that compromise air quality					-							

Targets

Commitment: Webuild constantly strengthens its environmental prevention controls and activities in line with its values, changes in the related regulations and international best practices, in order to minimise atmospheric emissions. The sustainable management of water is a strategic priority and the Group undertakes to ensure the availability and quality of this resource for future generations by investing in desalination plants, drinking water and waste water treatment systems, resilient infrastructure and urban hydraulic projects to combat water pollution, involving the entire value chain. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPI and internal parameters.

Webuild's own operations do not generate significant pollutants⁶² 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 areas affected by increasingly frequent extreme weather conditions as well as the pollution of rivers and water basins, strengthening the resilience of water systems and the safety of local communities.

Webuild again ranked first in the Water Top 250 International Contractors category of Engineering News-Record (ENR), the world's leading magazine for the construction sector. This latest accolade acknowledges Webuild's more than decade-long leadership in this field.

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.

⁶² The assessment is based on Regulation (EC) no. 166/2006, whereby Webuild's operations are not included in the list of activities in Annex I.

Actions

[E2-2; MDR-A]

Compared to other industrial sectors, the construction section is not a significant source of direct atmospheric pollutants. Moreover, polluting emissions (such as NO_x, SO_x and PM₁₀) 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 described below.

- **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 which decrease the NO_x, SO_x and PM₁₀ emissions, thus contributing to improved air quality;
- **Mobility in the work sites:** when designing infrastructure, the Group deploys a safe and sustainable approach to mobility with specific measures to 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 safer, more efficient and sustainable mobility in the work sites and nearby areas, which has a positive impact throughout the value chain;
- **Replacement of road transport:** by substituting road transport with conveyor belts for the movement of excavation materials, the Group eliminates a significant part of the exhaust emissions from heavy transport vehicles and thus reduces the environmental impact of its work sites;
- **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 2025, 74% of the purchased materials were sourced within 160 km of the work sites compared to 67% in 2024). When agreed with customers and compliant with local regulations, Webuild builds increasingly low-carbon infrastructure to minimise the emission of NO_x, SO_x and PM₁₀ along the value chain.

In addition, works for purification and sewerage systems to improve the quality of the water resources and receiving waters and to limit pollutants are designed during the pre-construction phases carried out by the upstream value chain to ensure a sustainable approach to water management. These projects have a positive impact on the water ecosystem, maximising reuse, minimising withdrawals and protecting the receiving water bodies.

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 2025.

Water

Material impacts, risks and opportunities

[E3 IRO-1; E3-3; MDR-T]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Exploitation of water resources due to the consumption of water for own operations, especially in water stressed areas					-		○—●—○		●—○—○		
Exploitation of water resources due to the consumption of water for suppliers' operations, especially in water stressed areas					-		●—○—○		●—○—○		

Targets

Commitment: Webuild is firmly committed to optimising the use of resources, which include water, and to reducing the environmental footprint of its own operations. It is well aware of the limited availability of natural resources and the importance of preserving them for future generations. The Group has a multifaceted, responsible 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. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPI and internal parameters.

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.

Actions

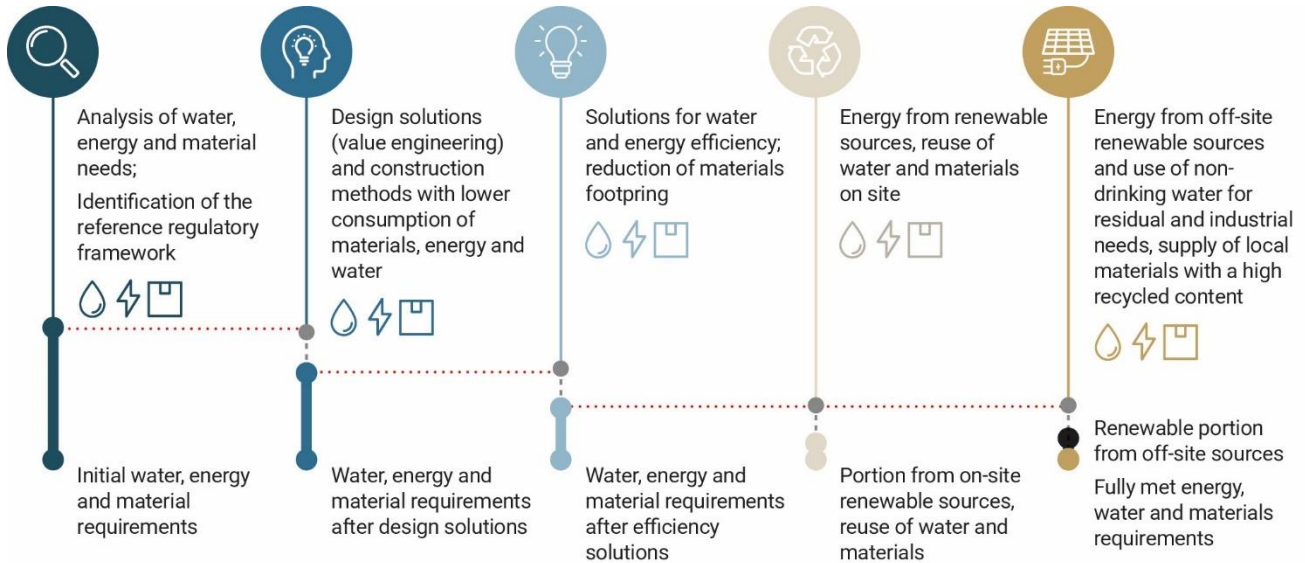
[E3-2, MDR-A]

In line with its objective to optimise the use of resources and reduce its environmental footprint, Webuild has introduced preventive, protective and precautionary mitigation measures, partly identified through the environmental risk assessment. It also ensures its own and value chain workers receive appropriate training. The Group has measures in place to safeguard the local areas where it operates, prevent environmental accidents with potential material impacts and make its production processes more efficient through the more effective use of local raw materials. In accordance with the applicable laws, it reuses water resources and materials and reduces the generation of waste by promoting reuse and recycling practices. Accordingly, the Group assesses its water management cycle and equipment to identify additional opportunities to reduce its environmental impacts. The Group’s main actions in place are set out below.

Webuild has developed a low-carbon, sustainable work site strategy to reduce the use of water, energy and materials during construction through design choices and innovative construction methods. This strategy has five phases starting with an analysis of the regulatory constraints and requirements, the identification of design solutions and construction methods to reduce impacts, followed by the introduction of water and energy efficiency solutions as well as solutions to reduce the climate footprint of materials and the local procurement of available resources, including rainwater harvesting and industrial water recycling using special systems. The

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

Webuild’s low-carbon, sustainable work site strategy is presented below.



The water optimisation system developed by the Group, WWE – Webuild Water Efficiency is part of this strategy. It is an innovative monitoring system for the remote digitalised mapping of water resources which 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 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 2025.

Metrics

The Group is committed to optimising water usage, 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; MDR-M]

The next table shows the Group's drinking water consumption⁶³, the water intensity ratio⁶⁴ and withdrawals by source.

Water consumption is calculated as the difference between the volume of water withdrawn and discharged⁶⁵.

In 2025, the Group recycled and reused approximately 3.4 million cubic metres, equal to 15% of water withdrawn. Specifically, 60% of the water withdrawn in water-stressed areas is recycled/reused⁶⁶.

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 continuity⁶⁷.

Water consumption	Unit	2024 ⁶⁸	2025
Water consumption	m ³	599,145	8,512,467
Water consumption in areas at high water risk	m ³	1,476,438	2,375,307
Water consumption in areas of high-water stress	m ³	1,138,561	2,681,905
Recycled and reused water	m ³	3,832,187	3,426,456
Stored water	m ³	289,660	309,507
Change in volume of stored water	m ³	-	19,847
Water intensity	m³/€m	51	627

Water withdrawals	Unit	2024	2025
Wells	m ³	2,379,672	4,639,842
Rivers	m ³	10,421,979	10,929,137
Lakes	m ³	158,166	390,657
Sea	m ³	-	-
Aqueducts	m ³	1,713,530	3,487,245
Water produced at work site (e.g., drainage)	m ³	928,089	4,173,253
Total	m³	15,601,437	23,620,134

⁶³ Water with concentration of total dissolved solids of $\leq 1,000$ mg/litre.

⁶⁴ The water intensity ratio is calculated considering note 33 "Revenue and other income" to the consolidated financial statements.

⁶⁵ In line with that set out in the "Sources of estimation and outcome uncertainty" chapter of the "General information" section, the data collection process is based on the use of timely and measured data. When data cannot be measured directly, the project teams may make an estimate drawing on their knowledge of the project's specific operating requirements, which is moreover a marginal amount compared to the total. Estimate methods are reviewed internally and may include, for example, an estimate of consumption based on previous periods or the calculation of discharge volumes using the ratio of water withdrawn to an average return rate.

⁶⁶ 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.

⁶⁷ 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.

⁶⁸ In order to ensure the consistency and comparability of information over time, the water consumed in areas at high water risk and very high water stress in 2024 was restated after the calculation criteria used for the joint operations' water consumption was revised. The comparative figures published in the 2024 Consolidated Sustainability Statement were 1,796,405 m³ and 1,460,137 m³, respectively. This change did not affect the water intensity ratio, as it is calculated considering total water consumption which had been reported correctly.

Water withdrawals in the 2024-2025 two-year period are in line with the upturn in the Group's production in 2025, consistent with the trend seen for energy consumption. The increase in volumes withdrawn reflects the continuation of projects at the work sites. In addition, certain factors related to water management in 2024 should be considered, such as the use of water stored in previous years, which led to the distribution of water outflows during the year in line with management and operating trends.

Biodiversity and ecosystems

Material impacts, risks and opportunities

[E4 IRO-1; E4 SBM-3; E4-4; MDR-T]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term	
+	-	+	-	R	O							
positive	negative	positive	negative									
Impacts on biodiversity of works located near biodiversity-sensitive areas (in terms of their ecosystems, biodiversity, the cultural/landscape and archaeological heritage)						-	●	○	○	○	○	●

Targets

Commitment: Webuild acknowledges biodiversity and ecosystem protection as a fundamental principle and is committed to protecting and enhancing the natural heritage throughout the construction of the infrastructure. Its approach is to ensure continuous improvement in line with its values, changes in environmental regulations and international best practices. Webuild’s commitment takes the form of actions designed for the areas where it operates in order to both protect the ecosystems and proactively contribute to enhancing the natural heritage. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPI and internal parameters.

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 guidelines⁶⁹, 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 (more information is provided in the “Integrated Environmental Management System” chapter of this section) 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.

⁶⁹ 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.

Around 7% of the areas where it worked in 2025 (more than 1,200 square kilometres) is inside biodiversity-protected areas while 1% is adjacent to such areas.

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.

Actions

[E4-3; MDR-A]

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 or local bodies) that assess the thoroughness of the 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 (see the “Strategy, business model and value chain” chapter).

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, the Group performs a robust environmental risk assessment which also covers its subcontractors in the form of regulatory requirements and contract terms they are obliged to satisfy (more information is available in the “Environmental Management System” chapter of this section).

In areas of special natural, cultural or archaeological interest, Webuild adopts dedicated biodiversity protection measures scheduling work programmes that consider the biological rhythms of wildlife and preparing dedicated management plans. These plans include actions, such as the capture and controlled relocation of animals to safe areas, the gradual occupation of areas to encourage the natural movement of fauna to surrounding areas, creating wildlife corridors at the “linear” work sites and vegetative buffers. The Group also uses state-of-the-art technologies to monitor and protect the ecosystems. These include satellite systems, environmental sensor systems and distance monitoring tools to map the impact of the work sites’ activities on sensitive flora and habitats and take timely remedial action.

In order to mitigate the risk of soil erosion due to excavations and aggravated by weather events (wind and rain), 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 in response to the natural elements, surrounding environment and characteristics of the area.

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

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.

In 2025, 538,642 square metres were reforested while 2,516,152 square metres underwent restoration.

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 dedicated 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 practices 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 2025.

Resource use and circular economy

Resource inflows, including resource use

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[E5 IRO-1; E5-3; MDR-T]

[E4-4]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term	
+	-	+	-	R	O							
positive	negative	positive	negative									
Exploitation of natural resources due to the use of raw materials, mostly not renewable (e.g., aggregates, iron, cement, earthworks) in own operations						-	○ — ● — ○			● — ○ — ○		
Unavailability or delays in the procurement of materials and machinery						R	○ — ● — ○			● — ● — ○		
Optimisation of operating efficiency and cost reduction through new processes and low-impact technology that reduce consumption, emissions and materials						O	○ — ● — ○			○ — ○ — ●		

Targets

Commitment: The Group is fully committed to maximising the reuse, recycling and recovery of materials, limiting extractions from the biosphere, particularly from non-renewable sources. It promotes sustainable, low-environmental impact practices. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPI and internal parameters.

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.

Actions

[E5-2; MDR-A]

The Group has a low-carbon, sustainable work site strategy to ensure, in particular, the efficient management of material resources and a reduction in work site requirements so as to limit the extraction of resources from the biosphere (see the “Water” chapter of this session for more information about this strategy). This approach 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 reuse and 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, encouraging the use of local resources, reducing transport distances, scouting innovative materials and the use of non-drinking water when possible. More information is provided in the “Environmental Management System” and “Policies related to Environmental information” chapters of this section.

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 with 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 the 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, 71% of the excavated materials was reused⁷⁰;
- **CLS concrete 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 55 thousand tonnes of low-carbon cementitious materials were used;
- **recycled materials or materials with a high recycled content:** greater use of steel with a higher recycled content; in 2025, 44% of the steel used was low-carbon steel with recycled content equal to or greater than 90%. It also used recycled asphalt for 22% of the total;
- **optimisation of the tunnel segments’ 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.

The Group has also developed Webuild Circular, 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. The tool, currently being digitalised, 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 2025.

On 5 June 2025, the Group’s work sites celebrated World Environment Day (WED) with initiatives to protect the environment involving more than 10,000 people in line with the theme proposed by the United Nations Environment Programme (UNEP), “Beat Plastic Pollution”.

An online “Time to talk” event was organised to discuss plastic pollution open to all Webuild personnel, featuring the explorer, mental coach and environmental communicator, Alex Bellini, and attended by over 1,000 people.

The 2025 Environmental Trophy was won by the SS-106 state road Jonica project, recognised for its ability to involve workers, subcontractors and the client in the day’s activities. In line with the 2025 theme, the project promoted activities aimed at reusing materials in production cycles, thus contributing to reducing waste. In

⁷⁰ The materials reused during the year may include excavated materials from previous years.

addition, it made videos on the Environmental Rules introduced by the Group in 2024, confirming its strong drive to being at the forefront of the proposed initiatives.

Metrics

RESOURCE INFLOWS

[E5-4; MDR-M]

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 "Environmental Management System" chapter of this section).

The main raw materials used by the Group in the reporting period are shown below⁷¹.

The data used to calculate the quantities of materials used at the Group's work sites are taken from their reporting systems (e.g., cost accounting and warehouse records) and subsequently consolidated at group level.

A greater quantity of materials was used in 2025 in line with the heightened activities carried out at the Group's work sites. The trend is in line with the year's production volumes and progress made on the projects underway.

Materials used	Unit	2024	2025
<i>Principal technical construction materials</i>			
Bitumen	t	39,891	37,889
Cement	t	529,707	823,051
Steel	t	382,594	469,720
Ready-mixed and pre-cast concrete	t	6,111,577	7,658,123
Ready-mixed asphalt	t	694,479	779,037
Aggregates and sand	t	17,367,092	21,214,715
<i>Principal biological materials</i>			
Wood	t	19,827	67,576
Total	t	25,145,168	31,050,111

⁷¹ The Group did not use biofuel for non-energy uses while the percentage of wood used compared to total materials used is 0.3% (0.1% in 2024). Specifically, it used roughly 270 tonnes of FSC (Forest Stewardship Council) certified wood (roughly 108 tonnes in 2024).

Waste

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[E5 IRO-1; E5-3; MDR-T]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Waste generated by own operations						-	○—●—○		●	○	○
Environmental impacts of the generation of waste materials in the end-of-life phase of the infrastructure						-	○—○—●		●	○	○

Targets

Commitment: Webuild continues to prioritise the optimal use of resources and reduction of its environmental footprint. It has measures in place to prevent and limit waste generation, minimise hazardous waste generated and increase the reuse, recycling and recovery of materials 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 environmental impacts starting from the design and planning of the work site start-up phases.

While it has not formalised and communicated targets, group management regularly reviews environmental performances and the management system’s strengths and weaknesses. It sets objectives for the subsequent period to ensure ongoing improvement.

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.

Actions

[E5-2; MDR-A]

Waste generated during construction of large-scale infrastructure can be grouped into two separate categories:

- **municipal waste:** this is generated by offices, base camps and 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:** this 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 anthropic 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 (almost entirely non-hazardous) 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, 89% 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 2025.

Metrics

QUANTITIES OF WASTE GENERATED

[E5-5; MDR-M]

The Group's performance is set out below⁷². The data refer to waste generated by the projects.

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.

68% (69% in 2024) of the waste generated is from excavations, which significantly affects Webuild's overall waste performance. This material 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 65% for the year.

Hazardous waste is usually a marginal part of the waste generated in the Group's projects (19% in 2025). 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.

The volume of waste generated in 2025 increased compared to 2024, reflecting the intensification of work carried out at the Group's work sites and in line with the other environmental indicators. The figures also incorporate a special intervention performed as part of an Australian project which entailed the management of a large quantity of contaminated excavation waste⁷³. These materials were transferred to authorised third parties for treatment and subsequently reintroduction for reuse in accordance with local regulations.

⁷² No radioactive waste is produced. In line with that set out in the "Sources of estimation and outcome uncertainty" chapter of the "General information" section, the data collection process is based on the use of timely and measured data. When data cannot be measured directly, the project teams may make an estimate drawing on their knowledge of the project's specific operating requirements, which is moreover a marginal amount compared to the total. Estimate methods are reviewed internally and may include, for example, standard reference densities for the conversion of volumes into weight.

⁷³ The contamination is not attributable to Webuild, but refers to an existing situation.

This extraordinary intervention was responsible for most of the increase in total waste and, especially the hazardous component, seen in 2025. Apart from this contingent situation, the percentage of non-recycled waste was substantially consistent with the previous year, as per the management method which prioritises the recovery and reuse of materials, including in situations of considerably higher operating volumes.

Waste	Unit	2024	2025
Waste generated	t	4,402,567	6,482,438
Hazardous waste diverted from disposal	t	4,242	955,858
Hazardous waste diverted from disposal through reuse	t	3,258	4,168
Hazardous waste diverted from disposal through recycling	t	549	942,842
Hazardous waste diverted from disposal through other recovery operations	t	435	8,849
Non-hazardous waste diverted from disposal	t	2,972,016	3,277,860
Non-hazardous waste diverted from disposal through preparation for reuse	t	1,485,207	942,049
Non-hazardous waste diverted from disposal through recycling	t	459,732	963,296
Non-hazardous waste diverted from disposal through other recovery operations	t	1,027,076	1,372,515
Hazardous waste directed to disposal	t	168,818	291,580
Hazardous waste directed to disposal through incineration	t	8	5
Hazardous waste directed to disposal through transport to landfill	t	42,293	220,622
Hazardous waste directed to disposal through other disposal operations	t	126,517	70,954
Non-hazardous waste directed to disposal	t	1,257,492	1,957,139
Non-hazardous waste directed to disposal through incineration	t	796	884
Non-hazardous waste directed to disposal through transport to landfill	t	1,198,976	1,808,454
Non-hazardous waste directed to disposal through other disposal operations	t	57,720	147,800
Non-recycled waste	t	1,426,310	2,248,719
Percentage of non-recycled waste	%	32%	35%

Waste	Unit	2024	2025
Construction and demolition waste	t	1,224,139	1,485,314
Excavation waste	t	3,024,690	4,424,813
Waste from support activities	t	153,739	572,311
Total waste generated (hazardous and non-hazardous)	t	4,402,567	6,482,438

EU taxonomy for sustainable economic activities

The European Union (EU) 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 ecosystems⁷⁴. Regulation (EU) no. 2020/852⁷⁵ 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 environmental objectives starting from their financial statements at 31 December 2024.

Webuild applied the assessment of the eligibility and alignment of its activities, which it had already updated in 2024 to include new initiatives, considering the additional economic activities related to the other four environmental objectives, again in 2025 in line with the reporting boundary as set out in the "General information" section.

In January 2026, the EU Taxonomy Simplification Delegated Act was published in the EU Official Journal to simplify application of the taxonomy and reduce the reporting burden for financial and non-financial companies⁷⁶.

The taxonomy sectors and eligible economic activities for 2025 are set out below⁷⁷.

⁷⁴ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

⁷⁵ 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.

⁷⁶ Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 allows companies to postpone application of the new provisions to 2026, as established by article 4 thereof. Webuild has availed of this option. Therefore, it has applied the regulations in place at 31 December 2025 for this reporting cycle.

⁷⁷ 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
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 11 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).

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 and treatment included in economic activities 5.1 and 5.13⁷⁸ 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 14.2⁷⁹ includes projects to build, raise or restore embankments to avoid flooding of waterways.

The eligibility assessment extended to the activities included in the other four objectives (i.e., not climate change mitigation and adaptation) 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.

⁷⁸ Economic activity introduced with Commission Delegated Regulation (EU) 2486 of 27 June 2023.

⁷⁹ Economic activity introduced with Commission Delegated Regulation (EU) 2486 of 27 June 2023.

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)⁸⁰. In addition, as required by the ESMA in October 2024⁸¹, 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 concurrently complies with the following criteria:

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

Webuild assessed its projects' alignment applying the technical screening criteria (defined in the Climate Delegated Act⁸²) 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, international standards or the equivalent applicable national law applied in a third country. This allowed it to comply with the reporting requirements of Regulation (EU) 2020/852 and Directive (EU) 2022/2464 which extend the reporting boundary to all economic activities performed by entities included in the Group's consolidated reporting scope irrespective of their geographical location.

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/m².

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.

⁸⁰ 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.

⁸¹ 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.

⁸² Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023.

Other economic activities

Economic activities 2.1, 5.1, 5.3, 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. 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:

- for activities with an expected lifespan of less than 10 years, the assessment included, at a minimum, climate projections at the smallest appropriate scale;
- for all other activities, the assessment was performed using the very high resolution, advanced 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 it falls under point b) during its operation phase (i.e., with a lifetime of more than ten 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-sustainable.

Webuild assessed economic activities 4.5, 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.”⁸³

⁸³ Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021, Annex I - Appendix A.

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 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.

Activity 7.1 Construction of new buildings

With respect to projects included in 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 does 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 basin 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 average flush capacity of 3.5 litres, urinals use a maximum of 2 litres/bowl/hour. 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 resource efficient, adaptable, flexible and dismantlable 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 laws and 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 objective, 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 activities 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, aligned for the climate change adaptation objective, 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 assessed at group level considering the four main topics identified in the Final Report on Minimum Safeguards published by the Platform on Sustainable Finance in October 2022, namely, human rights (including workers' rights), corruption, taxation and fair competition.

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 chapter entitled "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" 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 complies with 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 organisational, management and control model as per Legislative decree no. 231/2001 (the "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 ensure that the Group respects all the rules, procedures and processes to calculate taxes, keep tax records and prepare tax returns for approval⁸⁴.

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.

In 2025, 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 Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023, the KPIs associated with the eligible and aligned economic activities as per the 2025 taxonomy are set out in Annex 1.

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 turnover, 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)⁸⁵; 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 combinations⁸⁶. 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. 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.

⁸⁴ More information is available in the relevant paragraphs of the "Business conduct" chapter of the "Governance information" section.

⁸⁵ 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.

⁸⁶ 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) and 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.

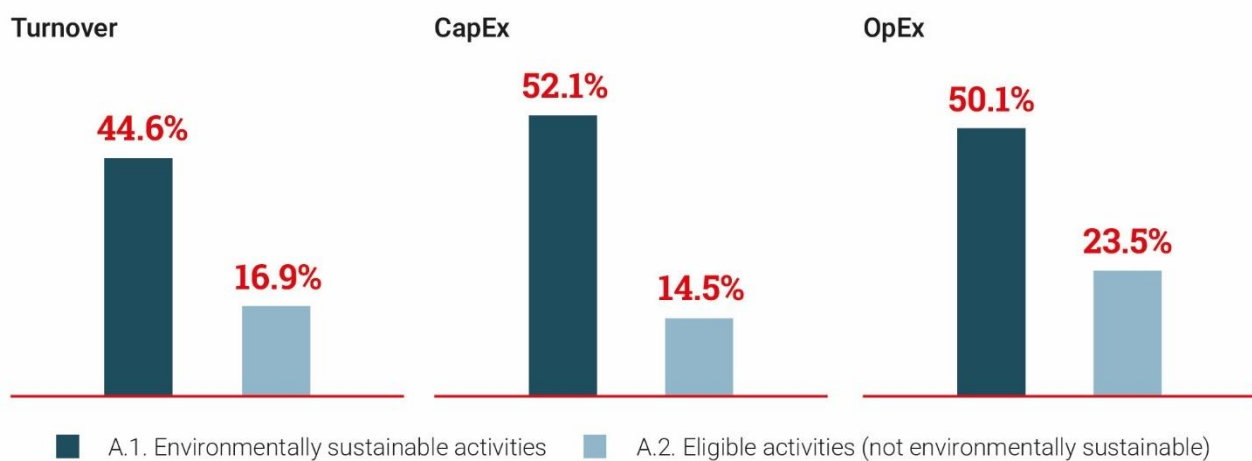
of Annex I to Delegated Act, article 8)⁸⁷. It did not identify these types of CapEx and was, once again, able to match the CapEx to the contracts without having to make estimates.

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 equipment⁸⁸. The Group did not resort to estimates to identify and allocate OpEx as it can be directly associated with the individual projects.

Overview of results

Based on the assessment, the Group calculated the proportion of turnover, CapEx and OpEx recorded in 2025 as follows:



The eligible economic activities account for 61.5% of turnover, 66.5% of CapEx and 73.5% of OpEx⁸⁹.

Of these, the environmentally sustainable activities (i.e., aligned) account for 44.6% of turnover, 52.1% of CapEx and 50.1% of OpEx⁹⁰ 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;

⁸⁷ The analysis did not identify these types of CapEx.

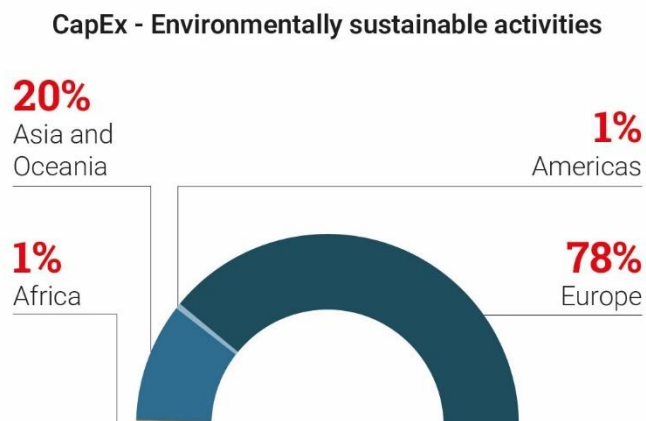
⁸⁸ See note 34.3 "Services" to the consolidated financial statements for information on the denominator.

⁸⁹ 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).

⁹⁰ 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.

- 6.15 Infrastructure enabling low-carbon road transport and public transport and 7.1 Construction of new buildings that make a significant contribution to the climate change adaptation objective which were assessed as aligned solely for CapEx and OpEx purposes⁹¹.

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 20%.



⁹¹ 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.

Social information

Policies related to Social information

[S1-1; S2-1; S3-1; MDR-P]

Guided by its values of **Excellence, Respect, Sustainable Innovation, Integrity and Trust**, Webuild contributes to the economic development and well-being of the countries where it operates. Together with its Code of Ethics and Sustainability Policy, the Group’s social policies address and regulate those social matters that are important for its own workforce, the value chain workers and affected communities in a coordinated manner.

The Group’s policies for the main social topics are set out below.

Policy	Working conditions	Training and skills development	Human rights	Diversity and inclusion	Human rights	Affected communities
Health and Safety Policy	✓ ✓	✓ ✓	✓ ✓			
Equal opportunities, Diversity & Inclusion Policy	✓	✓	✓	✓ ✓	✓ ✓	
Social Responsibility and Human Rights Policy	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓
Suppliers’ Code of Conduct		✓ ✓		✓ ✓	✓ ✓	✓

Own workforce: ✓ Value chain workers: ✓ Affected communities: ✓

Health and Safety Policy: this expresses the Group’s ongoing commitment to protecting the safety of all people involved in its operations, ensuring safe and healthy working environments at every stage of the activities and pursuing the “zero injuries” target. It is applicable to all operating units, including the Group’s suppliers and subcontractors and encourages a shared and widespread safety culture.

The health and safety management system, underpinned by the policy, includes the Group’s Life Saving Rules and establishes:

- **control procedures**, with roles, responsibilities and operating methods, that are continuously monitored by top management;
- **training and awareness-raising programmes** and the system’s accessibility via internal and operating channels;
- **inclusion of the principles** enshrined in the Policy in the ESG Plan and QHSE Management Expectations, with objectives supported by dedicated actions plans (more information about this is provided in the “Policies” paragraph of the “Health and safety” chapter of the “Own workforce” section).

The **Road Traffic Safety Policy** extends the prevention practices to mobility and logistics areas connected to operations. It applies to all phases of a project and involves all workers, including supply chain workers.

Social Responsibility and Human Rights Policy: this formalises the Group's commitment to ensuring (at worldwide level and without limitation) respect for dignity, fundamental rights and the freedom of all people involved in its operations, be they workers, suppliers, local communities or stakeholders. The policy addresses fundamental issues such as health and safety, child or forced labour, freedom of association and the right to collective bargaining, diversity and inclusion, working conditions and the rights of indigenous peoples. Webuild strongly discourages any form of exploitation and especially that of migrant workers. It does not tolerate any form of forced or child labour along the value chain and fully complies with the minimum age established by the laws of the countries where it operates.

It developed the policy in line with the UN's Guiding Principles on Business and Human Rights with the participation of internal and external actors, focusing on the areas at greater risk and assembling the main concerns expressed by external stakeholders, such as NGOs and experts, through interviews conducted with group employees. The policy's content is reinforced by an agreement with Italian and international (Building and Wood Workers' International) trade unions. The agreement entailed the establishment of a joint liaising and monitoring group and mechanisms to make safe and anonymous notifications through a multilingual web, ensuring transparent procedures and protection of whistleblowers against retaliation.

Both the **Environmental Policy** and the **Environmental Code of Conduct** reinforce the role played by local communities, already considered fundamental in the Group's human rights policy. They promote the generation of shared value in the areas where Webuild operates, which has positive social and environmental impacts. Through its operating and organisational rules, the code encourages active stakeholder involvement and aims to improve the quality of life of the communities residing near the Group's work sites.

Equal opportunities, Diversity & Inclusion Policy: this reinforces the principles enshrined in the Code of Ethics and the Social Responsibility and Human Rights Policy to promote a safe, inclusive and rewarding environment. It ensures equal opportunities for equal roles and decisions based on objective criteria (skills, aptitudes and performance) while rejecting all forms of discrimination. Webuild acknowledges diversity to be a lever to generate synergies, improve decision quality and grow the Group's results and performance over time.

The policy encourages the dissemination of an inclusive culture by raising awareness of unconscious bias, the development of people to lead diversified teams and the adoption of inclusive practices by suppliers and subcontractors, supported by dedicated monitoring and reporting systems. Webuild rejects any form of harassment, intimidation or coercion. It has a range of secure channels to report incidents of discrimination, ensuring the protection of whistleblowers and it has appropriate procedures in place to investigate any notifications.

The Group's commitment to creating a work environment oriented towards personal growth, skills development and operational excellence is reinforced by the **Quality Policy**, which acknowledges that the development of skills is fundamental to allow each worker to achieve their potential and reach quality objectives. Webuild encourages the continuous development of its people to build a shared culture of operating excellence and sustainability through information and training programmes, which are also available to its suppliers and subcontractors.

Suppliers' Code of Conduct: this fundamental tool extends the Group's principles of sustainability, integrity and social responsibility along the value chain. It emphasises the Group's commitment to protecting and developing value chain workers and local communities, as well as reiterating its position against all forms of child, forced or illegal labour in favour of fair and inclusive working conditions. To this end, the code defines the minimum standards expected of suppliers and subcontractors for each issue.

The code also ensures protection against all forms of retaliation, discrimination or penalisation against whistleblowers, supported by an anonymous and multilingual whistleblowing system, which is also available to third parties.

In addition to its social policies, Webuild's Code of Ethics and Sustainability Policy also act as group-wide reference points to consolidate Webuild's sustainability culture and conduct.

The **Code of Ethics** is the Group's baseline of values and defines the principles of probity, accountability, transparency and respect required of employees, collaborators, suppliers, subcontractors and partners. It

provides guidance applicable throughout the Group on its policies on sustainability, human rights, health and safety, inclusion and engagement with communities. The code's implementation ensures a safe, fair, respectful and inclusive work environment, preventing abuse and discrimination in line with international standards through the definition of clear-cut roles, responsibilities and processes at all stages of the projects.

The **Sustainability Policy** guides the Group towards sustainable, responsible and inclusive development in all areas of its operations. It requires that employment decisions be based on objective criteria, considering skills and performances. It promotes technical development and collaboration with strategic partners along the supply chain, and encourages local hiring and sourcing to generate shared value and positive impacts, while respecting the rights of local communities and indigenous peoples.

Own workforce

Characteristics of employees in its own workforce⁹²

[S1-6]

The trend seen in recent years was confirmed again in 2025 with employment rates up in particular in certain geographical areas (e.g., Middle East and Italy) due to the start-up of major 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	2025
Female	no.	4,644	4,447
Male	no.	38,929	36,229
Other	no.	-	-
Not reported	no.	-	1
Total	no.	43,573	40,677

The following tables show the countries in which the Group has at least 50 employees, representing at least 10% of its total number of employees.

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

Number of employees (head count)	Unit	2025
Saudi Arabia	no.	10,423
Italy	no.	8,196
Ethiopia	no.	7,746

⁹² 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").

Employees by contract type, broken down by gender	2024					2025				
	Female	Male	Other	Not disclosed	Total	Female	Male	Other	Not disclosed	Total
Total number of employees	4,644	38,929	-	-	43,573	4,447	36,229	-	-	40,677
Number of permanent employees	3,865	31,635	-	-	35,500	3,800	29,488	-	-	33,289
Number of temporary employees	719	7,185	-	-	7,904	647	6,741	-	-	7,388
Number of non-guaranteed hours	60	109	-	-	169	-	-	-	-	-
Number of full-time employees	4,581	38,849	-	-	43,430	4,381	36,085	-	-	40,467
Number of part-time employees	63	80	-	-	143	66	144	-	-	210

Number of employees by contract type, broken down by region	2024							Total
	Italy	Africa	Europe	Americas	Asia	Oceania		
Total number of employees	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	

Number of employees by contract type, broken down by region	2025							Total
	Italy	Africa	Europe	Americas	Asia	Oceania		
Total number of employees	8,196	8,910	2,353	5,226	12,229	3,763	40,677	
Number of permanent employees	6,896	8,437	1,405	3,008	10,974	2,569	33,289	
Number of temporary employees	1,300	473	948	2,218	1,255	1,194	7,388	
Number of non-guaranteed hours employees	-	-	-	-	-	-	-	
Number of full-time employees	8,088	8,878	2,333	5,224	12,223	3,721	40,467	
Number of part-time employees	108	32	20	2	6	42	210	

Turnover rate	Unit	2024	2025
Number of employees who left the Group	no.	9,041	12,959
Outbound turnover rate	%	21 %	32 %
Number of employees hired by the Group	no.	9,982	10,300
Inbound turnover rate	%	23 %	25 %

S1-7 Characteristics of non-employees in the undertaking's own workforce

Non-employees	Unit	2025
Self-employed people	no.	878
People provided by undertakings primarily engaged in employment activities	no.	2,495
Interns	no.	57
Total	no.	3,430

Working conditions

Material impacts, risks and opportunities

[IRO-1; SBM-3; S1-5; MDR-T]

Material impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Unavailability of workers					R						

The Group's formalised targets related to working conditions are set out below.

Targets

Commitment: While it has not formalised and communicated targets, the Group monitors its performance using a structured system of KPIs and internal parameters on an ongoing basis and has actions to minimise the risk of the unavailability of workers and create more jobs, especially for work site personnel (workers and staff).

Webuild's operations involve a high number of workers⁹³, 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 proper 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 certain 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.

As confirmation of its commitment to enhancing its workforce, the Group has been included in Europe's Best Employees 2025 ranking drawn up by Statista with the Financial Times.

⁹³ Workers include employees and non-employees, i.e., collaborators with continuous collaboration contracts, VAT number self-employed persons, interns and temporary workers.

Actions

[S1-4; MDR-A]

In a rapidly changing context, the construction sector is growing significantly, 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 as well as the alignment of technical and specialist skills with the required standards. With specific reference to Italy, given the volume of the works awarded and the need to ensure the required availability of highly qualified and specialised labour, in 2023, Webuild launched the **Cantiere Lavoro Italia** project to support the growing demand for workers at Italian and foreign work sites (more information is provided in the “Training and skills development” chapter of this section).

The project’s key characteristics are summarised below:

- 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 for inexperienced workers and staff entering the industry for the first time;
- upskilling or reskilling for internal resources and resources recruited on the market (including from abroad);
- memoranda of understanding signed with southern Italy regions (Sicily, Calabria and Campania) to facilitate collaboration between Webuild and institutions and to strengthen strategic relationships with local training bodies, construction schools and work agencies.

The corporate HR and workforce planning departments continuously monitor personnel planning, project requirements and courses held at the Webuild schools⁹⁴ to analyse employee needs in qualitative and quantitative terms.

At 31 December 2025, the Cantiere Lavoro Italia project had trained and hired around 2,000 participants, of whom 80% from southern Italy (roughly 62% of whom are blue collars trained through the Scuola dei Mestieri and 38% white collars through the Scuola delle Professioni).

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

⁹⁴ More information about the Webuild schools is provided in the “Own workforce - Training and skills development” chapter of this section.

Retention initiatives

In 2025, the Group introduced retention initiatives for project employees to promote stability and the development of key employees.

Key steps in this approach are:

- **assessment of position risk**, considering the stability of managers, the availability of internal/external candidates and the complexity of the related succession plan;
- **specific intervention actions** and priorities based on the risk assessment, to ensure operating continuity and the growth of internal candidates;
- **inclusion and diversity policies**, enhancing the capacity and potential of individuals, and taking steps to discourage discrimination.

The specific actions implemented are described below.

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

This action does not require ongoing monitoring as it entails tailored interventions with individual employees.

Training is essential to personnel management and is provided in parallel to the above retention initiatives. In 2025, 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, in 2025, Webuild continued to deploy its advanced search tool to create a network of talents in Italy and abroad to meet future staffing needs. This initiative is part of the succession plan, representing an additional lever to guarantee and safeguard business continuity.

Proactive recruiting directed at schools and universities continued and 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	<p>Italy</p> <ul style="list-style-type: none"> • long-standing relationships with 15 major Italian universities, contributing to projects for students, work placements and improved training paths. <p>United States – Lane Construction</p> <ul style="list-style-type: none"> • partnerships with 13 major universities in 11 US states to strengthen its foothold in the academic world. <p>Australia – Webuild/Clough</p> <ul style="list-style-type: none"> • University of Technology Sydney – Development and provision of content for the Master in Tunnelling and Underground Engineering program; • University of Melbourne - Delivery of a Risk Management in Construction course for engineering students; • Curtin University and University of Western Australia - Partnerships and events to celebrate diversity in STEM careers, address challenges and to enhance unique skills through workshops, panels and networking. One such initiative is the 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. • University of Western Australia – Engineering Your Career, a project to familiarise engineers starting out in their careers (“Graduate Centre”).
Events and activities	<p>Italy</p> <ul style="list-style-type: none"> • Two Recruitment Days at the Enna Kore and La Sapienza Universities to hire engineering graduates; • participation at roughly 18 events to engage with the younger generations, including as group ambassadors, seminars, career orientation workshops and career days. <p>United States – Lane Construction</p> <ul style="list-style-type: none"> • participation at 15 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 1,400 applications at these university fairs and conventions. It also mentored five students at Purdue University (the no. 3 civil engineering programme in the United States) with the team that won a prestigious design building competition and provided guest lecturers to more than 200 students. During the year, 20 field engineers joined the Field Engineer Development Program (FEDP), a two-year competency-based course for early-in-career hires. <p>Australia – Webuild/Clough</p> <ul style="list-style-type: none"> d.Future Female Leaders: a six-month programme for Year 11 female students in Western Australia, designed to empower future female leaders through structured training, mentoring and work experience. Webuild participated as a Visionary Investor, with the opportunity to present its brand and provide a mentor for one of the students; e.It takes a Spark EDU Conference: this conference is designed to inspire and bring together forward-thinking students, teachers and leaders in the STEAM sector; d.Open day at the Perth offices; d.The Big Meet: a career expo held in Victoria, New South Wales and Western Australia for university students and graduates of all the metropolitan area universities to increase the attraction of the Webuild brand.

Initiative	Description
Employer Branding programmes ⁹⁵	<p>Italy</p> <ul style="list-style-type: none"> • UniWeLab: the first edition of the “Project management for large sustainable infrastructure” course was held as part of the partnership with Genoa University involving 30 students. The convention provides for the donation of €90,000 over three years; • Build Up project: completion of the second edition of the PCTO (Pathway for Transversal Skills and Orientation), which has seen 2,300 technical high school students involved in the first two editions and the launch of the third edition, with the objective of attracting young people to Webuild work sites and involving another 1,000 students. <p>United States – Lane Construction</p> <ul style="list-style-type: none"> • high schools: participation in the spring career fairs and advisory committees in Florida; • universities: participation at curriculum review processes at the University of South Florida and University of Florida, engaging with 14 students and building brand visibility. Lane also took part in a career orientation event at Colorado School of Mines involving 15 civil engineering students; • in the autumn, Lane acted as sponsor for an important “back to school” event held at North Carolina State University attended by hundreds of students. Finally, the SR 417 project in Florida hosted eight students as part of the Knight Shadow programme of the University of Central Florida providing them with a day of immersive, hands-on-learning. <p>Australia – Webuild/Clough</p> <ul style="list-style-type: none"> • scholarships: provided scholarships through Australian universities in New South Wales, Victoria and Queensland, including: • Western Sydney University – one Webuild Future Leaders Aboriginal and Torres Strait Islander Scholarship; • University of Queensland: two Webuild Indigenous Engineering Scholarships; • University of Melbourne – one Webuild Master of Engineering (Civil) Scholarship; • scholarships to employees in Western Australia who are also attending university alongside work, requiring recipients to meet the academic requirements in each of the two semesters of the year.

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 2025.

Health and safety

Material impacts, risks and opportunities

[IRO-1; SBM-3]

Impacts, risks and opportunities

	Actual impact		Potential impact		Risk R	Opportunity O	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
	+	-	+	-								
	positive	negative	positive	negative								
Dissemination of a health and safety culture in the workplace to own workers through training and awareness-raising						+	○ — ● — ○			○ — ● — ○		
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						-	○ — ● — ○			● — ○ — ○		
Work-related incidents involving own workers						R	○ — ● — ○			● — ● — ○		
Reduction in the number of injuries, greater productivity and competitiveness thanks to processes and activities to protect worker health and safety						O	○ — ● — ○			● — ● — ●		

⁹⁵ Aimed at university and high school students

The Group's formalised targets related to health and safety are set out below.

Targets

Statement	Base year	Base year figure	Target year	Target	2025 performance
Reduction in LTIFR (own workers and subcontractors' workers)	2022	2.79	2025	-6%	-20%

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 consistent with the Group's strategies, product/service requirements and customer and stakeholder expectations, and compliant with environmental and occupational health and safety requirements.

Employee (own workers and value chain workers - mostly subcontractor workers) accidents are mostly caused by deficiencies/inadequacies in the areas of: safety leadership and potential unsafe conduct (insufficient safety culture); the assessment of health and safety risks and/or implementation of prevention and protection measures, the organisational structure/resources dedicated to occupational health and safety (OHS) matters; supervision, monitoring and coordination by operations and project OHS personnel; skillset and experience in OHS matters of key subcontractors and suppliers; definition/design of construction methods and management and maintenance of machinery and equipment.

Specifically, the negative impact identified by the double materiality assessment is associated with individual incidents. Through its monitoring activities defined in the Integrated Management System, the Group identifies specific or systemic weaknesses and particularly critical activities, roles or situations defining 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 develops activities to promote a health and safety culture. For example, 1) in the case of high need for personnel, it integrates school curriculums 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 continuously instils a safety culture through the Safety Leadership Programme (Safety Builders Programme).

Policies

[S1-1]

The Health and Safety Policy⁹⁶ 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 injuries.

The targets established in the ESG Plan and QHSE Management Expectations reflect this commitment. 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 and initiatives implemented during the year.

⁹⁶ See the “Policies related to Social information” chapter of this section.

The action plans linked to the principles set out in the Health and Safety Policy are set out below.

Health and Safety Policy principles	Action plan to guarantee compliance with the Policy
Ethics and accountability	Ensure 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	Increase the safety leadership and introduce safety-conscious conduct (build up a safety culture)
Protection and growth of all stakeholders	
Right to intervene	
Involvement of the supply chain	Ensure the adequacy of the organisational structure/resources dedicated to OHS matters
	Improve the level of expertise and experience in OHS matters by 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:

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

Meetings are held at each operating unit attended by senior management, the workers' representatives, the prevention and safety protection officer and the healthcare personnel who monitor workers' health to regularly assess: 1) the effectiveness of the risk assessment document, 2) work-related accidents/ill health, 3) the adequacy of health surveillance, 4) the criteria applied to choose PPE, 5) training programmes (in accordance with article 35 of Legislative decree no. 81/2008 or equivalent regulations, depending on the applicable local legislation). In addition, each unit has an officer, who has been granted the appropriate proxies and responsibilities, 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 in relation to safety during the construction of large works to give employees a deeper understanding. This document establishes a structured collaboration between the two 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 flows 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 or contributed to by 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, with the assistance of 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 the investigations into significant accidents as required by 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 concern 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; MDR-A]

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 to improve the overall well-being of its workforce.

The Group's prevention and protection measures are summarised in the following action plan which is updated once a year with new quantitative targets:

GUARANTEE	IMPROVE	INCREASE
<ul style="list-style-type: none"> the adequacy of the organisational structure/resources dedicated to OHS matters adequate supervision, checks and coordination by operations and project OHS personnel; maintain the QHSE management system; 	<ul style="list-style-type: none"> the health and safety risk assessment and introduce prevention and protection measures; the level of definition/design of construction methods; health and safety management vis-à-vis the maintenance of plant and equipment; Webuild's reputation 	<ul style="list-style-type: none"> the safety leadership and introduce safety-conscious conduct (build up a safety culture); the level of expertise and experience in OHS matters of the key subcontractors and suppliers; activities that reduce the impact (damage) on health and safety as a result of an accident (involving own workers and subcontractor workers).

This 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 identifies the main health and safety risks to which the Group is exposed, which may be related to its own operations or the value chain as part of its assessment of enterprise risks.

They 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 health and safety risks depending on their geographical location and the activities that they perform.

Webuild is able to identify any specific or systemic critical issues thanks to the monitoring and frequent analyses of 1) data about accidents that happen at its operating units, 2) near misses, 3) unsafe behaviour, 4) the outcome of inspections and 5) checks of the operating units through internal and third party audits. As a result, it can identify activities, jobs or contexts that are particularly critical and define new preventive strategies and targeted actions.

Specific attention is given to training workers and the operating controls over work processes, performed 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 the following issues at a minimum:

- 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 role;
- first aid and emergency management procedures (in particular, the fire fighting and evacuation plans).

The Employers and 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 group rules and the use of collective and personal protective equipment. Workers, Officers/Supervisors and Managers attend regular refresher courses. The minimum content of courses for health and safety specialists (Protection and Prevention Manager, Protection and Prevention Officer, First Aid Officers, etc.) meets the requirements of the relevant legislation. The work site workers (employees of the Group and its subcontractors) receive special training on the relevant risks, specific activities and the possible risks of interference (Induction, Tool Box Talk, 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 a Risk Assessment Manager;
- accidents.

In 2025, 551,544 hours of health and safety training was provided to own workers (corporate and operating sites).

During the year, the Group continued the Safety Builders Program 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, 84 workshops and 201 safety intervention (s.a.f.e.r.) training courses were held in 2025, with the participation of 5,032 managers, supervisors and workers for a total of over 18,457 hours of training.

The Group also adapted the Safety Builder Program for its Australian work sites. Thanks to its Safety Buildings Frontline Leader programme, Webuild received the Gold Stevie® Award at the International Business Awards® 2025 for the Health, Safety & Environment Program of the Year for Asia, Australia and New Zealand. The 2025 edition of the International Business Awards, one of the world's premium business awards, received over 3,800

nominations from 78 countries, which were assessed by an international jury of more than 250 experts. The jury acknowledged the programme's effectiveness, impact on the sector and cultural sensitivity, recognising the Group's commitment to fostering a safety culture.

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.

In addition, in 2025, the Group 1) introduced four new operational rules (temporary works, falling materials in tunnels, entrapment and crushing, and hazardous substances, agents and mixtures), 2) revisited two operating rules (weather conditions - former waterways and construction vehicles and equipment - merged into one rule) and 3) defined a new organisational/management rule (organisation of work areas).

To supplement the communication and worker engagement tool, a related poster was also issued for each operational rule on the Hierarchy of Controls. The posters present the prevention and protection measures to be adopted for each operational rule based on the hierarchy (in line with Webuild's specific minimum safety requirements and ISO 45001).

In April 2025, the Group's main workplaces celebrated the World Day for Safety and Health at Work ("WSD") in line with the theme promoted by the International Labour Organisation (ILO) "How AI & Digitalisation are Transforming Occupational Safety and Health" and the in-person training session "Posture and Well-being" delivered at the Milan and Rome offices to more than 150 people. Over 22,500 people were involved across 65 projects. As part of the WSD celebrations, Webuild's work site for Lot 2 of the Rogun Hydropower Project (Tajikistan) received an important award from the Minister of Labour, Migration and Employment of Population, Holmahmadzoda Soleha, recognising the Group's constant commitment to health and safety.

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 Sydney Metro - Western Sydney Airport (SSTOM) project in Australia, acknowledging its active involvement of the entire workforce of 2,000 people in a debate about the pros and cons of AI and digitalisation in the workplace. Special multimedia products were developed to emphasise how the human factor plays an essential role in health and safety matters, including mental health. The takeaway was that it is important to always intervene, to look out for colleagues and not to look away.

Health

Webuild 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. It has a health management unit, which monitors worker health and supervises the well-being policies to ensure coordination and promotion of the initiatives. The unit develops tailored programmes, oversees the results and promotes a culture based on prevention and improving the work-life balance.

Health interventions take place on four levels:

1. worker health surveillance, considering also the inherent characteristics of persons in vulnerable situations⁹⁷. Every six months, Webuild collects (at corporate level) aggregated clinical, medical-statistical and health-hygienic data 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 permanent 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 (health promotion programmes, health screening, health education and nutrition counselling programs).

In 2025, Webuild entered into a partnership with a healthcare provider to offer:

- simplified access to medical care: easily accessible health services designed to reduce organisational, geographical and timing difficulties;
- prompt and continuous assistance: rapid interception of healthcare requirements to ensure immediate and consistent care over time;
- prevention and health orientation: promotion of a proactive approach through primary healthcare prevention, awareness and health education initiatives;
- complementary approach to the national health system: a model that does not replace the NHS but flanks it to provide a more efficient and sustainable management of health issues.

As part of an advanced approach, health care assistance has been extended to each worker's immediate family, recognised as a fundamental element for individual well-being and Group stability. Support for families is a pillar of equity, inclusion and work-life balance.

In fact, during 2025, 1,814 healthcare check-ups (videocalls and medical prescriptions) were provided to workers at the corporate offices and work sites as part of the initiative, while their family members received 356 check-ups.

The Group also launched new projects and stepped up/continued other existing ones. The following table shows the most important projects of the year.

⁹⁷ 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.

Project	Description
<i>Webuild World Health Day</i>	<p>For the third year in a row, Webuild celebrated World Health Day (7 April 2025) promoted by the World Health Organisation (WHO). This year's theme was "Healthy beginnings, hopeful futures". The campaign focuses on maternal and newborn health and invites governments, institutions and healthcare communities to step up their work in this respect.</p> <p>All work sites in Italy and abroad participated in humanitarian projects with a high impact on health, well-being and quality of life of workers and local communities. They shared their experiences and initiatives to promote good practices and develop a culture that guarantees everyone's right to good health.</p> <p>In 2025, the Group rewarded the work site with the best initiatives and the work site working on the Apice - Hirpinia section of the high-speed/capacity Naples - Bari railway line won the Health Trophy. It stood out for its ability to excellent combination of the protection of maternal and newborn health, effective communication and active involvement of participants.</p>
Blood Donation Day	<p>The first edition, organised with AVIS (the Italian volunteer blood donation association), was held at Webuild's corporate offices on 13 October 2025. It was well-met by the office staff and 40 people donated blood. This is the first of what is intended to be a recurring calendar of events to encourage solidarity-based behaviours and collective responsibility.</p>
Flu vaccination campaign	<p>Webuild rolled out a flu vaccination campaign at its corporate offices to strengthen primary prevention, protect people's health, and help reduce the seasonal impact of flu on the healthcare system. Around 30% of the staff participated, in line with previous years.</p>
Cardioprotection campaign	<p>In the period from 9 April to 20 July 2025, 11 events were held at the corporate offices and operating sites to provide training on cardiopulmonary resuscitation (CPR) with the use of a defibrillator (AED) and airway clearance methods to prevent suffocation. More than 230 employees attended, confirming their heightened awareness of the issues of safety and emergency management.</p>
Skin cancer prevention campaign	<p>The corporate offices hosted 16 awareness days on the risks associated with sun exposure in the period from 7 to 26 April 2025. More than 320 participants were able to undergo specialist dermatological visits, aimed at the evaluation and early identification of any potentially at-risk skin lesions.</p>
Breast cancer prevention campaign	<p>Seven awareness days were held at the corporate offices on the importance of screening for the prevention of breast cancer in the period from 12 September to 3 October 2025. More than 160 specialist breast examinations were carried out, including bilateral breast ultrasounds.</p> <p>Together with the skin cancer prevention campaign, this initiative made a significant contribution to strengthening the cancer prevention culture within the Group by encouraging employees to participate in cancer screening programmes.</p>
Health education and well-being initiatives	<p>Webuild created and promoted initiatives to inform and raise employee awareness of health topics through the intranet, dedicated webinars and monthly newsletters. The participation of more than 500 employees at the webinars confirms their strong interest in the initiatives offered and a high engagement level. This confirmed Webuild's ability to launch effective, inclusive training and information pathways of real support to its people's well-being.</p> <p>In addition, the Group continued its training and awareness-raising activities for employees on secondment, involving more than 260 people working at 11 work sites. The intention is to reduce modifiable risk factors, promote healthy life styles and reinforce the prevention culture in the Group's international locations. Its programme consists of practical modules dedicated to five key areas for primary prevention: physical activity and health, cardiovascular risks, sleep and performance, proper nutrition and tobacco smoking.</p>

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 normal operations, they did not entail significant non-recurring investments or costs in 2025.

Targets

[S1-5; MDR-T]

As part of the Safe & Inclusive Builders sustainability "work site" of the ESG Plan, the Group has set itself the target of a 6% reduction in LTIFR by 2025 compared to 2022.

The corporate Safety, Environment and Quality Department monitors achievement of management's objectives by:

- coordinating the QHSE management system activities to support the competent work sites teams;
- encouraging a change in the HSE culture through a competence centre;
- strengthening the integration of health and safety aspects within engineering processes through the technical safety unit.

The department also provides strategic guidance and operational support to the work sites, including with respect to health matters.

These activities are regulated by internal guidelines and procedures, which define the minimum 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. It allocates precise duties to the Employers, Managers, Officers and Workers in line with the proxy system. Specialist teams oversee the implementation of the processes at each work site.

To ensure achievement of the targets, Webuild has defined SMART actions that include:

- dedicated training courses to improve the culture and leadership focusing on health and safety factors along the entire value chain;
- standardising and regulating accident risk prevention and reduction processes starting from the design stage, promoting the system of "lessons learnt";
- innovation and digitalisation initiatives to improve risk management tools and methods.

The action plans are shared throughout the entire organisation through the annual QHSE strategic plan using a cascading communication process from the corporate departments to the worksites of the policies and QHSE Management Expectations, which are monitored by the QHSE managers around the world. Each work site is responsible for preparing its plan tailored to meet contractual requirements or local legislation.

Webuild intends to pursue its continuous improvement journey over the coming years to achieve a further reduction in its injury rates, an increase in the per capita safety training provided for direct employees and to step up its operating monitoring activities, with on-site safety inspections, assessments and audits. It encourages work sites to hold short daily briefings or meetings where the site or team manager liaises with the workers about safety issues.

Metrics

HEALTH AND SAFETY METRICS

[S1-14; MDR-M]

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 considered⁹⁸.

Accident figures and rates - own workers	Unit	2024	2025
Percentage of people in own workforce covered by a health and safety management system based on legal requirements and/or recognised standards or	%	100	100
Number of fatalities as a result of work-related accidents	no.	2	4 ⁹⁹
Number of recordable work-related accidents	no.	317 ¹⁰⁰	335
Number of days lost to work-related accidents	no.	5.822	7,061
Rate of recordable work-related accidents	TRFR	2.66	2.71
Lost Time Injury Frequency Rate	LTIFR	1.31	1.64

Accident rates - subcontractors	Unit	2024	2025
Rate of recordable work-related accidents	TRFR	2.99	3.88
Lost Time Injury Frequency Rate	LTIFR	2.17	2.52

Total accident rates	Unit	2024	2025
Rate of recordable work-related accidents	TRFR	2.78	3.19
Lost Time Injury Frequency Rate	LTIFR	1.64	2.00

In order to assess variations in the Group's performance considering the **criteria applied to define the -6% LTIFR target**, it analyses the accidents data of other entities included in the scope of the QHSE management systems:

On this basis, the **Group's 2025 LTIFR is 2.23**. Therefore, Webuild's safety performance at 31 December 2025 improved by 20% compared to the December 2022 baseline (LTIFR 2.79), which is much better than the -6% target¹⁰¹ included in both the Long-Term Incentive Plan for the 2023-2025 three-year period and the 2024-2025 ESG Plan.

⁹⁸ The number of fatalities of value chain workers who work at Webuild work sites is zero.

⁹⁹ The accidents relate to three incidents that took place inside the work site under the responsibility of the site manager and one on a public road more than 400 km from the workplace.

¹⁰⁰ In order to ensure consistency and comparability of information over time, the number of recordable work-related accidents for 2024 was restated to reflect checks and a realignment of the operating figures to adjust an entry error. The comparative figure published in the 2024 (') Consolidated Sustainability Statement of 156 was incomplete as it did not include accidents that did not lead to days lost due to work-related accidents. This modification does not affect the reporting accident rates, as they had been calculated using the correct figure.

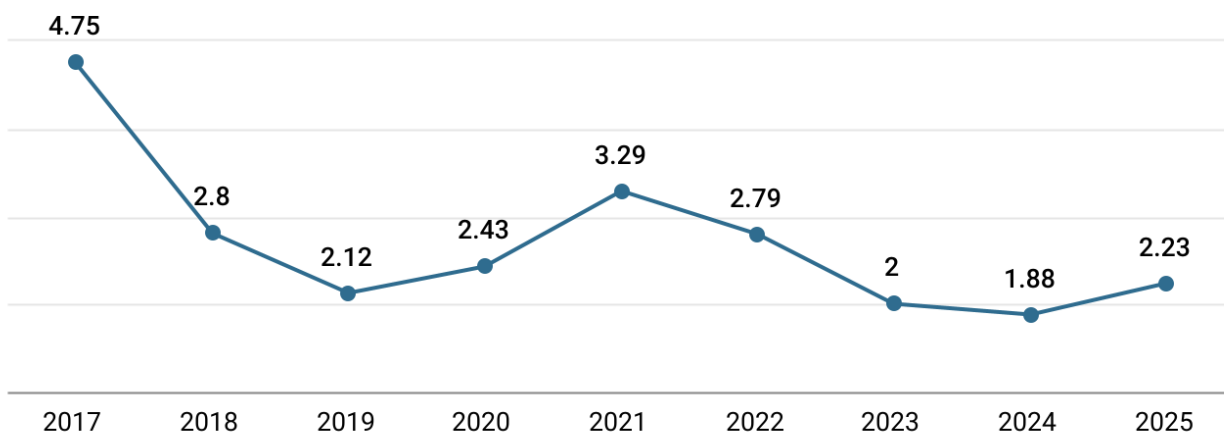
¹⁰¹ The target was defined considering the expected upturn in projects in Italy.

The 2025 figures should be evaluated considering the significant expansion of the order backlog, especially in Italy (including the Italian National Recovery and Resilience Plan-sponsored projects). This led to a large number of workers hired when the work sites were set up, with a considerable proportion of external hires.

Therefore, the variations in the figures are consistent with the start-up of numerous projects and the onboarding of new hires. The Group has planned and introduced special action and monitoring plans for each affected work site. It also stepped up the onboarding programmes about its procedures, technical matters and safety leadership, as well as carrying out on-site inspections.

The effectiveness of its measures can be seen in the LTIFR, which outperformed the -6% target, i.e., with a 20% decrease in injuries.

Lost Time Injury Frequency Rate



Training and skills development

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1; SBM-3; S1-5; MDR-T]

Impacts, risks and opportunities

Actual impact	Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
	+	-								
positive	negative	positive	negative	R	O					
Upskilling and professional growth opportunities for own workers through adequate technical and management training plans				O		○ ● ○		○ ● ○		
Insufficiently trained or untrained workers				R		○ ● ○		● ● ○		
Attraction of new talents and reduction in turnover thanks to a stable work environment				O		○ ● ○		○ ● ○		

The Group's formalised targets related to training and skills development are set out below.

Targets

Commitment: Webuild designs programmes and initiatives for career improvement and development, and to provide workers with the opportunity to gain skills and expertise thus aiding them along their career path. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPIs and internal parameters.

Promoting its people's growth and talents is a strategic driver for Webuild. It deploys career development tools and launches new programmes and initiatives to best respond to its employees' specific requirements.

Over time, this approach enables the Group to ward off risks of the lack of skills or insufficient training, especially in the very specialised positions, and to move towards its strategic objectives of building up expertise, becoming increasingly attractive as an employer and reducing the costs of a 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 special occasions.

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; MDR-A]

The Group annually plans its worker development and training actions, which include defining contents, the related budget, scheduling of any 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 targets. 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 initiatives, measure their effectiveness and the performance and growth potential of workers.

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

Participants receive an evaluation of their progress based on tests, reaction questionnaires given to participants and trainers and, when applicable, on-the-job assessments. It is also designed to encourage participation and engagement of employees, by providing them with structured, transparent growth opportunities and a certificate on completion of the course.

In 2025, 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. Specifically, support was provided for the drafting and subsequent issuing of operating instructions for the project management document with respect to its structure, archiving methods and naming conventions.

The **Cantiere Lavoro Italia** programme has confirmed the Group's reputation as training centre of excellence that attracts thousands of young school leavers and people looking for employment. It provides them with the opportunity to acquire sought-after technical and professional skills (specialised workers and office staff). This project provides training to both current workers and new hires in the area of in-demand technical skills helping to lift standards and know-how in the large works sector.

The courses alternate classroom theory sessions with practical experience both in laboratories and through on-the-job training to give participants the necessary technical and safety skills to work in a work site.

Specifically, the programme includes several schools for different categories of group and non-group workers. The Group also has training sessions designed solely for its own workers to provide them with ongoing professional refresher courses and training.

With respect to non-group participants new to the sector, the programme provides:

- **general basic training** required before joining the Group provided in collaboration with the main Italian employment agencies;
- **specialist training** provided after being hired by the Group. This is paid and takes place at the work sites and advanced training centres.

There are currently three active advanced training centres based in Belpasso (CT), Novi Ligure (AL) and Apice/Bovino (BN-FG). These centres have 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 specialised machines and equipment as well as simulators that provide a highly realistic environment to safely provide training about complex tunnel boring projects.

Training activities are also provided through three "schools" structured as follows:

- **Scuola del Territorio**

This school provides the basic skills necessary to find work at a Webuild site and partners with universities, construction schools, work agencies and local training agencies. In 2025, it delivered training courses of two to three weeks for both work site blue collars and white collars. They were provided in 14 locations around Italy to high school leavers, university graduates and job seekers. The main subjects were the use of TBMs, conventional excavation, work accounting, health and safety and contract management.

The school collaborates with the third sector to provide training and retraining sessions to persons in vulnerable situations, thus consolidating its commitment to inclusion and social accountability. These latter projects included, for example:

- WeCare, a project developed with Caritas' branches in Sicily to provide socio-occupational support to people in vulnerable situations;
- a project to assist the reintegration of former prisoners into society carried out with the Department of Prison Administration of the Italian Ministry of Justice. The pilot project was launched at the Benevento District Prison for seven prisoners, three of whom were hired by Webuild in 2025 and another two should join the Group in 2026.
- **Scuola dei Mestieri**

This trade 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. The school caters for blue collars and specialised technicians and courses are carried out in the classroom and at advanced training centres (boot camps). The boot camps can be divided into two groups: those specialised in conventional excavation skills (excavator operators, carpenters, blacksmiths and 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. Upskilling pathways are provided to the Group's existing workers as well as acceleration and role change sessions for expert workers coming from sectors other than the large infrastructure sector. In 2025, over 25,000 hours of training were provided to blue collars and specialist technicians.

- **Scuola delle Professioni**

This professional 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 25 locations provide courses tailored to the different roles with theoretical classroom learning and on-the-job training provided on the basis of structured learning pathways that last three to four weeks. These centrally monitored courses are agreed with the tutors (who are an essential part of on-the-job training and a tutor is assigned to each participant in the work site). The training courses are designed by Webuild's experts and the classroom learning is provided in classrooms located directly at the work sites where the participants work to enable them to immediately apply their newly-acquired knowledge. The on-the-job sessions are an innovative approach based on a programme that blends experiential learning with workshops designed to upskill and reskill the participants, reinforce their motivation and encourage a shift to a technological mindset.

In 2025, this school provided roughly 20,000 hours of training to workers hired with temporary contracts (white collars sourced through undertakings primarily engaged in employment activities).

In addition to the Cantiere Lavoro Italia programmes, the Group also has structured, systematic programmes for the:

- online mandatory onboarding training course for new white collar workers about the Group's principles, values and fundamental guidelines, applicable regulations and its systems, processes and procedures. This course includes a company overview module and training about the Code of Ethics and the main internal systems (anti-corruption, privacy, human rights and cyber security). In addition, the Group rolled out a refresher course about the new provisions of Legislative decree no. 231;

- development of all white collar workers, including:
 - Project Team Foundations, an induction programme for the first level staff of operating units' project teams, aimed at both people hired from outside the Group or on job rotation from other work sites in the last three years. This programme 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, the programme was extended to 90 participants in Saudi Arabia and Romania after the first editions which focused on Italian projects.

Its international expansion will continue in 2026 with a new edition in Australia that will include tailored modules that have been tailored to the local projects with a view to continuous improvement.

- 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 220 junior staff members participated in the programme in 2025, and it will be gradually extended to other group companies starting from 2026.

In 2025, the Group developed a **new training system on internal procedures**, especially operating procedures. The intention is to:

- create a scalable and replicable training system in Italy and abroad that can be tailored to the participants and applied to both existing and future procedures;
- refresh the training programmes to trial the use of AI with an AI chatbot to facilitate learning, access to and search for information.

Around 600 people from more than 60 projects were involved in this project in 2025. Subject matter experts, chosen from the different professional groups, delivered the courses on a first set of operating procedures (which will be expanded in coming years).

The Group concurrently continued to expand its management training and development programme, focusing in particular on the professional growth of its people and a results-based leadership style. Alongside the performance management process, the Group introduced new assessment tools for employees involved in managerial growth paths, including 360° feedback from collaborators, colleagues and superiors.

These tools enable a wider and more balanced understanding of leadership skills and management abilities, encouraging participants to reflect on behaviour adopted in the workplace

During the year, the Group also started to work on a new programme to foster leadership growth and talent development. This programme sets out an integrated framework of training and development initiatives formalising Webuild's approach to leadership. It defines the guiding principles, goals and management career paths. It covers various management levels in Italy and abroad with the key aim of cultivating internal talents through pathways customised by goal, assessment tools, experiential training and individual development plans.

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

- environmental sustainability in constrAction: ecodesign, decarbonisation and circular economy training for staff at the head offices and group companies. The initiative deploys a concrete, objective and specific approach for the construction sector to address climate change, the circular economy and decarbonisation;
- the Professional Group Academy aims to develop technical skills, deploying group subject matters experts to design and deliver training programmes (corporate and work site staff) in line with the business challenges and requirements of the Group’s main professional groups (e.g., supply chain, contract management, engineering, production, security and QHSE).

Clough – Australia:

- new edition of the Australian Managerial Academy, an offshoot of the Group’s Global Managerial Academy which provides training for professionals who are already working in key roles or who are rising within Webuild, to foster both the development of the managerial and technical skills that are fundamental to the Group’s business. Training involves business simulation sessions, technical deep dives of the main internal processes and leadership workshops to hone soft skills in line with the Group’s leadership model. Since its start-up, around 400 managers throughout the Group have received training, including 60 in the two editions provided by Clough;
- development of a platform for mandatory onboarding training about SSTOM;
- the WeMentor programme designed to provide support and mentorship to people rising within the Group by pairing them with more senior resources (this involved around 180 people).

Lane – USA:

- Field Engineering Development Program Orientation, an onboarding programme involving an introduction to Lane’s processes, site visits and team building;
- new edition of the Leader Essentials programme focused on team management involving 46 managers;
- roll-out of the Leaders in Action programme for high performers and high potential resources who already hold management positions to assist them to grow towards positions of greater responsibility through a one-year programme that blends classroom learning with self-assessment, self-learning and coaching tools.

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 2025.

Metrics

TRAINING AND SKILLS DEVELOPMENT METRICS

[S1-13; MDR-M]

Average number of training hours per employee	Unit	2024	2025
Managers and white collars	hours	16	19
Blue collars	hours	20	23
Total	hours	19	22

In addition to training provided to own workers, the Group also provides classroom and on-site training to value chain workers (employees of its service providers) as part of the Cantiere Lavoro Italia project (45,000 hours in 2025).

It provided 879,988 hours of training to own workers during the year for a total of 1,283,508 hours of total training, including subcontractor workers.

Diversity and inclusion

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1: SBM-3]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Gender discrimination within the workforce, with possible negative impacts on career paths and remuneration due to conduct that does not comply with Webuild policies and/or the relevant regulations					-						

The Group's formalised targets related to diversity and inclusion are set out below.

Targets

Statement	Base year	Base year figure	Target year	Target	2025 performance
Increase in women managers in the Group ¹⁰²	2023	299	2025	+20%	+27%

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 ensures equal opportunities for everyone through an integrated, inclusive approach.

Given the complexity and scale of its operations, Webuild is conscious that individual workers or specific 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).

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

PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

[S1-2]

¹⁰² In Webuild, the term "manager" includes managers, junior managers or equivalent positions under regulations other than those ruling in Italy.

Webuild has recently set up a 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 aspects required by UNI PdR 125:2022 gender equality certification. Its members include workers' representatives for the certification and managers. Nonetheless, responsibility for compliance with standards lies with top management.

When a steering committee is set up at project level, the relevant trade unions may designate one or more members as the workers' representatives for 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 purposes.

PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

[S1-3]

Webuild has recruiting and human capital management procedures that define methods and responsibilities to avoid any form of discrimination in recruitment and HR management, including in relation to gender equality and diversity and inclusion. Specifically, the procedures establish the recruitment methods to ensure they are not biased in gender terms and include both men and women. They require the use of inclusive language to avoid potentially discriminating terms and stereotypes. Questions about marriage, pregnancy or carer responsibilities are not permitted during interviews.

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

The Group has formal protocols and channels to enable employees to report any pay gaps. 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.

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; MDR-A]

During the year, Webuild pursued its awareness-raising, communication, employer branding, recruiting and training initiatives to proactively foster an inclusive culture which supports diversity.

Specifically, it continued its inclusion-oriented selection programme which covers:

- 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 2025, Webuild renewed 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 managerial skills and reinforcement of an inclusive culture, workshops, training labs and talks, designed to cultivate soft skills as part of the development of broader leadership skills.

At head office level, a volunteering project for female victims of violence was launched in collaboration with CADMI (a Milan-based women's shelter), whereby employees can give their time (including by using paid leave) to assist women starting a new life.

As part of the Cantiere Lavoro Italia project and thanks to the collaboration with the Department of Prison Administration, Webuild introduced a new training and job placement programme for prisoners selected by the Department. This pilot project is the result of the memorandum of understanding between Webuild and the Department of Prison Administration and the discussions with the Campania Office of Public Works. More information is provided in the "Actions" paragraph of the "Own workforce - Training and skills development" chapter of this section.

Outside Italy and, chiefly in Australia, Webuild carried out numerous initiatives, 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 consider engineering degrees. The initiative aims to inspire and create networking opportunities for students interested in STEM subjects;
- two scholarships (Webuild Future Leaders Aboriginal and Torres Strait Islander Scholarship and Webuild Indigenous Engineering Scholarship) for ATSI (Aboriginal and Torres Strait Islander) students in collaboration with the University of Melbourne, Western Sydney University and the University of Queensland;
- a management development programme, Elevate, for five key female talents.

More information about training initiatives is provided in the "Own workforce - Training and skills development" chapter of this section.

Training initiatives include online diversity and inclusion courses such as 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 2025, as part of the Cantiere Lavoro Italia project, Webuild held a workshop on D&I issues for blue collars, white collars and new hires for a total of 831 hours. The trainers were specifically trained in the inclusion of different learning styles.

Webuild also continued its online communication and awareness-raising activities on gender equality drawing on the experiences, journeys and unique characteristics of its people.

Confirming the Group's commitment to fostering an inclusive culture aimed at ensuring equal opportunities and refuting all forms of discrimination, it was recognised as "Leader in Diversity and Inclusion 2025" by Statista in collaboration with the newspaper Il Sole 24 Ore.

As the above actions are an integral part of the Group's regular operations, they did not entail significant non-recurring investments or costs in 2025.

Targets

[S1-5; MDR-T]

Webuild's aim is to promote diversity and inclusion as a lever to better understand the different cultural contexts in which it operates and to continuously improve the decision-making processes essential to achieve its business objectives. As part of this project, Webuild exceeded its 20% target for women in management positions set in the 2024-2025 ESG Plan reaching 27%, over the two-year period compared to the base year (2023).

Metrics

Diversity metrics at 31 December 2025

[S1-9; MDR-M]

Number of employees	Unit	2024	2025
Under 30 years	no.	10,589	9,217
Under 30 years %	%	24 %	23 %
30 to 50 years old	no.	25,392	23,242
30 to 50 years old %	%	58 %	57 %
Over 50 years old	no.	7,592	8,218
Over 50 years old %	%	17 %	20 %

Number of employees by position ¹⁰³	Unit	2024	2025
Managers	no.	464	505
White collars and junior managers	no.	14,090	13,348
Blue collars	no.	29,019	26,824
Total	no.	43,573	40,677

As required by Disclosure Requirement S1-9 and in line with the ESRS definition of top management, 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					2025				
		Female	Male	Other	Not disclosed	Total	Female	Male	Other	Not disclosed	Total
Top management	no.	7	42	-	-	49	7	45	-	-	52
Top management	%	14%	86%	- %	- %	100%	13%	87%	- %	- %	100%

REMUNERATION METRICS

[S1-16]

The gender pay gap calculation method, refined in 2024 and aimed at analysing any pay gaps, was confirmed and applied again in 2025.

Specifically, the total shown in the table is the weighted average pay gap by geographical area¹⁰⁴ compared to the number of employees.

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).

S1-16 Remuneration metrics (pay gap and total remuneration)

Remuneration metrics	Unit	2024	2025
Gender pay gap	%	15 %	15 %

¹⁰³ The number of employees by position for 2024 was restated after an internal reclassification of own workers, made to comply with the Group's organisational definitions. For comparative purposes, the figures published in the 2024 Consolidated Sustainability Statement showed the following values for that year: Managers: 2,090; White collars and junior managers: 12,464. The number of blue collars and the total number of employees are unchanged at 29,019 and 43,573, respectively.

¹⁰⁴ 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; S1-5; MDR-T]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Non-observance of human rights					R						

The Group's formalised targets related to human rights are set out below.

Targets

Commitment: With respect to human rights, Webuild is committed to strengthening its oversight and prevention approach in line with its values, changes in regulations and international best practices. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPIs and internal parameters.

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 specific 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 aim is to ensure scrupulous compliance with the applicable 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.

Actions

[S1-4; MDR-A]

In 2025, Webuild has reinforced its due diligence procedure for human rights, which was already in line with international standards such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. It refined the impact identification and assessment method (the human rights risk assessment).

While the previous procedure's key structural elements were maintained, the new structure, with its greater depth and traceability, improves consistency with the European and international regulatory framework and the growing demand for organisations to focus on social issues from multiple stakeholder categories.

The first phase of this project was to identify and update the categories of human rights relevant to the Group based on the activities carried out and the main regulations and principles and international standards about human rights.

Based on this phase, the Group adjusted and restructured the Human Rights Risk Register, which describes the specific risk events mapped and related to the activities performed either by own workers and/or value chain workers at the Group work sites for each relevant category, i.e.:

- child labour;
- forced labour;
- violation of freedom of association and collective bargaining;
- discrimination;
- inadequate working and living conditions;
- violations of rights of local communities;
- violations of privacy rights.

During the second phase, the settings of the country risk assessment tool associated with the relevant human rights categories were revised.

The assessment is based on a set of normalised and weighted international set of indicators to be assigned to each country a risk score, the mixed country risk, grouped in four levels (low, medium low, medium high, high), and integrated with an “alert” system, which reports when some additional indicators record high or medium-high levels on rights with a high impact on people, such as child or forced labour or working conditions.

The subsequent phase covered an assessment of activities carried out by own workers or value chain workers at the Group’s operating sites. Each work site has a country risk level depending on the country where it is located and, if it exceeds a set ceiling, the residual risk is assessed by the project managers using a structured questionnaire. The tool requires mapping of specific risk events for each category and active prevention and mitigation measures (both more standardised than the previous methodology). In addition, an estimate of the level of residual risk is required based on criteria and assessment scales consistent with those used for the impact materiality assessment (likelihood, severity, scale and irremediable nature of the impact).

In 2025, the country risk assessment covered all the projects classified as operating to define the reporting method (the Group has a sustainability data collection system for all relevant indicators of these projects)¹⁰⁵. None of the 21 countries analysed for the mixed country risk parameter were found to be at high risk, while six were classified as medium to high risk.

The Group pursues a commercial strategy that from year to year further impacts the composition of the country risk described. Indeed, around 80% of the Group’s current order backlog is located in countries that are substantially low or medium-low risk, such as in the EU (mainly Italy), North America and Oceania.

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.

¹⁰⁵ More information is available in the “General basis for preparation of the consolidated sustainability statement - Reporting boundary” chapter of the “General information” section.

In addition, in 2022, the Group set up a Social Performance Team (STP) which performs regular assessments of social responsibility 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, ultimate 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 2025.

Metrics

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS *MDR-M 75*

[S1-17; MDR-M]

In 2025, Webuild received 36 reports of alleged mobbing, discrimination and harassment¹⁰⁶ related to the workers of the parent, SPEs and subsidiaries. These reports are managed in accordance with the related internal procedures.

Incidents of discrimination	Unit	2024	2025
Number of incidents of discrimination, including harassment	no.	4	14
Number of complaints filed through internal channels to allow own workers to raise concerns	no.	35	36
Number of complaints filed through National Contact Points for OECD Guidelines for Multinational Enterprises	no.	0	0
Total amount of fines, penalties, and compensation for damages as a result of the violations related to social and human rights factors	€	0	0
Number of severe human rights incidents connected to the workforce	no.	0	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	0
Amount of significant fines, penalties and compensation for severe human rights incidents connected to its own workforce	€	0	0

¹⁰⁶ 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; S2-5; MDR-T]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term	
+	-	+	-	R	O							
positive	negative	positive	negative									
Non-observance of human rights					R		●	○	○	●	●	○

Targets

Commitment: While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPIs and internal parameters. It is committed to improving its ability to promote and foster best human right practices. Specifically, Webuild takes steps to ensure that human rights are respected along the value chain through internal processes such as qualifying, monitoring and assessing its suppliers’ performances in this respect.

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 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).

Actions

[S2-4; MDR-A]

Webuild has designed and implemented a due diligence process compliant with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

As already 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 applying the method described in the “Own workforce” chapter.

With respect to the rest of the direct supply chain, the assessment evaluates two main categories:

- Country risk, based on the mixed country risk

Based on orders issued in the first ten months of 2025, 88% of the suppliers are based in countries with a “low” or “medium-low” risk while 12% work in “medium-high” risk countries. None of the assessed suppliers are based in countries classified as “high” risk.

- Commodity supply risk

With respect to the above orders, just over 1% refer to large categories of purchases that include or may include the goods listed in the ILAB¹⁰⁷ list, if produced in countries specifically indicated in the list (good-country logic)¹⁰⁸. This percentage is calculated on a prudent basis and is an overestimate of the risk exposure.

As part of its due diligence process and in order to assess supply chain risks, Webuild has defined specific 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 supplies’ performances, which include ethical and social aspects.

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, 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 bolster oversight of the supply chain’s ESG performance, Webuild invites suppliers to register on the Open-es platform during the qualification and sourcing phases. These platforms collect and monitor suppliers’ ESG performances using specific parameters and assist them improve. With a view to continuous improvement, the invitation to use Open-es was extended to all Webuild suppliers and not just those in Europe in 2025.

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 local area, people, employees, suppliers, customers and communities that it works with, evaluating its compliance with human rights, absence of 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. It has three main conceptual categories: fundamental, maturity and master. Webuild invites its suppliers to complete the

¹⁰⁷ The Bureau of International Labor Affairs (ILAB) within the U.S. Department of Labor which prepares a list of goods which, if produced in certain countries, are at high risk of being produced using forced and/or child labour in violation of international standards. This list complies with the Trafficking Victims Protection Reauthorization Act (TVPPRA).

¹⁰⁸ The percentage does not refer to the entire category at international level, but only when it relates to goods coming from countries included in the ILAB list as at risk of child or forced labour.

fundamental category as a minimum. The Open-es sustainability score takes into account the size of the evaluated company and its business sector and it can be validated by having a third party check the questionnaire responses. 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.

To support this process, the Vendor Management and Sustainability Department regularly monitors registrations and the questionnaire completion status. It provides direct assistance to suppliers by email and telephone, if requested.

The Open-es ESG evaluations are integrated into Webuild's procurement platform, enabling all the platform users (head office or project procurement departments) to access the data and use them as a parameter to assess suppliers during the sourcing phase. Oversight of these activities is ensured by specific internal KPIs, designed to measure the level of ESG coverage both during the bidding and supplier onboarding phases.

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 (third party).

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 PPE, 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 and quality requirements;
- Service: compliance with deadlines;
- Financial soundness.

The Webuild procurement platform assesses performance and the results are available to all platform users 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 2025.

Health and safety

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1: SBM-3]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term	
+	-	+	-									
positive	negative	positive	negative	R	O							
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					-		●	●	○	●	○	○
Incidents involving workers (value chain workers)					R		●	●	○	●	●	○

The Group's formalised targets related to health and safety for value chain workers are set out below.

Targets

Statement	Base year	Base year figure	Target year	Target	2025 performance
Reduction in LTIFR (own workers and subcontractors' workers)	2022	2.79	2025	-6%	-20%

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 could involve workers along the value chain, especially subcontractor workers at the Group's work sites (approximately 46,700 in 2025). The Group continuously monitors activities using the Integrated Management System to identify specific or systemic weaknesses, roles or situations that are especially at risk and define prevention strategies and targeted remedial actions.

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 healthy 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; MDR-A]

With the aim of always improving its pursuit of 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 QHSE 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 QHSE 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 2025.

Targets

[S2-5; MDR-T]

The Group’s ESG Plan includes the target of -6% LTIFR by 2025 compared to 2022. This target includes both own workers and subcontractor workers. More information is available in the “Own workforce - Health and safety” chapter of this section.

Training and skills development

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1; SBM-3; S2-5; MDR-T]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term	
+	-	+	-									
positive	negative	positive	negative	R	O							
Support to develop the skills of workers of suppliers and subcontractors in the upstream value chain through initiatives to build up their technical skills necessary to carry out their jobs												
						+	●	●	○	○	●	○

Targets

Commitment: Webuild promotes the development of skills along the value chain with dedicated initiatives to spread knowledge, tools and work methods which will be of benefit to the companies and workers in the value chain. While it has not yet formalised and communicated targets, Webuild continuously monitors its performance using a structured system of KPIs and internal parameters.

It holds that supply chain workers, and especially those involved in technical tasks, are essential to respond more efficiently, with greater quality and in greater safety to the Group's requirements, thus contributing to an improvement in the Group's overall performance and competitive edge. It follows that development of their skills is essential. The positive impacts of these skills development initiatives affect all workers along the value chain and in particular the subcontractors that carry out key activities for the completion of the Group's projects. In 2025, Webuild provided more than 400,000 hours of QHSE training to subcontractor workers.

In line with the practices in place for its own workers, Webuild is committed to understanding the value chain workers' training needs and to designing both structured sessions and more tailored courses to respond to specific requirements (e.g., that may arise as a result of extraordinary events).

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; MDR-A]

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 innovation related to their business. Employees from both the suppliers 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.

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 concerns, interesting facts, 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. 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 2025.

Affected communities

Material impacts, risks and opportunities

[IRO-1; SBM-3; S3-5; MDR-T]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-	R	O						
positive	negative	positive	negative								
Direct and indirect contribution and initiatives that benefit local communities					O		○—●—○		○—●—○		
Differences of opinion or disputes with local stakeholders (trade unions, communities, local organisations, etc.)					R		●—●—○		●—●—○		

Targets

Commitment: Webuild deems it essential that engagement with the local communities and territories where it works always be transparent and constructive. Although it has not yet formalised and communicated targets, the Group continuously monitors its activities and implements 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.

Webuild’s business strategy, focused on the construction of large infrastructure, has an impact on the areas where it works, 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 bring 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 encourages transparent and constructive engagement with the local stakeholders, which includes active listening and social responsibility practices to balance its requirements with the local community’s needs, reduce risks and maximise shared value.

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 and the fight against corruption” chapter of the “Governance information” section, to which reference is made.

Actions

[S3-4; MDR-A]

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 employment opportunities, including local suppliers in its supply chain and involvement in development initiatives that foster the development of the economy and the quality of life of the local communities.

Qualified labour and training

With respect to the creation of employment opportunities 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-how and expertise as well as generating additional wealth for the local economy. Investment in training and access to qualified labour is an essential factor. For example, through Cantiere Lavoro Italia, the Group has created entry pathways for high school leavers, university graduates and job seekers. It offers competitive remuneration, accommodation and meals during the training phase and certification of the skills that can be used in the sector. The Group also intends to expand its training schools, Scuola del Territorio and Scuola dei Mestieri that provide classroom sessions and the advanced training centres in Belpasso (CT), Novi Ligure (AL) and Apice/Bovino (BN-FB).

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 is furthered by the memoranda of understanding signed by the Sicily, Calabria and Campania regions in collaboration with training bodies, construction schools and work agencies.

In order to promote social cohesion in the areas where it operates, the Group has inclusive initiatives with the third sector and institutions. The WeCare programme, developed with Caritas' branches in Sicily, is designed for persons in vulnerable situations who are embarking on socio-labour reintegration paths. The Group is also running a pilot project with the Department of Prison Administration at the Benevento Regional Prison for seven prisoners, three of whom were hired by Webuild in 2025 and another two should join in 2026. These initiatives and the Cantiere Lavoro Italia training courses expand access to skilled employment and build stable connections between business, public services and social bodies in local areas.

In addition, this approach creates the opportunity for the Group to build up a pool of qualified workers who can also be employed for future projects¹⁰⁹.

Local procurement and development of the value chain

Purchases from suppliers resident in the countries where the Group operates are a main factor in developing the value chain (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 information about locally-hired workers and local procurement are provided in the "Metrics" paragraph of this section.

Social and philanthropic initiatives to support communities

Initiatives undertaken in areas where Webuild works include sponsorships¹¹⁰ and 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.

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 roughly 60 initiatives for roughly €2.1 million in 2025. The most sizeable initiatives were carried out at both corporate and branch level, mostly for social, environmental, cultural and educational

¹⁰⁹ More information is available in the "Own workforce" chapter of this section.

¹¹⁰ 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.

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 Koysa). More than 12,100 medical check-ups and roughly 5,800 health interventions were provided in 2025.

As already described in the “Own workforce - Diversity and inclusion” chapter of this section, at head office level, a volunteering project for female victims of violence was launched in collaboration with CADMI (a Milan-based women’s shelter), whereby employees can give their time (including by using paid leave) to assist women starting a new life, thus strengthening the local protection services network.

Engagement with indigenous peoples

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.

Engagement with communications and monitoring of operational impacts on the local areas

As described in the “Interests and views of stakeholders” chapter of the “General information” 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 provides support with the management of interaction between the work sites and surrounding areas. 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 QHES 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 areas, encourage dialogue and collaborative relationships with the local authorities and stakeholders.

Generally, sensitive receptors who could potentially be affected by noise impacts 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 in the presence of 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 impact. Close attention is paid to the reduction of light pollution: cut-off lamps are used to limit the upward dispersion of light and 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 2025.

Metrics

EMPLOYMENT CREATED BY THE GROUP’S PROJECTS

[MDR-M]

In 2025, 80% of the 40,677 own workers were local personnel, i.e., employees hired in the county of their nationality.

Own workers hired locally	Unit	2024	2025
Africa	%	97 %	97 %
Europe	%	91 %	90 %
Americas	%	96 %	95 %
Asia and Oceania	%	31 %	37 %
Average	%	79 %	80 %

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 2025, local managers made up 75% of the total, with peaks of 98% 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. Subcontractor workers and non-employee workers involved in group projects exceeded 50,000 at 31 December 2025.

LOCAL PROCUREMENT

[MDR-M]

In 2025, the Group maintained a strong relationship with its local supply chain, with an average of 92% 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	2025
Africa	%	60 %	37 %
Europe	%	89 %	95 %
Americas	%	100 %	100 %
Asia and Oceania	%	85 %	89 %
Average	%	88 %	92 %

ECONOMIC VALUE GENERATED AND DISTRIBUTED

[MDR-M]

The direct economic value generated by the Group in 2025 amounted to €13,579 million (€11,930 million in 2024), including €12,863 million (€11,271 million in 2024) which was distributed and €716 million (€659 million in 2024) which was retained. Specifically, €9,865 million (€8,465 million in 2024) was distributed to suppliers (operating costs), €2,298 million (€2,100 million in 2024) to employees (remuneration and benefits), €513 million (€538 million in 2024) to lenders and €187 million (€168 million in 2024) to the public administration (taxes)¹¹¹.

¹¹¹ This does not include dividends to be distributed to the shareholders, which will be available after the ex-dividend date expected to be 18 May 2026.

Governance information

Policies related to Governance information

[G1-1; G1-3; MDR-P]

Webuild has a business model based on principles and standards designed to uphold a responsible and transparent management system. It aims to ensure maximum compliance with regulations, to prevent risks and foster a culture based on integrity, legality and innovation. The Group's principal policies support and reinforce this model in terms of important governance matters such as its corporate culture, the fight against corruption, management of relationships with suppliers, innovation and digitalisation.

The Group's policies for the main governance topics are set out below.

Policy	Corporate culture – Fight against corruption	Management of relationships with	Innovation and digitalisation
Code of Ethics	✓	✓	✓
Sustainability Policy	✓	✓	✓
Anti-corruption Policy	✓	✓	
Suppliers' Code of Conduct	✓	✓	
Environmental Policy and Environmental Code of Conduct	✓	✓	✓
Energy Management Policy			✓
Quality Policy			✓
Health and Safety Policy			✓

Code of Ethics: it sets out the principles to be adhered to by Webuild's directors, statutory auditors, managers, employees and collaborators in line with the laws and regulations of the locations where the Group operates. The Code provides direction about direct or indirect, long-term or temporary relationships between Webuild and its collaborators, partners and its stakeholders more generally, as well as an ethical leadership model. It formalises the values referred to in the organisational and management model and the management and control tools¹¹² designed to address material sustainability matters, which include ethics and legality, in line with the regulations applicable in the countries where Webuild operates and the main international standards and guidelines. The Code also establishes that it does not make contributions to political and trade organisations of any kind (parties, movements, committees, etc.) or their representatives.

Together with the **Sustainability Policy**, the Code of Ethics establishes Webuild's integrity and legality values, including for the management of tax aspects related to its operations. Taxation is a fundamental lever to contribute to the social and economic development of the countries where the Group operates. Webuild's approach to tax is directly linked to its business requirements, and its foreign operations are mostly limited to

¹¹² For example, the risk management model, other models such as, in particular, the Anti-corruption Model and the 231 Model, procedures and controls.

those countries where the Group has commercial interests (participation in calls for tenders) and/or operating possibilities (contract management, concessions, equity investments, etc.).

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. In all locations where it operates, the Group complies with the established rules of behaviour, protocols and controls to ensure compliance with tax requirements in order to minimise the risk that tax crimes could be committed and ensure that the Group respects all the rules, procedures and processes to calculate taxes, keep tax records and prepare tax returns for approval.

Anti-corruption Policy: this contains the anti-corruption principles and is implemented through a dedicated anti-corruption management system which meets the ISO 37001 requirements and is certified by an independent certification body. To supplement the Policy, the system provides for the drafting, updating and application of an Anti-corruption Model, Guidelines and internal procedures to define the roles and responsibilities of the parties involved and the operating methods for the processes and controls defined in the above documents.

The Policy promotes a transparent corporate culture supported by a whistleblowing system 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 or incorrect behaviour. 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. In 2025, the Compliance Department also formalised dedicated internal operating instructions to manage notifications.

Employees are obliged to report any violations of internal and/or external regulations, ethical and integrity principles, the organisational, management and control model as per Legislative decree no. 231/2001 (the "231 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. Once it has performed an initial analysis of the notification, the department may involve the following departments in performing the necessary checks as long as there are no conflicts of interest:

- Internal Audit, for notifications about suspected fraud, inefficiencies and ineffectiveness of internal controls;
- HR, Organisation and QHSE, for suspected violations of rules about the correct performance of duties and suspected violations of quality, health, safety and environmental regulations;
- Security, for suspected crimes and situations that could put the safety of people or company assets in danger.

The whistleblowing management guidelines establish that any conflicts of interest (when the person in charge of checking the notification has a personal and/or professional interest that affects their impartiality) must be communicated and avoided by assigning the checks to another department or employee. They also provide that the employees who check the notifications and manage the consequent internal investigation may not be part of the department under investigation, unless this is essential to allow the investigation to take place and the employees can provide adequate guarantees of their independence.

The Compliance Department regularly communicates the progress and outcome of investigations performed as a result of whistleblowing notifications to the Control, Risk and Sustainability Committee, the Board of Statutory Auditors and the Integrity Board. The data communicated (number of notifications, the companies where the alleged non-compliance took place, the investigation findings, etc.) do not include any information that could allow identification of the whistleblower.

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 may be assisted by external experts.

Webuild ensures that its corporate culture and ethical principles are disseminated through a comprehensive system of initiatives described in the "Actions" paragraph of the "Business conduct - Corporate culture and fight against corruption" chapter.

With respect to the management of relationships with suppliers, Webuild firmly believes in loyal and sustainable competition as a means to select the best suppliers and improve quality in the procurement phase.

Accordingly, and as defined in its Code of Ethics, Webuild's conduct hinges on principles of correctness and transparency, avoiding actions that could give it an advantage based on any conditions of dependence or weakness of its suppliers.

Webuild selects its suppliers using 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 price.

It has adopted a **Suppliers' Code of Conduct** to extend the scope of its sustainability principles and standards, as set out in the Code of Ethics and other policies. This Code is based on Webuild's commitments and the highest standards of integrity, probity, reliability and sustainability and sets out the binding behaviour expected of its suppliers. It is both a practical model and guide.

All the Group's suppliers are required to formally accept the Suppliers' Code of Conduct, the Code of Ethics and Anti-corruption Model. Webuild also encourages its suppliers to apply the same values of integrity, probity, reliability and sustainability when screening their subcontractors, thus passing on these principles along the entire supply chain.

As Webuild deems that innovation and digitalisation have a strategic and transversal value for the entire Group, it addresses these topics in several policies:

- the **Environmental Policy** and the **Environmental Code of Conduct** promote (both by Webuild directly and with its partners) the development of innovative solutions that are environmentally-friendly in terms of materials, technologies, design and development methods and that are beneficial to the planet, workers and communities. Webuild reiterates this commitment, especially as regards energy-intensive processes, in its **Energy Management Policy** which highlights the importance of innovative projects conceived to optimise energy consumption and reduce emissions during operating activities, thus creating a significant competitive advantage;
- the **Quality Policy** formalises the Group's commitment to investing and adopting the most innovative technologies to ensure that the infrastructure built complies with the design requirements and according to the rules of the art;
- the **Health and Safety Policy** promotes the deployment by Webuild and its partners of innovative technological solutions to ensure that the highest levels of health and safety are considered during the design and performance of activities. Specifically, the **Road Traffic Safety Policy** encourages the adoption of new tools to reduce road accidents and incidents in the project design and execution phases.

Webuild is committed to protecting the confidentiality of the corporate information and know-how.

Business conduct

Corporate culture and the fight against corruption

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1; MDR-T]

Impacts, risks and opportunities

Actual impact		Potential impact		Risk R	Opportunity O	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+ positive	- negative	+ positive	- negative								
Dissemination and cultivation of a business culture based on ethics, integrity and sustainability via the Code of Ethics and responsible governance policies, transparent and anti-corruption practices and integration of sustainability principles into decision-making processes and leadership models					+						
Tax risk					R						
Non-compliance with laws and regulations by own workers and non-employee workers					R						

Targets

Commitment: while Webuild has not yet formalised and communicated targets, the Compliance Department has established specific measurable targets related to corporate culture and the fight against corruption, which it monitors continuously and discloses in its annual report to the governance bodies. It provides an update on 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 and the fight against corruption. It also does this by adopting performance monitoring and assessment tools, such as audits and regular inspections.

Actions

[G1-3; MDR-A]

The Compliance Department¹¹³ is responsible for monitoring the anti-corruption system and its proper application. It 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 the ISO 37001-certified companies. The assessment is performed for the other group entities 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 specific targets to meet the compliance system's objectives and maintain ISO 37001 certification. The plan includes the annual scheduling of:

- **dissemination and implementation** of ethical and integrity policies, procedures and organisational models at the group companies;
- **checks** designed to ensure the correct application of the ethical and anti-corruption procedures and standards by them.

¹¹³ As identified by the Board of Directors.

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 systems similar to that of Webuild. They have all maintained the ISO 37001 certification obtained in previous years.

Webuild defines and holds training, information and awareness-raising activities for its employees on ethics and integrity, human rights, diversity and inclusion, health, safety and well-being in the workplace, as well as security issues, 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 an e-learning platform, E-learning Academy, which provides both mandatory and optional courses available to all employees who have access to the platform.

The principal training programmes on corporate culture matters include:

- **mandatory training for new hires** on human rights and the content of the Code of Ethics, the 231 Model, the Anti-corruption System and whistleblowing;
- **training for departments most exposed to corruption risks** (e.g., Supply Chain, Business Development, HR) identified by the Compliance Department based on a risk assessment, the programmes include detailed content on corruption risks related to the affected processes. The aim is to provide targeted training to all the departments involved in processes at other than low risk of corruption, providing them with training sessions throughout the year. The Compliance Department designs the programme and content in accordance with the ISO 37001 standards: 2016 Anti-bribery Management System and, in turn, attends regular, dedicated refresher courses tailored to its specific needs, duties and relevant areas;
- **additional compliance training activities** are assessed by the Compliance Department once a year, assisted by the Group HR, Organisation and QHSE Department. For example, it delivered a new on-line training course on Legislative decree no. 231/2001 and the 231 Model in 2025, as well as dedicated training activities for projects it is responsible for checking;
- **formal renewal** by all employees of their **compliance with the Group's ethical principles** and confirmation that there are no conflicts of interest.

To avoid potential conflicts of interest (and contain the revolving door risk), Webuild's hiring system involves checking whether potential new hires have held public positions in the previous three years which involved authorising or negotiating contracts with the Group, which would exclude the candidate from roles that could present potential conflicts of interest. Moreover, candidates applying for roles deemed at other than low risk of corruption undergo a specific anti-corruption due diligence process.

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 linked to its business given that its foreign operations 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 231 Model defines its rules of behaviour, protocols and controls to ensure compliance with tax requirements and minimise the risk that tax crimes could be committed. It also serves to ensure that the Group respects all the rules, procedures and processes to calculate taxes, keep tax records and prepare tax returns for approval.

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 2025.

Metrics

[G1-4; MDR-M]

In 2025, there were no cases and, consequently, no convictions or fines imposed for violation of anti-corruption and anti-bribery laws. Therefore, the Group did not undertake actions to remedy violations of the anti-corruption procedures and rules.

Entity-specific disclosures

	2024	2025
Hours of training on compliance issues	29,058	35,324

Management of relationships with suppliers

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1; MDR-T]

Impacts, risks and opportunities

	Actual impact		Potential impact		Risk R	Opportunity O	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
	+	-	+	-								
	positive	negative	positive	negative								
Encouraging a sustainable development culture when engaging with partners and suppliers to disseminate and cultivate high ethical, environmental and social standards along the value chain						+	●—●—○			○—●—○		
Inadequate or non-performing suppliers/subcontractors					R		●—●—○			●—●—○		

Targets

Commitment: While it has not yet formalised and communicated targets in this respect, Webuild encourages the adoption of its sustainability principles and best practices by its suppliers and partners. Using performance monitoring and assessment 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 are fully adequate.

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.

Actions

MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

[G1-2; MDR-A]

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 Vendor Management & Sustainability Department manages the procedure, which involves a number of preliminary checks of the potential supplier's reputation, its expertise and confirmation 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 responsibility (including human rights) and specific information about their goods categories.

Based on these questionnaires, the Vendor Management & Sustainability Department may proceed with specific analyses and detailed checks, which can include on-site assessments at 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). Moreover, all suppliers undergo technical assessments by the competent departments to ensure they effectively have the capacity and resources needed to carry out the specific project.

More information about the inclusion of sustainability matters in the supplier qualification process is provided in the "Workers in the value chain - Human rights" caption 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, Webuild monitors the performance of its key suppliers using a special assessment process, involving the central Vendor Management & Sustainability 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 QHSE Departments, which mainly cover subcontractors and is designed to check that their activities comply with Webuild’s quality standards and applicable requirements for the environment, health and safety. Specifically, the local QHSE Departments regularly inspect and 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 they have been 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 regular operations, they did not entail significant non-recurring investments or costs in 2025.

Metrics

Entity-specific disclosures

[MDR-M]

	2024	2025
Percentage of orders with suppliers qualified using social and environmental criteria	90%	92%

Innovation and digitalisation

(Entity-specific disclosures)

IMPACTS, RISKS AND OPPORTUNITIES

[IRO-1]

Impacts, risks and opportunities

Actual impact	Potential impact	Risk	Opportunity	Upstream	Own operations	Down-stream	Short-term	Medium-term	Long-term
+	-	+	-						
Development and/or systematic adoption of innovative solutions and digital technologies to design and build large infrastructure, with the aim of improving its social and environmental performances and reducing its environmental footprint			+						
Risk of a lack of or inadequate innovation		R							
Use of innovative solutions to create value, be more competitive and expand market share		O							

The Group’s formalised targets related to innovation and digitalisation are set out below.

Targets

Statement	Base year	Base year figure	Target year	Target	2024-2025 performance
Investments in innovative and clean tech projects	2023	€0 m	2025	€430 m	€586 m

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 is located in a specific territorial context, requiring 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.

Actions

[MDR-A]

Innovative initiatives are carried out at project and corporate level. At project level, in addition to researching new materials and the pursuit of ever higher safety, quality and environmental protection standards, targeted experiments are undertaken, particularly for those projects with technical characteristics that cannot be addressed using conventional techniques and technologies.

At corporate level, the technical departments work unceasingly to design and disseminate state-of-the-art methods, developing and scaling solutions that can be replicated across different projects. Webuild's specialist teams partner with the best experts in the market, universities and research centres right from day one to develop tailored innovative solutions able to meet customers' requirements while protecting the local environments and communities.

To achieve the objectives defined in the policies described above, a suite of actions has been implemented or are being implemented, of which the most important are reported below.

The first Webuild Innovation Centre

Webuild's innovation centre promotes innovation for both its work sites and external stakeholders. It deploys disruptive technologies to design and develop complex solutions with the objective of improving the Group's construction products and processes, also from a sustainability and safety viewpoint.

The innovation centre is also a shared physical and digital space where new expertise can be developed and honed as well as virtuous collaboration mechanisms both with the academic world and with research organisations and local counterparts. This has a positive effect on employment and enhances territorial resources.

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 to match the Group's global footprint.

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.

In 2024, the Group set up a special team made up of members with different skill-sets. It also started to work with universities and strategic partners.

In 2025, the initial results of the research into innovative construction materials and techniques were received. The team also started to develop solutions to digitalise internal processes and build technologies to support safety, sustainability and automation.

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 harvesting 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 CO₂ emissions by approximately 140 tonnes a year;
- **Roboplant 3 (Dittaino, Sicily):** Designs for this factory are at an advanced stage (70%) and will be completed before construction can begin.

These factories are in Sicily and Puglia and will provide the work sites with tunnel segments for the high-speed Naples - Bari and Palermo - Catania - Messina railway lines, supporting the value chain for the construction of mechanised bored tunnels. Overall, the four factories will help to **create roughly 450 jobs**, mostly local, between the 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.

Additional green TBMs were readied for use and delivered in 2025 to the RFI Italia railway work sites, while the operating data of those already commissioned were monitored. They have been designed to reduce their environmental footprint and improve 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 projects' 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 work with the TBM 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, expertise, data and assets, availing of cloud sharing potential throughout the Group. This will allow processes that generate data to engage 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 the Group's processes, making them more efficient and effective.

The objective behind the project is to eliminate the gap between the EPC (Engineering, Procurement and Construction) sector 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 intends 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]

The target will indirectly involve 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.

It was defined using a process involving internal departments and considering a range of elements and factors. The methodology is largely based on the forecasts in the budgets for the Group's innovation (including R&S) 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 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	2025
Total investments in innovative and clean tech projects	253	333

The metric considers actual data for the main innovative projects carried out at group level, related both to R&D activities¹¹⁴ and innovative activities¹¹⁵ other than R&D. It also includes investments of the year in plant and machinery that can be classified as clean tech.

¹¹⁴ 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 knowledge in at least its reference context / sector.

¹¹⁵ 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.

Annexes

Annex 1: Tables of economic KPIs associated with EU Taxonomy-eligible and aligned economic activities in 2025

Table 1 - Turnover

Year N	2025			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)						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)
	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)				
		€/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/N o	Yes/N o	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	-432.27	- %	No	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	0.05%	A	-
Electricity generation from hydropower	4.5 CCM	2,194,778.26	17.37%	Yes	N/AM	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	16.17%	-	-
Infrastructure for rail transport	6.14 CCM	3,436,938.43	27.20%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	23.90%	A	-
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		5,631,284.41	44.56%	44.57%	- %	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	40.13%		
Of which enabling		3,436,506.15	27.20%	27.20%	- %	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	23.95%	A	
Of which transitional		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	- %	AM	AM	N/AM	N/AM	N/AM	N/AM								- %		
Electricity generation from hydropower	4.5 CCM	126,873.91	1.00%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								1.18%		

Table 1 - Turnover

Year N	2025			Substantial contribution criteria						DNSH (“Do No Significant Harm”) criteria (h)						Taxonomy-aligned (A.1) or eligible (A.2) proportion of turnover (year N-1) (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
	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)			
Construction, extension and operation of water collection, treatment and supply systems	5.1 CCM	7,551.82	0.06%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0.03%	
Construction, extension and operation of waste water collection and treatment	5.3 CCM	19,168.15	0.15%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0.21%	
Desalination	5.13 CCA	49,495.73	0.39%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0.50%	
Infrastructure for rail transport	6.14 CCM / CCA	1,884,054.86	14.91%	AM	AM	N/AM	N/AM	N/AM	N/AM								19.36%	
Flood risk prevention and protection infrastructure	14.2 CCA	48,697.64	0.39%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								1.15%	
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		2,135,842.10	16.90%	16.13 %	0.78 %	- %	- %	- %	- %								22.46%	
Total (A.1 + A.2)		7,767,126.51	61.47%	60.69 %	0.77 %	- %	- %	- %	- %								62.59%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Turnover of Taxonomy-non-eligible activities		4,869,072.91	38.53%															
TOTAL		12,636,199.43	100.00%															

Proportion of turnover/Total turnover

	<i>Taxonomy-aligned by objective</i>		<i>Taxonomy-eligible by objective</i>	
CCM	44.57	%	60.69	%
CCA	-	%	15.68	%
WTR	0		0	
CE	0		0	
PPC	0		0	
BIO	-	%	-	%

Table 2 - CapEx

Year N	2025			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)						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)
	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)				
		€/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/N o	Yes/N o	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	- %	No	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	- %	A	-
Electricity generation from hydropower	4.5 CCM	84,701.22	8.68%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	7.84%	-	-
Infrastructure for rail transport	6.14 CCM	416,190.37	42.66%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	55.82%	A	-
Infrastructure enabling road transport and public transport	6.15 CCA	5,186.99	0.53%	N/AM	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	2.85%	-	-
Construction of new buildings	7.1 CCA	1,777.42	0.18%	N/AM	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	0.27%	-	-
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		507,855.99	52.06%	51.35%	0.71%	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	66.78%		
Of which enabling		416,190.37	42.66%	42.66%	- %	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	55.82%	A	
Of which transitional		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	- %	AM	AM	N/AM	N/AM	N/AM	N/AM								- %		
Electricity generation from hydropower	4.5 CCM / CCA	37.56	- %	AM	AM	N/AM	N/AM	N/AM	N/AM								- %		

Table 2 - CapEx

Year N	2025			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)						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)	
	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)
Construction, extension and operation of water collection, treatment and supply systems	5.1 CCM / CCA	3.79	- %	AM	AM	N/AM	N/AM	N/AM	N/AM									- %		
Construction, extension and operation of waste water collection and treatment	5.3 CCM / CCA	377.87	0.04%	AM	AM	N/AM	N/AM	N/AM	N/AM									0.01%		
Desalination	5.13 CCA	28.51	- %	N/AM	AM	N/AM	N/AM	N/AM	N/AM									- %		
Infrastructure for rail transport	6.14 CCM / CCA	55,527.38	5.69%	AM	AM	N/AM	N/AM	N/AM	N/AM									12.54%		
Infrastructure enabling road transport and public transport	6.15 CCA	82,486.06	8.46%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									4.25%		
Infrastructure enabling water transport	6.16 CCA	0.00	- %	N/AM	AM	N/AM	N/AM	N/AM	N/AM									- %		
Construction of new buildings	7.1 CCM / CCA 3.1 CE	1,032.30	0.11%	AM	AM	N/AM	N/AM	AM	N/AM									0.02%		
Renovation of existing buildings	7.2 CCM / CCA 3.2 CE	245.88	0.03%	AM	AM	N/AM	N/AM	AM	N/AM									- %		
Flood risk prevention and protection infrastructure	14.2 CCA	1,234.45	0.13%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									0.05%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		140,973.80	14.45%	5.74%	8.72%	- %	- %	- %	- %									16.88%		
Total (A.1 + A.2)		648,829.78	66.51%	57.08%	9.43%	- %	- %	- %	- %									83.66%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
CapEx of Taxonomy-non-eligible activities		326,660.79	33.49%																	

Table 2 - CapEx

Year N	2025			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)
TOTAL		975,490.57	100.00%																

Proportion of CapEx/Total

	<i>Taxonomy-aligned by objective</i>		<i>Taxonomy-eligible by objective</i>	
CCM	51.35	%	57.21	%
CCA	0.71	%	15.17	%
WTR	-	%	-	%
CE	-	%	0.13	%
PPC	0		0	
BIO	0		0	

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

Breakdown of the amounts included in the numerator of the CapEx KPI for alignment of the economic activity (€/000)

Assets	Increases to property, plant and equipment	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	81,542.90	-	3,158.31	84,701.22	-	-
6.14	390,779.98	387	25,023.25	416,190.37	-	-
6.15	5,185.92	-	1.07	5,186.99	-	-
7.1	1,777.42	-	-	1,777.42	-	-

Table 3 - OpEx

Year N	2025			Substantial contribution criteria						DNSH ("Do No Significant Harm") criteria (h)						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)
	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)				
		€/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; 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	695.04	0.09%	No	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	A	-
Electricity generation from hydropower	4.5 CCM	87,879.13	11.59%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	-	-
Infrastructure for rail transport	6.14 CCM	207,552.21	27.37%	Yes	No	N/AM	N/AM	N/AM	N/AM	-	Yes	Yes	Yes	Yes	Yes	Yes	Yes	A	-
Infrastructure enabling road transport and public transport	6.15 CCA	40,137.95	5.29%	N/AM	Yes	N/AM	N/AM	N/AM	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	-	-
Construction of new buildings	7.1 CCA	43,333.31	5.71%	No	Yes	N/AM	N/AM	No	N/AM	Yes	-	Yes	Yes	Yes	Yes	Yes	Yes	-	-
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		379,597.65	50.06%	38.96%	11.10%	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes		
Of which enabling		208,247.25	27.46%	27.37%	0.09%	- %	- %	- %	- %	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	A	
Of which transitional		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	- %	AM	AM	N/AM	N/AM	N/AM	N/AM										
Electricity generation from hydropower	4.5 CCM / CCA	850.80	0.11%	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	7.12	- %	AM	AM	N/AM	N/AM	N/AM	N/AM										

Table 3 - OpEx

Year N	2025			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)
Construction, extension and operation of waste water collection and treatment	5.3 CCM / CCA	439.23	0.06%	AM	AM	N/AM	N/AM	N/AM	N/AM									0.12%		
Desalination	5.13 CCA	554.49	0.07%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									0.02%		
Infrastructure for rail transport	6.14 CCM / CCA	79,257.72	10.45%	AM	AM	N/AM	N/AM	N/AM	N/AM									12.17%		
Infrastructure enabling road transport and public transport	6.15 CCA	79,970.63	10.55%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									13.17%		
Infrastructure enabling water transport	6.16 CCA	1,436.47	0.19%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									- %		
Construction of new buildings	7.1 CCM / CCA 3.1 CE	6,312.93	0.83%	AM	AM	N/AM	N/AM	AM	N/AM									1.43%		
Renovation of existing buildings	7.2 CCM / CCA 3.2 CE	3,432.70	0.45%	AM	AM	N/AM	N/AM	AM	N/AM									0.44%		
Flood risk prevention and protection infrastructure	14.2 CCA	5,775.69	0.76%	N/AM	AM	N/AM	N/AM	N/AM	N/AM									2.09%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		178,037.79	23.48%	10.62%	12.86 %	- %	- %	- %	- %									29.69%		
Total (A.1 + A.2)		557,635.44	73.54%	49.58%	23.96 %	- %	- %	- %	- %									80.79%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
OpEx of Taxonomy-non-eligible activities		200,645.83	26.46%																	
TOTAL		758,281.26	100.00%																	

Proportion of OpEx/Total

	<i>Taxonomy-aligned by objective</i>	<i>Taxonomy-eligible by objective</i>
CCM	38.96 %	50.87 %
CCA	11.10 %	34.58 %
WTR	0	0
CE	- %	1.29 %
PPC	0	0
BIO	0	0

A breakdown of the amounts included in the numerator of the KPI for alignment is provided below:

Table 3.1

€'000

Breakdown of the amounts included in the numerator of the OpEx KPI for alignment (€/000)

Research and development expenditure	-
Short-term leases	37,811
Maintenance and repairs	341,786
Other direct costs related to the daily maintenance of property, plant and equipment	-
Total	379,598

Table 4 - Nuclear and fossil gas related activities

Model 1 - 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.	No
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

Annex 2 – Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

[IRO-2]

This table lists the Disclosure Requirement included in this Sustainability Statement and the topics that have been omitted as not material, as a result of the materiality assessment.

Disclosure requirement	Not applicable / phase-in	Note	Chapter
ESRS 2 – GENERAL DISCLOSURES			
ESRS 2 BP-1			<i>Reporting boundary</i>
ESRS 2 BP-2			<i>Disclosures in relation to specific circumstances</i>
ESRS 2 GOV-1			<i>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</i>
ESRS 2 GOV-2			<i>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</i>
ESRS 2 GOV-3			<i>Integration of sustainability-related performance in incentive schemes Remuneration report</i>
ESRS 2 GOV-4			<i>Statement on due diligence</i>
ESRS 2 GOV-5			<i>Risk management and internal controls over sustainability reporting</i>
ESRS 2 SBM-1			<i>Strategy, business model and value chain Directors’ report Part I: Webuild Group - We envisage, We design, We build the future</i>
ESRS 2 SBM-2			<i>Interests and views of stakeholders</i>
ESRS 2 SBM-3	Phase-in: Webuild has omitted the information required by ESRS 2 SBM-3, paragraph 48 (e) for 2025 as provided for in Appendix C (ESRS 1) of Commission Delegated Regulation (EU) 2023/2772.		<i>Material impacts, risks and opportunities and their interaction with strategy and business model</i>
ESRS 2 IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities</i>
ESRS 2 IRO-2			<i>Disclosure requirements in ESRS covered by the undertaking’s sustainability statement</i>
ESRS 2 MDR-P			<i>Policies adopted to manage material sustainability matters; Policies related to Environmental information; Policies related to Social information; Policies related to Governance information</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
ESRS 2 MDR-A			<p>Actions in <i>Climate change</i>; <i>Pollution</i>; <i>Water</i>; <i>Biodiversity and ecosystems</i>; <i>Resource use and circular economy</i> <i>Resource inflows, including resource use</i>; <i>Waste</i></p> <p>Actions in <i>Own workforce</i>: <i>Working conditions</i>; <i>Health and safety</i>; <i>Training and skills development</i>, <i>Diversity and inclusion</i>; <i>Human rights</i>; <i>Workers in the value chain</i>: <i>Human rights</i>; <i>Health and safety</i>; <i>Training and skills development</i>; <i>Affected communities</i></p> <p>Actions in <i>Business conduct</i>: <i>Corporate culture and fight against corruption</i>; <i>Management of relationships with suppliers</i>; <i>Innovation and digitalisation</i></p>
ESRS 2 MDR-M			<p>Metrics in <i>Climate change</i>; <i>Water</i>; <i>Resource use and circular economy</i>: <i>Resource inflows, including resource use</i>; <i>Waste</i></p> <p>Metrics in <i>Own workforce</i>: <i>Working conditions</i>; <i>Health and safety</i>; <i>Training and skills development</i>, <i>Diversity and inclusion</i>; <i>Human rights</i>; <i>Affected communities</i></p> <p>Metrics in <i>Business conduct</i>: <i>Corporate culture and the fight against corruption</i>; <i>Management of relationships with suppliers</i>; <i>Innovation and digitalisation</i></p>
ESRS 2 MDR-T			<p>Tracking effectiveness of policies and actions through targets</p> <p><i>Climate change</i>: <i>Impacts, risks and opportunities</i>; <i>Transition plan for climate change mitigation</i></p> <p>Targets in <i>Own workforce</i>: <i>Health and safety</i>; <i>Diversity and inclusion</i>;</p> <p>Targets in <i>Business conduct</i>: <i>Innovation and digitalisation</i></p>
ESRS E1 CLIMATE CHANGE			
GOV-3			<i>Integration of sustainability-related performance in incentive schemes</i>
E1-1			<i>Climate change: Transition plan for climate change mitigation</i>
SBM-3			<i>Environmental management system</i> <i>Climate change: Material impacts, risks and opportunities</i>
IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities</i> <i>Climate change: Impacts, risks and opportunities</i>
E1-2			<i>Policies related to Environmental information</i>
E1-3			<i>Climate change: Actions</i>
E1-4			<i>Climate change: Impacts, risks and opportunities</i> ; <i>Transition plan for climate change mitigation</i>
E1-5			<i>Climate change: Metrics</i>
E1-6			<i>Climate change: Metrics</i>
E1-7			<i>Climate change: Metrics</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
E1-8		In 2025, the Group did not apply internal carbon pricing schemes to support its decision-making process and encourage the implementation of climate-related policies and targets.	
E1-9	Phase-in: Webuild has omitted the information required by ESRS E1-9 for 2025, as provided for in Appendix C (ESRS 1) of Commission Delegated Regulation (EU) 2023/2772.		
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Environmental information</i>
MDR-A			<i>Climate change: Actions; Transition plan for climate change mitigation</i>
MDR-M			<i>Climate change: Metrics</i>
MDR-T			<i>Tracking effectiveness of policies and actions through targets Climate change: Impacts, risks and opportunities; Transition plan for climate change mitigation</i>
ESRS E2 POLLUTION			
IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities Pollution: Impacts, risks and opportunities</i>
E2-1			<i>Policies related to Environmental information</i>
E2-2			<i>Pollution: Actions</i>
E2-3		No measurable targets related to pollution are included in the 2025 Sustainability Statement.	<i>Pollution: Impacts, risks and opportunities</i>
E2-4	Not applicable		
E2-5	Not applicable		
E2-6	Not applicable		
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Environmental information</i>
MDR-A			<i>Pollution: Actions</i>
MDR-M	Not applicable		
MDR-T		No measurable targets related to pollution are included in the 2025 Sustainability Statement.	<i>Pollution: Impacts, risks and opportunities</i>
ESRS E3 WATER			
IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities Water: Impacts, risks and opportunities</i>
E3-1			<i>Policies related to Environmental information</i>
E3-2			<i>Water: Actions</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
E3-3		No measurable targets related to water are included in the 2025 Sustainability Statement.	<i>Water: Impacts, risks and opportunities</i>
E3-4			<i>Water: Metrics</i>
E3-5	Not applicable		
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Environmental information</i>
MDR-A			<i>Water: Actions</i>
MDR-M			<i>Water: Metrics</i>
MDR-T		No measurable targets related to water are included in the 2025 Sustainability Statement.	<i>Water: Impacts, risks and opportunities</i>
ESRS E4 BIODIVERSITY AND ECOSYSTEMS			
E4-1	Not applicable		
SBM-3			<i>Environmental management system Biodiversity and ecosystems: Impacts, risks and opportunities</i>
IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities Biodiversity and ecosystems: Material impacts, risks and opportunities</i>
E4-2			<i>Policies related to Environmental information</i>
E4-3			<i>Biodiversity and ecosystems: Actions</i>
E4-4		No measurable targets related to biodiversity and ecosystems are included in the 2025 Sustainability Statement.	<i>Biodiversity and ecosystems: Impacts, risks and opportunities</i>
E4-5	Not applicable		
E4-6	Not applicable		
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Environmental information</i>
MDR-A			<i>Biodiversity and ecosystems: Actions</i>
MDR-M	Not applicable		
MDR-T		No measurable targets related to biodiversity and ecosystems are included in the 2025 Sustainability Statement.	<i>Biodiversity and ecosystems: Impacts, risks and opportunities</i>
ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY			
IRO-1			<i>Description of the processes to identify and assess material impacts, risks and opportunities Impacts, risks and opportunities in Resource use and circular economy Resource inflows, including resource use; Waste</i>
E5-1			<i>Policies related to Environmental information</i>
E5-2			<i>Actions in Resource use and circular economy Resource inflows, including resource use; Waste</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
E5-3		No measurable targets related to resource use and circular economy are included in the 2025 Sustainability Statement.	<i>Impacts, risks and opportunities in Resource use and circular economy Resource inflows, including resource use; Waste</i>
E5-4			<i>Metrics in Resource use and circular economy Resource inflows, including resource use</i>
E5-5			<i>Metrics in Resource use and circular economy Waste</i>
E5-6	Phase-in: Webuild has omitted the information required by ESRS E5-6 for 2025, as provided for in Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772.		
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Environmental information</i>
MDR-A			<i>Actions in Resource use and circular economy Resource inflows, including resource use; Waste</i>
MDR-M			<i>Metrics in Resource use and circular economy Resource inflows, including resource use; Waste</i>
MDR-T		No measurable targets related to resource use and circular economy are included in the 2025 Sustainability Statement.	<i>Impacts, risks and opportunities in Resource use and circular economy Resource inflows, including resource use; Waste</i>
ESRS S1 OWN WORKFORCE			
SBM-2			<i>Interests and views of stakeholders</i>
SBM-3			<i>Material impacts, risks and opportunities and their interaction with strategy and business model Impacts, risks and opportunities in Own workforce Working conditions; Health and safety; Training and skills development, Diversity and inclusion; Human rights</i>
S1-1			<i>Policies adopted to manage material sustainability matters Policies related to Social information Own workforce: Health and safety - Policies</i>
S1-2			<i>Processes for engaging with own workforce and workers' representatives about impacts in Own workforce: Health and safety; Training and skills development, Diversity and inclusion</i>
S1-3			<i>Processes to remediate negative impacts and channels for own workforce to raise concerns in Own workforce: Health and safety; Diversity and inclusion</i>
S1-4			<i>Actions in Own workforce: Working conditions; Diversity and inclusion; Human rights Health and safety; Training and skills development</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
S1-5		No measurable targets related to working conditions, training and skills development and human rights are included in the 2025 Sustainability Statement.	<i>Targets in Own workforce: Health and safety; Diversity and inclusion Impacts, risks and opportunities in Own workforce: Working conditions, Training and skills development; Human rights</i>
S1-6			<i>Own workforce: Characteristics of employees in its own workforce</i>
S1-7			<i>Own workforce: Characteristics of employees in its own workforce</i>
S1-8	Not applicable		
S1-9			<i>Own workforce: Diversity and inclusion - Metrics</i>
S1-10	Not applicable		
S1-11	Not applicable		
S1-12	Not applicable		
S1-13	Phase-in: Webuild has omitted the information required by ESRS S1-13, par. 83 (a) and (b), the latter solely related to the breakdown by gender for 2025. Information on the average number of training hours per employee required by ESRS S1-13, par. 83 (b) is provided in line with the previous reporting format.		<i>Own workforce: Training and skills development - Metrics</i>
S1-14 Health and safety metrics	Phase-in: 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 for 2025, as provided for in Appendix C (ESRS 2) of Commission Delegated Regulation (EU) 2023/2772.		<i>Own workforce: Health and safety - Metrics</i>
S1-15	Not applicable		
S1-16			<i>Own workforce: Diversity and inclusion - Metrics</i>
S1-17			<i>Own workforce: Human rights - Metrics</i>
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Social information</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
MDR-A			<i>Actions in Own workforce: Working conditions; Health and safety; Training and skills development, Diversity and inclusion; Human rights</i>
MDR-M			<i>Own workforce: Characteristics of employees in its own workforce Metrics in Own workforce: Health and safety; Training and skills development, Diversity and inclusion; Human rights</i>
MDR-T		No measurable targets related to training and skills development, human rights and working conditions are included in the 2025 Sustainability Statement.	<i>Targets in Own workforce: Health and safety; Diversity and inclusion Impacts, risks and opportunities in Own workforce: Working conditions, Training and skills development; Human rights</i>
ESRS S2 WORKERS IN THE VALUE CHAIN			
SBM-2			<i>Interests and views of stakeholders</i>
SBM-3			<i>Material impacts, risks and opportunities and their interaction with strategy and business model Material impacts, risks and opportunities in Workers in the value chain: Human rights; Health and safety; Training and skills development</i>
S2-1			<i>Policies adopted to manage material sustainability matters Policies related to Social information</i>
S2-2			<i>Processes for engaging with value chain workers about impacts in Workers in the value chain: Health and safety; Training and skills development</i>
S2-3			<i>Workers in the value chain: Health and safety - Processes to remediate negative impacts and channels for value chain workers to raise concerns</i>
S2-4			<i>Actions in Workers in the value chain: Human rights; Health and safety; Training and skills development</i>
S2-5		No measurable targets related to training and skills development and human rights are included in the 2025 Sustainability Statement.	<i>Workers in the value chain: Health and safety - Targets Impacts, risks and opportunities in Workers in the value chain: Human rights; Training and skills development</i>
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Social information</i>
MDR-A			<i>Actions in Workers in the value chain: Human rights; Health and safety; Training and skills development</i>
MDR-T		No measurable targets related to training and skills development and human rights are included in the 2025 Sustainability Statement.	<i>Tracking effectiveness of policies and actions through targets Workers in the value chain: Health and safety - Targets Impacts, risks and opportunities in Workers in the value chain: Human rights; Training and skills development</i>
ESRS S3 AFFECTED COMMUNITIES			

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
SBM-2			<i>Interests and views of stakeholders</i>
SBM-3			<i>Material impacts, risks and opportunities and their interaction with strategy and business model</i> <i>Affected communities: Material impacts, risks and opportunities</i>
S3-1			<i>Policies adopted to manage material sustainability matters</i> <i>Policies related to Social information</i>
S3-2			<i>Affected communities - Processes for engaging with affected communities about impacts</i>
S3-3			<i>Affected communities: Impacts, risks and opportunities</i>
S3-4			<i>Affected communities: Actions</i>
S3-5		No measurable targets related to affected communities are included in the 2025 Sustainability Statement.	<i>Affected communities: Impacts, risks and opportunities</i>
MDR-P			<i>Policies adopted to manage material sustainability matters</i> <i>Policies related to Social information</i>
MDR-A			<i>Affected communities: Actions</i>
MDR-T		No measurable targets related to affected communities are included in the 2025 Sustainability Statement.	<i>Tracking effectiveness of policies and actions through targets</i> <i>Affected communities: Impacts, risks and opportunities</i>
ESRS G1 BUSINESS CONDUCT			
ESRS 2 GOV-1			<i>The role of the administrative, management and supervisory bodies</i>
IRO-1			<i>Material impacts, risks and opportunities and their interaction with strategy and business model</i>
G1-1			<i>Policies adopted to manage material sustainability matters</i> <i>Policies related to Governance information</i>
G1-2			<i>Business conduct: Management of relationships with suppliers - Actions</i>
G1-3			<i>Policies related to Governance information</i> <i>Business conduct: Corporate culture and the fight against corruption - Actions</i>
G1-4			<i>Business conduct: Corporate culture and the fight against corruption - Metrics</i>
G1-5	Not applicable		
G1-6	Not applicable		
MDR-P			<i>Policies adopted to manage material sustainability matters</i> <i>Policies related to Governance information</i>
MDR-A			<i>Actions in Business conduct: Corporate culture and the fight against corruption; Management of relationships with suppliers</i>
MDR-T		No measurable targets related to business conduct are included in the 2025 Sustainability Statement.	<i>Tracking effectiveness of policies and actions through targets</i> <i>Impacts, risks and opportunities in Business conduct: Corporate culture and the fight against corruption; Management of relationships with suppliers</i>

<i>Disclosure requirement</i>	Not applicable / phase-in	Note	Chapter
MDR-M			<i>Metrics in Business conduct: Corporate culture and the fight against corruption; Management of relationships with suppliers</i>
Entity-specific disclosures Innovation and digitalisation			
MDR-P			<i>Policies adopted to manage material sustainability matters Policies related to Governance information</i>
MDR-A			<i>Innovation and digitalisation: Actions</i>
MDR-T			<i>Tracking effectiveness of policies and actions through targets Innovation and digitalisation: Targets</i>
MDR-M			<i>Innovation and digitalisation: Metrics</i>

Annex 3 – 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 ¹¹⁶	Pillar 3 ¹¹⁷	Benchmark Regulation reference ¹¹⁸	EU Climate Law reference ¹¹⁹	Chapter in 2025 Sustainability Statement
ESRS 2 GOV-1 Paragraph 21 (d)	x		x ¹²⁰		<i>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</i>
ESRS 2 GOV-1 Paragraph 21 (e)			x		<i>Statement on due diligence</i>
ESRS 2 GOV-4 paragraph 30	x				<i>Irrelevant</i>
ESRS 2 SBM-1 paragraph 40 (d) i	x	x ¹²¹	x		<i>Irrelevant</i>
ESRS-2 SBM-1 paragraph 40 (d) ii	x		x		<i>Irrelevant</i>
ESRS 2 SBM-1 paragraph 40 (d) iii	x		x ¹²²		<i>Irrelevant</i>
ESRS 2 SBM-1 paragraph 40 (d) iv			x		<i>Irrelevant</i>
ESRS E1-1 paragraph 14				x	<i>Climate change - Transition plan for climate change mitigation</i>
ESRS E1-1 paragraph 16 (g)		x	x		<i>Climate change - Targets</i>
ESRS E1-4 paragraph 34	x	x	x		<i>Climate change - Metrics</i>
ESRS E1-5 paragraph 38	x				
ESRS E1-5 paragraph 37	x				<i>Climate change - Metrics</i>
ESRS E1-5 paragraphs 40 to 43	x				
ESRS E1-6 paragraph 44	x	x	x		<i>Climate change - Metrics</i>
ESRS E1-6 paragraphs 53 to 55	x	x	x		
ESRS E1-7 paragraph 56				x	<i>Climate change - Metrics</i>
ESRS E1-9 paragraph 66			x		<i>Phase-in</i>
ESRS E1-9 paragraph 66 (a) and (c)		x			<i>Phase-in</i>
ESRS E1-9 paragraph 67 (c)		x			<i>Phase-in</i>
ESRS E1-9 paragraph 69			x		<i>Phase-in</i>

¹¹⁶ 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).

¹¹⁷ 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).

¹¹⁸ 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).

¹¹⁹ 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).

¹²⁰ 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).

¹²¹ 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).

¹²² 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 ¹¹⁶	Pillar 3 ¹¹⁷	Benchmark Regulation reference ¹¹⁸	EU Climate Law reference ¹¹⁹	Chapter in 2025 Sustainability Statement
ESRS E2-4 paragraph 28	x				Irrelevant
ESRS E3-1 paragraph 9	x				Policies related to
ESRS E3-1 paragraph 13	x				Environmental information
ESRS E3-1 paragraph 14	x				Irrelevant
ESRS E3-4 paragraph 28 (c)	x				Water - Metrics
ESRS E3-4 paragraph 29	x				
ESRS 1 SBM-3 E4 paragraph 16 (a) i	x				Biodiversity and ecosystems - Material impacts, risks and opportunities
ESRS 1 SBM-3 E4 paragraph 16 (b)	x				
ESRS 1 SBM-3 E4 paragraph 16 (c)	x				
ESRS E4-2 paragraph 24 (b)	x				Irrelevant
ESRS E4-2 paragraph 24 (c)	x				Irrelevant
ESRS E4-2 paragraph 24 (d)	x				Policies related to Environmental information
ESRS E5-5 paragraph 37 (d)	x				Resource use and circular economy: Waste - Metrics
ESRS E5-5 paragraph 39	x				
ESRS 1 SBM-3 – S1 paragraph 14 (f)	x				Policies adopted to manage material sustainability matters
ESRS 1 SBM-3 – S1 paragraph 14 (g)	x				
ESRS S1-1 paragraph 20	x				
ESRS S1-1 paragraph 21			x		Policies related to Social information
ESRS S1-1 paragraph 22	x				Policies related to Social information
ESRS S1-1 paragraph 23	x				
ESRS S1-3 paragraph 32 (c)	x				Processes to remediate negative impacts and channels for own workforce to raise concerns: Own workforce: Health and safety; Diversity and inclusion Own workforce: Health and safety - Metrics
ESRS S1-14 paragraph 88 (b) and (c)	x		x		Phase-in for letter (b) of paragraph 88 ESRS S1-14
ESRS S1-14 paragraph 88 (e)	x				Phase-in
ESRS S1-16 paragraph 97 (a)	x		x		Own workforce: Diversity and inclusion - Metrics
ESRS S-16 paragraph 97 (b)	x				Irrelevant
ESRS S1-17 paragraph 103 (a)	x				Own workforce: Human rights - Metrics
ESRS S-17 paragraph 104 (a)	x		x		Workers in the value chain: Human rights - Material impacts, risks and opportunities
ESRS 1 SBM-3 – S2 paragraph 11 (b)	x				Policies adopted to manage material sustainability matters
ESRS S2-1 paragraph 17	x				Policies related to Social information
ESRS S2-1 paragraph 18	x				
ESRS S2-1 paragraph 19	x		x		Workers in the value chain: Human rights
ESRS S3-1 paragraph 16	x				Policies adopted to manage material sustainability matters
ESRS S3-1 paragraph 17	x		x		Policies related to Social information
ESRS S3-4 paragraph 36	x				Affected communities - Actions
ESRS S4-1 paragraph 16	x				Irrelevant
ESRS S4-1 paragraph 17	x		x		Irrelevant

Disclosure requirement and related datapoint	SFDR¹¹⁶	Pillar 3¹¹⁷	Benchmark Regulation reference¹¹⁸	EU Climate Law reference¹¹⁹	Chapter in 2025 Sustainability Statement
ESRS S4-4 paragraph 35	x				<i>Irrelevant</i>
ESRS G1-1 paragraph 10 (b)	x				<i>Policies adopted to manage material sustainability matters</i>
ESRS G1-1 paragraph 10 (d)	x				<i>Policies related to Governance information</i>
ESRS G1-4 paragraph 24 (a)	x		x		<i>Business conduct: Corporate culture and the fight against corruption - Metrics</i>
ESRS G1-4 paragraph 24 (b)	x				<i>Business conduct: Corporate culture and the fight against corruption - Metrics</i>

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) as required by article 8.4 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020.

Milan, 11 March 2026

Chief Executive Officer

Corporate Reporting Officer

Pietro Salini

Massimo Ferrari

(signed on the original)

(signed on the original)

Independent auditors' limited assurance report on the consolidated sustainability statement

Independent auditor’s limited assurance report on the consolidated sustainability statement in accordance with article 14-bis of Legislative Decree 39/2010

To the Shareholders of

Webuild SpA

Conclusion

In accordance with articles 8 and 18, paragraph 1, of Legislative Decree 125/2024 (the “Decree”), we have undertaken a limited assurance engagement on the consolidated sustainability statement of the Webuild group (the “Group”) for the year ended 31 December 2025 prepared in accordance with article 4 of the Decree, presented in the specific section of the consolidated report on operations.

Based on the procedures performed, nothing has come to our attention that causes us to believe that:

- the consolidated sustainability statement of the Webuild group for the year ended 31 December 2025 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”, also the “ESRS”);
- the information set out in paragraph “EU taxonomy for sustainable economic activities” of the consolidated sustainability statement is not prepared, in all material respects, in accordance with article 8 of Regulation (UE) 852/2020 (the “Taxonomy Regulation”).

PricewaterhouseCoopers SpA

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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 statement” section of this report.

We are independent in accordance with the principles of ethics and independence applicable to assurance engagements on consolidated sustainability statements under Italian law.

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.

Responsibilities of the directors and the board of statutory auditors of Webuild SpA for the consolidated sustainability statement

The directors of Webuild SpA are responsible for developing and implementing the procedures adopted to identify the information included in the consolidated sustainability statement in accordance with the provisions of the ESRS (the “materiality assessment process”) and for describing those procedures in the section “Description of the process to identify and assess material impacts, risks and opportunities” of the consolidated sustainability statement.

The directors are also responsible for preparing the consolidated sustainability statement, 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 statement 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 statement

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 statement

Our objectives are to plan and perform procedures to obtain limited assurance about whether the consolidated sustainability statement 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 statement.

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 statement and assuming full responsibility for the conclusion on the consolidated sustainability statement.

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 statement, 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 statement.
- 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 statement.
- We reconciled the information reported in the consolidated sustainability statement 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 statement in accordance with the ESRS.



- We obtained management's representation letter.

Milan, 3 April 2026

PricewaterhouseCoopers SpA

Signed by

Andrea Brivio

(Partner)

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